



# SMETS1 Conclusions Exclusion where Dormant but not due to Change of Supplier

A SMETS1 conclusion on proposals by DCC on how to treat  
Dormant SMETS1 Installations arising from termination of  
the contract between Energy Supplier and their SMETS1  
SMSO

Filename: CON\_SMETS1\_Conclusion\_ACTIVE\_to\_DORMANT\_ISSUED

Date: 25 May 2022

Author: [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk)

Classification: DCC Public

# Table of Contents

|   |          |
|---|----------|
| <b>1. Introduction and Context .....</b>  | <b>3</b> |
| <b>2. Stakeholder Engagement.....</b>   | <b>3</b> |
| 2.1. Questions .....  | 3        |
| 2.2. Responses.....   | 4        |
| <b>3. Analysis of Responses .....</b>   | <b>4</b> |
| 3.1. Proposed Excluded Category – Dormant not due to Change of<br>Supplier (Active to Dormant Q1) ..... | 4        |
| 3.1.1. Respondents' Comments / DCC Analysis / Clarifications.....                                       | 4        |
| 3.1.2. Areas of Unresolved Disagreement.....  | 5        |
| 3.1.3. Summary .....  | 6        |
| 3.2. Re-designation Date for the TMAD (Active to Dormant Q2).....                                       | 6        |
| 3.2.1. Respondents' Comments / DCC Analysis / Clarifications.....                                       | 6        |
| 3.2.2. Areas of Unresolved Disagreement.....  | 6        |
| 3.2.3. Summary .....  | 6        |
| <b>4. Summary of Drafting Changes .....</b>   | <b>6</b> |
| <b>5. Conclusions.....</b>  | <b>6</b> |
| <b>6. Next Steps.....</b>   | <b>7</b> |
| <b>7. Attachments .....</b>   | <b>7</b> |

# 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 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 Code (SEC). The latest version of the SEC was published on 24 March 2022 as v59.0.

In December 2020, the Department for Business, Energy and Industrial Strategy (BEIS) consulted<sup>1</sup> on changes to the TMAD to provide a framework to develop options for the Migration of SMETS1 Installations comprising Device Model Combinations (DMCs) which DCC consider currently blocked. In February 2021, BEIS concluded<sup>2</sup> on these changes, introducing Clauses 1.4 to 1.9 in the TMAD which provide a transparent process for promptly assessing SMETS1 Installations currently blocked for Migration. There have been several consultations and TMAD amendments consequently bringing in regulatory solutions to maximise migrations and to introduce Excluded Categories which are available on the DCC website<sup>3</sup>.

DCC issued the 'Active to Dormant' consultation which was titled 'SMETS1 Consultation – Exclusion where Dormant but not due to Change of Supplier'<sup>4</sup>. This consultation proposed a new Excluded Category (in Clause 18 of the TMAD) to capture the following circumstances:

1. there are Dormant Meters (where the change in status from Active to Dormant is due to the Energy Supplier terminating their contract for smart services with the SMETS1 SMSO); and
2. the Energy Supplier has provided a statement to DCC to confirm that the Energy Supplier reasonably believes that such Dormant Meters are not capable of successful Migration.

The Active to Dormant consultation was issued on 28 April 2022 with responses due by noon on 19 May 2022. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD.

## 2. Stakeholder Engagement

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

### 2.1. Questions

Table 1 below details the questions that were presented in the public consultation.

<sup>1</sup> 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/>

<sup>2</sup> The BEIS conclusion is available via <https://smartenergycodecompany.co.uk/latest-news/sec-v35-0-implemented-to-support-the-dcc-smets1-service/>

<sup>3</sup> <https://www.smartdcc.co.uk/consultations/>

<sup>4</sup> <https://www.smartdcc.co.uk/consultations/smets1-consultation-active-to-dormant/>

|                      |   |
|----------------------|---|
| Active to Dormant Q1 | Do you agree with DCC's proposal to exclude Dormant Meters where it is due to the Energy Supplier terminating their contract with the SMETS1 SMSO and the Energy Supplier has provided a statement as captured by Clauses 18.2A and 18.9 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views. |
| Active to Dormant Q2 | Do you agree with the proposed re-designation date of 6 June 2022 for updates to the TMAD within the scope of this consultation?  |

Table 1 – Consultation Questions – Active to Dormant

## 2.2. Responses

Stakeholders were invited to respond to the consultation issued by noon on Thursday 19 May 2022 using the response template<sup>5</sup> that was provided.

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

Following closure of the consultation, DCC has spoken to two respondents to confirm some aspects of their response.

## 3. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed each response.

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.

### 3.1. Proposed Excluded Category – Dormant not due to Change of Supplier (Active to Dormant Q1)

DCC sought views on a new Excluded Category asking: *“Do you agree with DCC's proposal to exclude Dormant Meters where it is due to the Energy Supplier terminating their contract with the SMETS1 SMSO and the Energy Supplier has provided a statement as captured by Clauses 18.2A and 18.9 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”*.

#### 3.1.1. Respondents' Comments / DCC Analysis / Clarifications

All six respondents provided a response to this question.

All six respondents supported DCC's proposal for a new Excluded Category in Clause 18 of the TMAD. One of these respondents made no further comment. Another of these respondents stated it was the most pragmatic solution.

One respondent (that expressed support for the proposals) considers that DCC should explore opportunities to simplify the closure of each Requesting Party where sufficient time has elapsed since the EPCL entries were approved, and where multiple attempts to enrol

<sup>5</sup> <https://www.smartdcc.co.uk/media/3wug3r0y/smet1-consultation-exclusion-where-dormant-but-not-due-to-change-of-supplier-response-template.docx>

SMETS1 Installations have been completed. The respondent believes that the proposed Excluded Category will be effective both operationally and from a cost perspective.

