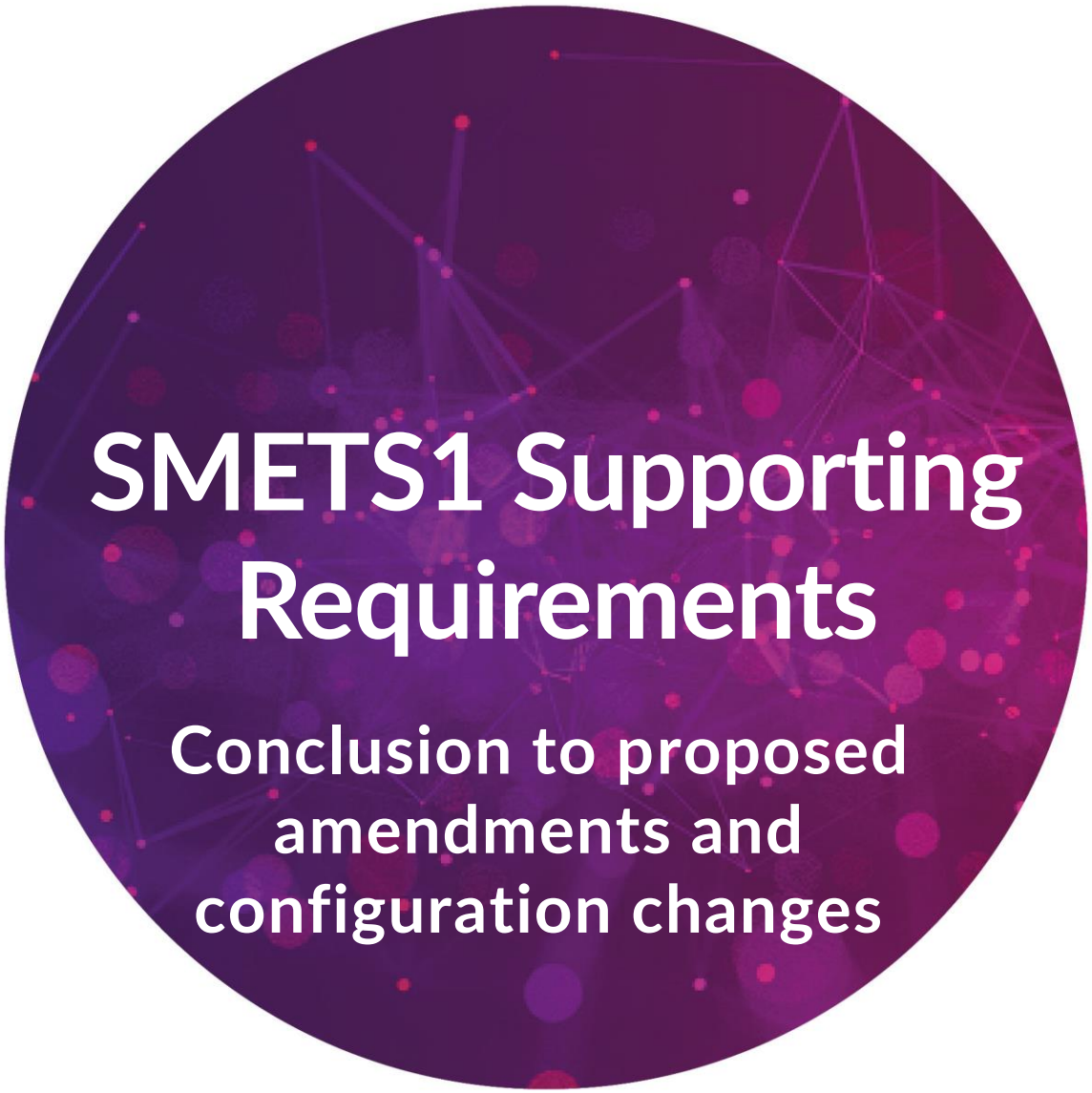
Data Communications Company



SMETS1 Supporting Requirements

Conclusion to proposed amendments and configuration changes

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1. Executive Summary

1. In February we consulted on a range of proposed changes to the SMETS1 Supporting Requirements, this document is the conclusion to that consultation. We have attempted to describe the topics in plain English, but the document is aimed at readers with l knowledge of the functioning of SMETS1 Devices.

