

SMETS1 Consultation - Various 1A

A SMETS1 consultation on a proposal by DCC on partial migration (ESME only) for Dormant and Mixed Installations where there is no GSME-HAN connectivity for the IOC Cohort.

Filename: SMETS1_Consultation_Various1A

Date: 14 January 2022

Respond by: 1600 on 4 February 2022

Expected Conclusion date: 18 February 2022

Author: consultations@smartdcc.co.uk

Classification: DCC Public

Table of Contents

1. Introduction and Context	3
2. Background to Maximising Migrations.....	4
3. Application of partial Migration (Migrate ESME / Exclude GSME) to Dormant Meters	4
4. Next Steps	8
5. How to Respond	8
6. Attachments	9

1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems.

The detailed technical and procedural requirements of the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The TMAD is Appendix AL of the Smart Energy Code¹ (SEC). The latest version of the SEC was published on 23 December 2021 as v55.0.

This consultation covers changes to the TMAD.

In February 2021, following consultation, BEIS introduced² (via TMAD amendments) a framework by which DCC can propose to formally exclude DMCs from the scope of SMETS1 meter cohorts for which BEIS has previously determined that DCC should provide a SMETS1 service.

The framework provides for:

- i) the unblocking of SMETS1 Installations presently eligible for migration (by virtue of having corresponding EPCL entries) but that cannot currently be successfully migrated; and
- ii) the exclusion of certain SMETS1 Smart Metering Systems that are currently in scope for enrolment (and which may or may not have a corresponding EPCL entry).

DCC issued the Various 1 Consultation³ in October 2021 and the unblocking / exclusions framework was modified following the Various 1 Part 1 Conclusion⁴. This conclusion proposed increased aspects of DCC engagement with Responsible Suppliers and introduction of a number of exclusion categories into Clause 18 of the TMAD. The amendments resulting from the Various 1 Part 1 Conclusion were designated into the SEC on 9 December 2021 by the Secretary of State⁵.

The Various 1 Part 1 Conclusion included partial migration of SMETS1 Installations where the electricity meter is migrated, and the gas meter is excluded. This approach accounts for the circumstance where migration of the entire SMETS1 Installation is persistently failing due to no HAN communication between the GSME and the Communications Hub. At present, following the re-designation of the TMAD on 9 December 2021, partial migration is only available for the IOC cohort and restricted to SMETS1 Installations containing solely Active Meters. This consultation is proposing to extend the scope for partial migration within the IOC cohort to SMETS1 Installations containing Dormant Meters, both solely Dormant Installations and Mixed Installations (an Active Meter and a Dormant Meter).

DCC will be separately consulting on making partial migration available for MOC (Secure) in early 2022. The MOC (MDS) cohort is considered out of scope for partial migration given that only 90 SMETS1 Installations could be unblocked by such a change; DCC notes that these 90 SMETS1

¹ The current version of the SEC is available from <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>

² The BEIS consultation is available via <https://smartenergycodecompany.co.uk/latest-news/secretary-of-state-direction-on-the-smets1-tmad-and-further-smets1-tmad-consultation/>

³ <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-1/>

⁴ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-1-part-1/>

⁵ <https://smartenergycodecompany.co.uk/latest-news/sec-v53-0-implemented-to-support-the-dcc-smets1-service/>

Installations are expected to be excluded based on Clause 18.8 of the TMAD (Excluded Category - Five Retries Attempting Migration).

Partial migration of Active Meters for IOC allows for up to 10,200 SMETS1 Installations to be unblocked / excluded i.e. each electricity meter within the SMETS1 Installation is unblocked and thus when the electricity meter is migrated the corresponding gas meter is excluded.

The extension of partial migration to Installations with one or more Dormant Meters in IOC provides the same opportunity to the remaining 4,900 SMETS1 Installations.

2. Background to Maximising Migrations

The migration of SMETS1 Installations into the DCC System is progressing across the range of cohorts and all eligible meter families. Based on available data at the time of publication, around 4.4 million SMETS1 Installations have been Migrated, thereby facilitating interoperable smart services to these energy customers. By the end of 2021 all remaining EPCL entries were approved by BEIS.

DCC has identified certain categories of SMETS1 Installations where a small minority of these SMETS1 Installations are 'blocked' from migration due to a range of reasons. This cuts across meters both on the EPCL as well as those that are not able to be brought up to the level of an EPCL approved DMC. At the start of 2021, BEIS introduced changes to Clause 1 of the TMAD to address such 'blocked' SMETS1 Installations. The existing Clause 1 of the TMAD provide two routes to address such blocked SMETS1 Installations:

- 'Unblocking' - DCC to consult on changes to the SEC to facilitate successful Migration; and
- 'Excluding' - DCC to consult where it considers that it will not be possible to facilitate successful Migration due to technical / operational barriers or economic inefficiency.

