

## SMETS1 Consultation - Initial Closure Matters

A SMETS1 consultation on a proposal by DCC to: amend the rules for RP Decommissioning, change the PPCT rules following RP Decommissioning: end the provision of: Migration DUST for IOC & MOC (MDS), end Migrations for MOC (MDS), and stop the DMCT Process in respect of the MOC (MDS) 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.

In this document DCC proposes a range of changes to regulatory documents (SMETS1 TMAD, SVTAD, ETAD and MTAD) in support of SMETS1 service delivery. 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 Code<sup>1</sup> (SEC). The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process. It also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the SEC. The procedural and technical details related to the enduring Testing Services provided by DCC are set out in the Enduring Testing Approach Document (ETAD). The ETAD is Appendix J of the SEC. The latest version of the SEC was published on 24 March 2022 as v59.0.

DCC has an obligation to provide its services in an efficient manner. This consultation is aiming to improve efficiency by bringing forward proposals to close the MOC (MDS) Requesting Party (RP) migration service given operational evidence that this is now justified and in consumers best interests. This would signal the completion of migration for the MOC(MDS) cohort.

In order to achieve this, DCC has also recently brought forward proposals to unblock or exclude the last remaining 'blocking' devices from the MOC (MDS) cohort as part of the 'Various 2' consultation<sup>2</sup> that was published on 23 March 2022 with all other available MOC (MDS) Dormant Meters having been migrated. The proposals in this consultation document assume the successful conclusion and designation of the amendments in that consultation to the extent they materially impact the MOC (MDS) cohort. This means that for DCC to proceed with the closure of the Requesting Party for MOC (MDS) the TMAD changes will need to be re-designated as per the 'Various 2' timeframe specified i.e. 11 May 2022. This is so that the final changes are made to allow DCC to process the changes set out in 'Various 2' (exclusions / unblocking) and subsequently conclude on the RP Decommissioning date. Therefore, delays in concluding / re-designating 'Various 2' are expected to give rise to a consequential delay on concluding on this consultation. DCC has engaged with stakeholders throughout the migration process in order to maximise the number of installations that can be migrated. However, due to a range of issues (that have been described in the previous 'Various 1' and 'Various 2' consultations), there are some SMETS1 Installations that it is not possible to migrate. There are a limited number of SMETS1 Installations that will be unblocked (assuming the proposals in the 'Various 2' consultation are accepted) and DCC is confident that these SMETS1 Installations will be Migrated prior to the timescales set out for Requesting Party closure in this consultation.

DCC is also setting out, as part of this consultation, changes to the Requesting Party closure process in order to make the process more efficient and transparent to stakeholders. These process changes would apply in respect of all cohorts. Additionally, as part of this consultation there is a proposed RP Decommissioning Date for the MOC (MDS) cohort. DCC will bring forward the consultation proposals for RP Decommissioning Dates applicable to the other cohorts in line with the indicative timeline for each cohort set out in Table 1 below.

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

<sup>2</sup> <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-2/>

This consultation covers various changes to the ETAD, TMAD, SMETS1 SVTAD and MTAD to decommission aspects of DCC's services related to SMETS1; specifically this consultation proposes that:

1. the regime in Clause 7 of the TMAD setting out the process for Requesting Party Decommissioning is amended (see Section 6.1 below for the planned date);
2. DCC's Migration Service for Energy Suppliers with SMETS1 Meters in the MOC (MDS) cohort terminates from the proposed RP Decommissioning Date (see Section 6.3 below for the window of planned dates) and the capability to migrate any further SMETS1 meters from the MOC (MDS) cohort therefore ends at that point;
3. the provision of the DMCT Process in respect of a particular cohort ends in line with decommissioning of the relevant Requesting Party for that cohort via an amendment of the SMETS1 SVTAD (see Section 6.1 below for the planned date);
4. restrictions on using new devices for the PPCT process aligned to decommissioning of the relevant Requesting Party for that cohort and equivalent restrictions to UEPT and DUST related to decommissioning of Migration DUST for that cohort via an amendment of the ETAD (see Section 6.1 below for the planned date); and
5. the provision of Migration DUST services in respect of the IOC and MOC (MDS) cohorts is ended via an MTAD amendment (see Section 6.2 below for the planned date).

Whilst this consultation proposes a date for ending the Migration Service (and closing the Requesting Party) for the MOC (MDS) cohort, DCC considers that it would be helpful to provide an indicative estimate for the equivalent dates for other cohorts (in Table 1). The estimated dates presented in Table 1 are based on DCC's initial assessment for these cohorts; noting there is a licence requirement on Energy Suppliers to replace any unenrolled SMETS1 meters with SMETS2+ meters by no later than 31 December 2022.

GroupID	Cohort	RP Decommissioning Date	Status
CB	MOC (MDS)	19 June 2022 (subject to any delay as set in Section 6.3 below)	Proposal
AA, BA, & CA	IOC	Q3 2022	Estimate
EB	FOC (NP SMETS1 SMSO)	Q3 2022	Estimate
EA	FOC (BG SMETS1 SMSO)	Q4 2022	Estimate
DA	MOC (Secure)	Q4 2022	Estimate

**Table 1 – All RP Decommissioning Dates**

Given the expiry of the TMAD at the end of 2022, during 2022 DCC is planning a detailed review of the TMAD, S1SR, and SMETS1 SVTAD requirements in order to identify any provisions that may need to be captured as an enduring requirement and therefore moved to another part of the SEC that is not transitional. Should this be required, DCC will consider at the time the appropriate way to take forward such proposed amendments.

## **2. Proposed changes to the process in the TMAD for ending Migrations**

### **2.1. Overview**

Migration Services cannot be provided without, amongst other things, a Requesting Party undertaking activities in respect of the cohort for which it operates. The existing Clause 7 of the TMAD provides a process for the cessation of Migration activities by each Requesting Party and, therefore, the cessation of further Migrations for the associated cohort. This is achieved via Secretary of State approval of a date for decommissioning of the Requesting Party. Once that approved date has passed, DCC is obliged to ensure that the Requesting Party does not take further steps that could enable Migrations. The TMAD requires DCC to consult on the dates for decommissioning of all Requesting Parties via a document titled 'RP Decommissioning Timetable' which sets out the date (the 'RP Decommissioning Date') for each Requesting Party to be decommissioned. Following consultation, DCC will submit the draft RP Decommissioning Timetable to the Secretary of State for approval.