2. We consulted on proposals to describe certain SMETS1 Device behaviours in the SMETS1 Supporting Requirements (S1SR) which we considered would support the operation of those Devices by Parties. Those proposals would not amend the behaviour of the SMETS1 Device.

3. The consultation also described two issues identified in SMETS1 Devices in the FOC cohort. The first issue related to the generation of unnecessary HAN Alerts during changes between British Summer Time (BST) and Greenwich Mean Time (GMT) which can cause significant increases in network demand and risks a reduction of service levels and potentially a Category 1 Incidents[1]. The second issue related to the return of incorrect half hourly data which risks negatively impacting billing accuracy and industry settlement. We proposed S1SR amendments which would require SMETS1 Device amendments to be applied in order to resolve both these issues.

4. The consultation closed on 7th March, and we received 9 responses which broadly supported the proposals. The proposals were welcomed on the basis that they would provide benefits in terms of clarity of SMETS1 Device behaviour, the removal of unnecessary HAN Alerts and its associated network demand, and the correction of returned half hourly data to allow for accurate billing and settlement which will bring benefits to Market-wide Half Hourly settlement.

5. On this basis, and to deliver the benefits highlighted we recommend that the Department for Energy Security and Net Zero (DESNZ, the Department) designate an updated version of the S1SR reflecting the proposed amendments.

[1] SEC Appendix AG - Incident Management Policy

2. Introduction

2.1. Background

6. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single, secure, digital network. DCC supports the roll-out and operation of second-generation (SMETS2) smart meters, as well as the migration and operation of existing first-generation (SMETS1) meters onto our network.

7. In the initial stages of the smart meter roll-out across Great Britain, and before DCC was established, a number of energy suppliers installed SMETS1 Devices, in households and small/medium non-domestic premises. These SMETS1 Devices were initially operated through Suppliers' own systems and not connected to DCC Services. This meant that a SMETS1 Device could not always continue to provide smart functionality when operated by another supplier (for example following a change of Supplier event).

8. In 2018 and 2019, the Secretary of State 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 Devices 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. There are more than 11 million SMETS1 Devices categorised into three main cohorts, now operating on DCC systems. Most energy suppliers have now completed enrolling their SMETS1 Devices.

9. The SEC Appendix AM SMETS1 Supporting-Requirements[1] (S1SR) document provides supporting requirements, including communications, in relation to SMETS1 Devices, and in particular where this differs from SMETS2 equivalents.

2.2. Areas on which DCC consulted

10. In February 2025 DCC consulted on proposals for amendments to the S1SR. The consultation was split into two main sections: one section related to SMETS1 Device behaviour; the other section related to SMETS1 Device configuration. DCC received 9 responses to the consultation. Of those responses, 3 were from large Supplier Parties, 2 were from small Supplier Parties, 1 was from a Network party and 3 responses from Non-SEC Industry Code Managers.

11. This conclusion document does not repeat the detailed description of the proposals which can be found in the original consultation[2].

2.2.1. SMETS1 Device behaviour

12. The Great Britain Companion Specification[3] (GBCS) describes the detailed requirements for communications between Smart Metering Devices. In a number of cases the behaviour of the SMETS1 Device does not align to the detail within GBCS. To allow Parties to understand the behaviour of their SMETS1 Devices and operate them with efficiency the S1SR describes that unaligned SMETS1 Device behaviour.

13. There have been a number of iterations of the S1SR, as new SMETS1 Device behaviours, which are not aligned to GBCS, have been identified over time and added. We consulted on a range of

[1] smartenergycodecompany.co.uk/documents/sec-subsidiary-documents/sec-appendix-am-smets1-supporting-requirements/
[2] SMETS1 Supporting Requirements | Smart DCC
[3] SEC Schedule 8 – GB Companion Specification

proposed updates to the S1SR where additional SMETS1 Device behaviour had been identified for inclusion.

