

SMETS1 Consultation

FOC (BG); Unenrolled L&G
meters not included in FOC (BG)
or FOC (NP) cohorts; SMETS1
TMAD; DMCT and MDUST

Version: 1.0

Date: 10th September 2024

Closure Date: 8th October 2024 at 17:00

Author: DCC Regulation

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1. Executive Summary

Background

1. The Data Communications Company (DCC) is the digital spine that is supporting the transformation of the energy system in Great Britain. DCC was licensed by the Secretary of State and is regulated by the Office of Gas and Electricity Markets (Ofgem) to connect smart meters in homes and small businesses across Great Britain to a single, secure, and interoperable digital network.
2. In 2018 and 2019, the Secretary of State¹ at the time directed changes to the Energy Supplier and DCC Licences as well as the Smart Energy Code (SEC). This required DCC to provide services to enrol first-generation (SMETS1) meters on to DCC systems and for energy suppliers to enrol these in a timely way. This has enabled consumers to access the benefits of an interoperable smart metering market. To date, a total of 12.29 million SMETS1 meters have successfully migrated on to DCC systems. Most energy suppliers have now completed enrolling their SMETS1 meters.

Areas for consultation

3. DCC is now consulting on a number of key SMETS1 areas. These are as follows:
 - A. Decommissioning the FOC (BG) cohort migration capability – Chapter 2
 - B. Disapply the migration requirements for the unenrolled L&G meters not included in FOC (BG) or FOC (NP) cohorts– Chapter 3
 - C. Extending SMETS1 TMAD to 31 Dec 2025 to **support** MOC (Secure) migrations – Chapter 4
 - D. Closing MDUST service for the FOC (BG) cohort and curtailing DMCT service – Chapter 5

A. Decommissioning the FOC (BG) cohort migration capability (Chapter 2)

4. SMETS1 eligible meters² have been separated into three groups termed Initial Operating Capacity (IOC), Middle Operating Capacity (MOC) and Final Operating Capacity (FOC). Each group, or sub-group based on SMSO, was allocated a GroupID with specific requirements described in the SMETS1 TMAD. Those GroupIDs form the different cohorts of meters where the process and rules for enrolment differ from other cohorts.
5. The meters in the FOC are split into three cohorts: FOC (BG) and FOC (NP) cohorts (with GroupID EA and EB respectively); and the unenrolled L&G meters that were not included in the FOC (BG) or FOC (NP) cohorts
6. SEC Appendix AL of the TMAD³ is currently set to expire on 31 December 2024. This sets out the regulatory framework including the bulk of the rights and responsibilities for DCC and Supplier Parties governing the migration of SMETS1 meters onto DCC network.
7. The FOC (BG) meter cohort is expected to complete by October 2024 and so the closure and decommissioning of this cohort can begin. In this context, this consultation also considers the small number of meters remaining in the FOC cohort, which had previously been deprioritised to allow progress in enrolling the larger components of the FOC cohort (BG and Npower).

B. Disapply the migration requirements for the unenrolled L&G meters not included in FOC (BG) or FOC (NP) cohorts from migration requirements (Chapter 3)

¹ BEIS is now the Department for Energy Security and Net Zero (DESNZ). This document will refer to it as the “Department”

² [DECC Government response to the consultation on the enrolment of SMETS1 meter cohorts](#)

³ [SMETS1 Transition Migration Approach Document \(SMETS1 TMAD\)](#)

8. DCC has been investigating options for a possible migration solution for the unenrolled L&G meters not included in FOC (BG) or FOC (NP) cohorts. The options are subject to high technical risk and uncertainty and the risk and uncertainty may lead to the costs for each option materially changing. As such, it is DCC's view that this renders the migration uneconomic. We are now seeking views from stakeholders on the proposal to disapply the migration requirements in relation to this small group of meters.

