

SMETS1 Consultation - Closure 2

A SMETS1 consultation on proposals by DCC: to end Migrations for the IOC and FOC (NP) cohorts; partial Migration (ESME only) for Dormant and Mixed Installations where there is no GSME-HAN connectivity for the IOC, MOC (Secure), and FOC Cohorts; exclude certain categories of SMETS1 Installations from Migration; unblock Migration of SMETS1 Installations.

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1. Introduction and Context

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

The detailed technical and procedural requirements of the Migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The TMAD is Appendix AL of the Smart Energy Code¹ (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.

This consultation proposes to end Migrations for the IOC and FOC (NP) cohorts from 26 March 2023 as Migrations will be materially complete by this point i.e. SMETS1 Installations will either be Migrated or excluded.

This consultation also proposes various changes to the TMAD covering:

- partial Migration (ESME only) for Dormant and Mixed Installations (impacting the IOC, MOC (Secure), and FOC cohorts);
- changes related to Excluded Categories to exclude certain categories of SMETS1 Installations from Migration (impacting the IOC, MOC (Secure), and FOC cohorts); and
- certain changes to unblock Migration of SMETS1 Installations (impacting the FOC (NP) cohort).

2. Background

The regulatory framework, as set out in the TMAD, provides DCC with an obligation to take all reasonable steps to progress Migrations as quickly as possible. Before February 2021 the TMAD did not cater for certain scenarios, such as, where all reasonable Migration attempts have been exhausted but the SMETS1 Installation is persistently failing to Migrate, or where data quality issues are preventing Migrations being attempted. In February 2021, following consultation, BEIS introduced and subsequently modified² Clauses 1.4 to 1.9 in the TMAD, which now provide DCC with a framework for:

- i) unblocking SMETS1 Installations presently eligible for Migration but that cannot currently be successfully Migrated³; and

¹ The current version of the SEC is available from <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>. The latest version of the SEC was published on 3 November 2022 as v65.

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/>. The DCC's Various 1 consultation is available here <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-various-1/>. The conclusions from this consultation, which responded to most of the consultation's elements, are available here <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-1-part-1/>.

³ This can be done through having corresponding EPCL entries, although successful firmware upgrade may be required.

- ii) excluding certain SMETS1 Installations that are currently in scope for enrolment⁴ on the basis that a solution to enable Migration is not practicable or proportionate, whether on technical, operational, or economic grounds.

DCC has two reporting obligations related to providing information to Energy Suppliers on Excluded Categories covering:

- information on the extent of impact when new Excluded Categories are proposed; and
- routine reporting on the number of each Energy Suppliers' SMETS1 Meters within each Excluded Category.

DCC⁵ has an ongoing obligation to assess SMETS1 Installations presently blocked for Migration. In some cases, DCC has been able to take economically efficient steps to unblock the path to migrating these installations without regulatory change, for example, by correcting data errors between registration data in the SMETS1 SMSO and DCC. DCC's investigation into blocked SMETS1 Installations is ongoing and DCC is continuing with such unblocking activities where possible as DCC and Energy Suppliers progress towards the completion of Migration for all eligible SMETS1 Installations across all cohorts and then the closure of each Requesting Party. Further consultations cannot be ruled out although no further unblocking initiatives are identified at this point. At present DCC is investigating blocking issues with roughly 26,000 SMETS1 Installations across FOC (BG) and MOC (Secure) cohorts. It may be that further unblocking initiatives in the FOC (BG) and MOC (Secure) cohorts are needed to resolve these matters.

This consultation distinguishes between the two Requesting Parties for the SMETS1 FOC cohort as some of the detailed arrangements differ and these are described as follows, as already prescribed in TMAD:

- FOC (BG) where GroupID = "EA"; and
- FOC (NP) where GroupID = "EB".

This consultation proposes amending Clause 18 of the TMAD to include new Excluded Categories. It also provides for partial Migration of eligible SMETS1 Dormant and Mixed installations where migration is currently failing due to gas meter issues. The amendments also propose to extend partial Migration for eligible SMETS1 installations in the MOC (Secure), FOC, and IOC cohorts.

Given DCC's obligation to provide its services in an efficient and economical manner and the operational evidence that this is now justified and in consumers' best interests, this consultation is also bringing forward proposals to close:

1. the Requesting Party (RP) migration service for the IOC cohort; and
2. the Requesting Party migration service for the FOC (NP) cohort.

Consistent with Clause 7 of the TMAD, DCC is proposing an RP Decommissioning Date for the IOC cohort and a separate RP Decommissioning Date for the FOC (NP) cohort. From these dates the DCC's Migration Service for Energy Suppliers with SMETS1 Meters covering both the IOC and FOC (NP) cohorts will terminate. Section 9 sets out the closure recommendations and planned draft Decommissioning timetables. This would signal the completion of Migration for each of these cohorts. For consistency with the existing Clause 20.1A of the SMETS1 SVTAD, once the

⁴ These may or may not have a corresponding EPCL entry.

⁵ Where appropriate, the DCC is supported in this by Energy Suppliers and / or SMETS1 SMSOs.

relevant Requesting Party has been decommissioned, the DMCT Process⁶ for the IOC and FOC (NP) cohorts will also be closed.

These closure proposals are contingent on a number of changes to the TMAD, which this document proposes. These TMAD changes will be re-designated if there is support from industry, including completion of any relevant actions. If the proposed changes to the TMAD are not re-designated (or re-designation is delayed), then DCC may need to re-consult on later dates for the Requesting Party closures⁷.

Section 9 in this document presents closure recommendations for the IOC cohort and the FOC (NP) cohort. Within this document the dates presented for each cohort are aligned but there is scope for these to differ i.e. DCC is consulting on the same RP Decommissioning Date for both cohorts but the conclusion of this consultation may result in differing RP Decommissioning Dates within the windows being proposed. DCC can confirm that there are no additional risks or complexities arising from the planned concurrent closure of the IOC and FOC (NP) cohorts.

DCC recognises the economic efficiency arising from closing each cohort. Thus, DCC intends to consult separately on additional RP Decommissioning Timetables for the closure of the MOC (Secure) cohort and the FOC (BG) cohort once able to do so.

3. Partial Migration for Firmware / Configuration Failure for IOC, MOC (Secure), and FOC

For the IOC, MOC (Secure), and FOC cohorts, 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, the estimated quantity of SMETS1 Installations impacted by this matter for each of the cohorts is the following:

- 3,187 SMETS1 Installations for IOC;
- 5,992 SMETS1 Installations for MOC (Secure);
- 12 SMETS1 Installations for FOC (NP); and
- 4,765 SMETS1 Installations for FOC (BG).

The information on quantities of SMETS1 Installations is based on available data at the time of publication and is subject to change, for example, where devices within a SMETS1 Installation are replaced with SMETS2+ devices. The figure for FOC (NP) is lower than the other cohorts as the SMETS1 SMSO (following discussion with the MAP) decided to de-register non-communicating Gas Meters as these devices were not considered to be SMETS1 capable.