14. These proposals received broad support from respondents and are detailed in Section 3.

2.2.2. L&G ESME SMETS1 Device configuration

15. We provided details of SMETS1 Final Operating Capacity (FOC) Electricity Smart Meter Equipment (ESME) Devices configuration issues which have caused service impacts due to increases in network demand from the generation of unnecessary Alerts, and the return of incorrect half hourly data impacting billing and settlement. We proposed amendments to the S1SR which would require these SMETS1 Devices to have their configuration and a solution to be developed and deployed by DCC.

16. The proposed configuration changes are expected to provide a solution for those SMETS1 Device-specific issues by removing the generation of unnecessary Alerts and correcting the half hourly data return.

17. The proposals included amendments to the S1SR that would allow for DCC to develop and implement a solution to the issues identified.

18. These proposals received broad support from respondents and are detailed in Section 4.

3. SMETS1 Device Behaviour

19. The S1SR 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[1] of the S1SR is the Device Model Variations to Equivalent Steps Matrix (DMVESM) which identifies the specific SMETS1 Device (or Devices) that each S1SR clause relates to. The proposed changes in the consultation covered amendments to S1SR clauses and amendments to the DMVESM.

20. The S1SR references Electricity Smart Metering Equipment as ESME, Gas Smart Metering Equipment as GSME, and the Communications Hub Function as CHF.

21. Below we proposed changes to the S1SR and DMVESM, which related to three key areas:

    a. Correction of a formatting error within the S1SR

    b. The addition of new SMETS1 Device behaviour into the S1SR identified through DCC's Device Issues Recommendation Forum[2] and in support of half hourly settlement

    c. SMETS1 Device configuration changes to resolve incidents and incorrect response

22. For each proposal we provided draft changes to the S1SR and the DMVESM.

3.1. Formatting error

23. DCC identified a formatting error at clause 18.5 of the S1SR, which we believe was implemented during the change from version 11 to version 12. The error occurred at clause 18.5p where the sub-clauses related to it were assigned their own clause reference (18.5q, 18.5r, etc). These sub-clauses should have been referenced 18.5 i, ii, and so on. This resulted in a misalignment with the DMVESM.

24. We proposed that the clause references are corrected to those in S1SR version 11 to ensure that they align to the DMVESM.

Question One

Do you agree with the proposal to correct the formatting error in the S1SR, including amendments to the following clauses which restores overall alignment of the S1SR clauses to the DMVESM? Please give a rationale for your response.

25. Question one asked if respondents agreed with the proposal to correct the formatting issue in the S1SR that had been identified, which would also realign the S1SR to the DMVESM.

26. We received four responses to this question, from three large Supplier Parties and one from a Non-SEC Industry Code Manager. All the responses received support the proposal.

27. One respondent noted that the correction is a logical step to ensure align the S1SR and the DMVESM which would ensure clarity and prevent misinterpretation.

28. It is DCC's view that these changes should be included in the S1SR to restore alignment with the DMVESM, and we recommend that the Department designates the changes into the S1SR.

[1] https://smartenergycodecompany.co.uk/documents/sec-subsidiary-documents/sec-appendix-am-annex-a-device-model-variations-to-equivalent-steps-matrix-v12-2/

[2] The Device Issues Forum is a Department and DCC forum that considers SMETS1 Device behaviour raised by Parties and considers how best to manage those behaviours.

3.2. Device Issues Recommendation Forum recommended amendments

29. 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 the S1SR.

30. Through DIRF engagement SMETS1 Device behaviour has been highlighted that does not align to GBCS and is not yet described in the S1SR.

31. This behaviour is considered suitable for inclusion in the S1SR by DIRF and we proposed to add that SMETS1 Device behaviour to the S1SR. We consider that the addition will allow Parties to understand the behaviour of their SMETS1 Devices better and manage them more effectively.