C. Extending the SMETS1 TMAD to 31 December 2025 to support MOC (Secure) migrations (Chapter 4)

9. Enrolment in the MOC (Secure) meter cohort is ongoing. Approximately 1 million eligible meters remain to be enrolled. As such, it is unlikely to be completed in 2024. To facilitate this and the required steps for closing the cohort's RP - whilst allowing time for any delays - requires DCC to maintain support for the MOC (Secure) migration service past the current TMAD expiry date on 31 Dec 2024. We are therefore consulting on an extension of the SMETS1 TMAD validity to 31 December 2025.

D. Closing the MDUST service for the FOC (BG) cohort and curtailing the DMCT service (Chapter 5)

10. Given the reduced number of parties migrating, DCC is seeking stakeholder views on reducing the testing services that DCC provides in support of SMETS1 enrolment in line with the provisions in SEC Appendix AK - SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD)¹. These testing services are as follows:
 - a. Device Model Combination Testing (DMCT) - The first element of these services is the Device Model Combination Testing (DMCT) process. This is used to evidence that a device model combination (DMC) operates successfully with DCC's enrolment solution. The usage of this service has significantly reduced. DCC therefore intends to curtail its usage as described within Chapter 5.
 - b. Migration Device and User System Testing (MDUST) - The second element is the MDUST process, which allows a Testing Participant to test the interactions between its solution and the systems and processes used by DCC to enrol Active and Mixed SMETS1 Installations. Presently MDUST remains on open only for the FOC (BG) cohort, we are now proposing to close the MDUST service for this final cohort.

Next steps

11. This conclusion closes at 17:00 on **8th October 2024**. Please provide responses to DCC at consultations@smartdcc.co.uk. DCC will provide the Department with a copy of each consultation response.
12. For the FOC (BG) closure, DCC will provide the Department with the Draft Decommissioning Timetable and a letter setting out the closure statements. Where the Department direct DCC to proceed DCC will work through the decommissioning process.
13. DCC will also provide a report and recommendations on the responses related to the migration requirements for the unenrolled L&G meters not included in FOC (BG) or FOC (NP) cohorts.
14. DCC will provide a conclusion report on the proposal to extend the SMETS1 TMAD.
15. DCC will provide a conclusions report to the Department related to the requirements of Clause 4 of the SMETS1 SVTAD (covering the proposed amendments to the TMAD by DCC) and proposed changes to the SMETS1 SVTAD itself.

¹ See <https://smartenergycodecompany.co.uk/documents/sec-subsidary-documents/sec-appendix-ak-sec-variation-testing-approach-document-for-smets1-services/>

2. Completing Migrations in the FOC (BG) Cohort

2.1. Overview

16. Consistent with SMETS1 TMAD Clause 7, this section sets out the rationale for DCC considerations that it is appropriate for DCC to now propose the closure of the Requesting Party service in respect of the FOC (BG) cohort.
17. This cohort consists of British Gas SMSO meters, of which approximately ~3,380,000 meters have been successfully migrated onto DCC systems to date. One Responsible Supplier is responsible for the active unenrolled SMETS1 meters operating in this cohort and has indicated that migrations will be completed by the end of October 2024.
18. By the proposed Decommissioning date for this cohort DCC expects that there will be no further unmigrated solely dormant SMETS1 installations that will be eligible to be enrolled. Each of these installations will have had the opportunity for exhaustive attempts to be Migrated. Any unenrolled dormant meters will have been notified to suppliers under the various Exclusion Categories, as set out in SMETS1 TMAD Clause 18, as part of the monthly reporting to suppliers via SharePoint.

2.1.1. Active / Mixed Meters

19. Migration of SMETS1 active and mixed installations can only be triggered through Migration Authorisation request to DCC by the Responsible Suppliers that operate the Active Meters, which are contained in the installations. Based on discussions with the Responsible Supplier that operates the Active Meters in such installations as part of the FOC (BG) cohort, DCC understands that by the proposed Decommissioning date all Migration attempts for SMETS1 installations containing Active Meters within the cohort will have been exhausted. DCC has arrangements in hand with the SMETS1 SMSO, which is involved in progressing migrations in the FOC (BG) cohort, to progress any mixed SMETS1 installation as soon as a Migration Authorisation is provided for the Active Meters. 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.

