

SMETS1 Consultation - Various 2

A SMETS1 consultation on proposals by DCC: to provide partial Migration for MOC (MDS), exclude certain categories of SMETS1 Installations from Migration, and unblock Migration of SMETS1 Installations.

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Table of Contents

- 1. Introduction and Context3**
- 2. Proposed Exclusion Category – Unable to Attempt
Firmware Upgrade where GroupID = “AA”, “BA”, or
“CA”4**
- 3. Proposed Exclusion Categories – Firmware Upgrade /
Configuration Failure where GroupID = “CB” and
Firmware Upgrade / Configuration Failure where
GroupID = “AA”, “BA”, or “CA”6**
- 4. Proposed Exclusion Categories – Data Issues & Duplicate
MPANs and MPRNs9**
- 5. Partial Migration for Firmware Failure11**
- 6. Unblocking – Data Issues (Ceased Trading and Non-live
User)12**
- 7. Unblocking – Data Issues (Duplicate MPxNs).....13**
- 8. Next Steps14**
- 9. How to Respond14**
- 10. Attachments15**

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 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 5 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.

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 15 March 2022 as v58.0.

This consultation covers various changes to the TMAD.

In February 2021, following consultation, BEIS introduced² Clauses 1.4 to 1.9 in the TMAD and these elements were subsequently modified by BEIS following the Various 1 consultation³ / conclusion⁴. Prior to these changes, the regulatory framework provided DCC with an obligation to take all reasonable steps to progress migrations as quickly as possible but did not cater for certain scenarios. For example, where all reasonable attempts at retry have been exhausted but they remain blocked, or where data quality issues are preventing migrations being attempted. These elements of the TMAD provide a framework 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 Installations that are currently in scope for enrolment (and which may or may not have a corresponding EPCL entry) on the basis that a solution to enable migration is not practicable or proportionate, whether on technical, operational or economic grounds.

The conclusion to Various 1⁵ introduced a number of exclusion categories into the TMAD. Each exclusion category is captured as a specific TMAD element in Clause 18 that details the characteristic of each exclusion. DCC retains obligations to advise impacted SEC Parties on how the decisions impact them, where DCC reasonably knows this information (which includes provision of device level details via the SharePoint regime used to support SMETS1 Migration information transfer).

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. For example, 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

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/customer-engagement/smets1-consultation-various-1/>

⁴ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-1-part-1/> - Various 1 Part 1 Conclusion responded to most elements of the consultation.

⁵ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-1-part-1/>.

Installations is on-going. Further consultations are envisaged in the coming months to address the remaining SMETS1 Installations across a number of cohorts (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.

This consultation proposes amendments to Clause 18 of the TMAD to include new categories for exclusion which will have the effect of excluding certain SMETS1 Installations as well as provide for partial migration of SMETS1 Installations for MOC (MDS). These exclusion categories cover where DCC is unable to attempt firmware upgrades, firmware upgrade / configuration failure, and where migration isn't possible due to unresolvable data issues.

In total, the various matters proposed in this consultation cover exclusion of approximately 80,000 SMETS1 Installations and unblocking of approximately 4,500 SMETS1 Installations.

Please note this is an updated version of the consultation document to include a typographical correction to Section 4.

2. Proposed Exclusion Category – Unable to Attempt Firmware Upgrade where GroupID = “AA”, “BA”, or “CA”

This section proposes a new Exclusion Category for the IOC cohort titled 'Unable to Attempt Firmware Upgrade where GroupID = “AA”, “BA”, or “CA”' to be included via amendments to Clause 18 of the TMAD. In this circumstance, DCC considers that a migration solution is not possible and thus an exclusion is consistent with the rationale set out in Clause 1.5 of the TMAD i.e. there are technical or operational barriers that make it impossible for Migration to be completed successfully or it is economically inefficient to take the necessary steps to facilitate Migration. Please note that the information on quantities of SMETS1 Installations reported below is based on available data at the time of publication and is subject to change e.g. impacted numbers of SMETS1 Installations will change where SMETS1 devices in a premises are replaced with SMETS2+ devices. Responsible Suppliers should be aware that details on the extent of impact on their own dormant portfolio will be provided to them by DCC via the existing DCC SharePoint used for the exchange of SMETS1 migration information at the time of publication of this document.