32. In total there were six additional SMETS1 Device behaviours proposed for inclusion into the S1SR, including one that is required in preparation for Market-wide Half Hourly Settlement due for implementation in October 2025. The behaviours related to the following SRVs and SMETS1 Device type:

    a. Honeywell ESME SRV 1.1.1 (Update Import Tariff) – specify the day and month

    b. Secure ESME GSME SRV 2.1 (Update Prepayment Configuration) – prepayment part-penny updates

    c. Itron ESME SRV 6.8 (Update Device Configuration (Billing Calendar)) – incorrect billing period on PPMID

    d. Secure ESME SRV 6.12 (Update Device Configuration (Instantaneous Power Threshold)) – power thresholds

    e. Secure CHF SRV 11.1 (Update Firmware) – firmware updates to CHF

    f. Secure ESME SRV 4.2 (Read Instantaneous Export Registers) – half hourly data

Question Two

Do you agree with the proposed amendments to the S1SR as set out above, which describe, as yet undocumented, behaviour of SMETS1 Devices highlighted through DIRF and that behaviour which will be implemented to support Market-wide Half Hourly Settlement? Please give a rationale for your response. If you agree with some, but not all the proposed amendments please provide details.

33. Question two asked if respondents agreed with the proposed amendments to the S1SR for the addition of these SMETS1 Device behaviours into the S1R.

34. We received four responses to this question, from three large Supplier Parties and one small Supplier Party. All the responses support the proposals.

35. One respondent noted that the proposals would provide clarity on SMETS1 Device behaviour and ensure alignment with Market-wide Half Hourly Settlement, while also enhancing operational reliability, data accuracy and the consumer experience.

36. It is DCC view that the proposed changes, which describe yet undocumented SMETS1 Device behaviour and provide clarity to Parties on the functioning of SMETS1 Devices, should be included in the S1SR, and we recommend that the Department designates the changes into the S1SR.

4. SMETS1 Device Configuration

4.1. L&G FOC SMETS1 Device Configuration Proposals

37. We described our proposals related to L&G ESME SMETS1 Devices in the FOC cohort where the configuration of the SMETS1 Device causes service impacts and where to remove those impacts a change to the configuration of the SMETS1 Devices is required.

38. We considered how to categorise the L&G ESME SMETS1 Devices in the S1SR to allow other proposed changes to be applied to this specific group of SMETS1 Devices only and described two SMETS1 Device specific issues and their proposed solution. The issues described related to:

    a. HAN Alerts and Alert storms related to changes between BST and GMT (4.1.2), and

    b. Incorrect reporting of Half Hourly data (4.1.3)

39. Finaly, we considered how best to implement the changes in configuration and presented two different approaches.

40. It should be noted that SMETS1 Devices, and their configuration, are the responsibility of Supplier Parties. However, DCC recognises that we can offer a service to resolve those issues, where that resolution route might be more efficiently and cost effectively delivered through a single delivery method provided by a single Party rather than multiple Supplier Parties, which would additionally need to factor in consumer switching.

4.1.1. Categorisation of L&G FOC SMETS1 Devices

41. The issues highlighted that configuration changes are required only for the L&G ESME SMETS1 Devices. We therefore proposed the addition of a new category of SMETS1 Device to distinguish L&G ESME SMETS1 Devices in the FOC cohort from other SMETS1 Devices. This new SMETS1 Device category would then be used to apply SMETS1 Device configuration requirements.

42. DCC proposed a new definition for L&G SMETS1 Devices in the definition section of the S1SR under “Category 3 Device” in definitions.

Question Three

Do you agree that the proposed amendments the S1SR definitions will group L&G Devices in the FOC cohort into their own separate category?

43. Question three asked if respondents agreed that the proposed addition to the S1SR definitions that would group L&G SMETS1 Devices in the FOC cohort into their own separate category.

44. We received four responses to this question, from three large Supplier Parties and one from a Non-SEC Industry Code Manager. All the responses support the proposal to add a definition into the S1SR that sets aside L&G ESME SMETS1 Devices as a separate group.

45. One respondent noted that this categorisation will allow for a targeted solution of impacted SMETS1 Devices in order to resolve the issue of HAN Alert generation causing Alert storms and increased Network demand during changes between BST and GMT, and the return of incorrect half hourly data.

46. It is DCC view that the proposed changes to the S1SR definitions, which set aside L&G ESME SMETS1 Devices as a separate group and will allow targeted solutions for the issues impacting those SMETS1 Devices, should be implemented as consulted upon, and we recommend that the Department designate the changes into the S1SR.

4.1.2. HAN Alerts and alert storms related to changes between BST and GMT

47. There are ~2.3 million FOC ESME SMETS1 Devices currently operating on DCC systems. In the consultation we described the issue of significantly increased network demand experienced during changes between BST and GMT, the potential impact on DCC customers and steps taken by DCC to manage the issue.