2.1.2. Dormant Meters

20. In this context, DCC's consideration is whether, for SMETS1 installations containing solely Dormant Meters, DCC has Migrated all SMETS1 installations that are not subject to being placed in an Exclusion Category, as defined by SMETS1 TMAD Clause 18. DCC is of the view that for the FOC (BG) cohort all Migrations of solely Dormant installations will be completed (i.e. either excluded from the migration path by being placed into a defined Exclusion Category or migrated) before the proposed RP Decommissioning Date.
21. It should be noted that following the specification of a Decommissioning date for the migration capability, a SMETS1 installation may become 'newly' Dormant following a Change of Supplier event in timescales 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.
22. Where time allows, DCC will continue to attempt Migrations for SMETS1 installations containing Dormant Meters (including SMETS1 installations containing newly Dormant Meters) up to and including the final Migration week.

2.1.3. Technical

DCC confirms that it has the technical and process matters in hand to enable it to comply with its obligations to ensure that the Requesting Party (RP) does nothing further to commence Migrations once the RP Decommissioning Date has expired.

In line with the requirements in SMETS1 TMAD Clauses 7.7 to 7.12 DCC must delete security keys and revoke certificates that are used for data encryption and message signing within the TMAD processes. SMETS1 TMAD Clause 7.13 also requires DCC to procure an audit covering the Requesting Party Decommissioning for the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to consider. For the FOC (BG) cohort, DCC can confirm that plans to deliver these matters are in hand and will be undertaken in respect of the Requesting Party following the decommissioning process to gather evidence to support the audit. DCC can confirm that there are no requirements on Energy Suppliers related to the Decommissioning process for the Requesting Party covering the FOC (BG) cohort or the following audit process.

23. In shutting down the Requesting Party in respect of the FOC (BG) cohort, DCC will ensure that the Requesting Party:
 - completes the Migrations relating to all SMETS1 installations where they have been commenced (where completion constitutes either successful commissioning or successful rollback to the SMETS1 SMSO);
 - shuts down the Secure File Transfer Protocol (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.
24. DCC will also ensure that:
 - any DCC accounts in use by the 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 relating to the FOC (BG) cohort.
25. Once a Requesting Party in respect of the FOC (BG) cohort is decommissioned, the services in respect of the cohort, which the Requesting Party provides to DCC under the existing contract, will have ended. It will not be possible to re-enable the services of the Requesting Party other than by re-procurement by DCC of such Requesting Party services.
26. In line with the requirements in SMETS1 SVTAD Clause 20.1A the Device Model Combination Testing (DMCT) Process in respect of the FOC (BG) cohort will also be closed on the proposed RP Decommission Date in respect of the FOC (BG) cohort.

2.2. Proposed Decommissioning Timetable

27. Based on the available information relating to the FOC (BG) cohort, DCC considers that it is appropriate to propose the below Decommissioning Timetable in respect of the cohort, which will allow Migrations in this cohort to be completed, and for the migration service to be decommissioned in the most cost-effective manner. This includes allowing the Responsible Supplier in the cohort to exhaust all Migration attempts for the cohort's SMETS1 installations containing Active Meters.
28. Note, while the 12-month enrolment eligibility periods for most meters in the FOC (BG) cohort, which followed their entry on the EPCL, expired by the end of 2022, the last additions to the EPCL relating to this cohort covered only a small number of installations and was added to the EPCL 10th October 2023 after approval by the Department on 6th October 2023. The decommissioning date

proposed below is more than 12 months after this date. This complies with SMETS1 TMAD 7.2 which stipulates that a proposed decommissioning date in a draft Decommissioning Timetable in respect of a Requesting Party cannot be earlier than 12 months after the last date on which the EPCL was updated by the DCC to include DMC entries for enrolment in each meter cohort, which is supported by the relevant Requesting Party

FOC (BG) Decommissioning Stage	Date
The final date for submission of a Migration Authorisation in relation to SMETS1 installations	Thursday 24 October 2024
The final Migration Week applicable to the SMETS1 SMSO for the FOC cohort	Week commencing Monday 28 October 2024
The Requesting Party P Decommissioning Date for the Requesting Party for the FOC cohort	Sunday 3 November 2024

Question One

Do you agree with the proposal to decommission migrations for FOC (BG) and do you agree with the proposed Decommissioning Timetable? Please give a rationale for your response.