The existing TMAD provisions in Clause 7 envisage a process whereby the 'RP Decommissioning Timetable' is a single document covering all Requesting Parties. In order to prepare a single RP Decommissioning Timetable on this basis, DCC would need certainty on the expected end date for each Requesting Party which could delay closure of some cohorts given the differing status of each cohort. DCC considers that such delays would be economically inefficient as it would be required to continue to procure Requesting Party services for some cohorts pending the outcome of all others i.e. closure would be linked to the last Requesting Party being complete. Given the scope for material economic efficiency gain from a prompt Requesting Party closure, DCC is proposing a change to the TMAD to allow for a separate RP Decommissioning Timetable for each Requesting Party i.e. for dates to be approved for the closure of each Requesting Party in isolation. An amendment to Clause 7.3 is proposed to allow such consultation on the dates to take place prior to the amendments proposed to the TMAD in this Section 2 taking effect, as this will enable DCC to achieve closure of the Requesting Party for MOC (MDS) as soon as reasonably practicable. An amendment to Clause 7.3 also allows DCC to set out a range of possible RP Decommissioning Dates in consultation and then conclude on a single date in the timetable that it submits to the Secretary of State for approval. Consulting on a range of dates allows for contingency e.g. where there are any delays in final Migration outcomes for a cohort. DCC considers this to be an efficient approach rather than launching an entirely new consultation process if a single proposed date cannot be met.

DCC is also proposing an amendment to the TMAD to include details on the last Migration Week / final day for submission of a Migration Authorisation to provide additional clarity for stakeholders. This change is captured via amendments to Clause 7.1 of the TMAD (as well as some minor consequential drafting changes to reflect the revised approach). A new Clause 7.4A is also introduced to be clear that the pre-migration activities in Clause 4 of the TMAD should no longer be undertaken by DCC in respect of Migrations that would not be capable of commencing until after the final Migration Day in the final Migration Week. There is also a change to Clause 3.6 of the TMAD to remove a variation to Section F2.10A of the SEC related to the EPCL as this will fall away once the RP is closed. DCC is setting out its proposals for the decommissioning of the Requesting Party in respect of the MOC (MDS) Cohort in Section 3 below on the assumption that the proposed changes to the TMAD outlined in this Section 2 are made, as this will enable closure for this cohort at the earliest feasible opportunity, with the attendant efficiency savings.

### **2.2. 12 months from the last EPCL entry**

The existing Clause 7.2 of the TMAD provides that each RP Decommissioning Date should not be earlier than 12 months from the last EPCL entry for each GroupID. However, DCC is proposing to

remove this requirement from the TMAD as DCC considers that it is economically inefficient to continue to require DCC to procure Requesting Party services for a cohort across a fixed period of time where:

1. no further Migrations are planned for SMETS1 Installations containing one or more Active Meters for the cohort; and
2. almost all SMETS1 Installations containing Dormant Meters are in an Exclusion Category except for minimal quantities of SMETS1 Installations that are 'newly Dormant' (i.e. arising from churn which is presently low in the market) and 'viable' (i.e. likely to be successfully Migrated by DCC).

It is important to note that, as each cohort nears completion, DCC expects there to be minimal SMETS1 Installations being both 'newly Dormant' and 'viable' as such SMETS1 Installations should fall into an exclusion category. This is because firmware upgrade / configuration and Migration for such SMETS Installations will have previously been attempted by the Responsible Supplier while the SMETS1 Installation contained Active Meters given the economic incentives and licence obligations on Energy Suppliers.

DCC considers that removing Clause 7.2 of the TMAD is acceptable as the overall regime in Clause 7 provides sufficient safeguards to prevent any Requesting Party closure that stakeholders may consider premature, noting that there is an existing licence obligations on Energy Suppliers to enrol all SMETS1 Meters within 12 months of an EPCL entry (which extended for a further 12 months on churn) and have replaced any unenrolled SMETS1 meters with SMETS2+ meters by no later than 31 December 2022. Closure of each Requesting Party is not a unilateral decision by DCC; there is a requirement for public consultation and sign-off by the Secretary of State. Within this process there is an ability for stakeholders to directly raise concerns with BEIS after DCC has made its recommendation; in this regard BEIS have indicated to DCC that a 5 day period will be made available to stakeholders to raise any concerns (this is described in Section 3 below).

## **2.3. Migration after the RP Decommissioning Date**

Clause 7.6 of the TMAD sets out that no steps related to Migration should be taken by the Requesting Party after the expiry of the RP Decommissioning Date. However, DCC considers that this should be amended such that any Migrations in progress aren't prevented from completing. On this basis, DCC is proposing to amend Clause 7.6 to make reference to preventing the commencement of Migration. This would mean that no further Migrations could be started (including for previously attempted Migrations that had failed and been rolled back) but in-progress migrations would be completed (whether that be failure and rollback, or successful commissioning) as this is considered to be in the best interests for consumers whilst providing a clear backstop.

## **2.4. Data Retention**

There are also a couple of proposed changes to the TMAD related to data retention to allow for any disagreements to be addressed. In Clauses 7.9 and 7.12 of the TMAD, DCC is permitted to retain migration data for a limited period in order to resolve any disagreements. The current drafting restricts the information that DCC can retain to:

1. Migrations Authorisations provided by Energy Suppliers (Clause 7.9); and
2. information sent to Energy Suppliers (Clause 7.12).

DCC is proposing a minor amendment to remove the restriction as other data related to Migrations may also be needed to resolve any disagreements that may arise (e.g. information



provided to energy Suppliers on excluded SMETS1 Installation / firmware upgrade information provided by Installing Suppliers).

#### Closure 1 Q1

Do you agree with DCC's proposal to amend Clause 3.6, and the range of amendments to Clause 7 of the TMAD (and related definitions) regarding decommissioning of each Requesting Party? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

## 3. Ending Migrations in respect of the MOC (MDS) Cohort

### 3.1. Overview

As set out in this section, DCC is of the view that at the time of the proposed closure of the Requesting Party for MOC (MDS) cohort there will be no further unmigrated SMETS1 Installations that, other than for a disproportionately small number of Dormant Meters in the limited circumstances described above, will be eligible to be enrolled that won't have had the opportunity to have exhausted attempts to be migrated by the proposed date. DCC notes that only Energy Supplier for the MOC (MDS) intends to finish their Migrations of SMETS1 Installations containing Active Meters soon and thus the Requesting Party for this cohort can accordingly be decommissioned using the provisions of Clause 7 of the TMAD.