Following further investigation and the introduction of a similar change for the MOC (MDS) cohort⁸, the SMETS1 SMSOs for the IOC, MOC (Secure), and FOC cohorts have advised that they would be able to partially Migrate such SMETS1 Installations by de-registering the Gas Meter within the respective SMETS1 SMSO systems. For IOC and FOC this can be implemented using existing functionality whereas a solution change is needed for MOC (Secure). For the MOC (Secure) cohort, the proposed solution change will also allow de-registration⁹ where there is

⁶ This is provided for under Clause 20 of the SMETS1 SVTAD.

⁷ There has been one prior decommissioning of a Requesting Party. On 29 September 2022, DCC concluded⁷ on proposals to decommission the Requesting Party for the MOC (MDS) cohort which was closed from Sunday 23 October 2022 following approval by the Secretary of State. See at <https://smartenergycodecompany.co.uk/latest-news/beis-moc-mds-cohort-decommissioning-timetable-and-decision/>

⁸ This was introduced via Various 2 Conclusion, see at <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-2/>

⁹ As it is currently implemented for the MOC (MDS) cohort within Clause 4.26B of the TMAD

persistent failure at GT01 step 4 related to a communications failure with the GSME at the point Migration is attempted.

For Migration purposes, this de-registration of the GSME would turn the site into an electricity-only site¹⁰, which would enable attempts to migrate each such eligible SMETS1 Installation. As set out previously¹¹, 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 (favouring SMETS2+ replacement). However, DCC remains of the view that the benefit from expediting the restoration of smart services to the ESME outweighs the potential negative impacts highlighted in previous consultation responses¹². Those Energy Suppliers raising objections indicated a preference for replacement of the entire SMETS1 Installation with SMETS2+ devices. 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' objective to maximise benefit to end consumers by allowing for prompt restoration of smart services to Dormant Meters where feasible.

DCC is also adjusting the approach to partial Migration to consider whether the SMETS1 Installation could be Migrated at a prior firmware (noting that this may require an additional entry on the EPCL).

When partial Migration is extended to the ESME in such circumstances, the GSME within the SMETS1 Installation would be excluded from Migration under the existing Excluded Category titled 'Excluded Category - Partial Migration' which is set out in Clause 18.5 of the TMAD.

In order to capture these changes within the TMAD, DCC is proposing to extend Clause 4.26A to apply to all cohorts as well as amending Clause 4.26A to consider the scope for Migration without firmware upgrade. DCC is also proposing to extend Clause 4.26B (which allows partial Migration where there is persistent failure at GT01 step 4 related to communications failure with the GSME at the point Migration is attempted) to apply to MOC (Secure). It is important to note that for the MOC (Secure) cohort there are required system changes to be implemented to support these partial Migration changes that are schedule for implementation in the February 2023 maintenance release.

It is also important to note that if these changes are not adopted to facilitate partial Migration, then such SMETS1 Installations will be entirely excluded. Without partial Migration, where the firmware on the GSME fails to upgrade these SMETS1 Installations will be notified to Responsible Suppliers under an Excluded Category which was included within Clause 18.9 of the TMAD (for the IOC cohort) or via the new Excluded Category proposed in Section 8 below for the MOC (Secure) and FOC cohorts. Also, where there is persistent failure at GT01 step 4 for the MOC (Secure) cohort these SMETS1 Installations will be excluded under the 'Five Retries Attempting Migration' Excluded Category in Clause 18.8 of the TMAD.

Closure 2 Q1

Do you agree with DCC's proposal to amend the TMAD (changes to Clause 4.26A and 4.26B) to extend partial Migration for GSME firmware / configuration failure to the IOC, MOC (Secure), and FOC cohorts? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

¹⁰ This would still be aligned to a corresponding EPCL entry.

¹¹ Various 1 Consultation www.smartdcc.co.uk/consultations/smetics1-consultation-various-1/
 Various 1 Part 1 Conclusion www.smartdcc.co.uk/consultations/smetics1-conclusion-various-1-part-1/
 Various1A Consultation www.smartdcc.co.uk/consultations/smetics1-consultation-various-1a/
 Various 1A Conclusion www.smartdcc.co.uk/consultations/smetics1-conclusion-various-1a/

¹² An example of such impact is that partial Migration may lead to a poor customer experience with only the ESME providing smart services.

4. Deregister Dormant PPMID for FOC (BG)

For the FOC (BG) cohort (where GroupID = "EA"), there are certain eligible SMETS1 Installations containing solely Dormant Meters where DCC is unable to attempt to Migrate due to issues with the SMETS1 PPMID. This is because the firmware version data provided by the relevant SMETS1 SMSO is unrecognised as a valid identifier by the manufacturer of such devices. DCC and the manufacturers have jointly undertaken extensive assessments of this matter but have been unable to obtain a satisfactory resolution. The impact of this issue is that DCC is unable to obtain the information required to add these devices to the Eligible Products Combination List (EPCL)¹³ as a SMETS1 PPMID. This prevents DCC from proposing EPCL entries with DMCs that contain such devices within the DMCT Process. As the firmware is unrecognised, it is not possible to assess such devices within the DMCT Process for either testing or substantive equivalence. Furthermore, these devices cannot be upgraded to align these SMETS1 Installations to an existing entry on the EPCL. It is important to note that the relevant SMETS1 SMSO has confirmed that this situation doesn't apply to SMETS1 PPMIDs in the FOC (NP) cohort.

At present, there are 966 SMETS1 Installations containing solely Dormant Meters for FOC (BG) impacted by this issue. Please note that the number of such SMETS1 Installations is based on available data at the time of publication and is subject to change, for example, where the Devices within a SMETS1 Installation are replaced with SMETS2+ Devices. Without any additional action, these SMETS1 Installations will be excluded under the Excluded Category titled 'Excluded Category – Data Issues' within Clause 18.12 of the TMAD. During the preparation of this aspect of the consultation, DCC has reviewed the drafting for 'Excluded Category – Data Issues' in Clause 18.12 of the TMAD. Following this review, DCC is now proposing an amendment to clarify that DCC will consider TMAD changes and/or a new EPCL entry to resolve such data issues prior to affected SMETS1 Installations becoming excluded by Clause 18.12.

However, following further investigation, the SMETS1 SMSO for the FOC (BG) cohort has advised that it would be able to de-register the SMETS1 PPMID using the functionality already present within the SMETS1 SMSO systems (i.e. at zero cost), thus enabling the Migration to take place. For SMETS1 Installations containing Active Meters, the SMETS1 PPMID can be de-registered via an instruction from a Responsible Supplier to the SMETS1 SMSO. In contrast, DCC does not presently have permission to instruct the SMETS1 SMSO to de-register the SMETS1 PPMID for SMETS1 Installations containing Dormant Meters, this proposal will allow DCC to extend this activity to SMETS1 Installations containing Dormant Meters. In order to capture this ability within the TMAD, DCC proposes new Clauses 4.26D and 4.26E. Responsible Suppliers should note that it should be possible for them to re-commission such SMETS1 PPMIDs following Migration so long as the devices are correctly pre-notified. It would also be possible for a Responsible Supplier to commission an alternative SMETS1 PPMID for their customer.