2.3. Next Steps

29. Following consultation closure DCC will review responses and provide those details to the Department (as required through SMETS1 TMAD section 7).
30. Following the outcome of this consultation, DCC will provide a draft RP Decommissioning Timetable to the Department for approval by the Secretary of State. Based on prior discussion with the Department, and in line with the recommendation for the prior Decommissioning, this submission to the Secretary of State will take the form of a separate letter for covering the following four matters to support the recommendation:
 - 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 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 where it not to close.
31. Where the Department direction is to proceed with the proposed Decommissioning Timetable DCC will confirm the timetable and work through the decommissioning steps to completion. DCC aims to provide the final Decommissioning Timetable in mid-October.

3. Unenrolled L&G meters not included in FOC (BG) or FOC (NP) cohorts

3.1. Overview

32. In 2019, the combined FOC (NP) and FOC (BG) cohorts had over four million meters while it was initially assessed that there was an additional small number of meters (c32,000), which were not included in the FOC (BG) or FOC (NP) cohorts, potentially requiring a different enrolment solution.
33. During the investigation of migration solutions, DCC found that migrating the relatively larger FOC (BG) and FOC (NP) cohorts was more technically straightforward. Migrating the unenrolled L&G meters that were not included in the FOC (BG) or FOC (NP) cohorts required a more complex technical solution, made more complex as the meters were installed by two Supplier Parties with one subject to a Supplier of Last Resort event in 2019. Since 2019, 90% of the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, have been operated by more than 20 Supplier Parties, with one Supplier responsible for approximately 10%. All the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, are presently operating in dormant mode.
34. In January 2020, DCC encountered issues when testing the implementation for the FOC (BG) and FOC (NP) capabilities. These related to the interoperability of legacy components. As a result, a decision was taken to delay implementing the solution to migrate the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, in order to focus on enrolling the FOC (BG) or FOC (NP) cohorts based on the clear benefits to consumers. This de-prioritisation of the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, was formalised in August 2020 at the Implementation Managers Forum (IMF) and reflected in the Joint Industry Plan (JIP) - version 7.6 from November 2020.
35. Between August 2020 and September 2022, the FOC (BG) and FOC (NP) cohorts remained the priority, including resolving the compatibility and interoperability issues identified in January 2020 through multiple code uplifts.

3.2. Developing Options to enrol the unenrolled L&G meters not included in the FOC (BG) or FOC (NP) cohort

36. Between September 2022 and March 2024, DCC focused on finding a solution to enrol the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts. In that time, the total number of meters available for migration in the cohort has fallen from c. 32,000 to c. 15,000 due to suppliers replacing SMETS1 with SMETS2 meters. This is continuing at a rate of c. 450 per month.
37. During this period, seven different solution options for migrating the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, were identified by DCC. Most of these involved variations of the standard approach to migration in line with the SMETS1 TMAD where the same entity, such as Trilliant, would typically provide the SMSO and Requesting Party services to enable migration. Such options included re-using some of the infrastructure that DCC had developed for replacing SMETS1 devices, relaxing security requirements (if deemed appropriate and at low risk) that would need to be complied with during migration and using Trilliant's SMSO services alongside Requesting Party services from another entity.
38. These innovative variations of the standard approach to enrolment were considered and then pursued by DCC as part of DCC's attempts to find a time and cost-efficient way of enrolling the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, even where

significant amendments to regulations would have been required. The variations were explored because after beginning its work to identify possible options for migrating the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts,, it became clear to DCC that the standard approach would be too costly and protracted to implement.