Unable to Attempt Firmware Upgrade where GroupID = "AA", "BA", or "CA"

<p>Description</p>	<p>For IOC, there are a number of Dormant Meters where the SMETS1 SMSO is unable to attempt to configure a device and/or attempt to upgrade the firmware on a device due to a range of issues. The purpose of such upgrade / configuration is to ensure that the SMETS1 Installation is aligned to an entry on the EPCL such that migration can be attempted.</p> <p>In some circumstances, the firmware reported by the SMETS1 SMSO is not recognised by the device manufacturer. DCC have tried using alternative sources of information to correctly identify the firmware, including the information that was shipped with the devices when they were manufactured (referred to as the IO11 file for the IOC cohort) and cross-referencing the firmware from the device serial number, but these attempts have only achieved limited success. This leaves DCC unable to assess whether the firmware currently on the device is on the EPCL nor which (if any) upgrade path to follow to upgrade the firmware on the device to a firmware level that is on the EPCL. DCC has taken steps to resolve these matters where possible. For example, in order to minimise the number of devices which may fall under this exclusion category DCC has identified 880 SMETS1 Installations containing solely Dormant Meters where the firmware version information read from at least one of the devices by the SMETS1 SMSO is not a valid firmware version. Without confirmation from the device DCC cannot verify which of the approved firmware upgrade paths is appropriate. The firmware that was on the device when it was shipped from the manufacturer is included in the accompanying IO11. The SMETS1 SMSO has visibility of firmware upgrades carried out on a device and, where the firmware upgrade was successful, such devices are not included in this scenario.</p> <p>DCC has verified with the SMETS1 SMSO that there are no known issues should the firmware on the device be downgraded. DCC acknowledges there is a minor risk that a firmware upgrade may mean a device is unable to provide smart services; should this risk be realised then the installation will fall within the scope of the failure to upgrade firmware proposed. Furthermore, DCC considers there is a very low risk to an energy consumer from losing supply in taking this approach and is proceeding with these steps. On this basis, consistent with Clause 4.26 of the TMAD, DCC has instructed the SMETS1 SMSO to apply firmware to the device on the basis that the IO11 file is a known start point for an approved firmware upgrade path.</p> <p>Furthermore, there are a small number of SMETS1 Installations for which the Installing Supplier has indicated that they are unable to provide a firmware path to allow an upgrade which would align to an entry on the EPCL.</p> <p>In all these cases the firmware upgrade / device configuration process cannot be attempted by DCC.</p>
<p>Exclusion Type</p>	<p>Technical or operational barriers.</p>
<p>Number of SMETS1 Installations</p>	<p>229 SMETS1 Installations.</p>

Unable to Attempt Firmware Upgrade where GroupID = "AA", "BA", or "CA"	
Rationale	<p>All resolutions are based on finding an alternative source of information that would, with a reasonable level of confidence, indicate which firmware version is on a device. The alternative sources investigated were:</p> <ul style="list-style-type: none"> • SMETS1 SMSO systems that do not form part of the Requesting Party (RP); and • Installing Suppliers. <p>However, these alternative sources did not provide the required information to allow firmware upgrades to be attempted.</p> <p>Aside from the regulatory requirements that require devices being migrated into the DCC Systems to be at a firmware level which aligns to an EPCL entry (thereby providing appropriate functionality and thus consumer benefits) there is the risk that device behaviour would be undetermined due to a lack of any testing against DCC Systems. DCC is of the view that reasonable steps have been taken to allow these devices to be migrated and that they should now be considered for exclusion.</p>
Estimated Cost (where economically inefficient)	n/a

Various 2 Q1	Do you agree with DCC's proposal to exclude dormant SMETS1 Meters for IOC where it is unable to attempt firmware upgrade as captured by Clause 18.9 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
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3. Proposed Exclusion Categories – Firmware Upgrade / Configuration Failure where GroupID = "CB" and Firmware Upgrade / Configuration Failure where GroupID = "AA", "BA", or "CA"

This section proposes two Exclusion Categories titled 'Firmware Upgrade / Configuration Failure where GroupID = "CB"' covering the MOC (MDS) cohort and 'Firmware Upgrade / Configuration Failure where GroupID = "AA", "BA", or "CA"' covering the IOC cohort to be included via amendments to Clause 18 of the TMAD. In this circumstance, DCC considers that a migration solution is not possible and thus an exclusion is consistent with the rationale set out in Clause 1.5 of the TMAD i.e. there are technical or operational barriers that make it impossible for Migration to be completed successfully or it is economically inefficient to take the necessary steps to facilitate Migration. Please note that the information on quantities of SMETS1 Installations reported below is based on available data at the time of publication and is subject to change e.g. impacted numbers of SMETS1 Installations will change where SMETS1 devices in a premises are replaced with SMETS2+ devices. Responsible Suppliers should also be aware that details on the extent of impact on their own portfolio will be provided to them by DCC via the existing DCC

SharePoint used for the exchange of SMETS1 migration information at the time of publication of this document.