It is important to note that if these changes are not adopted to facilitate de-registering the SMETS1 PPMID, these SMETS1 Installations will not have a route to Migration for the entire site. Any SMETS1 Installations that are not Migrated are envisaged to into Licence Obligation requirements (on Gas Suppliers and Electricity Suppliers) to replace any SMS not enrolled with DCC by the end of 2023. This may also have cost implications for impacted Responsible Suppliers.

Closure 2 Q2

Do you support the proposal to de-register the SMETS1 PPMID for SMETS1 Installations for the FOC BG cohort containing Dormant Meters to provide for alignment to an entry on the EPCL? Do you have any detailed comments on the relevant changes to the legal drafting in Clauses 4.26D and 4.26E of the TMAD and the amendment to Clause 18.12? Please provide a rationale for your views.

¹³ The devices would also subsequently need to be added to the Central Products List (CPL).

5. Early Closure – Removing 12 Months from the last EPCL Entry requirement for IOC and FOC (NP)

Clause 7.2 of the TMAD requires that each RP Decommissioning Date should not be earlier than 12 months from the last EPCL entry for the relevant SMETS1 cohort (each GroupID). Clause 7.2 of the TMAD was varied by the Initial Closure Matters consultation¹⁴ and conclusion¹⁵ and disappplied for the MOC (MDS) cohort given the proposal to close that cohort in the summer of 2022. When concluding on the Initial Closure Matters consultation, DCC agreed to consider this matter on a cohort-by-cohort basis.

The last prior entry on the EPCL was December 2021 for IOC and March 2022 for FOC (NP). DCC's EPCL Report 28, which was published¹⁶ on 30 November 2022 proposed 209 additional EPCL entries for the IOC cohort which provides for the scope to attempt Migration for an additional 790 IOC SMETS1 Installations. EPCL Report 28 also proposes 9 additional EPCL entries for the FOC (NP) cohort which provides for the scope to attempt Migration for an additional zero FOC (NP) SMETS1 Installations. EPCL Report 28 was approved by BEIS and published on the SECAS website¹⁷ on 15 December 2022. Notwithstanding EPCL Report 28, DCC is now proposing to disapply the requirement in Clause 7.2 for the IOC cohort (where GroupID is "AA", "BA", or "CA") and the FOC (NP) cohort (where GroupID is "EB") as DCC is proposing to close these cohorts. This means that, if approved, the provisions within Clause 7.2 would only apply to the MOC (Secure) and FOC (BG) cohorts (where GroupID is "DA" or "EA").

This is proposed because DCC considers it economically inefficient to continue to require DCC to procure Requesting Party services for the IOC and FOC (NP) cohorts across a fixed time period where:

1. no further Migrations are planned for SMETS1 Installations containing one or more Active Meters for the cohort; and
2. at a point prior to what would otherwise be the earliest point that the Requesting Party could close, almost all SMETS1 Installations containing Dormant Meters are in an Excluded Category except for minimal quantities of SMETS1 Installations that are 'newly Dormant'¹⁸.

Migrations of SMETS1 Installations containing Active Meters are complete for IOC and almost complete for FOC (NP). As each cohort nears completion and current market churn is at a lower rate than previous years, DCC expects there to be minimal SMETS1 Installations being 'newly Dormant'. SMETS1 Installations containing newly Dormant Meters are also likely to have already been attempted for Migration several times whilst they were Active Meters.

Any proposal by DCC to close each Requesting Party is subject to public consultation, and approval by the Secretary of State of the Department for Business, Energy, and Industrial Strategy (BEIS). As part of this process stakeholders can raise any concerns directly with BEIS during a 5-day period after DCC has made its recommendation as set out in Section 9.3 below. DCC therefore considers that disapplying Clause 7.2 of the TMAD for these cohorts is acceptable as the DCC consultation provides an opportunity to make representations on any proposed Requesting Party closure that stakeholders may consider premature.

¹⁴ <https://www.smartdcc.co.uk/consultations/smetics1-consultation-initial-closure-matters/>

¹⁵ <https://www.smartdcc.co.uk/consultations/smetics1-conclusion-initial-closure-matters/>

¹⁶ <https://www.smartdcc.co.uk/media/sxdi1fc4/epcl-report-28.pdf>

¹⁷ <https://smartenergycodecompany.co.uk/latest-news/beis-approval-of-smets1-device-model-combinations-to-the-eligible-products-combination-list-for-dcc-smets1-services-epcl-report-28/>

¹⁸ These arise from churn as customers switch their energy suppliers.

Closure 2 Q3

Do you support the principle of amending Clause 7.2 of the TMAD to allow early closure of the IOC and FOC (NP) cohorts? Do you have any detailed comments on the relevant changes to the legal drafting in the TMAD? Please provide a rationale for your views.

6. Proposal to Refine ‘Excluded Category – Five Retries Attempting Migration’, extend its application to FOC, Remove System Errors, and an unblocking change related to incorrect certificate

6.1. Extend and Refine ‘Excluded Category – Five Retries Attempting Migration’

The existing TMAD Clause 18.8 contains an Excluded Category titled ‘Excluded Category – Five Retries Attempting Migration’¹⁹ that currently applies to all cohorts except FOC. The basis of this Excluded Category is that persistent failure to Migrate is demonstrated after five failed attempts based on operational experience from the SMETS1 SMSOs i.e. the likelihood of a successful Migration after five failed attempts is very low. However, it is important to note that some causes of Migration failure (e.g. due to administration issues) are not counted as one of the five ‘valid’ attempts. At present failures against the administrative checks set out in Table 5.10 of the TMAD are not included within the five attempts as prescribed in the existing drafting of Clause 18.8 of the TMAD.

DCC is now proposing the changes to the Excluded Category titled ‘Excluded Category – Five Retries Attempting Migration’ to:

1. extend this Excluded Category to the FOC cohort; and
2. expand the list of administrative checks and errors that should not be counted as ‘valid’ Migration attempts.

The FOC cohort was previously not included within the scope of this Excluded Category as there was very limited evidence on Migration failures for FOC at the point Clause 18.8 was first included into the TMAD as part of the Various 1 Consultation / Conclusion in December 2021.

Consistent with other cohorts, operational evidence for the FOC cohort suggests that there is very limited success Migrating after five attempts. For FOC, operational experience indicates that the improvement in successful Migration of SMETS1 Installations is less than 0.5 % after the fifth valid Migration attempt. Thus, DCC considers that it is prudent to extend the Excluded Category titled ‘Excluded Category – Five Retries Attempting Migration’ to the FOC cohort.

At present, DCC expects that the following quantities of SMETS1 Installations containing solely Dormant Meters will be excluded by the extension of this Excluded Category as follows:

- 14,480 for the FOC (NP) cohort; and
- 20,332 for the FOC (BG) cohort.