DCC is assessing the SMETS1 Installations presently blocked for migration and in some cases, DCC (supported by energy suppliers / SMETS1 SMSOs where appropriate) has been able to take economically efficient steps to unblock these migrations without the need for a regulatory / solution change e.g. by correcting data errors between registration data in the SMETS1 SMSO and DCC (with support from the Responsible Supplier where required). DCC is continuing with such unblocking activities where possible.

DCC's investigation into blocked SMETS1 Installations is on-going. Further consultations are envisaged in the coming months to address the remaining SMETS1 Installations (including any new blocking issues that may arise), as DCC and Energy Suppliers progress towards the completion of Migration for all eligible SMETS1 Installations across all Cohorts.

3. Application of partial Migration (Migrate ESME / Exclude GSME) to Dormant Meters

Pursuant to Clause 1.4 and 1.5 of the TMAD, this section contains a discrete category where DCC proposes that the Electricity Smart Metering System within the SMETS1 Installation can be included for migration (but the Gas Smart Metering System excluded) i.e. a partial migration of the SMETS1 Installation. Please note that the data reported below is based on available data at the time of publication.

There is a GT01 check as part of the Migration process that confirms the Communications Hub (CH) and the GSME communicated in the last 72 hours⁶ and thus, GSMEs with intermittent HAN communications are expected to be migrated. Since the GT01 check was extended to 72 hours in November 2021, DCC has seen an additional 2,474 SMETS1 Installations successfully migrate. However, DCC observes that there are a number of SMETS1 Installations where there is a persistent failure of HAN communication between the GSME and the CH. The Various 1 Consultation proposed that partial migration was appropriate for a situation where there is such persistent failure of HAN communication between the CH and the GSME.

The Various 1 Consultation proposed a slightly different process depending on whether the GSME is a Dormant Meter or an Active Meter as below.

Dormant: Where the GSME is a Dormant Meter and thus DCC is responsible for migration (consistent with the deemed authorisation provided by Clause 4.27 of the TMAD), DCC proposed that there should be at least three migration attempts, each in separate migration weeks, to clearly demonstrate persistent failure i.e. an objective test to demonstrate consistency in the GT01 error occurring. Following the three failed attempts, DCC set out that migration should be attempted without the GSME. DCC noted that Responsible Suppliers will receive reporting on the GT01 failures via the existing reporting pursuant to the Migration Reporting Regime. Following these failures, the fourth migration attempt would be on the basis that the GSME details are excluded from the Migration Common File following a subsequent deemed authorisation.

Active: Where the GSME is an Active Meter and thus the Responsible Supplier is required to schedule a migration (as per the Migration Authorisation Mechanism), DCC considered it is for the Responsible Supplier to form a view on persistent failure related to the GT01 error. DCC noted that Responsible Suppliers will receive reporting on these failures via the existing reporting pursuant to the Migration Reporting Regime. The Responsible Supplier for the GSME would be able to instruct the DCC to proceed on the basis that the GSME details are excluded from the Migration Common File following a subsequent authorisation to Migrate the GSME. The details of the GSME, that is an Active Meter to be excluded, would be provided to DCC via file exchange using the DCC's SharePoint in line with similar SMETS1 processes.

Mixed / Split: DCC did not consider that there needs to be any differential treatment for whether the ESME is an Active Meter or Dormant Meter as the normal authorisation regime will apply for the ESME in either case including any mixed SMETS1 Installations (i.e. where there is both a Dormant Meter and an Active Meter). This means that for the successful migration of the ESME only, there is an edge case where there is reliance on the Responsible Supplier for an Active GSME to provide an authorisation to allow the ESME to migrate (without the GSME). This approach is also equivalent to the circumstance where the ESME is with another Responsible Supplier and that other Responsible Supplier is required to provide the authorisation (i.e. a Split Site) as the standard authorisation regime applies. This edge case exists already within the TMAD regime where authorisations are required from both Responsible Suppliers in order for migration to proceed as per Clause 4.17 of the TMAD.