<u>Firmware Upgrade / Configuration Failure where GroupID = "CB" & Firmware Upgrade / Configuration Failure where GroupID = "AA", "BA", or "CA"</u>	
Description	Clause 4.26 of the TMAD covers the steps DCC is required to take to make Dormant Devices ready for Migration via firmware upgrade and/or configuration. DCC only has data on attempted upgrades and/or re-configuration for Dormant Devices within SMETS1 Installations, as Active Devices fall outside the responsibility of DCC to make ready for Migration. Following further investigation, DCC is proposing two exclusions for MOC (MDS) and IOC within Clause 18.10 and 18.11 of the TMAD (respectively) for those devices where the firmware upgrade / device configuration process is attempted a number of times but cannot be completed successfully. There are different TMAD clauses to reflect the differing arrangements for each of these cohorts.
Exclusion Type	Technical or operational barriers.
Number of SMETS1 Installations	<p>For IOC, at present, DCC has approximately 19,581 SMETS1 Installations containing only Dormant Meters blocked where the SMSO has been unable to upgrade the firmware or apply the correct configuration outside of "No WAN".</p> <p>For MOC (MDS), at present, DCC has approximately 9,928 SMETS1 Installation containing only Dormant Meters blocked where the MAP has been unable to upgrade the firmware.</p> <p>For MOC (MDS), at present, DCC has approximately 5,328 SMETS1 Installation containing only Dormant Meters blocked where the SMETS1 SMSO has been unable to apply the correct configuration following instructions from DCC to take this action to configure in readiness to migrate.</p>

Firmware Upgrade / Configuration Failure where GroupID = "CB" & Firmware Upgrade / Configuration Failure where GroupID = "AA", "BA", or "CA"

<p>Rationale</p>	<p>It is important to note that there are differences in the regime for firmware upgrade / configuration between MOC (MDS) and IOC reflecting different systems and operational experience. Within both IOC and MOC (MDS), there are robust processes in place for firmware upgrade / configuration.</p> <p>For the dormant devices in MOC (MDS), the MAP is undertaking firmware upgrades on its own behalf given its economic incentive where SMETS1 Installations containing Dormant Meters are made ready for migration. The MAP has indicated to DCC that it is prudent to stop continuing to attempt firmware updates after three cycles of five attempts to upgrade (15 attempts in total).</p> <p>Following successful firmware upgrade for dormant devices in MOC (MDS), DCC will send a single instruction to the SMETS1 SMSO, who will then make several attempts to configure the device for migration. DCC's single instruction will result in continued attempts on a weekly basis to configure the device, with no cut-off built into the process i.e. the SMETS1 SMSO are attempting all failed configurations each week. Based on experience for MOC (MDS), DCC considers that 10 attempts by the SMETS1 SMSO to re-configure is sufficient to demonstrate persistent failure such that the SMETS1 Installation should be excluded from the scope of migration. This is based on the SMETS1 SMSO attempting to configure 1,449 SMETS1 Installations at least 10 times and only 28 SMETS1 Installations successfully configuring on or after the 11th attempt.</p> <p>Within IOC, DCC will send a single instruction to the SMETS1 SMSO who will then make several attempts to upgrade the firmware and configure the device for migration. This consists of 3 cycles of 36 attempts over 6 days (108 attempts in total) for firmware upgrade, 3 cycles of 23 attempts over 3 days (69 attempts in total) and 3 cycles of 10 attempts over 10 days (30 in total) for configuration.</p> <p>For SMETS1 Installations containing one or more Active Meters, it is for the Responsible Supplier to engage with the SMETS1 SMSO and thus outside DCC's control.</p>
<p>Estimated Cost (where economically inefficient)</p>	<p>N/A</p>

<p>Various 2 Q2</p>	<p>Do you agree with DCC's proposal to exclude SMETS1 Installations for IOC & MOC (MDS) from the scope of Migration where firmware upgrade by the MAP / SMETS1 SMSO or the steps in Clause 4.26 (to reconfigure Dormant Meters and associated Devices) have persistently failed, as captured by Clause 18.10 (for MOC (MDS)) and Clause 18.11 (for IOC) of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.</p>
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4. Proposed Exclusion Categories – Data Issues & Duplicate MPANs and MPRNs