DCC discussed confidential aspects of their response with one supportive respondent in relation to how this Excluded Category may be applicable to their portfolio.

Another respondent that expressed support agreed that DCC should not retry meters that are unlikely to successfully Migrate. This respondent explained how they are already engaging with DCC on this matter in relation to aspects of their portfolio that has recently become dormant and could be captured by this Excluded Category.

DCC discussed this matter with one respondent that expressed support as they had queried how the 'summary statement' approach would work in practice, asking:

1. what, if any, activity DCC will undertake to confirm the status of sites (including checking any evidence provided) within the Energy Supplier Statement and, if any is undertaken?
2. how disagreements between DCC and the Energy Supplier on the status of sites within the statement will be settled? and
3. what impact any disagreement may have on required Migration or exclusion activities and the timeline?

DCC explained that it would be a simple statement to confirm persistent failure of SMETS1 Installations to Migrate i.e. whether DCC should or shouldn't attempt Migration. Thus, there would be no scope for disputes.

This respondent also set out further concerns related to Migration failures for split SMETS1 Installations i.e. where there are two Active Meters and the Electricity Supplier and Gas Supplier are different. In this circumstance both Energy Suppliers need to provide a Migration Authorisation for the same Migration Week to allow the Migration to be attempted. The respondent presently sees persistent failure for such sites where they are an Energy Supplier (as the other Energy Supplier for each such SMETS1 Installation are not providing a Migration Authorisation for the same Migration Week) and wish to flag this concern. DCC notes this concern which should be resolved once both Energy Suppliers provide a Migration Authorisation consistent with the TMAD requirements. However if this hasn't happened and one part of the split site becomes Dormant (due to one of the Energy Suppliers terminating its arrangements with the SMETS1 SMSO), DCC expects that such SMETS1 Installations should be capable of Migration once the remaining Energy Supplier (with an Active Meter) provides a Migration Authorisation, and as such the SMETS1 Installation should not be subject to an exclusion (unless it has persistently failed Migration for reasons other than provision of the required Migration Authorisations). In order to address this edge case, DCC plans to assess the situation further for the IOC and MOC (Secure) cohorts and propose an amendment to the Excluded Category to cater for this. DCC notes that such split sites are a small element of remaining SMETS1 Installations to be migrated (and this scenario can only apply to the IOC and MOC (Secure) cohorts as these are the only cohorts with more than one Energy Supplier to operate Active Meters in respect of the same SMETS1 Installation) and thus DCC does not expect that supporting Migrations for such newly mixed SMETS1 Installations will lead to delay in any Requesting Party closure. DCC would encourage all Energy Suppliers to expedite Migrations for all SMETS1 Installations containing their Active Meters that are already aligned to an entry on the EPCL.

### 3.1.2. Areas of Unresolved Disagreement

n/a

### 3.1.3. Summary

DCC concludes it is appropriate to amend the TMAD to include a new Excluded Category where a Meter becomes a Dormant Meter due to the Energy Supplier terminating their contract for smart services with the SMETS1 SMSO and the Energy Supplier has confirmed that the newly Dormant Meter is not capable of successful Migration. DCC will be bringing forward an amendment applicable to the IOC and MOC (Secure) cohorts for the Active / Active edge case in the near term.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

## 3.2. Re-designation Date for the TMAD (Active to Dormant Q2)

DCC sought views on the date for amending the TMAD asking: “*Do you agree with the proposed re-designation date of 6 June 2022 for updates to the TMAD within the scope of this consultation?*”.

### 3.2.1. Respondents' Comments / DCC Analysis / Clarifications

All six respondents provided a response to this question.

Five respondents supported the proposed date for redesignation without further comment.

One respondent indicated that they have no objections to the proposed re-designation date without expressing explicit support.

### 3.2.2. Areas of Unresolved Disagreement

n/a

### 3.2.3. Summary

DCC proposes that the Secretary of State re-designates the TMAD amendments in line with the schedule presented in the consultation document. Given this consultation process, DCC notes that the earliest date that the amendments to the TMAD could be re-designated is 6 June 2022 and the latest date is 6 July 2022 without requiring a further consultation on the designation date.

## 4. Summary of Drafting Changes

There were no drafting changes proposed by respondents to the consultation.

Stakeholders should note that DCC envisages that the TMAD changes from this conclusion may be consolidated with other changes and so the clause reference for the new Excluded Category may change once the TMAD is re-designated.

## 5. Conclusions

DCC is confident that the version of the TMAD submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has undertaken appropriate consultation with industry regarding these changes to the TMAD.

DCC has, where necessary, addressed the comments that have been received from industry and, where appropriate, sought additional feedback from respondents. DCC does not

believe that the views expressed by respondents result in fundamental amendments to the TMAD and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations.

The TMAD revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised TMAD is defined to a sufficient level of detail for re-designation into the SEC;
- the revised TMAD provides an overarching framework which 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; and
- the revised TMAD is materially complete, and the content is technically accurate.

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

## 6. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document.

DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD into the regulatory framework.

Given this consultation process, DCC notes that the earliest date that the amendments to the TMAD could be re-designated is 6 June 2022 and the latest date is 6 July 2022 without requiring a further consultation on the designation date.

## 7. Attachments

| Attachment | Title  |
|------------|--|
| 1.         | TMAD v20.a2d draft delta against current version v19.0 |
| 2.         | TMAD v20.a2d draft clean                               |

Table 2 - Attachments