

SMETS1 Conclusions Various 1A

A SMETS1 conclusion on a proposal by DCC for partial migration of the ESME only for Dormant and Mixed Installations where there is no GSME HAN connectivity for the IOC Cohort

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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 latest version of the SEC was published on 27 January 2022 as v56.0.

In December 2020, the Department for Business Energy and Industrial Strategy (BEIS) consulted¹ on changes to the TMAD to provide a framework to develop options for the Migration of SMETS1 Installations comprising Device Model Combinations (DMCs) which DCC consider currently blocked. In February 2021, BEIS concluded² on these changes, introducing Clauses 1.4 to 1.9 in the TMAD which provide a transparent process for promptly assessing SMETS1 Installations currently blocked for Migration.

The Various 1 Part 1 Conclusion³ was published on 30 November 2021 and enabled the partial migration of SMETS1 Installations where the electricity meter is migrated, and the gas meter is not. 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.

Following the Various 1 Part 1 Conclusion, DCC issued the Various 1A Consultation⁴ to seek views on extending the scope for partial migration within the IOC cohort to SMETS1 Installations containing Dormant Meters; covering both solely Dormant Installations and Mixed Installations (an Active Meter and a Dormant Meter). The Various 1A consultation was issued on 14 January 2022 with responses due by 1600 on 4 February 2022. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed regulatory changes.

2.1. Questions

Table 1 below details the questions that were presented in the public consultation.

¹ 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/>

² The BEIS conclusion is available via <https://smartenergycodecompany.co.uk/latest-news/sec-v35-0-implemented-to-support-the-dcc-smets1-service/>

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

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

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.
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?

Table 1 – Consultation Questions – Various 1A

2.2. Responses

Stakeholders were invited to respond to the consultation issued by 16:00 on Friday 4 February 2022 using the response template⁵ that was provided.

DCC received a written response from eight respondents regarding this consultation.

3. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed each response.

DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement.

3.1. Application of partial Migration (Migrate ESME / Exclude GSME) to Dormant Meters and Amendments to TMAD (Various 1A Q1)

DCC sought views on the proposal to extend partial Migration for the Dormant GSME asking: *“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.”*

3.1.1. Respondents' Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question. Four of these respondents supported the proposed amendments. The remaining four respondents objected to the proposal.

Two respondents provided a supportive response to this question without further comment.

One respondent provided a supportive response to this question and indicated that they recognised the impact of partial Migration on a SMETS1 Installation.

One respondent provided a supportive response to this question and sought clarity that any GT01 failures would be ones that had occurred after the change had been made to extend the period over which a check is performed from 24 to 72 hours. DCC can confirm that it

⁵ https://www.smartdcc.co.uk/media/6771/smets1_consultation_various_1a_response_template.docx

will only consider persistent failure to be demonstrated based on migration attempts following the change in threshold to 72 hours⁶. DCC has proposed a small amendment to the TMAD to be explicit on this commitment.

Four respondents objected to the proposal. These respondents proposed that the Responsible Supplier should be able to decide whether a GSME (that is a Dormant Meter) is excluded from the Migration i.e. adopting the same regime that applies where the GSME is an Active Meter. These respondents set out concerns that partial migration may lead to a poor customer experience (with only the ESME providing smart services) and so it is better for the Responsible Supplier to decide whether to attempt a partial migration on a case by case basis.

One respondent queried whether the existing TMAD drafting in Clause 5.8F (a) should be a reference to the 'SMETS1 GSME' rather than 'SMETS1 Installation'. DCC considers this drafting to be correct as presented; the purpose of Clause 5.8f (a) is to prevent partial migration where the GSME is in pre-payment mode, which is why the clause excludes the SMETS1 Installation from the MCF. This is because were the partial migration to take place where the GSME is in prepayment mode, there is a risk to the ongoing provision of prepayment services to the GSME.

3.1.2. Areas of Unresolved Disagreement

The consultation document set out that DCC considers the approach proposed (based on an objective test) is the appropriate way forward as this will maximise migration of Dormant Meters thereby expediting the restoration of smart services to the ESME. This approach was proposed as it was in line with DCC's transitional objective with respect to enrolment of eligible SMETS1 meters and BEIS's objective to restore smart services to Dormant Meters where feasible (as this maximises benefit to consumers).

Whilst DCC acknowledges the views provided by respondents, 'on balance' DCC considers more benefit is provided to end customers if the decision for partial migration is based on an objective test (where the GSME is a Dormant Meter).

3.1.3. Summary

DCC proposes to bring in amendments that extend the solution enabling partial Migration to Dormant meters.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.2. Re-designation Date for Extending Partial Migration (Various 1A Q2)

DCC sought views on the date for amending the TMAD to extend Partial Migration asking: "*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?*".

3.2.1. Respondents' Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question. Six of these respondents supported the proposed date for re-designation.

⁶ This change was introduced on 4 November 2021 - <https://smartenergycodecompany.co.uk/latest-news/sec-v50-0-published-for-the-november-2021-sec-release-and-beis-designation-re-designation-of-sec-subsiary-documents/>

Five respondents provided a supportive response to this question without further comment.

One respondent provided a supportive response to this question whilst restating their objection to the proposal for partial migration where the GSME is a Dormant Meter.

Two respondents expressed no view in response to this question given their objections to the proposal for partial migration where the GSME is a Dormant Meter.

3.2.2. Areas of Unresolved Disagreement

There were no areas of disagreement related to re-designating the TMAD on 25 February 2022 for the amendments to extend partial Migration.

3.2.3. Summary

DCC proposes that the Secretary of State re-designate the amendments to the TMAD in the scope of this consultation on 25 February 2022 or as soon as reasonably practicable within one month thereafter.

4. Summary of Drafting Changes

There is one drafting change to the TMAD resulting from consultation feedback.

Clause 5.8B (b) is amended to include reference to 4 November 2021, which is the date of the change for the check to be 72 hours. This change is highlighted in the redlined text for clarity.

5. Conclusions

DCC is confident that the version of the TMAD submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has undertaken appropriate consultation with industry regarding these changes to the TMAD.

DCC has, where necessary, addressed the comments that have been received from industry and where appropriate sought additional feedback from respondents. DCC does not believe that the views expressed result in fundamental amendments to the TMAD and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations.

The TMAD revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised TMAD is defined to a sufficient level of detail for re-designation into the SEC;
- the revised TMAD provides an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- the revised TMAD is materially complete, and the content is technically accurate.

In summary, DCC considers that the revised TMAD is fit for purpose.

6. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document.

DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD into the regulatory framework for both the unblocking and exclusion amendments.

Given this consultation process DCC notes the earliest date that the changes to the TMAD could be re-designated is 25 February 2022 and the latest date is 25 March 2022 without requiring a further consultation on the designation date.

7. Attachments

Attachment	Title
1.	TMAD v19.0 draft delta against current version v18.0
2.	TMAD v19.0 draft clean

Table 2 - Attachments