This section proposes two Exclusion Categories titled ‘Data Issues’ and ‘Duplicate MPANs and MPRNs’ to be included via amendments to Clause 18 of the TMAD. In this circumstance, DCC considers that a migration solution is not possible and thus an exclusion is consistent with the rationale set out in Clause 1.5 of the TMAD i.e. there are technical or operational barriers that make it impossible for Migration to be completed successfully or it is economically inefficient to take the necessary steps to facilitate Migration. Please note that the information on quantities of SMETS1 Installations reported below is based on available data at the time of publication and is subject to change e.g. impacted numbers of SMETS1 Installations will change where a SMETS1 Installation is replaced with a SMETS2+ Installation. Responsible Suppliers should also be aware that details on the extent of impact on their own portfolio will be provided to them by DCC via the existing DCC SharePoint used for the exchange of SMETS1 migration information at the time of publication of this document.

Data Issues & Duplicate MPANs and MPRNs	
Description	<p>In accordance with Clause 3.21 of the TMAD, DCC shall take reasonable steps to ensure any data provided by each SMETS1 SMSO is accurate for the purposes of migration. DCC have been working with SMETS1 SMSOs and Energy Suppliers to rectify a range of data errors present in the data provided to DCC by the SMETS1 SMSOs and proposes exclusions for those that cannot be rectified (at all or by the time RP shuts down). This has reduced the total amount of SMETS1 Installations at risk of exclusion under this category by 75%.</p> <p>The range of these data covers the following areas:</p> <ul style="list-style-type: none"> • duplicated devices i.e. two devices with the same GUID; • multiple installations assigned to the same MPxNs both within the same SMETS1 SMSO and across multiple SMETS1 SMSOs; • no prepayment key; and • unable to Identify Responsible Supplier. <p>This exclusion applies across all cohorts.</p>
Exclusion Type	Technical or operational barriers.

Data Issues & Duplicate MPANs and MPRNs

Number of SMETS1 Installations

The nature of these issues are complex and reflect the details across differing cohorts. Specifically for IOC, at present DCC has approximately 19 SMETS1 Installations containing only Dormant Meters blocked as there are two devices identified with the same GUID by the SMETS1 SMSO.

For MOC (MDS), at present DCC has approximately 404 SMETS1 Installations containing only Dormant Meters blocked as there are two devices with the same GUID or where multiple MPxNs have been recorded against the same Hub. At present for MOC (MDS), DCC has approximately 2 SMETS1 Installations containing only blocked Dormant Meters as there are no Prepayment keys for these devices.

Across all cohorts, at present DCC has approximately ~~1,340~~^{8,676} SMETS1 Installations containing only Dormant Meters blocked as the MPxN does not exist on the registration data. **[DN This amendment is to correct a typographical error; the correct figure was included in the 'rationale' box below].**

Across all cohorts, at present DCC has approximately 35,577 SMETS1 Installations with duplicates i.e. a SMETS1 Installation containing only Dormant Meters blocked as the MPxNs are registered across more than one SMETS1 SMSO and cannot be correctly identified.

In addition to the SMETS1 Installation excluded as duplicates, there are some reporting anomalies as it is not always straightforward for the SMETS1 SMSOs to remove data from their systems. Given this situation, the reports will continue to contain incorrect data on SMETS1 Installations; this is a solely reporting artifact rather than indicating further SMETS1 Installations are being excluded. Due to this data reporting situation, DCC estimates approximately 83,000 of the resolved duplicates will remain on the reports for the SMETS1 SMSOs at the point of the relevant RP shutdown. DCC considers it would be inefficient for DCC to procure the necessary software changes to remove these data items from the reporting solution of each SMETS1 SMSOs; rather DCC will keep a separate record of these data reporting errors.

Data Issues & Duplicate MPANs and MPRNs

Rationale

DCC is aware of instances where multiple devices are reported to have the same GUID within IOC & MOC (MDS). As defined in the SEC a Device ID must uniquely identify a Device, a condition which is enforced by DCC Systems. In addition, correct GUID information is required in order to communicate with the assets and to send various SRVs post-migration, meaning that even if migrated (in contravention to the SEC requirement for each GUID to be unique) these devices would be non-functional. DCC has contacted the device manufacturers who have indicated that the information held by the SMETS1 SMSO is correct and that there are multiple devices with the same GUID.

For MOC (MDS) SMETS1 Installations with no Prepayment keys, there is no way of successfully migrating the device in line with TMAD 18.4 - No Master Key exclusion.