39. DCC investigation of these variations showed that their implementation was likely to result in significant technical challenges and uncertainty that was associated with high costs and risks related to security aspects of enrolment and prolonged delivery time. The technical challenges, risks and uncertainty introduced further complexity to these options as well as the risk that the potential implementation costs for these options may materially change, which renders migration of the unenrolled L&G meters that were not included in the FOC (BG) or FOC (NP) cohorts, uneconomic.
40. To illustrate this, the technical option which was most viable required the cohort's meters first being migrated between Trilliant's SMSO and British Gas' SMSO before being migrated onto DCC's network. This unique and untested "SMSO-to-SMSO" migration step is unlike other SMETS1 migration steps that have been completed by DCC to date and represents increased delivery risk and uncertainty compared to existing SMETS1 migration practices.
41. Previous migration solutions have resulted failures to enrol at different stages of the process, including the required update firmware stage and through the standard migration process. Data from DCC's enrolment activity related to other SMETS1 cohorts shows that in other cohorts there is known to be a loss of SMETS1 meters during migration. DCC expects the "SMSO-to-SMSO" step may reduce the number of failures during enrolment, but the technical complexity that this step involves presents the risk that such failures increase and may result in even fewer meters being successfully migrated. These losses mean that relatively fewer than the c. 15,000 meters available for migration in March 2024 are likely to be successfully enrolled on to DCC systems.
42. Additional regulatory and technical complexity further added to the delivery risk of this option, including from the liabilities that would need to be accepted and accommodated in the regulatory framework to adjusting the reporting rules, which would place costs on all suppliers for relatively few meters. In June 2024 the viability assessment of this, and the other options that DCC has considered to enable migrating the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, showed an estimated implementation timeline in 2025 and a negative net present value. DCC therefore does not consider it in the best interests of the GB consumers to provide a migration solution for these meters.

3.3. Disapplying migration requirements in relation to the unenrolled L&G meters not included in the FOC (BG) or FOC (NP) cohorts

43. All Suppliers responsible for meters in this cohort operate them as Dormant and there is no active SMSO contract for the delivery of smart services for any of these meters. DCC has an obligation to migrate SMETS1 meters, to which migration requirements apply, and engaged with the Energy Suppliers that are responsible for operating the meters. These Supplier Parties initially indicated a preference for enrolment of these meters they have also shown their understanding of the technical challenges, risks and costs that are associated with developing an enrolment solution for the cohort, as well as their recognition that the residual meters in the cohort have no path to enrolment. The Parties that operate the majority of these meters have also indicated their assumption that the meters will need to be replaced with SMETS2 devices. In the light of the technical risks and cost impacts of delivering a solution in relation to the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, DCC is now proposing to disapply the SMETS1 migration requirements in relation to these meters.

Question Two

Do you agree that the SMETS1 enrolment requirements should be disapplied in relation to the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts? Please give a rationale for your response.

3.4. Next steps

44. Following consultation conclusion DCC will provide the Department with a copy of each consultation response.
45. DCC will provide a report on the proposal and consultation responses to the Department, including any recommendations based on those responses. Should the Department conclude that that migration requirements in relation to the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, should be disapplied, DCC will work to ensure impacted Parties are aware of the change.

4. Proposed TMAD Extension for MOC (Secure)

4.1. Overview

46. As described above, FOC (BG) is expected to complete migrations shortly and is proposed for decommissioning in 2024. It is also proposed that the SMETS1 migration requirements are disapplied in relation to the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts. Following this, the only remaining meters available for migration will be those in the MOC (Secure) cohort.
47. The SMETS1 TMAD Clause 1.3 sets out that the document will cease to apply on 31 December 2024, following which no further migrations can take place.
48. Migration services for SMETS1 meters in the MOC (Secure) cohort have been available since January 2021. Almost 5 million meters have been migrated in this cohort and around 4.5 million are operating on the DCC system. Around 1 million SMETS1 meters remain eligible for enrolment in the MOC (Secure) cohort, the vast majority of which are operated by a single Responsible Supplier. This Responsible Supplier has indicated that, most of the meters are operated in prepayment mode, and that migrations will be completed over the summer months to limit the risk of harm to the consumers. Therefore, enrolment in the MOC (Secure) cohort is unlikely to be completed in 2024.
49. Whilst most Energy Suppliers have completed enrolment, enrolment in the MOC (Secure) cohort is considered to be in the best interests of consumers, and so in August 2024, under SMETS1 TMAD Clause 1.2, DCC was directed by DESNZ, to prepare and consult on an extension to the SMETS1 TMAD validity period.
50. To enable enrolment in the MOC (Secure) cohort, the necessary steps for decommissioning, and to allow additional time for any unforeseen issues that might delay these activities would require DCC to maintain its support for the MOC (Secure) migration service past the current TMAD expiry date. DCC therefore proposes amending SMETS1 TMAD Clause 1.3 to extend the SMETS1 TMAD validity to 31 December 2025. In addition, a change to clause 3.14E is also proposed to ensure clarity regarding the disconnection of S1SP and SMSO systems following the completion of enrolment. A version of the SMETS1 TMAD, which shows the proposed amendment in track changes, has been published alongside this consultation.