In November 2021, DCC issued an RFI on Unaccounted for SMETS1 Devices<sup>3</sup> seeking information on possible dormant sites that SMSO's had not provided DCC a record for but which Responsible Suppliers were aware of. This closed on 17 December 2021. Based on the responses provided, DCC was made aware of 624,401 premises for which Dormant devices had been recorded (that appeared in SEC Party's inventories) but were not included in reports provided to DCC by any of the SMETS1 SMSOs across all cohorts. 10,537 of these related to the MOC (MDS) cohort. For the purposes of this consultation, DCC is only focused on the MOC (MDS) cohort and will consider other cohorts in due course. For MOC (MDS), this data was analysed and accounted for as follows:

- a migration has been previously attempted for the MPAN (DCC assumes that the installation provided in the RFI data has since been replaced by a different SMETS1 installation but the provider of the RFI data had not been informed and for the MOC (MDS) cohort, all the SMETS1 Installations that were accounted for due to this reason were successfully migrated);
- in the Smart Metering Inventory there is a commissioned installation for these MPAN (DCC assumes that the installation provided in the RFI data has since been replaced by a different set of devices but the provider of the RFI data had not been informed);
- the installation is part of a pre-migration exclusion category in TMAD (including those presently under consultation in 'Various 2');
- the MPAN or MPRN provided in the RFI Response does not exist in the registration data;
- the installation is not confirmed by the Energy Supplier as SMETS compatible in the RFI data supplied; or

<sup>3</sup> <https://www.smartdcc.co.uk/consultations/skets1-request-for-information-unaccounted-smets1-devices/>



- the installation has been included in an MR01 report (which is the data from each SMETS1 SMSO showing their estate of SMETS1 Installations).

Collectively the above cover Premises that have either been migrated, have been replaced with SMETS2+ Devices, or are not eligible for migration. 799 installations failed to be explained within the MOC (MDS) cohort and thus remain 'unaccounted' and potentially warrant further investigation by DCC to determine whether these are SMETS1 Installations that DCC could attempt to Migrate .

Of the MDS premises that were accounted for, DCC further analysed the RFI Responses to provide confidence that this was a valid conclusion. The results of this are given in Table 2. This data shows that the majority of premises are discounted for more than one reason.

Category	Discounted for only one reason	Discounted for more than one reason
Migration Attempted	165	8,276
MPAN Exists in Inventory	31	198
Defined Exclusion Category	0	188
Registration data does not include the MPxN	0	0
Not SMETS Compliant	637	9,481
MPAN Exists in an MR01	36	808

**Table 2 – Device Counts by Reason for Discounting**

To give some context to the table: for 8,276 installations a migration being attempted for the same MPxNs (though not the same device) resulted in them being discounted. However, this was the only reason for discounting the installation for 165 installations, the remaining 8,111 installations were also discounted for at least one other reason.

DCC has assessed what would be necessary for these devices to be made eligible for migration and whether there is a business case to justify the delay in closing the requesting party to allow these actions to be undertaken.

As the devices have never been registered with an SMSO and do not currently appear in Requesting Party reporting further investigation would be required to verify that the devices exist. Such an exercise may require site visits to verify what equipment is present if other data sources do not resolve matters. The current SMETS1 SMSO systems and processes only allow for Active devices to be registered by an Energy Supplier meaning that process and system development would be required to allow an Energy Supplier (or DCC on their behalf) to register Dormant devices. The various device information (hardware versions / firmware versions / IMSI / SIM / MAC addresses / serial numbers) is usually provided to the SMETS1 SMSO for initial installation / commissioning. This device information is required to register a device on the SMETS1 SMSO and therefore would have to be obtained (assuming that it is available) and provided to the SMETS1 SMSO. Within the current regulatory framework DCC does not have the right to request that Dormant devices are registered with a SMETS1 SMSO meaning that TMAD changes would need to be developed and consulted on. System and process development and testing would also need to take place e.g. assessment via the DMCT Process. Also, the Energy Supplier may need to arrange for site visits to commission these devices. DCC considers that this would delay Requesting Party Decommissioning for the MOC (MDS) cohort Requesting Party by a

considerable amount. Furthermore, DCC is of the opinion that it is unlikely that many, if any, of the devices would successfully be communicated with the SMETS1 SMSO (and thus Migrate successfully) as they have not been communicating for some time. Also, it is envisaged that all of such devices would require firmware upgrades.

Given the low number of unaccounted devices in the MOC (MDS) cohort, DCC considers that taking further material steps for these residual unaccounted meters would result in the need for a significant extension to the Requesting Party services for MOC (MDS) which would not be in consumer's best interests, given it is economically inefficient (against replacing such devices with SMETS2+ devices). Moreover, DCC has a low expectation that any of these sites would go on to successfully be migrated and therefore further investment in analysis represents poor value for money for end consumers. DCC observes that given the range of activities to resolve matters (include the material risk that a site visit may be needed), the position would be unchanged if the analysis criteria had not been applied to MOC (MDS) i.e. it remains uneconomic where it is assumed that there are 10,537 'unaccounted' premises in the MOC (MDS) cohort.

On this basis, DCC is proposing the RP Decommissioning Date for the MOC (MDS) cohort within the consultation without taking further action regarding such unaccounted for SMETS1 Devices.

A draft RP Decommissioning Timetable for the MOC (MDS) cohort is provided as Attachment 4 of this consultation document. It proposes that the Requesting Party is closed on Sunday 19 June 2022 for MOC (MDS) (where GroupID = 'CB') as well as setting out alternative Sundays up to 31 July 2020 were a subsequent delay to arise. In this context, DCC notes that the last EPCL entry for MOC (MDS) was added on 13 December 2021. Whilst, this date is before the '12 month' window, DCC considers that it is prudent to proceed with closure now as set out in this section as it meets the criteria defined above of being in the best interests of consumers, with no further active migrations expected and very low numbers of newly dormant meters remaining as un-attempted. In line with the proposed Clause 7.3 of TMAD, when DCC concludes on this consultation, DCC intends to send the consultation conclusions and draft RP Decommissioning Timetable to the Secretary of State, containing within it a single date for RP Decommissioning. As set out in Section 2, DCC intends to consult separately on additional RP Decommissioning Timetables to propose dates for the closure of IOC, MOC (Secure) and FOC (NP & BG) later in 2022, on the basis that the proposed amendments to the TMAD set out in Section 2 of this document are made.