Where MPxNs have been found to appear in more than one SMETS1 SMSO's data, DCC has worked extensively with the SMETS1 SMSOs, Responsible Suppliers and MAPs to correct and remove the data where possible to allow for the successful migration of the device. The remaining installations will be assessed against the criteria in section 7 of this consultation (which provides a regime to resolve a number of these duplicated SMETS1 Installations based on installation date / communication status). Any SMETS1 Installations that are outside the scope of that unblocking activity (described in section 7 of this consultation) will be excluded.

DCC relies on the industry registration data to identify Responsible Suppliers for the MPANs and MPRNs supplied by the SMETS1 SMSOs. There are 1,340 SMETS1 Installations where MPAN and MPRN do not appear in the registration data and therefore do not have the valid data to support migration. DCC proposes to exclude such installations from migration.

Estimated Cost (where economically inefficient)

n/a

Various 2 Q3

Do you agree with DCC's proposal to exclude dormant SMETS1 Meters where there are unresolved data issues and duplicate MPANs and MPRNs as captured by Clauses 18.12 and 18.13 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

5. Partial Migration for Firmware Failure

For the MOC (MDS) cohort, there are certain SMETS1 Installations containing solely Dormant Meters where the firmware upgrade or configuration process is successful for the ESME but fails for the GSME. At present, there are approximately 3,100 SMETS1 Installations for MOC (MDS) in this situation. Please note that the information on quantities of SMETS1 Installations is based on available data at the time of publication and is subject to change e.g. impacted numbers of SMETS1 Installations will change where a SMETS1 Installation is replaced with a SMETS2+

Installation. Without any additional action, these SMETS1 Installations will be excluded under a new exclusion category proposed within Clause 18.10 of the TMAD (See Section 4 above).

However, following further investigation, the SMETS1 SMSO for the MOC (MDS) cohort has advised that it would be able to partially migrate such SMETS1 Installations by de-registering the Gas Meter within the SMETS1 SMSO systems. This would effectively turn the site into a single-fuel electricity-only site for Migration purposes, which would then allow each such SMETS1 Installation eligible for Migration to be attempted. DCC is proposing to utilise a similar approach for partial Migration for this cohort where this is a consistent failure of the GT01 check (as per the IOC cohort which is captured in Clauses 5.8B to 5.8F of the TMAD). As set out in the Various 1 and Various 1A consultations / conclusions⁶, DCC considers that partial migration for Dormant Meters (based on an objective test) is an appropriate way forward as this will maximise migration of Dormant Meters thereby expediting the restoration of smart services to the ESME. In responses to previous consultations, this regime was supported by some respondents; whilst other respondents expressed concern related to a partial Migration being based on an objective test. However, DCC considers the benefit provided from expediting the restoration of smart services to the EMSE outweighs the potential impact highlighted in responses to the prior consultations. DCC also notes that the proposed approach is in line with DCC's transitional objective with respect to enrolment of eligible SMETS1 meters and BEIS's objective to maximise benefit to end consumers by allowing the restoration of smart services to Dormant Meters where feasible.

In order to capture these changes within the TMAD, DCC has proposed new Clauses 4.26A, 4.26B, and 4.26C as well as amendments to Clause 18.5.

It is important to note that if these changes are not adopted to facilitate partial Migration then these SMETS1 Installations will be entirely excluded.

DCC is presently exploring the extension of this unblocking amendment to be applied across the other cohorts.

Various 2 Q4

Do you agree with DCC's proposal to amend the TMAD (new Clauses 4.26A, 4.26B and 4.26C and changes to Clause 18.5) to extend partial migration to the MOC (MDS) cohort? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

6. Unblocking – Data Issues (Ceased Trading and Non-live User)

There are some circumstances where DCC is unable to migrate SMETS1 Installations because the Energy Supplier is reported as “ceased trading” or “not a live user”. Across all cohorts there are 378 SMETS1 Installations containing one or more Dormant Meters where the Energy Supplier is reported as ‘ceased trading’. Across all cohorts there are 1,055 SMETS1 Installations containing one or more Dormant Meters where the Energy Supplier is reported as ‘not a live user’. Please note that the information on quantities of SMETS1 Installations is based on available data at the time of publication and is subject to change e.g. impacted numbers of SMETS1 Installations will change where a SMETS1 Installation is replaced with a SMETS2+ Installation.