Question Three

Do you agree with the proposal to extend the SMETS1 TMAD expiry date to 31 December 2025 and with the proposed amendment to SMETS1 TMAD to implements this? Please give a rationale for your response.

4.2. Next Steps

51. Following consultation conclusion DCC will provide the Department with a copy of each consultation response. DCC will also provide the Department with a conclusions report related to the TMAD re-designation covering the proposed amendments and will make a recommendation to the Department on whether the proposals should result in re-designation by the Secretary of State.
52. DCC will also provide an updated copy of the TMAD that could be re-designated where the Secretary of State considers that to be appropriate.
53. DCC has discussed the re-designation of the TMAD with the Department 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 1st November or as soon as reasonably practicable within one month thereafter.

54. To expedite the re-designation of the SMETS1 TMAD, DCC is also seeking views on behalf of the Department 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.

Question Four

Do you agree with the proposed re-designating the SMETS1 TMAD on 1st November (or within one month thereafter)? Please provide a rationale for your views.

5. Proposed Changes to DMCT and Closure of MDUST

5.1. Overview

55. The SEC Variation Testing Approach Document for SMETS1 services (SMETS1 SVTAD) describes the testing requirements for the DCC's SMETS1 migration solution, including the requirement for DCC to provide the Device Model Combination Testing (DMCT) process and the Migration Device and User System Testing (MDUST) process.
56. The DMCT Process demonstrates that DCC systems can successfully migrate a Device Model Combinations (DMC), which form part of SMETS1 installations, and enables addition of the DMCs to the SMETS1 Eligible Product Combinations List (EPCL). Once added to the EPCL, those installations become eligible for enrolment. Robust utilisation of the DMCT process through physical testing and substantive equivalence¹, alongside SMETS1 System Integration Testing (SIT), has resulted in over 4,200 DMC entered on to the EPCL.
57. A substantial number of new DMCs were added to the EPCL following approval of EPCL Report #22 by the Secretary of State in December 2021. DMCT was most recently utilised in 2023 with DESNZ accepting EPCL report #30 and #31 relating to, respectively, the FOC (BG) cohort and the MOC (Secure) cohort.² These were accepted through an approval letter issued on the 6th of October 2023 where the new combinations were added to the EPCL on the 10th of October 2023. Previously, DCC commissioned a regular request for information (RFI) to energy suppliers to understand whether they intended to propose any new DMCs for potential entry to the EPCL. Following changes to this process in February 2024³, energy suppliers have responsibility to notify their intent to propose any such DMCs to DCC.
58. Since March 2022, DCC's MR01⁴ reports (that highlight potential new installations eligible for enrolment and may comprise new DMCs), have not identified any new DMCS that may potentially require new EPCL entries. Since February 2024, DCC has not been made aware by energy suppliers of any plans for additional entries to the EPCL, for the FOC (BG) or MOC (Secure) cohort that remain open.
59. MDUST allows Testing Participants (Energy Suppliers) to test the interactions between their own system solution and the systems and processes used by the DCC to migrate SMETS1 installations including to prove the migration works for any new DMC. The MDUST service is aligned to the broader Device and User System Testing (DUST) which is prescribed by the Enduring Test Approach Document (ETAD)⁵. The numbers of Testing Participants opting to perform Migration DUST has dropped significantly compared to when it was first introduced in August 2019. The last usage of Migration Testing by a Testing Participant (either in the DCC Lab or their own Remote Test Lab) was in May 2024.