It should be noted that there is an unlikely edge case, whereby a SMETS1 Installation may become 'newly' Dormant following a Change of Supplier event but where there is insufficient time remaining for DCC to undertake the actions necessary that would enable commencement of Migration of that Dormant Installation prior to the end of the final Migration Week'. In this situation, DCC will continue to attempt Migrations for SMETS1 Installations containing Dormant Meters (including newly dormant Installations) up to the final migration week. However, it should be noted that DCC will continue with preparatory steps until the Secretary of State decision is made. This means that in some limited circumstances there will be no prospect of the subsequent Migration commencing after the Secretary of State decision is made e.g. where an instruction to upgrade firmware (which may take a few weeks to successfully complete) is made the day before the Secretary of State decision is published.

DCC has considered the procedure to close down MOC (MDS) and considers it could deliver an RP Decommissioning Date of 19 June 2022 on the basis of meeting the process set out in Table 3 below. However, it may be that DCC proposes a later closure date based on representations made by stakeholders or because circumstances have changed such that DCC considers a later date to be the earliest achievable date. On this basis, DCC will be formally seeking views on the range of Sundays from Sunday 19 June 2022 up to and including Sunday 31 July 2022. In the unlikely event that the RP Decommissioning Date slips beyond 31 July 2022, DCC would re-consult on the RP Decommissioning Date. In the table below the 'proposed' RP Decommissioning Date is

assumed to be 19 June 2022. If the proposed date becomes a later one, then some of the activities in this table would slip accordingly.

Date	Activity
Tuesday 5 April 2022	This consultation is opened for period of four weeks.
Tuesday 3 May 2022	10 weeks prior to the proposed RP Decommissioning Date, the consultation will close for industry views on MOC (MDS) Requesting Party closure.
Friday 13 May 2022	7 weeks prior to the proposed RP Decommissioning Date, DCC will conclude on the consultation findings for MOC (MDS) Requesting Party closure.
Friday 20 May 2022	5 weeks prior to the proposed RP Decommissioning Date, provided the DCC's conclusion is that RP closure should be enacted and the regulatory changes are supported, the Secretary of State will re-designate the TMAD, SMETS1 SVTAD and ETAD and DCC will modify the MTAD.
Monday 23 May 2022	5 weeks prior to the proposed RP Decommissioning Date, DCC will formally submit a decommissioning timetable to MOC (MDS) (include prior conclusion evidence and current status of any final migration activity)
Tuesday 24 May 2022 to Tuesday 31 May 2022	BEIS have advised there will be a five day period for any stakeholders to raise further concerns directly to BEIS.
Wednesday 8 June 2022	10 calendar days prior to the RP Decommissioning Date, a decision by the Secretary of State is expected on the closure of the Requesting Party for MOC (MDS)
Thursday 9 June 2022	<p>9 Days prior to the RP Decommissioning Date and assuming Secretary of State approval has been given, any final Migration Authorisations submitted authorising Migrations to commence in the following (final) Migration Week as per the Migration Authorisation Mechanism. DCC will no longer process:</p> <ul style="list-style-type: none"> <li>▪ further instructions to the SMETS1 SMSO to configure devices (where migrations are not able to commence during the final Migration Week);</li> <li>▪ notifications to Migrate; and</li> <li>▪ Demand Commitments</li> </ul>

Date	Activity
	Up to the point of the week preceding the final migration week, Migrations will continue to be processed by DCC as usual.
w/c Monday 13 June 2022	DCC will commence the final Migrations during final Migration Week based on submissions made on Thursday 9 June 2022. All migrations taking place during the week are expected to have finished processing (successful / failed / rolled back) before the Sunday.
Sunday 19 June 2022	DCC doesn't usually process Migrations on weekends.  RP Decommissioning Date will be on this Sunday.
Monday 20 June 2022	From the point of expiry of the RP Decommission Date and once all final migrations have finished processing (successful / failed and rolled back), DCC will instruct MDS to enact the required steps to shut down the MOC (MDS) Requesting Party, confirming to DCC when decommissioning is complete. This is expected to take 20 working days to fully complete.
Q3 2022	To confirm decommissioning of the Requesting Party has been carried out appropriately, an independent audit of the close down process will be carried out and reported back to DCC.

**Table 3 – Detailed Closure Activities for MOC (MDS)**

DCC considers that in order to proceed with the closure of each Requesting Party, DCC needs to clearly demonstrate that there is no scope for further Migration Authorisations to arise (including deemed Authorisations), or that any further potential authorisations are so disproportionately small as to make it inefficient to keep the Migration Service open. Further information on the status of the MOC (MDS) cohort are now presented in the following paragraphs. Additionally, DCC needs to have plans in place to progress the technical aspects of Requesting Party decommissioning and DCC can confirm that it does have those plans in place as further set out below.

### **3.2. ACTIVE/MIXED**

For Active / Mixed, the consideration is whether Responsible Suppliers for SMETS1 Installations containing one or more Active Meters, have ceased authorising Migrations of their Active Meters within SMETS1 Installations for the relevant cohort. For mixed SMETS1 Installations, where one meter is an Active Meter and the other is a Dormant Meter, DCC is only able to commence migration of these SMETS1 Installations following an authorisation from the Energy Supplier for the Active Meter within the SMETS1 Installations. DCC has arrangements in hand with the SMETS1 SMSOs to progress any mixed SMETS1 Installation as soon as a Migration Authorisation is provided for the Active Meters. Therefore, cessation of Migration Authorisations for Active Meters by all Responsible Suppliers for a cohort also means that no further mixed SMETS1 Installations can be migrated.

From the information that has been provided to DCC, it has been established that there is one Responsible Supplier that has SMETS1 Installations containing one or more Active Meters in the MOC (MDS) cohort. This Responsible Supplier has indicated to DCC that they will have completed all of their Migrations for this cohort by the end of April 2022. Furthermore, this Responsible Supplier supports DCC's aim to expedite the closure of the RP for MOC (MDS). Hence, DCC does not anticipate any further migration of SMETS1 Installations that contain one or more Active Meters after 30 April 2022 for the MOC (MDS) cohort.

