

James Cosgrove
Deputy Director & Head of Delivery
Department for Energy Security and Net Zero

By email only

2nd December 2025

Dear Jim,

RE: DCC's Recommendations following the October 2025 SMETS1 TMAD retention and SEC Appendix AM SMETS1 Supporting Requirements¹ consultation

DCC recently consulted on the two topics below:

1. **SMETS1 Device behaviour**, adding one device behaviour not yet incorporated into the SEC Appendix AM; and
2. **SMETS1 TMAD clause retention**, in preparation for the expiry of the SMETS1 TMAD, maintaining several definitions and obligations in SEC Appendix AM and SEC Appendix AC.

DCC received four responses to the consultation and on XX November 2025, DCC published its conclusions. This letter sets out our recommendations on the above stated proposals:

- **SMETS1 Device behaviour** - DCC received four responses to this part of the consultation, all of which supported the proposal. One response suggested a small amendment to align more with structure of the data query the Device behaviour relates to.
- **SMETS1 TMAD Retention** – DCC received four responses to this part of the consultation, all of which supported the proposals. No responder highlighted any additional clauses or definitions they considered should be retained post SMETS1 TMAD expiry.

Next steps

The proposed changes to SEC Appendix AM, regarding Device behaviour, will provide clarity to Parties on the functioning and management of the SMETS1 Devices they operate. Additional information is provided in Annex One. We recommend that the Secretary of State designate these proposed changes into SEC Appendix AM.

The updated versions of SEC Appendix AM and SEC Appendix AC provided contain the changes that the DCC consulted on in October. The changes received support from all consultation

¹ [SMETS1 Consultation - Clause retention beyond SMETS1 TMAD expiry and proposed amendments to the SMETS1 Supporting Requirements | Smart DCC](#)



responses. We recommend that the Secretary of State designate these proposed changes into SEC Appendix AM and SEC Appendix AC.

For the implementation of these changes, we consulted on a proposed Designation date of 12th December 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter). The four responses were supportive of this approach. Additional information can be found in Annex Three. We therefore recommend that the Secretary of State designate these proposed changes into SEC Appendix AM and SEC Appendix AC on 12th December 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter).

Yours sincerely,

A handwritten signature in dark ink that reads 'Arik Dondi'.

Arik Dondi
Arik Dondi
Head of Regulatory Compliance, DCC



Annex One

DETAIL OF PROPOSED AMENDMENTS TO SEC APPENDIX AM CONCERNING DEVICE BEHAVIOUR

SEC Appendix AM contains clauses that explain SMETS1 Device behaviour where that behaviour does not align to GBCS. The behaviours and their description relate to specific SMETS1 Devices. Annex A of the SEC Appendix AM is the Device Model Variations to Equivalent Steps Matrix (DMVESM) which identifies the specific SMETS1 Device (or Devices) that each SEC Appendix AM clause relates to. The proposed change in this consultation cover both amendments to SEC Appendix AM clauses and amendments to the DMVESM.

Additional Device behaviour for inclusion in the S1SR

The Device Issues Recommendation Forum (DIRF) is technical group attended by DCC and SEC Parties that considers SMETS1 Devices specific issues, including whether they are suitable for inclusion in SEC Appendix AM. Through that engagement one additional meter behaviour has been highlighted that does not align to GBCS and is not yet described in SEC Appendix AM.

This behaviour is considered suitable for inclusion into SEC Appendix AM by DIRF and we proposed to add this device behaviour to SEC Appendix AM. We consider that the addition will allow Parties to understand the behaviour of their devices better and manage them more effectively.

The Device behaviour and SEC Appendix AM additions related to Itron ESME Devices and the SRV 4.4.2 (Retrieve Change Of Mode / Tariff Triggered Billing Data Log). For Itron ESME Devices the SRV fails where no temporal data is provided and the proposed amendments reflect this behaviour.

All the consultation responses received supported the proposed amendment to SEC Appendix AM and the associated change to the DMVES.

Recommendation

The proposed change provides additional information on the behaviour of SMETS1 Devices where that behaviour does not align to expectations, and those set out in GBCS.

The proposed changes will provide clarity to Parties on the behaviour of the Devices they operate and allow them to manage those Devices more efficiently.

DCC received four responses to the proposed addition of this SMETS1 Device Behaviour in SEC Appendix AM. All the consultation responses provided support for the proposals. DCC consider that the proposed change should be designated into SEC Appendix AM as soon as possible.



Annex Two

SMETS1 TMAD CLAUSE RETENTION AND DETAIL OF PROPOSED AMENDMENTS TO THE SEC APPENDIX AM AND SEC APPENDIX AC CONCERNING DEVICE CONFIGURATION

The SMETS1 TMAD is due to expire from 31st December 2025 after which it will cease to apply. The SMETS1 TMAD was designed and written to be transitional and focused on providing the rights, obligations and operational mechanisms by which SMETS1 Devices would be enrolled on to DCC systems. It was drafted cognisant of the wider regulatory framework and which it would be removed from at expiry.

