

SMETS1 Conclusion Closure 2 – Part A

A SMETS1 conclusion on proposals by DCC for partial Migration (ESME only) for Dormant and Mixed Installations where there is no GSME-HAN connectivity for the IOC, MOC (Secure), and FOC Cohorts.

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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 an 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). In this document DCC concludes on its proposals to amend the TMAD in support of SMETS1 service delivery.

The Closure 2 Consultation² was issued on 16 December 2022 with responses due by noon on 10 February 2023. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD. DCC will be concluding on the Closure 2 matters in a number of separate parts.

This document is 'Closure 2 Part A Conclusion' covering the TMAD change for partial Migration. This conclusion document is expediting this TMAD amendment as there are required system changes to be implemented to support partial Migration (for the MOC (Secure) cohort) that are scheduled for implementation in the February 2023 maintenance release.

In the near term, there will be subsequent conclusions published by DCC covering:

- the remaining TMAD changes proposed in Closure 2;
- closure of the Requesting Party for the FOC (NP) cohort; and
- closure of the Requesting Party for the IOC cohort.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed regulatory changes.

2.1. Questions

The consultation set out eleven questions across a range of topics. This document only provides a response to Closure 2 Q1 (covering partial Migration), and Closure 2 Q11 (re-designation of the TMAD). Table 1 below details these questions as presented in the public consultation.

Number	Question
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.

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

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

Number	Question
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.

Table 1 – Consultation Questions – Closure 2 – Part A Conclusion

2.2. Responses

Stakeholders were invited to respond to the consultation by noon on Friday 10 February 2023 using the response template³ that was provided.

DCC received a written response from eight respondents regarding this consultation.

One respondent only provided a few comments and did not provide an explicit response to any of the questions. This respondent expressed broad support for the proposals outlined in the consultation document.

Following closure of the consultation, DCC has spoken to

- one respondent to confirm some aspects of their responses in relation to Q1 (see Section 3 below); and
- another respondent to confirm some aspects of their responses in relation to Q11 (see Section 4 below); and

2.3. Analysis of Responses

DCC subject matter experts have reviewed each response and analysed the respondents' feedback to the consultation. DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement. These are now presented in the following sections by question.

3. Partial Migration for Firmware / Configuration Failure for IOC, MOC (Secure), and FOC (Closure 2 Q1)

DCC sought views on proposals to extend partial Migration to the IOC, MOC (Secure) and FOC cohorts in the circumstances that there are GSME firmware / configuration failure. These changes were covered by the following question: "*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.*".

3.1. Respondents' Comments / DCC Analysis / Clarifications

Seven respondents provided a response to this question with all seven expressing broad support.

³ <https://www.smartdcc.co.uk/media/0ldfs5ok/smets1-consultation-closure-2-response-template-v2.docx>

One respondent expressed support without further comment.

One supportive respondent set out that partial Migration will be based on the S1SP activity to ignore the device for the FOC cohort. DCC discussed this point with the respondent. The respondent's comment was with reference to the operational implementation i.e. how partial Migration will work in practice based on changes to the data in the Migration Common File (MCF) within the Migration process. The respondent accepted DCC's explanation of this point (i.e. that the Requesting Party will prepare the data to support partial Migration ignoring the presence of the GSME). This respondent confirmed to DCC that it had no further concerns.

One supportive respondent set out that they supported partial Migration given the prior precedents set in this area. The respondent indicated that partial Migration improves smart services to customers (albeit for electricity) and does not constrain any subsequent action by an energy supplier either adding a SMETS2 gas-only install or replacing the entire SMETS1 Installation for SMETS2 devices. The respondent noted that the cost of the MOC (Secure) change scheduled for the February 2023 maintenance release to support partial Migration was not provided. The respondent assumed that the costs were relatively minor given the implementation schedule. DCC can confirm the cost of the change was proportionate to the scope of system change and thus minimal compared to the cost of early asset replacement.

One respondent expressed support, stating they are supportive of any change which will allow additional Migrations to be attempted.

One respondent agreed with this proposal, stating they accept that the partial migration of SMETS1 Installations is a pragmatic way forward when persistent GSME issues exist.

One respondent expressed support for extending partial Migration for GSME firmware / configuration failures in IOC, MOC Secure, and FOC cohorts. This respondent stated that Migrating the electricity meters on these SMETS1 Installations reduces the impact on consumers while maximising overall Migration. This respondent expressed explicit support for the legal drafting in Clauses 4.26A and 4.26B of the TMAD.