### 3.3. DORMANT

For Dormant, the consideration is whether for SMETS1 Installations containing solely Dormant Meters, DCC has Migrated all SMETS1 Installations that are not subject to an exclusion (where any exclusions have been advised to the Responsible Energy Supplier via SharePoint). DCC is of the view that for MOC (MDS) all Migrations of solely Dormant Installations will be complete (i.e. either excluded or migrated) before the proposed RP Decommissioning Date (with the exception of any SMETS1 Installation newly Dormant meter as described above in Section 3.1). By this date, DCC will have migrated all SMETS1 Installations containing solely Dormant Meters that do not fall into an Exclusion Category (if in an Exclusion Category they are not to be migrated). DCC has consulted on the remainder of the Exclusion Categories in a separate 'Various 2' consultation<sup>4</sup>. At present, for the MOC (MDS) cohort there is a very low percentage of SMETS1 Installations where Migration is still to be attempted / under analysis. Thus, DCC is of the view that prior to the proposed RP Decommissioning Date for MOC (MDS) all eligible SMETS1 Installations containing solely Dormant Meters will either:

- (i) have been migrated;
- (ii) fall into an Exclusion Category; or
- (iii) be one of a very few newly Dormant Installations.

### 3.4. Technical

DCC also needs to confirm that it has the technical / process matters in hand to enable it to comply with its obligations to ensure that the Requesting Party does nothing further to commence migrations once the RP Decommissioning Date has expired.

DCC has requirements in Clauses 7.7 to 7.12 to delete security keys and revoke certificates that are used for data encryption and message signing within the TMAD processes. DCC also has a requirement in Clause 7.13 to procure an audit covering each RP closure for the SMKI PMA to consider. DCC can confirm that plans to deliver these matters are in hand and will be undertaken for the Requesting Party covering MOC (MDS) both during the decommissioning, to gather evidence to support the audit and following decommissioning to support the audit activity itself. DCC can confirm that there are no requirements on Energy Suppliers related to the closure of the Requesting Party covering MOC (MDS).

It is important for Stakeholders to note that once a Requesting Party is decommissioned for a GroupID, the services under the existing contract will have ended and it will not be possible to re-enable the services of the Requesting Party other than by re-procurement of such Requesting Party services. The relevant service provider has advised DCC that this will not be possible at short notice, not least as it expects that the personnel and IT infrastructure within the service provider will have been re-deployed into other areas. There are also restrictions in Condition 16 of

<sup>4</sup> <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-2/>

the DCC Licence that may impact any such attempt by DCC to obtain new procurement (including engagement with the Secretary of State on the nature, scope and reasons for the procurement).

In shutting down the Requesting Party for MOC (MDS) DCC will ensure that:

- the Requesting Party completes the migrations of all installations where they have been commenced (where completion constitutes either successful commissioning or successful rollback to the SMSO);
- the Requesting Party shuts down the SFTP interfaces to DCC and removes any associated cryptographic material – Retain evidence evidence for audit purposes (as required by the TMAD);
- any Requesting Party Private key material is destroyed and RP HSM decommissioned – Retain evidence for audit purposes;
- any DCC accounts in use by the Requesting Party are removed;
- the Requesting Party will extract any required data and submit to DCC;
- the Requesting Party will then shut down the RP environments; and
- these changes have no impact on the other services provided to Energy Suppliers other than preventing DCC from continuing with migrations of the MOC (MDS) cohort; it is important to note that other aspects of the production solution used to undertake Migrations for the MOC (MDS) cohort will continue as they are also in used for the IOC cohort and the shared services across all cohorts (e.g. Commissioning Party) will continue.

### 3.5. Summary

Given the information presented, DCC proposes that the RP for the MOC (MDS) cohort can be decommissioned on the date set out in the attached RP Decommissioning Timetable and considers that this consultation process provides sufficient notice period. DCC is also of the view that there will be no adverse impact on energy consumers resulting from the closure of the RP for MOC (MDS). When DCC provides its report to the Secretary of State, DCC intends to provide updates of the evidence presented in this consultation document alongside the conclusion on the RP Decommissioning Timetable. Stakeholders should note that DCC would look to extend the RP Decommissioning Date for MOC (MDS) and conclude on a later date if there are any delays in expected processes and outcomes (including both this consultation and the 'Various 2' consultation). As set out above the range of dates is Sunday 19 June 2022 (or any following Sunday up to and including Sunday 31 July 2022).

#### Closure 1 Q2

Do you agree with DCC's proposed RP Decommissioning Timetable document for the MOC (MDS) cohort that sets out the proposed date for the Requesting Party to be decommissioned for the MOC (MDS) cohort to be 19 June 2022 (or any following Sunday up to and including Sunday 31 July 2022)? Do you have any detailed comments on the RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.

## 4. Partial Decommissioning of DMCT Process and limits on PPCT aligned to RP Decommissioning

### 4.1. Overview

This section sets out some amendments to the testing regime related to RP Decommissioning covering the DMCT Process and PPCT, and also notes impacts on DCC release testing in SIT.

The enrolment of 'new' SMETS1 devices into the SIT environment is achieved via services provided by the Requesting Party. These Requesting Party test services are linked commercially with the Production Requesting Party service for each cohort, therefore once a Requesting Party is decommissioned in Production for a cohort, DCC is proposing to decommission the Requesting Party across all its SIT testing environments. This has implications for DMCT, PPCT and DCC Release testing. DCC is planning to brief TAG and TDEG on these matters before this consultation closes.

As an alternative to the current Requesting Party test services, a "cold start" option was investigated to retain the capability to enrol SMETS1 devices onto DCC's test ecosystem in a form that could be spun up as required for the IOC cohort. The cost of such an option was similar to retaining the full service so was discounted as uneconomic and DCC considers the same would be true for all other cohorts given the fundamentals of the arrangements are equivalent. In addition, there would have been a lengthy period as systems would need to be rebuilt and personnel to operate those systems located or, as would more likely be the case, trained to operate those systems. Current service provider contracts include provision to maintain dedicated resource for the activity which would no longer be appropriate with the cold start option and add to the issue of suitable resource being available should the service need to be spun up. The rationale was also considered that once a cohort has finished being migrated in production there will no longer be a requirement to test the migration process for that cohort, the only demand would be for PPCT (and DCC SIT release testing) that can be performed using already migrated assets.