DCC considered it prudent to review the SMETS1 TMAD to identify any obligations that are required for the ongoing operation of SMETS1 Devices before they expire on 31st December 2025. In that review we have found a small number of obligations which we consider are beneficial to be retained to support the ongoing operation of SMETS1 Devices.

We consider that those clauses, such as definitions, identified for retention will provide clarity regarding ongoing obligations, or clarify DCC obligations where actions are ongoing. We consider that the majority of clauses in the SMETS1 TMAD are no longer required and their ceasing to apply will not cause any disruption or confusion to the ongoing operation of SMETS1 Devices.

Proposed SMETS1 TMAD clause retention

We identified five definitions contained within the SMETS1 TMAD where the defined term is also used elsewhere in the SEC. Since these other references utilise the SMETS1 TMAD definition we consider that the five definitions need to be retained. Without their retention, the other obligations that may use these definitions, may become ambiguous or irrelevant. To avoid this, we proposed retaining the five definitions from SMETS1 TMAD in SEC Appendix AM and to SEC Appendix AC, where applicable.

SMETS1 TMAD 3.14E and 3.14F provide obligations on DCC to ensure that any SMETS1 Service Provider systems, which are no longer required for the provision of Services, are disconnected from DCC Systems and the SMETS1 Service Provider. At the time of writing, these disconnection activities are ongoing and for the avoidance of doubt we propose that these obligations are retained in SEC Appendix AM to support secure operation of SMETS1 Devices. These obligations include additional defined terms (beyond those already highlighted) in the SMETS1 TMAD which should therefore be retained.

SMETS1 TMAD 7.9A – 7.9D provide rights and obligations in relation to the deletion or retention of data used for migration purposes. Since DCC continues to hold data, and where that data may be required for the continued operation of SMETS1 Devices, we consider that these obligations should be retained in the S1SR. Retaining these rights and obligations provides clarity about DCC's ability to retain data that is needed to support ongoing operation of SMETS1 Devices and to delete data where it is no longer required.

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Table One - Proposed amendments to the SEC Appendix AM and SEC Appendix AC

Current reference	Item description	Logic	Proposed reference
SEC Appendix AL SMETS1 TMAD Defined Terms and Interpretations	Definition of GroupID Definition of Group Definition of Group Device Model Combination List	GroupID Referenced in the SEC Appendix AM and required for those obligations, where each definition provides additional information	SEC Appendix AM 2 Defined Terms
SEC Appendix AL SMETS1 TMAD Defined Terms and Interpretations	Definition of SMETS1 CAD Definition of SMETS1 PPMID	Referenced in SEC Appendix AC and required for those obligations	SEC Appendix AC Section 13 Definitions
SEC Appendix AL SMETS1 TMAD 3.14E – 3.14F	RP Separation requirements	Avoidance of doubt on the obligation to disconnect	SEC Appendix AM 2A Application of Section G (Security) 2A 1.1 – 1.2
SEC Appendix AL SMETS1 TMAD Defined Terms and Interpretations – related to 3.14E – 3.14F	RP Decommissioning Date Requesting Party Commissioning Party	Term contained in 3.14E – 3.14F which are proposed for retention.	SEC Appendix AM 2 Defined Terms
SEC Appendix AL SMETS1 TMAD 7.9A – 7.9D	Rights and obligations relating to DCC's continued use or deletion of data collected for migration purposes	To ensure that data required for the continued operation of SMETS1 Devices can be retained, while also providing a clear obligation on the deletion of data no longer required	SEC Appendix AM 2B Decommissioning of a Requesting Party or the Commissioning Party 2B 1.1 – 1.4

Out of Scope changes for future consideration

We have not identified any clause beyond SMETS1 TMAD that requires immediate amendment as a result of TMAD expiry. However, there are a number of clauses related to SMETS1 throughout the SEC which are no longer required where their retention will not impact the obligations or requirements for the continued operation of SMETS1 Devices.



DCC will engage with SECAS in due course on how to best manage a SEC Modification to consider removing SMETS1 migration related obligations that are no longer required.

Recommendation

DCC received four consultation responses to these proposals. All four responses supported the retention of the highlighted clauses in SEC Appendix AM and SEC Appendix AC. Three of the responses commented that their retention would ensure clarity for ongoing operation of SMETS1 Devices. All four responders confirmed that they had not identified any additional clauses that should be considered for retention.

DCC consider that the proposed change should be designated into SEC Appendix AM and SEC Appendix AC as soon as possible.



Annex Three

PROPOSED DESIGNATION DATE FOR AMENDED SEC APPENDIX AM AND SEC APPENDIX AC

For the proposed amendments to SEC Appendix AM and SEC Appendix AC, covering both the additional Device behaviour and TMAD clause retention, we proposed that Designation would be completed 12th December 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter).

All respondents supported the proposed designation date.

DCC consider that the proposed change should be designated into SEC Appendix AM and SEC Appendix AC as soon as possible.