Due to the stability issues DCC is experiencing with Migrating eligible SMETS1 installations in the FOC cohort, DCC is proposing to refine the rules it uses when applying the 5 retries methodology across all cohorts. There are specific and defined error codes that indicate a system error rather than a failed Migration due to failure for a particular site and/or device. Such error codes do not

¹⁹ The category was included in the TMAD in December 2022 following the Various 1 Part 1 conclusion. See at <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-1-part-1/>

currently fall within the scope of administrative checks set out in Table 5.10 and thus the current Excluded Category prescribed within the existing Clause 18.8 of the TMAD. DCC is also proposing that checks in Table 5.9 are treated the same way as the checks in Table 5.10. Because DCC considers that such errors can be resolved where they apply across all cohorts, DCC is proposing the following amendments to Clause 18.8 of the TMAD to exclude these administrative checks (listed below) from being counted as part of the five Migration attempts in addition to those in Table 5.10 already detailed in Clause 18.8:

1. **ET02.4.4** - System errors related to Migration are reported back to users as ET02.4.4 in the Migration reports.
2. **Migration Authorisation Expiry** - There have been instances where Migrations have been suspended for a length of time and thus the Migration Authorisation may have expired. In this case users would receive error code MA101 indicating that the MA had not been processed.
3. **Table 5.9** - Following a further examination of this matter, DCC considers that there are also administrative checks presented in Table 5.9 of the TMAD that shouldn't constitute a valid failed Migration attempt.
4. **GT02.3 or GT01.4 for FOC (BG)** - DCC has observed an incorrect Migration failure for certain SMETS1 Installations that do not contain a GSME within the FOC (BG) cohort (where GroupID = "EA"). Due to a system defect, the Migration of a SMETS1 Installation that does not contain a GSME may have failed. Such failure is reported as either the GT02.3 or GT01.4 error check. However, these errors may relate to the non-existent GSME. DCC considers that these errors should be removed from the five retries where the Migration attempt occurred before 2 November 2022 (which is when the fix for the defect was deployed).

At present, there are an extra 18,297 SMETS1 Installations (across all cohorts) that will be able to be attempted for Migration by removing these additional checks from being counted as part of the Excluded Category titled 'Excluded Category - Five Retries Attempting Migration'.

Closure 2 Q4	Do you support the principle of amending the Excluded Category titled 'Excluded Category - Five Retries Attempting Migration' (Clause 18.8 of the TMAD) to be applicable to the FOC cohort? Do you have any detailed comments on the relevant changes to the legal drafting in the TMAD? Please provide a rationale for your views.
Closure 2 Q5	Do you support the principle of amending the Excluded Category titled 'Excluded Category - Five Retries Attempting Migration' (Clause 18.8 of the TMAD) to remove some failures related to system issues? Do you have any detailed comments on the relevant changes to the legal drafting in the TMAD? Please provide a rationale for your views.

6.2. Unblocking for Incorrect Certificates

DCC is unable to resolve certain Migration failures related to the checks in Table 5.10 within the TMAD. These failed checks are where the Energy Supplier provides the incorrect Network Operator Certificate IDs for the Gas Transporter which fail at either check 5.10.16 or 5.10.17 as set out in Table 5.10 of the TMAD. At present, each time the Migration retry fails (at either check 5.10.16 or 5.10.17) such failures do not fall within the Excluded Category in Clause 18.8 of the TMAD. DCC continues to raise such failures with the relevant Energy Supplier but is wholly dependent on the Energy Supplier correcting the Network Operator Certificate IDs for the Gas Transporter. DCC has had success in resolving most of the errors caused by failures at either

check 5.10.16 or 5.10.17 but 18 SMETS1 Installations remain impacted and cannot be progressed through to Migration or fall into an Excluded Category.

In order to address this issue, DCC is proposing that it should be permitted to proceed with attempting Migration while omitting the Network Operator Certificate IDs for a SMETS1 Installation where the Migration has previously failed at least five times. This proposal would allow the 18 SMETS1 Installations that are currently blocked to be progressed through to Migration. In such circumstances, the existing obligations on the Energy Supplier to add the certificate following successful Migration would apply. This change allows any impacted SMETS1 Installation to be Migrated; the alternative being that it would ultimately need to be replaced with SMETS2. This permission is captured by inclusion of a new Clause 4.32A in the TMAD.

Closure 2 Q6

Do you support the principle of disregarding the incorrectly provided certificate where it has prevented successful Migration at least five times as per the new Clause 4.32A in the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting in the TMAD? Please provide a rationale for your views.

7. Amended Excluded Category 'Dormant not due to Change of Supplier' for 'split Active/Active' SMETS1 Installations

DCC is proposing an amendment to the existing Excluded Category titled 'Excluded Category - Dormant not due to Change of Supplier' set out in Clause 18.14 of the TMAD to address an edge case related to 'split Active/Active' SMETS1 Installations.

Currently, this Excluded Category applies to all cohorts and allows for SMETS1 Installations to be excluded based on evidence from the Responsible Supplier in the following circumstances:

- a. there are newly Dormant Meters (where the change in status from Active to Dormant is due to the Responsible Supplier terminating their contract for smart services with the SMETS1 SMSO); and
- b. the Responsible Supplier has provided a statement to DCC to confirm that the Responsible Supplier reasonably believes that such Dormant Meters are not capable of successful Migration (as prescribed by Clause 18.2A of the TMAD).

Within the scope of this Excluded Category, there is an edge case related to SMETS1 Installations that are 'split Active/Active' i.e. a different Electricity Supplier and Gas Supplier are responsible for the two Active Meters prior to termination of a contract for smart services with the SMETS1 SMSO by one or more of the Responsible Suppliers. DCC proposes to amend Clauses 18.2A and 18.14 of the TMAD to remove this edge case from the scope of this Excluded Category related to 'split Active/Active'. It should be noted that 'split Active/Active' can only arise in the MOC (Secure) cohort, as it is now the only cohort with more than one Responsible Supplier with Active Meters and thus where 'split Active/Active' SMETS1 Installations might arise. At present there are 11,811 'split Active/Active' SMETS1 Installations pending Migration in the MOC (Secure) cohort.

Migrations for split 'Active/Active' SMETS1 Installations are subject to administrative complications as both Energy Suppliers need to provide a Migration Authorisation for the same Migration Week to allow the Migration to be attempted. If a 'split Active/Active' SMETS1 Installation has failed to be authorised for Migration, and one part of the split SMETS1 Installation becomes Dormant²⁰, the TMAD currently provides that the whole SMETS1 Installation could be excluded from further Migration attempts where the Responsible Supplier provides an appropriate statement to DCC. Such statement should set out that the Responsible Supplier reasonably

²⁰ This would be due to one of the Energy Suppliers arrangements with the SMETS1 SMSO coming to an end

believes that such Dormant Meters are not capable of successful Migration. However, if only one Responsible Supplier's arrangements with its SMETS1 SMSO end, the SMETS1 Installation would become 'mixed' and the right for the remaining Responsible Supplier (with an Active Meter) to continue to attempt Migration should be retained, as it is possible that the SMETS1 Installation should be capable of Migration once the remaining Responsible Supplier (with an Active Meter) provides a Migration Authorisation.