At the point of RP decommissioning, DCC will have a standby inventory of enrolled SMETS1 devices in the SIT environment which provides the ability to test new SMETS1 devices (PPMID, IHD, CAD device types), device firmware and DCC systems releases even after the associated RP has been decommissioned, without the need to incur the on-going cost of an RP 'enrolment' test service. It is acknowledged that this will not be an infinite testing capacity as there will be limited test device stock. However, there are cost implications of maintaining the capability to bring new devices into an environment which in DCC's view are not commensurate with the anticipated usage of the capability.

DCC is of the view that all CHF, ESME, and GSME Device Models (without differentiating between variants of the Firmware Version) which may need testing in future are already present in the Test Environments. DCC considers that it is unlikely that any new SMETS1 CHFs, ESMEs or GSMEs will be developed given that SMETS1 is now legacy, and all new development is focussed on SMETS2+ devices (or those such as PPMIDs which can work across both SMETS1 and SMETS2+ devices). This is consistent with DCC's experience in that it is challenging to obtain new test devices given that SMETS1 equipment is no longer in production. On this basis, any future testing need to migrate a CHF, ESME, or GSME model that is not already present within test environments is considered to be an unlikely 'edge case' and therefore not considered to be an enduring requirement. Also, there is an inherent risk that no test devices may have the appropriate firmware version to support a particular set of testing within PPCT (given the extent of device availability) which is not impacted by the changes proposed.

DCC is currently migrating all existing UIT test devices such that the likelihood of DCC running out of test devices is expected to be very low in the UIT environment. DCC is therefore also



exploring the option to move the PPCT service from SITA to UITA. In the case of PPCT, any possible testing of PPCT will be the result of a new firmware release; this would require existing devices to be updated to the new firmware, after which PPCT could proceed as usual. It should be noted that it will also be possible to test new PPMIDs with a set of a CHF, ESME, and GSME within the existing test inventory after the Requesting Party has been decommissioned as PPMIDs can be commissioned using the relevant service request.

Set out below are the proposed changes to DMCT and PPCT as a result of Requesting Party Decommissioning.

## **4.2. DMCT**

The DMCT Process is provided for under Clause 20 of the SMETS1 SVTAD as a way to assess whether further DMCs can be proposed for addition to the EPCL subsequent to the initial Go Live decision for a cohort. At present there are no rules for the closure of the DMCT Process and thus, in principle, further DMCs for a cohort could be proposed for assessment after the relevant Requesting Party is decommissioned. This would leave DCC being required to assess whether further DMCs can be added to the EPCL pre-migration even though migrations cannot be progressed for that cohort. It is important to note that where, for example, new firmware needs to be deployed for migrated devices, enduring assessment of the resultant DMCs that would exist post the firmware upgrade is provided for via SMETS1 Pending Product Combinations Tests (PPCT) under the ETAD. In practice, DCC does not envisage new DMCs will be submitted for assessment under the DMCT regime where no further migrations are planned. Nonetheless, DCC is proposing an amendment via a new Clause 20.1A of the SMETS1 SVTAD to restrict the DMCT Process to only those GroupIDs (i.e. in respect of SMETS1 SMSOs) for which the Requesting Party has not been decommissioned. There is also a proposed amendment to halt the DMCT Process for any DMCs that are partially progressed through the DMCT Process by the RP Decommissioning Date and are relevant to the SMSO for that Requesting Party.

## **4.3. PPCT**

DCC is proposing the following changes to PPCT (which is provided under Clause 9 of the ETAD), as a result of decommissioning of the Requesting Party:

- removal of a requirement for DCC to enrol 'new' devices for the purposes of testing within PPCT in respect of cohort (where the Requesting Party has been decommissioned) (Clause 9.6A); and
- removal of the obligation on DCC to undertake testing in PPCT where the Requesting Party has been decommissioned and DCC does not have the necessary test devices available to undertake the testing (i.e. in the event that test stock is not at a suitable firmware version for the testing) (Clause 9.6B).

Additionally, DCC is proposing a clarification to the rules for PPCT to reflect existing arrangements. The ETAD drafting for PPCT currently states that the Testing Participant requesting PPCT will send example devices of the DMC to be tested to DCC (Clause 9.7 of the ETAD), and that DCC shall install them to use in the testing (Clause 9.9 of the ETAD). In practice there is often no need for the Testing Participant to send through example devices as DCC already possesses a stock of them within the existing inventory. The proposed amendment to Clause 9.7 is looking to make the drafting more reflective of existing arrangement and thus a Testing Participant would now only be asked to provide example devices where DCC requires this. In practice DCC would only require this where DCC does not already have devices available within the existing inventory (and is able to enrol the test devices in its test environment).

**Closure 1  
Q3**

Do you agree with DCC's proposal to introduce Clause 20.1A of the SMETS1 SVTAD to stop the DMCT Process where a Requesting Party has been decommissioned? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

**Closure 1  
Q4**

Do you agree with DCC's proposal to include Clause 9.6A and 9.6B in ETAD to limit PPCT to existing test devices where a Requesting Party has been decommissioned and to relieve obligation of DCC to test where no devices available? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

**Closure 1  
Q5**

Do you agree with DCC's proposal to amend Clause 9.7 of the ETAD to provide that test devices only need to be provided where requested by DCC? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

## **5. Partial Decommissioning of Migration DUST and Restrictions to DUST & UEPT – IOC & MOC (MDS)**

Please note that DCC is planning to brief TAG and TDEG on the changes set out in this section before this consultation closes.

### **5.1. Migration DUST**

The existing SMETS1 SVTAD, requires DCC to provide Migration DUST consistent with the details set out in the MTAD. Migration DUST is an element of the suite of Testing Services provided by DCC. Migration DUST allows a Testing Participant to test the interactions between their own solution and the systems and processes used by DCC to Migrate Active and Mixed SMETS1 Installations.

Migration DUST is a relatively expensive Testing Service with little routine utilisation as Migration is an activity that doesn't need additional testing where there is no new product development envisaged, unlike the broader DUST. Migrations are nearing completion for IOC and MOC (MDS), with no additional entries on the EPCL planned for these cohorts (and in the case of MOC (MDS), closure of the relevant Requesting Party contract is also being considered - See Section 0). Also, DCC has no further changes to the migration solution planned as a result of any unblocking proposals for these cohorts. Thus, DCC is proposing to close the Migration DUST service for these cohorts as it is expensive to maintain and therefore not economically efficient. The numbers of Testing Participants wishing to perform Migration DUST has dropped significantly compared to when it was first introduced. The last usage of Migration Testing by a Testing Participant (either in DCC's Test Lab or their own Remote Test Lab<sup>5</sup>) is:

- May 2020 for MOC (MDS) and
- January 2021 for IOC;

<sup>5</sup> Please note that DCC sees no data difference for test migrations whether the test devices are in DCC's test facilities or in a stakeholder's Remote Test Lab.