Whilst the implementation approach for partial migration was not challenged in responses to the Various 1 Consultation there was a divergence of views from Respondents on the principle of partial migration. Some respondents indicated general support and a desire for partial migration

⁶ The period was extended to 72 hours from 24 hours in November 2021 for the IOC cohort.

and others rejected partial migration, indicating a preference for replacement of the entire SMETS1 Installation with SMETS2+ devices. Also, a concern was raised by a respondent that the exclusion of a Dormant GSME may create further commercial issues related to the allocation of stranded asset cost for Dormant devices and thus needed careful consideration. On the basis that the proposed approach for partial migration for Active Meters is triggered solely by the Responsible Supplier, the Various 1 Part 1 Conclusion proposed that partial migration for SMETS1 Installations (containing solely Active Meters) could be included in the TMAD. However, DCC concluded it would be appropriate to reflect further and re-consult on the approach to partial migrations where there are one or more Dormant Devices within the SMETS1 Installation. Therefore, the TMAD drafting was amended to limit partial migration to SMETS1 Installations containing only Active Meters for the IOC cohort for the Various 1 – Part 1 Conclusion. This TMAD change was implemented on 9 December 2021 and some partial migrations were successfully performed for SMETS1 Installations containing solely Active Meters before the end of 2021.

DCC has considered an alternative regime based on adopting the same process for partial migration irrespective of whether the GSME is an Active Meter or a Dormant Meter i.e. the Responsible Supplier for the Gas Meter forms their own view on persistent failure to migrate and thus makes the decision / provides the Request to Exclude the gas meter that is a Dormant Meter (which is aligned to the position already implemented where the gas meter is an Active Meter). DCC discussed this alternative approach with six of the ten respondents to the Various 1 Consultation that had expressed concerns related to partial migration. All six of these respondents indicated general support for such an approach to Dormant devices, given it provides flexibility for Responsible Suppliers. On balance, however, DCC continues to favour the existing approach consistent with DCC's objectives as set out below.

DCC has reflected on the information that emerged and the divergence of views received in response to the Various 1 Consultation, including the commercial concerns raised. Given DCC's transitional objective with respect to enrolment of eligible SMETS1 meters and BEIS's objective to maximise the enrolment of Dormant Meters (as this maximises benefit to consumers), DCC still considers that the approach proposed (based on an objective test) in the Various 1 Consultation should be the recommended way forward as this will maximise migration of Dormant Meters. DCC also notes that if no further TMAD changes were implemented (for the IOC Cohort) to address persistent HAN communications failure for Dormant Meters (as demonstrated by the GT01 check) then this would lead to replacement of the entire SMETS1 Installation with SMETS2+ devices where the GSME persistent fails to communicate with a CH.

Thus, DCC remains of the view that in the case of solely Dormant Installations, partial migration where the GSME is a Dormant Meter should be attempted where there is persistent failure to migrate due to a lack of HAN communication between the GSME and the CH. Such persistent failure of HAN communication is demonstrated by at least three failed migration attempts (each with the GT01 error reported), each in separate non-contiguous Migration Weeks. The inclusion of the requirement for non-contiguous Migration Weeks has been made based on a response received to the Various 1 Consultation indicating that three failures across an elapsed period of three weeks was not sufficient to demonstrate persistent failure. Where the ESME and the GSME are both Dormant Meters, once the threshold for persistent failure has been demonstrated, DCC would proceed on the basis that the GSME details are excluded from the Migration Common File (based on a notification from DCC to the Requesting Party) following a subsequent instruction by DCC to Migrate the SMETS1 Installation based on the deemed authorisation set out in Clause 4.27 of the TMAD.

Similarly, in the case of Mixed Installations, DCC is proposing that the trigger for a partial migration is where there has been persistent failure to migrate due to a lack of HAN communication between the GSME and the CH in three non-contiguous weeks and a subsequent Migration Authorisation is received from the Responsible Supplier for the Active Meter in that Mixed Installation.

Where the ESME is an Active Meter and the GSME is a Dormant Meter the partial migration would be attempted following:

- a subsequent authorisation to migrate the ESME as per the Migration Authorisation Mechanism (as the ESME is an Active Meter); and
- a corresponding instruction by DCC to Migrate the GSME within the SMETS1 Installation based on the deemed authorisation set out in Clause 4.27 of the TMAD (as the GSME is a Dormant Meter), following which, the details of the GSME would be excluded from the preparation of the Migration Common File (based on a notification from DCC to the Requesting Party).