48. During changes between BST and GMT FOC SMETS1 Devices generate unnecessary Alerts which significantly increase Network demand. The Alerts are not sent to any DCC User or utilised by the S1SP. Their generation and transmission across the network utilise network capacity but return no benefit to DCC Users.

49. DCC proposed that the Alert configuration of FOC ESME SMETS1 Devices be amended so that such Alerts that are not described in GBCS or utilised by the S1SPs are prevented from being sent across the communication network.

50. To require such a configuration change we proposed two S1SR amendments which set the Alert configuration, these included:

    a. A new definition for *SMETS1 HAN Alert* which are those SMETS1 Device specific Alerts not described in GBCS

    b. The addition of a new Annex G where point (i) requires the configuration change so that SMETS1 HAN Alerts are not sent across the WAN

Question Four

What were the impacts on your organisation and your customers during the October 2023 Incident or what could be the impacts on your organisation if a similar incident were to occur?

51. Question four asked respondents for details of the impact on their organisations where the October 2023 BST to GMT clock change resulted in a Category 1 incident, or what the future impacts from a similar incident might be.

52. We received three responses to this question, from three large Supplier Parties. One respondent reported that it did not experience any service impacts from the issue.

53. One respondent noted that consumers were unable to successfully top up their prepayment SMETS1 Device during the October 2023 Incident. One respondent noted that the pausing of Scheduled Reads to support the increase in Network demand, and which is implemented to help manage increased Network demand during changes between BST and GMT, negatively impacts its internal business process and the ability to bill consumers.

54. One response noted the increase in FOC SMETS1 Devices operating on DCC systems and the respondent's support for DCC's proposal to mitigate the risk of a similar incident in the future.

Question Five

Do you agree with the proposal to amend FOC ESME configuration to stop HAN Alerts not mapped to GBCS or utilised by the S1SP being sent across the Network? Do you consider that the proposed S1SR amendments sufficiently define the Alerts which should be removed from network traffic and require the appropriate configuration? Please give a rationale for your response.

55. Question five asked respondents if they supported the proposal to amend FOC ESME configuration to stop HAN Alerts not mapped to GBCS or utilised by the S1SP being sent across the network and if the proposed S1SR amendments sufficiently define such Alerts.

56. We received three responses to this question, from three large Supplier Parties. All the responses were supportive of the proposal.

57. One respondent considered that the solution, which was proposed by DCC in its consultation, needs to be appropriately tested ahead of deployment. DCC will engage with SEC Testing Advisory Group (TAG) to agree appropriate testing to be completed before the solution is delivered.

58. One respondent considered that the same solution should also be applied to the Alerts storms experienced where the FOC ESME exists the non-disconnect period. DCC can confirm that the proposal to remove the unnecessary Alerts generated during GMT to BST clock changes will also stop those Alerts being generated at other times, including where a SMETS1 Device exists the non-disconnect period.

59. Two responses commented that the removal of unnecessary HAN Alerts will reduce network congestion and improve overall efficiency.

60. It is DCC view that, if realised, the proposed changes will remove the risk of future incidents during changes between BST and GMT and help to reduce demand on the DCC Network and support enhanced stability and resilience. The proposals would mitigate the risk of future incidents related to the Alerts generated during changes between BST and GMT, this would mean that Parties internal processes would not be impacted, and consumers would continue to be able to vend.

61. We anticipate that an eight-month timeline will be required to develop, test and deploy the proposed configuration change. DCC will be able to share more detailed information once confirmation of the changes being made are received. We will ensure Parties are kept informed of progress to deployment though the SEC Operations Group (OPSG) and will agree appropriate testing through TAG.

62. Considering the responses received and the benefits of the proposal to remove unnecessary HAN Alerts, including improved efficient use of the DCC Network and removal of the cause of increased Network demand seen during changes between BST and GMT, it is our view that the proposals should be included in the S1SR. DCC recommend that the Department designate the changes into the S1SR.