¹ <https://www.smartdcc.co.uk/media/6523/dcc-guidance-note-substantive-equivalence-v50.pdf>

² <https://smartenergycodecompany.co.uk/documents/sec/20231006-approval-of-smets1-epcl-entries-in-reports-30-and-31/>

³ <https://www.smartdcc.co.uk/consultations/conclusion-to-the-consultation-to-the-smets1-consultation-dmct-process-rfi-removal/>

⁴ MR01 - Installation Details Report - The report originates from Requesting Parties (RP) and contains list of all of installations registered on SMSO with details of the device models, whether the meters are Active or Dormant, whether it is a split site, the payment mode and WAN connectivity status. The file is delivered to SMETS1 Migration Reporting System.

⁵ <https://smartenergycodecompany.co.uk/documents/sec-subsidary-documents/sec-appendix-j-enduring-testing-approach-document/>

5.2. Proposed Changes to the DMCT Process and MDUST Closure

DMCT

60. Enrolment in the IOC, MOC (MDS), and FOC (NP) cohorts has been completed, the Requesting Party services in respect of those cohorts have been decommissioned, and so the DMCT process is no longer available in relation to these cohorts. DMCT is currently only open for the MOC (Secure) and FOC (BG) cohorts.
61. Where the proposals to decommission the FOC (BG) cohort and to disapply the migration requirements in relation to the unenrolled L&G meters, which were not included in the FOC (BG) or FOC (NP) cohorts, are accepted, there will be no requirement to provide a DMCT process for any FOC cohort from the above proposed RP Decommissioning Date in respect of the FOC (BG) cohort. DCC's proposal is, therefore, to close the DMCT Process in relation to FOC (BG) from the above proposed RP Decommissioning Date as per Clause 20.1A of the SMETS1 SVTAD, which stipulates that the DMCT Process should not apply once the relevant RP Decommissioning Date for the associated RP has expired.
62. The MOC (Secure) cohort will remain open until a Decommissioning Date is applied. Until that time, DCC is required to support enrolment for the MOC (Secure) cohort and therefore DMCT may need to be utilised.
63. DCC expects that DMCT will only be used in exceptional circumstances for the MOC (Secure) cohort and therefore proposes to curtail the way in which it can be used. Specifically, DCC proposes use of the DMCT service should be subject to Direction from the Secretary of State. This also means that DCC has increasingly been able to process DMCs as substantively equivalent to those with an existing EPCL entry, which negated the need for physical device testing and enhanced DCC's expertise in processing new DMCs.
64. In this context, DCC expects that DMCT will only be used in exceptional circumstances, including in relation to the MOC (Secure) cohort, as DCC is of the view that processing any new DMCs, and therefore any new EPCL entries, is unlikely to be required to support enrolment. Should any new proposed DMCs materialise, DCC considers it sufficient to use its testing experience to process them as substantively equivalent to those with existing EPCL entries, which is likely to save up to £155,000 per year after DCC's contract for DMCT service provision expires in 2024. However, should physical device testing be required, DCC would promptly seek to procure this service in a cost-efficient manner on a short-term basis. DCC therefore proposes to curtail the way in which DMCT can be used going forward. Specifically, DCC proposes use of the DMCT service should be subject to Direction from the Secretary of State.
65. To support any determinations by the Secretary of State in such cases, DCC proposes that Energy Suppliers would be required to provide adequate evidence to the Secretary of State to show that any proposed new EPCL entry is essential and unavoidable, given that firmware can always be upgraded via the DCC after migration. To reflect this in the SMETS1 SVTAD, DCC proposes amending SMETS1 SVTAD Clause 20 to only require DCC to support the DMCT process where there is a Direction to do so from the Secretary of State following an application for DMCT by an energy supplier. Additionally, a number of clauses will be removed from section 20 of the SMETS1 SVTAD that are no longer required with the closure of FOC (BG).
66. Given DCC's substantial device testing expertise and maturity of DCC's EPCL data, DCC will review evidence from energy suppliers in support of their application for potential new EPCL entries. DCC will then provide the Secretary of State with a recommendation for consideration, which would support any determinations by the Secretary of State in relation to any such application. To reflect this in the SMETS1 SVTAD, DCC proposes to amend the amending SMETS1 SVTAD Clause 20.1 that sets out the process for considering whether DMCT should apply to any new proposed DMCs.