In these circumstances, the various notifications / reports cannot be provided to the Responsible Supplier for Dormant Meters consistent with the TMAD requirements. DCC is proposing an

⁶ Various 1 Consultation www.smartdccc.co.uk/consultations/smets1-consultation-various-1/
 Various 1 Part 1 Conclusion www.smartdccc.co.uk/consultations/smets1-conclusion-various-1-part-1/
 Various1A Consultation www.smartdccc.co.uk/consultations/smets1-consultation-various-1a/
 Various 1A Conclusion www.smartdccc.co.uk/consultations/smets1-conclusion-various-1a/

amendment to the TMAD to allow such SMETS1 Installations to be unblocked and thus migration can be progressed without providing the various notifications and reports prescribed by the TMAD. DCC considers this activity to be minimal risk given there is no underlying issue identified with the devices in such SMETS1 Installations, rather this is a data issue within the reporting / notification regime. However, it is important to note that whilst attempting such migrations they may fail for a range of other issues and thus be excluded based on categories set out in / proposed for Clause 18 of the TMAD. These relevant changes to the TMAD are included in two clauses 4.1A and 4.1B.

Various 2 Q5

Do you agree with DCC's proposal to amend the TMAD (new Clauses 4.1A and 4.1B) to allow DCC to proceed with migration for these SMETS1 Installations without notification related to a Dormant Meter where the Energy Supplier is reported as "ceased trading" or "not a live user? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

7. Unblocking – Data Issues (Duplicate MPxNs)

Where an MPAN and/or MPRN appears more than once, either within the same SMETS1 SMSO or across multiple SMETS1 SMSOs, and at least one of the devices is Active, (i.e. an Active or Mixed installation) DCC will not attempt the migration of any devices, even where they are shown as Dormant in another SMETS1 SMSO.

For SMETS1 Installations containing solely Dormant Meters, DCC will undertake to ascertain whether the SMETS1 Installation is communicating with the SMETS1 SMSO:

1. SMETS1 Installations DCC is unable to verify are communicating with the relevant SMETS1 SMSOs in all cases will be excluded (including all duplicates) due to having no WAN communications.
2. SMETS1 Installations where DCC is able to verify that the SMETS1 Installation with the latest installation date is communicating with the SMETS1 SMSO will be submitted for the migration process as normal. All other duplicate SMETS1 Installations will be excluded under the proposed Exclusion Category (See Section 4).
3. SMETS1 Installations where DCC is able to verify that a SMETS1 Installation other than the one with the latest installation date is communicating with the SMETS1 SMSO will not be migrated due to the risk that doing so would allow the incorrect Energy Supplier to see consumption data and erroneously bill an energy consumer. This contrasts with the scenario in bullet 2 where device communications are aligned to data on installation date; hence DCC considers the risk of there being a data error in this case is greater than for the previous scenario and it would therefore not be appropriate to attempt a migration.
4. SMETS1 Installations where DCC is able to verify that more than one of the duplicates is communicating with the SMETS1 SMSO will not be migrated due to the risk that doing so would allow the incorrect Energy Supplier to see consumption data and erroneously bill an energy consumer.

Various 2 Q6

Do you agree with DCC's proposal to amend the TMAD (new Clause 4.1C) to allow DCC to commence migration for a SMETS1 Installation where the MPAN and/or MPRN are/is present in more than one SMETS1 SMSO or SMETS2+ devices and DCC is able to verify the last installed installation is the only one communicating? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

8. 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) a conclusions report for the Secretary of State consistent with the regulatory requirements for amending the TMAD, reflecting the specific requirements set out in Clause 1.6 of the TMAD related to exclusions. DCC is aiming to provide a conclusions report to BEIS no later than 6 May 2022.

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.

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 13 May 2022 or as soon as reasonably practicable within one month.

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.

It is important to note that DCC may propose to BEIS that various amendments to documents are made at different times to each other i.e. the individual changes set out in this consultation document are capable of going live at separate times. This circumstance may arise where there are elements of slippage on some but not all matters covered by this consultation. DCC considers this to be a prudent approach compared to delaying deployment of all changes until all elements are ready and thus delaying aspects of the benefits. 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.

Various 2
Q7

Do you agree with the proposed re-designation date of 11 May 2022 for updates to the TMAD within the scope of this consultation?

9. How to Respond

Please provide responses in the attached template by 1600 on 20 April 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.

10. Attachments

Attachment / Title
1. Draft Notification Text for TMAD
2. Response Template
3. TMAD v20.v Draft Redlined

Table 1 – Attachments

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 is 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 TMAD 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.