4.1.3. Incorrect reporting of half hourly data

63. It has now been established that all ~2.3 million L&G SMETS1 ESME SMETS1 Devices in the FOC cohort, which are operated on the DCC network, are not configured in alignment to DUIS requirements, specifically relating to half hourly data. This configuration results in incorrect half hourly data being provided from FOC ESME SMETS1 Devices following the issue of SRV 4.8.1 (Read Active Import Profile), 4.8.2 (Read Reactive Import Profile) and 4.8.3 (Read Export Profile). These SRVs return the maximum demand equivalents for a half hourly period rather than the total import or export values, which would be required for half hourly billing and settlement.

64. DCC proposed an amendment to the S1SR by adding a configuration table in Annex G ii. Where SMETS1 Devices are configured in the manner which the table sets out, correct data will be returned following the issue of SRV 4.8.1. 4.8.2 and 4.8.3.

Question Six

With reference to each SRV (4.8.1, 4.8.2 and 4.8.3) has your organisation identified this issue and how wide ranging do you understand the issue to be? Has this issue caused any negative impact to you or your customers and what has that impact been? Do you consider that the issue will present any additional problems in the future, particularly when considering half hour settlement? Without resolution could your organisation manage the data issue and what would the impacts of that be on consumers?

65. Question six asked respondents if they had identified the half hourly data issue and what the impacts now in the future might be.

66. We received six responses to this question, from three large Supplier Parties, one from a Network Party, and two from Non-SEC Industry Code Managers.

67. Respondents highlighted the following issues, which they consider could be seen, or are seen, as a result of incorrect HH data being returned:

    a. Inaccurate consumer billing

    b. The inability of consumers to access the benefits of Market-wide Half Hourly Settlement such as dynamic tariffs

    c. Suppliers are unable to use the data for consumer billing, but only where they are aware of the SMETS1 Device issue

    d. Consumer dissatisfaction and operational issues

    e. Current inaccurate settlement where those SMETS1 Devices are included in Elective HH settlement

    f. Future inaccurate settlement where those SMETS1 Devices are migrated to HH settlement

    g. An imbalance of charges and incorrect allocation of energy volumes across market participants

    h. The requirement for Settlement Runs to rectify issue where they are identified

    i. Negative impact on Supplier Performance Standards

    j. Wider implications where the data is used to inform on load shape across SMETS1 Devices not included in HH Settlement, particularly where impacted SMETS1 Devices are clustered or where there is a low number of other smart meters

    k. Potential for a delayed migration to Market-wide Half Hourly Settlement where a solution is provided post go-live, and therefore a risk to achieving the end Market-wide Half Hourly Settlement milestone at the detriment of all BCS Parties and consumers

    l. Growing impact as more SMETS1 Devices are moved to Market-wide Half Hourly Settlement

68. Two responses supported DCC's proposal and noted that resolving the half hourly data issue seen in these FOC SMETS1 Devices whilst maintaining them in consumer premises is the most effective approach as it would avoid the cost of asset replacement and allow for resolution required for implementing the half hourly settlement programme.

69. Two respondents noted their preference for a DCC-led approach to amending the configuration of the SMETS1 Devices as this could provide efficiency and confidence that the issue is resolved for all impacted SMETS1 Devices.

70. One respondent confirmed that it had identified the issue. Whilst unable to establish the number of impacted SMETS1 Devices, it estimated that ~10% of Devices on its Network of had been impacted by the issue.

71. One respondent is concerned that due to the eight-month timescales, which DCC had proposed in its consultation for resolving the issue, the Market-wide Half Hourly Programme will not be able to test the solution. DCC confirms that testing will be agreed with TAG and take place prior to the deployment of the solution and does not consider that additional testing will be required, and that this solution should not impact the timelines of other programmes.

72. The Market-wide Half Hourly Programme preference is for the DCC solution to be available earlier than proposed. This is not possible, therefore the proposed deployment timeline may require mitigating actions to be taken, and DCC will work with them closely during this period to support any of these actions. Market-wide Half Hourly governance is actively monitoring the progress of this issue and the proposed solution, and we have shared the testing approach with the Programme. Engagement with the Market-wide Half Hourly Programme will be through established Market-wide Half Hourly governance and separate bilateral meetings. We will continue to keep Market-wide Half Hourly Settlement Programme, and wider industry, engaged on progress towards deployment of the solution. DCC cannot access details of the meter configuration and therefore there are limitations on the reporting that can be provided. We are therefore working with key MHHS stakeholders to agree what reporting information is required to track progress of solution deployment.