Where the ESME is a Dormant Meter and the GSME is an Active meter, DCC would proceed on the basis that the GSME details are excluded from the Migration Common File following:

- a Request to Exclude from the Responsible Supplier for the GSME and a subsequent authorisation to migration the GSME as per the Migration Authorisation Mechanism as the GSME is an Active Meter), following which, the details of the GSME would be excluded from the preparation of the Migration Common File (based on a notification from DCC to the Requesting Party); and
- a corresponding instruction by DCC to Migrate the ESME within the SMETS1 Installation based on the deemed authorisation set out in Clause 4.27 of the TMAD (as the ESME is a Dormant Meter).

There is an edge case where partial migration of a Responsible Supplier's electricity meter is dependent on the actions of another Responsible Supplier of the gas meter where there is a Dormant ESME and Active GSME each with different Responsible Suppliers. First, the Responsible Supplier for the Active GSME would need to decide to exclude their gas meter. Second, there is reliance on the Responsible Supplier for the Active GSME to provide an authorisation for the GSME to migrate and thus allow the ESME to migrate (without the GSME) as authorisations are required from both Responsible Suppliers as per Clause 4.17 of the TMAD (which includes deemed provision for the Dormant ESME in this edge case). For the IOC cohort, DCC currently has 1,675 SMETS1 Installations that are not yet migrated where there is a Dormant ESME and Active GSME each with different Responsible Suppliers. This edge case (where partial migration is required) represents a small proportion of these as yet unmigrated SMETS1 Installations.

There is new TMAD drafting proposed for Clause 5.8B to require partial migration where the GSME is a Dormant Meter (covering both solely dormant installations and the scenario where the GSME is the dormant meter in a mixed installation), subject to 3 failures having occurred in non-contiguous weeks. Clause 5.8C is also varied to apply where the GSME is an Active Meter (previously it only applied where the installation contained solely Active Meters). This now supports the scenario where in a Mixed Installation, the GSME is an Active Meter, recognising that the Request to Exclude must come from the GSME Supplier. There are minor drafting changes to Clause 5.8F to allow it to apply for either Active or Dormant. The other aspects of the approach e.g. preventing migration when the GSME is in pre-payment mode will also apply. The result of these changes is that the exclusion category in Clause 18.5 of the TMAD also has a minor amendment as a result of the introduction of Clause 5.8B.

This change to allow partial migration for the ESME where the GSME is a Dormant Meter does not require a change to the DCC System as it is supported by the same solution (for DCC to notify a GSME exclusion to the Requesting Party) where the GSME is an Active Meter. DCC will need to implement some minor internal business process changes and can confirm that these will be ready prior to the envisaged re-designation of date for the TMAD.

Various 1A Q1

Do you support the principle of amending the TMAD to extend partial migration to exclude Dormant GSME based on an objective assessment for persistent failure of HAN communication for the IOC Cohort? Do you have any detailed comments on the relevant changes to the legal drafting in Clauses 5.8B, 5.8C, 5.8F and 18.5 of the TMAD? Please provide a rationale for your views.

4. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to the Department for Business, Energy and Industrial Strategy (BEIS) an amended version of the TMAD that it considers suitable for re-designation into the Smart Energy Code (SEC) by the Secretary of State.

DCC is aiming to conclude on this consultation no later than 18 February 2022. DCC plans to provide a conclusions report to BEIS related to the TMAD re-designation covering the extension of partial migration to Dormant Meters.

Where the Secretary of State accepts the finding in DCC's conclusions report related to proposed exclusions and thus re-designates the TMAD, the relevant SMETS1 Installations will be excluded from the scope of migration and/or SMETS1 SMSs not eligible for enrolment / SMETS1 Services and/or SMETS1 PPMIDs ignored.

DCC has discussed the re-designation of the TMAD with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, BEIS will re-designate the TMAD on 25 February 2022 or as soon as reasonably practicable within one month thereafter.

In order to expedite the re-designation of the TMAD, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the TMAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

Various 1A Q2

Do you agree with the proposed re-designation date of 25 February 2022 for updates to the TMAD related to extending partial migration (GT01 Pt 2 - migrate electricity meter / exclude gas meter) to Dormant Meters?

5. How to Respond

Please provide responses in the attached template by 1600 on 4 February 2022 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic

confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation, please contact DCC via consultations@smartdcc.co.uk.

6. Attachments

Attachment	Title
1	Draft Notification Text on TMAD
2	TMAD v19.a Draft Redlined
3	SMETS1 Various 1A Response Template

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the TMAD.

TMAD Draft Direction Text

This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DD MM YYYY], the SMETS1 Transition and Migration Approach Document (TMAD) previously designated and incorporated into the SEC as Appendix AL are hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.