- March 2022 for FOC; and
- March 2022 for MOC (Secure).

For FOC, DCC anticipates that further testing within Migration DUST will continue into early 2022 given recent amendments to the solution (e.g. Uplift 2.2) and further entries to the EPCL via the DMCT Process. Migration DUST activity is presently ongoing for MOC (Secure) with some activity planned but is expected to subsequently tail off in 2022.

Following some initial engagement with the Responsible Suppliers operating Active Meters, DCC envisages there is no further demand for Migration DUST for IOC and MOC (MDS) and expects requirement for testing within Migration DUST to complete for MOC (Secure) and FOC by the middle of 2022.

The current MTAD drafting in Clause 17.24 references closure of the Migration DUST being linked to decommissioning of the relevant Requesting Party (as per Clause 7 of the TMAD). However, given the limited demand for these services within certain cohorts, it may be beneficial to be able to close the Migration DUST service per cohort in advance of closure of the Requesting Party for the cohort. On this basis, DCC is proposing an amendment to Clause 17.24 of the MTAD to allow a date to be specified for closure by GroupID (as per the TMAD). For IOC (GroupID = 'AA', 'BA', or 'CA') and MOC (MDS) (where GroupID = 'CB') which could be earlier than the Requesting Party closure date. In the case of IOC and MOC (MDS), DCC is proposing that the end date for Migration DUST is set in the MTAD at 20 May 2022 as the support services are currently procured up to that date (without any material efficiency savings from an earlier contractual termination) and this is the earliest date that DCC is able to amend the MTAD consistent with the change regime for that document. Finally, the definition of the TMAD has been added to the MTAD Definitions for completeness and a typographical correction made to Clause 5.1. There is an unlikely edge case whereby a need for further testing via Migration DUST for IOC and/or MOC (MDS) arises following a termination date for it being specified in the MTAD. Should such a case arise, the cost of either continuing, or re-providing Migration DUST for the cohort would be considered against the likely value to be derived from it. DCC considers that it would be likely to be economically inefficient, as in order for Migration DUST to be re-started for IOC and/or MOC(MDS), DCC would need to do the following:

- undergo an expensive re-procurement exercise for the provision of the service; and
- consult on a further amendment to the MTAD to expand the scope of Migration DUST.

Nonetheless, in the unlikely event that such edge case arose, a SEC Modification would need to be raised by the party seeking the service requiring DCC to provide the service again.

DCC will consult separately on the end dates for the remaining cohorts during 2022 once there is no longer demand for Migration DUST related to MOC (Secure) and FOC.

## **5.2. Device and User System Testing (DUST) and User Entry Process Testing (UEPT)**

Testing Participants should note that once the Migration DUST service for a cohort has ended then the ability to enrol (migrate) new test devices for other Testing Services in UIT such as Device and User System Testing (DUST) and User Entry Process Testing (UEPT) would cease. This is because the ability to enrol new SMETS1 devices into the UIT environment is linked commercially to the provision of the Migration DUST service for each cohort.

This would apply to test devices whether they are in a Remote Test Lab or DCC's test lab. The rationale for the closure of these device enrolment services are the same reasons as described in Section 4 of this document; there are cost implications of maintaining the capability to bring new

devices into an environment which are not commensurate with the anticipated usage of the capability.

DCC acknowledges that ceasing to have a mechanism to migrate new devices sets into the UIT environments could limit DCC's ability to support other Testing Services as described in Section H14 of the SEC. To mitigate this, DCC are currently migrating all of DCC's remaining SMETS1 test stock for IOC and MOC (MDS) into DCC's UIT environments to ensure the maximum number of usable devices for Testing Participants is maintained post closure of Migration DUST. DCC envisages a similar activity will take place for the remaining cohorts in due course. There is a proposed amendment to the MTAD (a new Clause 8.3A) which states that DCC shall no longer be required to install new devices to support DUST where the associated Migration DUST service has ended. While DCC thinks the volume of devices being migrated into UIT will be sufficient for future needs, there is a small risk that DCC may not be able to meet a Testing Participant's devices needs within a particular timeframe or there may be contention between multiple Testing Participants requesting devices in a similar timeframe. To address this, DCC is proposing additions to ETAD around how DCC would address contention, which would be to prioritise the provision of UEPT over other testing services. The proposed amendments also provide the delayed Testing Participant with a disputes mechanism, where the Panel would take a final decision over which testing should be prioritised, should the delayed Testing Participant wish to refer the matter.

The current ETAD drafting in Clause 8.4, enables Testing Participants to supply their own devices for DUST. As the closure of Migration DUST limits the functionality to enrol (migrate) devices into the UIT environments, DCC is looking to amend the drafting so that, in the case of SMETS1 Devices, this would only apply for cohorts where the Migration DUST service has not ceased. If Testing Participants have test device stock that is unmigrated for IOC and MOC (MDS), they should look to migrate this ahead of the proposed Migration DUST closure date either in remote test labs or DCC's test lab.

**Closure 1  
Q6**

Do you agree with DCC's proposals to enable Migration DUST for a cohort to be closed earlier than the Requesting Party decommissioning based on changes to Clause 17 of the MTAD. Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

**Closure 1  
Q7**

Do you agree with DCC's proposals to close Migration DUST for IOC and MOC (MDS) from 20 May 2022 as captured by the proposed changes to the MTAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

**Closure 1  
Q8**

Do you agree with DCC's proposal to amend Clause 8.3 and 8.4 and introduce Clause 8.3A into the ETAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

## 6. Next Steps

Given the differing regulatory requirements there is a different procedure for re-designating the TMAD and SMETS1 SVTAD compared to updating the MTAD. As such, DCC will be provided two separate conclusion reports. DCC will also provide a separate conclusion on the RP Decommissioning Timetable.

## 6.1. TMAD, SMETS1 SVTAD, and ETAD Conclusion

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) a conclusions report for the Secretary of State consistent with the regulatory requirements for amending the TMAD, SMETS1 SVTAD, and ETAD. DCC is aiming to provide a conclusions report to BEIS no later than 13 May 2022.