73. One respondent considered that the Elexon Performance Assurance team will most likely want to have a detailed view of affected SMETS1 Devices so that the impact can be assessed. We are working to agree data sharing arrangements to facilitate this.

Question Seven

Do you agree with the proposed amendment to the S1SR to describe the required Device configuration for FOC ESME Devices that would remove the error related to half hour data? Please give a rationale for your response.

74. Question seven asked respondents if they agreed with the proposal to amend the S1SR to describe the required FOC ESME configuration to resolve the half-hourly data issue.

75. We received six responses to this question, from three large Supplier Parties, one from a Network Party, and two from Non-SEC Industry Code Managers. All the responses supported the proposal.

76. Four responses considered that DDCs proposed configuration amendment would resolve the issue of incorrect half-hourly data being returned and avoid the related impacts on consumers, Suppliers, Networks and settlement. One of these respondents considers that the solution should be delivered at the earliest opportunity to help avoid the impacts.

77. Two respondents consider that DCC reporting on progress of deployment and to help inform on remediation plans, including on instances where updates have not been successful, should be provided. Please see details provided above on the reporting DCC intends to make available.

78. It is DCC view that the proposed changes will correct the data returned following the issue of SRV 4.8.1. 4.8.2 and 4.8.3 and help to resolve the issues identified, including consumer dissatisfaction, operational issues including billing and the offering of dynamic tariffs, and inaccurate settlement calculations.

79. We anticipate that an eight-month timeline will be required to develop, test and deploy the configuration change. In an effort to keep the timeframe as short as possible we have worked to

ensure that work can begin as soon as possible following designation of the chances. DCC will be able to share more detailed information once confirmation of the changes being made to the S1SR is received. We will ensure Parties are kept informed of progress to deployment though the OPSG and will agree appropriate testing through TAG.

80. Given benefits of correcting the returned half hourly data from these SMETS1 Devices, including improved billing accuracy and settlement, it is our view that the proposals should therefore be included in the S1SR. We recommend that the Department designate the changes into the S1SR.

4.1.4. Implementation and costs of configuration changes

81. We consulted on two options for implementing the proposed configuration changes. The first option would require Supplier Parties to manage the deployment of such changes, and the second would require DCC to manage the deployment.

82. DCC considers that a cost-efficient solution for Parties and consumers can be delivered through a configuration change implemented by DCC via the S1SP. We proposed S1SR amendments that would require a DCC managed deployment. Discussions at the Technical Business Design Group provided support for a S1SR amendments to require the configuration change and for DCC to implement those changes on behalf of Parties.

Question Eight

For each proposed change (HAN Alerts and half hourly data errors), do you agree with the proposal that would require DCC to update FOC meter configuration for these proposed changes? Do you consider the proposed wording of clause 13.3 sufficient to require the configuration change? Please give a rationale for your response.

83. Question eight asked respondents if they agreed with the proposal that would require DCC to develop and deploy updates to FOC ESME SMETS1 Devices that would amend their configuration and remove the sending of unnecessary HAN alerts and fix the issues with HH consumption data.

84. We received six responses to this question, from three large Supplier Parties, one from a small Supplier Party, one from a Network Party, and two from Non-SEC Industry Code Managers. All but one of the responses supported the proposal.

85. One respondent noted that Supplier and Network Parties will bear the cost of the delivery of a solution to issues that, in its view, had been caused by Parties other than such Supplier and Network Parties. DCC agrees that the costs associated with resolving the issues caused by any particular Party should not be socialised wherever possible. In this scenario the issue relates specifically to L&G SMETS1 ESMSE SMETS1 Devices which, through consumer switching, can be operated by any supplier Party. The issues, therefore, can impact all supplier Parties. DCC therefore considers that, in this scenario, resolving the issue will therefore benefit all supplier Parties, other Parties including Networks, and the consumers who have those SMETS1 Devices installed at their premises and that cost socialisation is appropriate in this regard. In our consultation we considered one option for resolution might be to replace the installations containing the ~2.3 million impacted SMETS1 Devices, and that the costs to do so would be considerable[1]. The costs for a DCC delivered solution in this scenario is far less than SMETS1 Device replacement.