To address this edge case, DCC proposes to amend the 'Excluded Category - Dormant not due to Change of Supplier' Excluded Category to only apply to SMETS1 Installations where there is one Responsible Supplier and the SMETS1 Installation now contains only Dormant Meters due to the Responsible Supplier terminating their contract for smart services with the SMETS1 SMSO. This means that for a 'split Active/Active' SMETS1 Installation, when one Responsible Supplier terminates its contract (with the SMETS1 SMSO) then the normal Migration rules apply for a mixed SMETS1 Installation. Furthermore, this amendment means that the Excluded Category will also not be applicable for the edge case where both Responsible Suppliers for a 'split Active/Active' SMETS1 Installation terminate their arrangements with the SMETS1 SMSO simultaneously; in this instance then the normal Migration rules apply for a solely Dormant SMETS1 Installation.

Closure 2 Q7

Do you support the principle of amending the TMAD to amend Clauses 18.2A and 18.14 to exclude SMETS1 Installations that were previously 'split Active/Active' from the scope of the Excluded Category titled 'Excluded Category - Dormant not due to Change of Supplier'? Do you have any detailed comments on the relevant changes to the legal drafting in the TMAD? Please provide a rationale for your views.

8. Excluded Category - Firmware Upgrade / Configuration Failure where GroupID = "DA", "EA", or "EB"

DCC proposes amending Clause 18 of the TMAD to introduce a new Excluded Category titled 'Excluded Category - Firmware Upgrade / Configuration Failure where GroupID = "DA", "EA", or "EB"' that would apply to the MOC (Secure) and FOC cohorts within Clause 18.17 of the TMAD. In the circumstances covered by this proposed Excluded Category, DCC considers that, consistent with the rationale set out in Clause 1.5 of the TMAD, a Migration solution is not possible 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.

Firmware Upgrade / Configuration Failure where GroupID = "DA", "EA", or "EB"

Description	<p>Clause 4.24 of the TMAD set out an obligation on DCC to take all reasonable steps to Migrate Dormant Meters including any pre-requisite steps. 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 now proposing an exclusion for MOC (Secure) and FOC within Clause 18.17 of the TMAD for those devices where the firmware upgrade / device configuration process is attempted a number of times but cannot be completed successfully. This proposal is aligned to the equivalent Excluded Categories for the IOC and MOC (MDS) cohorts within Clauses 18.9 – 18.11 of the TMAD. This proposed Excluded Category also has a requirement for DCC to only exclude where DCC considers the SMETS1 Installation could not be Migrated at a prior firmware (noting that an additional entry on the EPCL may be needed). It should be noted that there is a single Excluded Category set out in Clause 18.17 of the TMAD as the firmware upgrade / configuration arrangements are similar for each of these three cohorts.</p>
Exclusion Type	<p>Technical or operational barriers.</p>
Number of SMETS1 Installations	<p>For MOC (Secure), at present, DCC has approximately 46,606 SMETS1 Installations containing only Dormant Meters blocked where the SMETS1 SMSO has been unable to upgrade the firmware or apply the correct configuration.</p> <p>For FOC (BG), at present, DCC has approximately 77,636 SMETS1 Installations containing only Dormant Meters blocked where the SMETS1 SMSO has been unable to upgrade the firmware or apply the correct configuration.</p> <p>For FOC (NP), at present, DCC has approximately 11,684 SMETS1 Installations containing only Dormant Meters blocked where the SMETS1 SMSO has been unable to upgrade the firmware or apply the correct configuration.</p>

Firmware Upgrade / Configuration Failure where GroupID = "DA", "EA", or "EB"

<p>Rationale</p>	<p>Within both the MOC (Secure) and FOC cohorts, there are robust processes in place for firmware upgrade / configuration.</p> <p>For the dormant devices in the MOC (Secure) and FOC cohorts, DCC will send a single instruction to the SMETS1 SMSO, which will then make several attempts to upgrade the firmware and configure the device such that they are ready for Migration. DCC's single instruction will result in continued attempts on a weekly basis to upgrade firmware / configure devices. The arrangement for each cohort varies on the underlying technology and implementation approach. By way of background, For IOC, this process 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 attempts in total) for configuration.</p> <p>For MOC (Secure), there are 5 retries (1 attempt every two weeks) which provides a success rate of over 99%. Thereafter, there are monthly retries where possible unless an unrecoverable error occurs.</p> <p>For FOC (BG), there are 20 retries for firmware upgrade / configuration.</p> <p>For FOC (NP), there are 5 cycles of retries for firmware upgrade / configuration with 5 attempts within each cycle so 25 retries in total.</p> <p>In addition to these retries for FOC (BG) and FOC (NP), in some specific circumstances the relevant SMETS1 SMSO can deploy the OTAP tool to recover where the firmware upgrade has failed for a SMETS1 Installation. This is where communication with the Communication Hub Function (CHF) fails and the OTAP tool seeks to initiate communication with the modem element within the CHF. The OTAP tool is retried 20 times for FOC (BG). The OTAP tool is retried up to 15 times for FOC (NP) within a two-month period due to slightly different regimes within the respective SMETS1 SMSOs.</p> <p>Given this obligation in Clause 4.24 of the TMAD, DCC has also instructed the SMETS1 SMSOs for IOC, FOC (NP), and FOC (BG) to consider the extent to which any of the SMETS1 Installations in each cohort could be Migrated at existing firmware where firmware upgrade has failed. Before any such Migration at existing firmware could be undertaken for a SMETS1 Installation, DCC may need to progress additional entries on the EPCL. Such additional entries would be progressed via the existing DMCT Process as prescribed in Clause 20 of the SMETS1 SVTAD. DCC will provide a statement on progress for these matters related to IOC, FOC (NP), and FOC (BG) in the conclusion to this consultation.</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>

Table 1 – Firmware Upgrade / Configuration Failure where GroupID = "DA", "EA", or "EB"

Closure 2 Q8

Do you support the principle of amending the TMAD to include Clauses 18.17 to exclude firmware upgrade and configuration failures for the MOC (Secure) and FOC cohorts where firmware upgrade and / or the steps in Clause 4.26 (to reconfigure Dormant Meters and associated Devices) by the relevant SMETS1 SMSO have persistently failed? Do you have any detailed comments on the relevant changes to the legal drafting in the TMAD? Please provide a rationale for your views.

9. Ending Migrations in the IOC and FOC (NP) Cohorts

9.1. Overview

Consistent with Clause 7 of the TMAD, this section sets out why DCC considers that it is appropriate to now propose the closure of the Requesting Party service for the IOC and FOC (NP) cohorts from 26 March 2023. By the proposed closure date, for these cohorts, DCC expects that there will be no further unmigrated solely dormant SMETS1 Installations that will be eligible to be enrolled that won't have had the opportunity to have exhaustive attempts to be Migrated. In respect of Active and Mixed Installations (for which Migration can only be triggered by the Active Supplier):

- from 31 July 2022 there were no Energy Suppliers with Active Meters within the IOC cohort; and
- by the time of the proposed closure DCC understands (based on discussions with the Responsible Supplier) that all Migration attempts will have been exhausted for SMETS1 Installations containing Active Meters within the FOC (NP) cohort.