One supportive respondent expressed the view that all reasonable steps to enrol SMETS1 meters should be taken. This respondent stated that solely the SMETS1 GSME within a premises can be replaced with a SMETS2 GSME and 'hot shoe' for the SMETS2 Communications Hub, to avoid removal of the SMETS1 ESME. This respondent stated that by de-registering the SMETS1 GSME this would mean that prepayment customers would cease to be able to vend on change of supply. DCC accepts this point but also notes that the rationale for partial Migration is that there are communication issues with the GSME such that remote vending is already very unlikely to be successful. Thus, replacement of such gas meters is envisaged to be driven by wider Licence requirements on energy suppliers related to protecting energy customers.

3.2. Areas of Unresolved Disagreement

n/a.

3.3. Summary

DCC concludes it is appropriate to amend Clauses 4.26A and 4.26B of TMAD.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD to implement partial Migration for these cohorts.

4. TMAD Re-designation (Closure 2 Q11)

DCC sought views on re-designating the TMAD between 21 February 2023 and 21 March 2023 to account for the changes proposed in this consultation. These matters were covered by the following question: “*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.*”.

4.1. Respondents’ Comments / DCC Analysis / Clarifications

Seven respondents provided a response to this question with six expressing broad support.

Five respondents expressed support without further comment.

One respondent expressed support and stressed that the TMAD re-designation should be as soon as possible.

One respondent suggested that it would be more appropriate to redesignate the TMAD on or after the 7 March 2023 to reflect the extension to this consultation. DCC considers that re-designating the TMAD within the window between 21 February 2023 and 21 March 2023 is appropriate where there has been sufficient time to consider responses to the consultation. DCC explained to this respondent that it plans to bring forward a conclusion covering one aspect of the TMAD changes covering partial Migration aligned to the maintenance release (given the economic efficiency benefits) and the respondent accepted DCC’s viewpoint. The respondent indicated their concerns were focused on any early decision to close the IOC cohort. The respondent stated that they supported bringing forward the TMAD change to allow for partial Migration to be included in the next maintenance release.

4.2. Areas of Unresolved Disagreement

n/a.

4.3. Summary

DCC concludes it is appropriate to re-designate the TMAD between 21 February 2023 and 21 March 2023.

DCC proposes that the Secretary of State re-designates the TMAD on 21 February 2023 (aligned to the February maintenance release) or a later date within the window prescribed.

5. Summary of Drafting Changes

There are no changes to the TMAD arising from the comments received regarding the matters set out in this conclusion document.

Arising from an internal review within DCC, there is a minor update to the drafting in Clause 4.26A (e). The reference for the GT01 check for MOC (Secure) should be to Step 2 Table C2 in Appendix C of the TMAD rather than to Appendix A (which only applies to IOC and MOC (MDS)). These references are now split out as Clause 4.26A (e) (i) and Clause 4.26A (e) (ii).

Please note that the proposed TMAD changes have been transposed into the latest version of the TMAD that was re-designated⁴ on 20 December 2022.

⁴ <https://smartenergycodecompany.co.uk/latest-news/secretary-of-state-direction-on-the-smets1-transition-and-migration-approach-document-tmada/>

6. Conclusions

DCC is confident that, in consulting on the proposed TMAD changes, it has met its SEC obligations. DCC believes that it has undertaken appropriate consultation with industry regarding the proposed changes to the TMAD. Where necessary, DCC has addressed the comments that have been received from industry respondents and, where appropriate, sought additional feedback from them. DCC does not believe that the respondents' feedback to this consultation results in fundamental amendments to the TMAD. As such further consultation is not necessary or appropriate.

DCC is confident that the TMAD version submitted to the Secretary of State for re-designation reflects the requirements for document submission (as per Section N of the SEC) and considers the revised TMAD to be fit for purpose as it:

- is defined to a sufficient level of detail for re-designation into the SEC and is materially complete, and the content is technically accurate;
- contains revisions that continue to align it with the overall solution design for the SMETS1 Service and other relevant documents; and
- continues to provide an overarching framework that sets out clearly and unambiguously parties' rights and obligations which are consistent and aligned with the rest of the SEC requirements in relation to SMETS1 Services.

In summary, DCC considers that the revised TMAD is fit for purpose.

7. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document. DCC will publish its conclusions report on DCC's website and notify SEC Parties.

DCC expects the Secretary of State to decide on whether and when to re-designate the revised TMAD into the regulatory framework for the amendments in the scope of this consultation.

Given this consultation process, DCC notes that the earliest date that the amendments to the TMAD could be re-designated is 21 February 2023 and the latest date is 21 March 2023 without requiring a further consultation on the designation date.

8. Attachments

Attachment	Title
1.	TMAD v24.C2A draft delta against current version v23.0
2.	TMAD v24.C2A draft clean

Table 2 - Attachments