A version of the SMETS1 SVTAD, which contains DCC's proposed amendments that implement the proposed changes. has been published alongside this consultation. A redlined version of this document is published alongside this document.

MDUST

67. Enrolment in the IOC, MOC (MDS), and FOC (NP) cohorts has been completed, and the MDUST process in respect of these all cohorts is closed. DCC concluded on the closure of the process for IOC and MOC (MDS) in May 2022¹, for FOC (NP) in September 2022², and for MOC (Secure) in January 2023³.
68. Migration DUST is only currently provided for the FOC (BG) cohort. Enrolment in the FOC (BG) cohort is expected to complete migrations by October 2024, in line with the proposed Decommissioning Timetable described above. This consultation proposes that the Migration DUST testing service is closed on 3rd of November 2024. DCC is proposing closure of MDUST for FOC (BG) in line with DCC's SVTAD requirements on economic efficiency grounds that there is no future demand. The approximate cost annual saving to DCC Customers in closing MDUST is £1,300,000 annually. DCC previously consulted on MDUST closure for FOC (BG)⁴; however, following consultation, MDUST for the cohort remained open. DCC has liaised with the Responsible Supplier who has indicated that MDUST will not be required following migration completion and therefore we consider 3rd of November 2024 a suitable closure date for the service.
69. The existing SMETS1 SVTAD, requires DCC to provide Migration DUST consistent with the details set out in the MTAD. Closure of Migration DUST for FOC (BG) (where GroupID = "EA") will require DCC to update MTAD Table 17.6 'Migration DUST Availability' as per requirements of MTAD 17.24. A redlined version of this document is published alongside this consultation.
70. DCC may modify the MTAD only in accordance with the procedures specified in clause 4 of the SMETS1 SVTAD. This includes:
 - a. Modifications must be in accordance with any direction to do so made by the Secretary of State.
 - b. Modifications by the DCC must have undertaken consultation with Parties and other relevant persons, the TAG, the Authority, and the Secretary of State.
 - c. DCC must present to the Secretary of State a summary of the consultation responses received and an explanation of how the DCC has taken them into account.

Question Five

Do you agree with DCC's proposal to curtail the SMETS1 DMCT process? Please provide a rationale for your views.

Question Six

Do you agree with DCC's proposal and timing to close SMETS1 MDUST processes? Please provide a rationale for your views.

¹ <https://www.smartdcc.co.uk/consultations/snets1-conclusion-initial-closure-matters/>

² <https://www.smartdcc.co.uk/consultations/snets1-conclusion-migration-dust-closure-for-foc-np/>

³ <https://www.smartdcc.co.uk/consultations/snets1-conclusion-migration-dust-closure-for-moc-secure/>

⁴ <https://www.smartdcc.co.uk/consultations/snets1-dcc-to-re-visit-migration-dust-closure-for-foc-bg/>

5.3. Next Steps

71. Following consultation conclusion DCC will provide the Department with a copy of each consultation response. DCC will also provide the Department with a conclusions report related to the requirements of Clause 4 of the SMETS1 SVTAD, (covering the proposed amendments to the MTAD by DCC) and proposed changes to the SMETS1 SVTAD itself. DCC will make a recommendation to the Department on whether the proposal should result in a Direction by the Secretary of State.
72. If a Direction is issued by the Secretary of State, DCC will work with the Code Administrator and shall publish the revised MTAD document on the relevant website.

6. How to Respond

73. Please provide responses by 17:00 on 8th October 2024 to DCC at consultations@smartdcc.co.uk.
74. 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 (The Department) and the Gas and Electricity Markets Authority (the Authority). Information provided to The Department 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 The Department 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.
75. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

7. Attachment 1

This attachment contains the text that the Department 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.