Once a Requesting Party is decommissioned for a cohort, the services under the existing contract will have ended. It will not be possible to re-enable the services of each Requesting Party other than by re-procurement of such Requesting Party services. It should be noted that there are restrictions in Condition 16 of the DCC Licence²¹ that may impact the schedule for any such re-procurement attempt by DCC for either IOC or FOC (NP).

- For IOC, the relevant service provider has advised DCC that re-procurement will not be possible at short notice and any such re-procurement with the existing service provider will incur material set-up costs to re-establish the service (e.g. as the existing personnel and IT infrastructure within the service provider will have been re-deployed into other areas). Also, restarting of the Requesting Party service for the IOC cohort would take at least three months from the point DCC contracted for the service to the re-start.
- For FOC (NP), the relevant service provider has advised DCC that re-procurement will not be possible as the business unit will be de-commissioned.

Additionally, it is important to note that Migration DUST for the IOC cohort was closed on 17 June 2022 and Migration DUST for the FOC (NP) was closed on 30 September 2022 via two separate modifications to the MTAD²². The DMCT Process will also be closed for both IOC and FOC (NP) as per the existing Clause 20.1A of the SMETS1 SVTAD from each cohort's RP Decommission Date.

²¹ These cover the requirement for DCC to engage the Secretary of State on the nature, scope, and reasons for any procurement.

²² See <https://smartenergycodecompany.co.uk/latest-news/sec-v60-0-implemented-to-support-the-dcc-smets1-service/> and <https://smartenergycodecompany.co.uk/latest-news/update-of-migration-testing-approach-document-mtad-for-smets1-services/>

9.2. Second RFI and MAP data on Unaccounted SMETS1 Devices

In November 2021, DCC issued a Request for Information²³ related to unaccounted SMETS1 Devices. This exercise aimed to help DCC in assessing the potential number of Dormant devices that some stakeholders had stated were recorded in their databases but do not appear on the data provided to DCC by the SMETS1 SMSOs and were not planned for migration. The TMAD defines Dormant Meters as those which are installed in premises and with which a SMETS1 SMSO can remotely communicate and where the Responsible Supplier does not have a contract for the provision of smart services. DCC has sought to understand the scale and scope of any such meters so as to inform BEIS decisions on whether it is technically viable and economically efficient to seek to migrate these meters. To support this analysis, in November 2022, DCC issued a second RFI on Unaccounted for SMETS1 Devices²⁴ seeking information from Responsible Suppliers on possible sites that they may be aware of but that SMETS1 SMSOs had not reported as SMETS1 Installations containing Dormant Meters to the DCC.

DCC received seven responses to the second RFI. DCC has evaluated the data provided by this second RFI. DCC's analysis of the data provided has been able to account for all the devices included in these responses. The outcome of the second RFI is that 129,434 devices were detailed across the responses provided and all of these devices are known to DCC:

- 28,869 of these devices have already been Migrated; and
- the remainder of these devices have been not yet Migrated (noting they may fall within existing or proposed Excluded Categories in this consultation if not able to be Migrated).

This analysis is a complex and resource intensive activity for DCC to undertake. This second RFI has been undertaken at this point in order to reach consensus that no migratable meters are being left behind given that the DCC is proposing to close the Migration process for FOC (NP) and IOC.

Alongside the second RFI, a number of Meter Asset Providers (MAPs) provided SMETS1 device data to BEIS on a confidential basis with the identity of each MAP anonymised. BEIS provided this data to DCC as the MAPs requested that their data was shared with DCC to allow for an equivalent analysis (to that for the second RFI) to be undertaken by DCC (subject to DCC's existing obligations related to data privacy).

DCC has been able to fulfil analysis on a proportion of this data where the information provided by the MAPs met the minimum bar required at SMETS1 Installation level to allow for such analysis (i.e. device serial number, GUID, SMETS1 SMSO and MPAN/MPRNs). As a next step, DCC understands that BEIS will be reverting to MAPs with the analysis that was undertaken in order to allow MAPs to further investigate certain sites with Responsible Suppliers and to seek better data on others, where available.

DCC considers that the evidence from the two RFI exercises support recommending closure of the Requesting Parties for FOC (NP) and IOC on the closure timelines proposed in this consultation. DCC will update this assessment if any new evidence arises (e.g. following BEIS's further engagement with the MAPs) when looking to conclude on this consultation.

DCC has assessed what would be necessary for any devices not recognised on SMETS1 SMSO systems to be made eligible for Migration. Objectively, even where such meters are discovered and proven to exist, it is considered highly unlikely to be technically and economically viable to seek to migrate these meters in a timely way.

²³ <https://www.smartdcc.co.uk/consultations/smets1-request-for-information-unaccounted-smets1-devices/>

²⁴ <https://www.smartdcc.co.uk/consultations/smets1-second-request-for-information-unaccounted-smets1-devices/>

As the devices have never been registered with a SMETS1 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 well need to arrange for site visits to commission these devices and bear the costs for such an exercise. DCC considers that this would delay Requesting Party Decommissioning for the IOC and FOC (NP) cohorts by a considerable amount and notes that no Energy Supplier has alerted DCC to such an unaccounted device in its RFI response. Furthermore, DCC is of the opinion that it is unlikely that many, if any, of the devices would successfully communicate with the SMETS1 SMSO (and thus Migrate successfully) as they have not been communicating for some time. Also, it is envisaged that all such devices would require firmware upgrades given that the majority of first generation meters have been upgraded since installation to facilitate Migration and/or be SMETS1 compliant.

In summary, there were no unaccounted SMET1 Installations following DCC's analysis of the second RFI. At present, there are a limited number of devices DCC has not been able to account for within the MAPs' data provided by BEIS given the analysis DCC was able to conduct. Thus, on balance, DCC is confident to proceed with this consultation and the closure dates proposed.

9.3. Draft RP Decommissioning Timetables

Draft RP Decommissioning Timetables for the IOC and FOC (NP) cohorts are provided as Attachments 3 and 4 of this consultation. Slightly different schedules are proposed for each cohort given differing commercial arrangements between DCC and the respective service providers. DCC has prepared a plan for each cohort to close which are described in detail within this section of the consultation document. In summary, DCC proposes that:

- the Requesting Party for the FOC (NP) cohort is closed on Sunday 26 March 2023 (or any following Sunday up to 28 May 2023); and
- the Requesting Party for the IOC cohort is closed on Sunday 26 March 2023 (alternatively Sunday 30 April 2023 or Sunday 28 May 2023).

For the FOC (NP) cohort, 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 SMETS1 Installation containing Dormant Meters 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 SMETS1 Installations) up to and including the final migration week (DCC will attempt Migration once per week for a SMETS1 Installation). However, 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 IOC and FOC (NP) and is of the view that it could deliver the proposed RP Decommissioning Date on the basis of meeting the process set out in Table 2 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 for each Requesting Party closure. On this basis, DCC will be formally seeking views on:

- the range of Sundays from 26 March 2023 up to and including 28 May 2023 for the closure of the FOC (NP) cohort.
- Sunday 26 March 2023, Sunday 30 April 2023, or Sunday 28 May 2023 for the closure of the IOC cohort (given DCC's commercial arrangement with the relevant service provider).