DCC has discussed the re-designation of the TMAD, SMETS1 SVTAD, and ETAD 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, SMETS1 SVTAD and ETAD on 20 May 2022 or as soon as reasonably practicable within one month.

In order to expedite the re-designation of the TMAD, SMETS1 SVTAD, and ETAD, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the TMAD, SMETS1 SVTAD, and ETAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

It is important to note that should readiness to deliver some of these changes slip such that some changes can be deployed at different times to others (e.g. in the circumstances that there are elements of slippage on some but not all matters covered by this consultation), then rather than hold up deployment of all changes until the later of them are ready and thus delay the benefits of them, DCC may propose to BEIS instead that various documents are changed at different times to each other such that individual changes set out in this consultation document are capable of going live at separate times. In such circumstances it is proposed that BEIS could re-designate different changes to the documents so long as such designations occur within the one-month period. Should any changes need to occur outside this window, then a separate consultation on the designation date(s) would be required.

It should also be noted that whilst many of these changes are generic across all cohorts, DCC made decide to recommend to BEIS that these changes are only made to apply to the MOC (MDS) cohort in order to expedite the RP Decommissioning for this cohort. If this occurs, then DCC would re-consult on changes to be applicable to other cohorts.

### Closure 1 Q9

Do you agree with the proposed re-designation date of 20 May 2022 for updates to the TMAD, SMETS1 SVTAD, and ETAD within the scope of this consultation?

## 6.2. MTAD Conclusion

DCC is proposing to modify the MTAD regarding the partial closure of Migration DUST using the procedure set out in Clause 4.2 of the SMETS1 SVTAD. The provisions in the SMETS1 SVTAD allow DCC to modify the MTAD directly following stakeholder consultation / provision of a conclusion report to the Secretary of State. DCC can then amend the MTAD so long as the Secretary of State does not direct DCC otherwise.

Following this consultation, DCC will ensure it builds in sufficient time for BEIS to take a view on the merit of designating the changes, providing first a summary of responses received and detail on how DCC have addressed any concerns raised.

DCC expects to issue its conclusion to this consultation, along with any necessary amendments to the MTAD on or before 13 May 2022. Unless the Secretary of State directs otherwise, DCC proposes to modify the MTAD through the draft direction at Attachment 2, on 20 May 2022 (or, if necessary, as soon as reasonably practicable within one month thereafter).



**Closure 1  
Q10**

Do you agree with the proposed modification date of 20 May 2022 for updates to the MTAD related to partial decommissioning of Migration DUST?

### 6.3. RP Decommissioning Timetable Conclusion

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) a conclusions report for the Secretary of State consistent with the regulatory requirements for preparing the RP Decommissioning Timetable for MOC (MDS) set out in the proposed Clause 7 of the TMAD (subject to it being amended following consultation). This conclusions report will contain updated evidence that the criteria for decommissioning of the Requesting Party for MOC (MDS) has been met, namely that no more migrations will be commenced for both Active Meters and Dormant Meters and DCC is ready to commence the decommissioning activities in conjunction with the relevant Requesting Party. DCC is planning to provide a conclusions report to BEIS no later than 13 May 2022.

Following amendment of the regulatory framework as set out in Section 6.1, DCC will then formally submit the RP Decommissioning Timetable for the MOC (MDS) cohort to the Secretary of State on 23 May 2022. Where the Secretary of State approves the RP Decommissioning Timetable for MOC (MDS), DCC will take steps to decommission the Requesting Party for MOC (MDS). DCC has discussed approval of the RP Decommissioning Timetable 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 approve the RP Decommissioning Timetable for the MOC (MDS) cohort such that the RP Decommissioning Date for MOC (MDS) will be Sunday 19 June 2022 (or a subsequent Sunday up to 31 July 2022 if delays in concluding arise) which is a month following DCC conclusion report being published. Following approval DCC understands that these closure dates will be reflected into the Joint Industry Plan (JIP) via the IMF, updated those introduced at consultation stage as necessary.

**Closure 1  
Q11**

Do you consider this consultation process provides Energy Suppliers with sufficient notice related to decommissioning the Requesting Party for the MOC (MDS) cohort on Sunday 19 June 2022 (or a subsequent Sunday up to 31 July 2022 if delays in concluding arise)? Please provide a rationale for your views.

## 7. How to Respond

Please provide responses in the attached template by 1200 on 3 May 2022 to DCC at [consultations@smartdcc.co.uk](mailto: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](http://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](mailto:consultations@smartdcc.co.uk).

## 8. Attachments

Attachment / Title
1. Draft Notification Text for TMAD & SMETS1 SVTAD
2. Draft Modification Text for MTAD
3. Response Template
4. RP Decommissioning Timetable for MOC (MDS) v1.0
5. TMAD v20.d Draft Redlined
6. SMETS1 SVTAS v10.d Draft Redlined
7. MTAD v2.d Draft Redlined
8. ETAD v5.d Draft Redlined

**Table 4 – Attachments**



## Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the TMAD, SMETS1 SVTAD, and ETAD.

### **TMAD, SMETS1 SVTAD, and ETAD 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 Enduring Test Approach Document (ETAD), the SMETS1 Transition and Migration Approach Document (TMAD) and the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) previously designated and incorporated into the SEC as Appendix J, Appendix AL, and Appendix AK (respectively) are hereby re-designated and incorporated in the form set out in Annex [XX], [YY], and [ZZ] to this direction.*

*For the avoidance of doubt such re-designation of the Enduring Test Approach Document, the SMETS1 Transition and Migration Approach Document, and the SEC Variation Testing Approach Document for SMETS1 Services shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated, or the continuing effectiveness of anything done in these documents prior to their re-designation (which shall have effect as if done under the re-designated documents).*

*This direction is also being notified to the SEC Administrator.*

## Attachment 2

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

### **MTAD Draft Modification Text**

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

*Pursuant to Clause 4.2 of Appendix AK of the SEC (the SEC Variation Testing Approach Document for SMETS1 Services), DCC directs that, with effect from [DD MM YYYY], the Migration Test Approach Document is hereby modified in the form set out in Annex [TBC] of this direction.*

*For the avoidance of doubt such modification of the Migration Test Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this first being established, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).*

*This direction is also being notified to the SEC Administrator.*