In the unlikely event that the RP Decommissioning Date slips beyond 28 May 2023 (for one or both cohorts), DCC would re-consult on the RP Decommissioning Date. In the table below the 'proposed' RP Decommissioning Date for the IOC and FOC (NP) cohorts is assumed to be Sunday 26 March 2023. If the proposed date becomes a later Sunday, then activities that are contingent on the closure date would slip accordingly. In line with Clause 7.3 of TMAD, when DCC concludes on this consultation, DCC intends to send the consultation conclusions to the Secretary of State recommending a single date for RP Decommissioning.

Date	Activity
Friday 16 December 2022	This consultation on Requesting Party closure for the IOC and FOC (NP) cohorts is opened for a period of six weeks (including the Christmas period).
Friday 27 January 2023	This consultation will close for industry views on Requesting Party closure for these cohorts.
Friday 10 February 2023	DCC will conclude on the consultation findings for these cohorts.
By Tuesday 21 February 2023	Secretary of State re-designates the TMAD (this gives at least five weeks for any final 'unblocked' Migrations prior to closure). NB partial Migration covering MOC (Secure) is due for implementation in the Maintenance Release on 21 February 2023.
Friday 24 February 2023	DCC will formally submit the decommissioning timetable for each cohort (including prior conclusion evidence and current status of any final migration activity).
Monday 27 February 2023 to Friday 3 March 2023	BEIS have advised there will be a five-day period for any stakeholders to raise further concerns directly to BEIS.
Wednesday 15 March 2023	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 each cohort.

Date	Activity
Thursday 16 March 2023	<p>9 calendar 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. For each cohort, DCC will no longer process:</p> <ul style="list-style-type: none"> • further instructions to the SMETS1 SMSO to configure devices (where migrations are not able to commence during the final Migration Week); • notifications to Migrate; and • Demand Commitments.
	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 20 March 2023	DCC will commence the final Migrations during the final Migration Week which will be based on submissions made on the prior Thursday. Migration will be attempted once for each Installation. All migrations taking place during the week are expected to have finished processing (successful / failed / rolled back) before the Sunday.
Sunday 26 March 2023	<p>DCC doesn't usually process Migrations on weekends.</p> <p>RP Decommissioning Date will be on this Sunday.</p>
Monday 27 March 2023	<p>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 each service provider to enact the required steps to shut down the Requesting Party for the respective cohort, confirming to DCC when decommissioning is complete. This is expected to take up to 20 working days to fully complete for both the FOC (NP) and IOC cohorts. In due course, DCC will also communicate to all Responsible Suppliers in both cohorts the breakdown of the final number of devices under their remit falling into the Exclusion Categories.</p> <p>From the RP Decommission Date the DMCT Process will also be closed for both the FOC (NP) and IOC cohorts as per Clause 20.1A of the SMETS1 SVTAD.</p>
Q3 2023	To confirm decommissioning of each 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 2 – Detailed Closure Activities for the IOC and FOC (NP) Cohorts

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 IOC and FOC (NP) cohorts is presented in the following sub-sections. Additionally, DCC needs to have plans in place to progress the technical aspects of Requesting Party decommissioning for each cohort. DCC can confirm that those plans are in place as set out below.

9.4. 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.

For the IOC Cohort, from 31 July 2022, there were no remaining SMETS1 Installations containing Active Meters.

For the FOC (NP) Cohort, it is expected that Migration attempts will have been exhausted for SMETS1 Installations containing Active Meters in advance of 26 March 2023. Furthermore, the Responsible Supplier that has Active Meters in this cohort supports DCC's aim to expedite the closure of the Requesting Party as described in this consultation document.

9.5. DORMANT

For SMETS1 Installations containing Dormant Meters, 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 Supplier via SharePoint). DCC is of the view that for the IOC and FOC (NP) cohorts all Migrations of solely Dormant Installations will be completed (i.e. either excluded or migrated) before the proposed RP Decommissioning Date (with the exception of any SMETS1 Installation that has become newly Dormant meter as described above in Section 9.3). By this date, DCC will have migrated (or partially migrated if the relevant proposal in this consultation is accepted) all SMETS1 Installations containing solely Dormant Meters that do not fall into an Excluded Category (if in an Excluded Category they are not to be Migrated). At present, for the IOC and FOC (NP) cohorts 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 the IOC and FOC (NP) cohorts all eligible SMETS1 Installations containing solely Dormant Meters will either:

- (i) have been Migrated or partially Migrated;
- (ii) fall into an Excluded Category; or
- (iii) be one of a very few newly Dormant Installations (for the FOC (NP) cohort).

9.6. 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 of the TMAD 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 of the TMAD to procure an audit covering each Requesting Party closure for the SMKI PMA to consider. DCC can confirm that plans to deliver these matters are in hand and will be undertaken for each Requesting Party covering the IOC and FOC (NP) cohorts 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 the IOC and FOC (NP) cohorts.

DCC can confirm that:

1. it has taken the steps to be operationally ready to proceed with these closures; and
2. there are no additional risks or complexities arising from the planned concurrent closure of the IOC and FOC (NP) cohorts.

In shutting down the Requesting Party for the IOC and FOC (NP) cohorts, DCC will ensure that each Requesting Party:

- completes the Migrations of all SMETS1 Installations where they have been commenced (where completion constitutes either successful commissioning or successful rollback to the SMETS1 SMSO);
- shuts down the SFTP interfaces to DCC and removes any associated cryptographic material whilst retaining evidence for audit purposes (as required by the TMAD);
- destroys Private key material and decommissions Requesting Party Hardware Security Model (HSM) whilst retaining evidence for audit purposes;
- extracts any required data and submits it to DCC; and
- finally, shuts down their Requesting Party environments.

DCC will also ensure that:

- any DCC accounts in use by each Requesting Party are removed; and
- any of the above changes have no impact on the other services provided to Energy Suppliers and/or consumers other than preventing DCC from continuing with Migrations of the IOC and FOC (NP) cohorts.

It is important to note that following closure of the IOC cohort:

- some elements of the production solution used to undertake Migrations for the IOC cohort will now become redundant (and DCC does not plan to remove these elements at this point as they are within the S1SP Migration solution which is separate from the S1SP enduring solution); and
- other aspects of the production solution used to undertake Migrations for the IOC and FOC (NP) cohorts will continue as they are shared services across all cohorts (e.g. the checks within Table 5.10 of TMAD are an element of the S1SP Migration solution).

9.7. Summary

Subject to the timely implementation of the changes proposed by this Consultation and given the information presented, DCC proposes that the respective Requesting Parties for the IOC and FOC (NP) cohorts can be decommissioned on the date set out in the attached RP Decommissioning Timetables 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 each Requesting Party for the IOC and FOC (NP) cohorts.

Following the outcome of this consultation, DCC will provide each draft RP Decommissioning Timetable to BEIS for approval by the Secretary of State. Based on prior discussion with BEIS, and in line with the recommendation for closure of the MOC (MDS) cohort, this submission to the Secretary of State will take the form of a separate letter for each cohort covering the following four matters to support the recommendation²⁵:

- **Closure Statement 1 (Prior Consultation)** – confirmation that DCC has engaged appropriately with stakeholders on these closure matters;
- **Closure Statement 2 (Migration Status)** – updates of the evidence presented in this consultation document on any remaining SMETS1 Installation still in scope for Migration and expectation at the proposed closure date;
- **Closure Statement 3 (Technical Readiness)** – confirmation that DCC and the relevant service providers are ready to close the Requesting Party service and also undertake the post-event audit activities; and
- **Closure Statement 4 (Economic Efficiency)** – confirmation that DCC considers it is economically efficient to close, supported by details on the on-going costs that DCC will incur to keep the Requesting Party service operational for the cohort.

DCC would look to extend the RP Decommissioning Date for the IOC and FOC (NP) cohorts and conclude on a later date if there are any delays in expected processes and outcomes (including this consultation). As set out above:

- for the FOC (NP) cohort the range of dates are: Sunday 26 March 2023 or any following Sunday up to and including Sunday 28 May 2023; and
- for the IOC cohort the range of dates are: Sunday 26 March 2023, Sunday 30 April 2023, or Sunday 28 May 2023.

Closure 2 Q9

For the IOC cohort, do you agree with DCC's draft RP Decommissioning Timetable document that sets out the proposed date for the Requesting Party for the IOC cohort to be decommissioned to be Sunday 26 March 2023 (or alternatively Sunday 30 April 2023 or Sunday 28 May 2023)? For the IOC cohort, do you have any detailed comments on the draft RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.

²⁵ Some elements of the submission may be confidential and be inappropriate for the public domain.

Closure 2 Q10

For the FOC (NP) cohort, do you agree with DCC's draft RP Decommissioning Timetable document that sets out the proposed date for the Requesting Party for the FOC (NP) cohort to be decommissioned to be Sunday 26 March 2023 (or any following Sunday up to and including Sunday 28 May 2023)? For the FOC (NP) cohort, do you have any detailed comments on the draft RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.

10. Next Steps

Given the differing regulatory requirements there is a different procedure for re-designating the TMAD compared to approving each RP Decommissioning Timetable. DCC is planning to combine these activities but they could be decoupled depending on:

- the responses DCC receives from stakeholders; and
- the subsequent outcome of this consultation.

10.1. TMAD Conclusion

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

DCC is aiming to conclude on this consultation no later than Friday 10 February 2023. DCC plans to provide a conclusions report to BEIS related to the TMAD re-designation covering the extension of partial Migration to Dormant Meters.

Where the Secretary of State accepts the finding in DCC's conclusions report related to proposed exclusions and thus re-designates the TMAD, the relevant SMETS1 Installations will be excluded from the scope of Migration and/or SMETS1 SMSs not eligible for enrolment and/or SMETS1 PPMIDs de-registered as each of these applies e.g. where DCC takes the relevant actions to proceed with partial Migration.

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, the Secretary of State will re-designate the TMAD on 21 February 2023 (in line with the maintenance release) or as soon as reasonably practicable within one month thereafter. It should be noted that if the TMAD re-designation does not proceed as planned then this may introduce a consequential delay to the planned closures of the FOC (NP) and IOC cohorts which could, in turn, lead to the need for further consultation.

In order to expedite the re-designation of the TMAD, DCC is also seeking views on behalf of BEIS on the proposed dates 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 readiness to deliver some of these changes may 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. If this situation arises, 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 that elements of the TMAD are changed at different times to each other. Thus, the 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 apply across different cohorts, DCC may decide to recommend to BEIS that these changes are only made to apply to the FOC (NP) cohort and/or IOC cohort in order to expedite the RP Decommissioning for these cohorts. If this occurs, then DCC would re-consult on changes to be applicable to other cohorts.

On 5 December 2022, DCC concluded²⁶ on proposals to extend the expiry date in the TMAD to 31 March 2024, along with some housekeeping matters and changes arising from the Various 1 Part 2 Conclusion. DCC expects the Secretary of State to re-designate the TMAD shortly following this recent conclusion. On this basis, the TMAD changes set out in this document are presented as redlined changes against the prior conclusion version TMAD V23.H²⁷.

Finally, in preparing this consultation DCC became aware that the definition of **Recently Dormant SMETS1 Installation** was incorrectly included in the TMAD with '*[date on which this version of TMAD takes effect to be inserted]*' instead of '*12 November 2020*'. DCC has corrected this matter in the TMAD included in this consultation.

Closure 2 Q11

Do you agree with the proposed re-designation date of 21 February 2023 (or within one month thereafter) for the changes to the TMAD within this consultation (including the correction to the definition of 'Recently Dormant SMETS1 Installation')? Please provide a rationale for your views.

10.2. RP Decommissioning Timetables

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to BEIS a conclusions report for the Department's Secretary of State consistent with the regulatory requirements for preparing the respective RP Decommissioning Timetables for both the IOC and FOC (NP) cohorts as per Clause 7 of the TMAD. This conclusions report will contain updated evidence that the criteria for decommissioning of the respective Requesting Parties for the IOC and FOC (NP) cohorts have 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 Friday 10 February 2023.

Following amendment of the regulatory framework arising from this consultation which is expected to be on 21 February 2023, DCC will formally submit the separate draft RP Decommissioning Timetables for the IOC and FOC (NP) cohorts to the Secretary of State on Friday 24 February 2023. Where the Secretary of State approves each the RP Decommissioning Timetables, DCC will take steps to decommission the relevant Requesting Party. DCC has discussed approval of each 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 each RP Decommissioning Timetable on Wednesday 15 March 2023 (as described above). Following approval DCC understands that these closure dates will be reflected into the Joint Industry Plan (JIP) via the IMF, updating those introduced at the consultation stage as necessary.

Please note that DCC may conclude separately on each cohort at different times to each other. This circumstance may arise where there are elements of slippage on one cohort compared to the other. DCC considers this to be an economically efficient approach compared to delaying closure

²⁶ <https://www.smartdcc.co.uk/consultations/snets1-conclusion-tmad-expiry-date-extension-and-housekeeping/>

²⁷ <https://www.smartdcc.co.uk/media/i2sbzdbn/tmad-v23h-clean.pdf>

of one cohort until both cohorts are ready. In such circumstances, it is proposed that BEIS could approve one RP Decommissioning Timetable at separate times to the other. Should any such approval need to occur outside the windows proposed, then a further consultation on a revised draft RP Decommissioning Timetable would be required.

11. How to Respond

Please provide responses in the attached template by 12:00 on Friday 27 January 2023 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.

12. Attachments

Attachment / Title
1. Draft Notification Text on TMAD
2. SMETS1 Closure 2 Response Template
3. Draft RP Decommissioning Timetable for IOC v1.0
4. Draft RP Decommissioning Timetable for FOC (NP) v1.0
5. TMAD v23.HC2 Draft Redlined against V23.H clean

Table 3 – Attachments

Attachment 1

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

This direction is also being notified to the SEC Administrator.