86. One respondent agreed with the proposal, provided that DCC adopts a robust testing regime and phased rollout. Where that is not the case, the respondents considers that DCC should be liable for asset replacement costs. This responder considers that DCC should fully engage with TAG and expert SMETS1 Device product groups to ensure successful development, testing and deployment. DCC will work with Parties through the OPSG to keep them informed on the progress of

[1] Smart Metering Implementation Programme - Cost-Benefit Analysis 2019 estimated meter asset costs

development and deployment of the solutions, and through TAG to agree appropriate testing of the solution before deployment.

87. One respondent noted the need to remove the unnecessary HAN Alerts and to make corrections to the HH consumption to provide a solution for the issues identified.

88. One respondent considers that a "best endeavours" requirement on DCC to make the required configuration change on SMETS1 Devices is more suitable as a stronger requirement. In the light that SMETS1 Devices are the responsibility of Supplier Parties, and where DCC has little to know influence on the SMETS1 Device, we consider an "endeavour to" approach to be more appropriate in this scenario. DCC will work with industry Parties to identify those SMETS1 Devices where an update to the configuration has not been successfully communicated to the SMETS1 Device and where the Supplier Party may choose the best course of action.

89. We consider that the most cost-effective and efficient solution for Parties is one delivered by DCC, and that any solution must be fully tested, as agreed with parties and through TAG engagement, before deployment. We will work with Industry to ensure the progress of deployment across the impacted SMETS1 Devices is understood, and to ensure details of those SMETS1 Devices to which an update cannot be communicated is described to impacted Parties. We recommend that the Department designate the changes into the S1SR.

5. S1SR designation date

90. We informed of our aims to provide a report to the Department on the outcome of the consultation and provide recommendations to them on the changes that we consider should be designated into the S1SR. We proposed that following these actions the Department designate changes to the S1SR on the 4th April or as soon as practicable within one month thereafter.

Question Nine

Do you agree with the proposed re designation date of 4th April 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR?

91. Question nine asked respondents if they agreed with the proposed S1SR designation date of 4th April 2025 (or if necessary, as soon as reasonably practicable within one month thereafter).

92. There were five responses to this question from three large Supplier Parties, one from a Network party and one from a Non-SEC Industry Code Manager.

93. One of the responses did not comment on the designation date but highlighted another area of SMETS1 Device behaviour that was not considered in the consultation. That issue is not related to the behaviours or configuration amendments covered in this consultation and conclusion, but DCC will work to understand the issue and consider the appropriate next steps.

94. Four of the responses supported the proposed designation date with one highlighting the need for the designation and deployment of a solution for the half hourly data issue to be provided as soon as possible.

95. One of these respondents suggested a backstop date is required to ensure reconfiguration is completed by June 2025. We have worked to ensure work to develop and deploy the required configuration changes can begin as early as possible subject to DESNZ designation. Our initial assessment of timescales suggests an eight-month period is required to develop, test and deploy the solution. We will keep Parties informed of progress, as described above, we consider that Parties should consider this timescale for their planning related to half hourly settlement.

6. Recommendation and Next Steps

96. DCC has provided a copy of all the responses to its consultation, and a summary of these responses, to the Department for review. We have also provided the Department with a copy of this report and our recommendations for designation.

97. Given the support, which DCC's proposals have received from the consultation responders, and the benefits of providing clarity on SEMTS1 Device behaviour, DCC-delivered solution to reduce the impact from Alerts generated during change between BST and GMT and for providing a solution to errors in returned half hourly data, we consider that the proposals, as set out in our consultation, should be progressed.

98. DCC has provided an updated copy of the S1SR that we consider suitable for designation by the Secretary of State and recommends that the Secretary of State designates that version on the 4th April or as soon as practicable within one month thereafter.

99. DCC will work closely with Parties through the OPSG to provide clarity on the development and deployment of SMETS1 Device configuration changes. We will work with TAG to agree appropriate testing ahead of deployment across the impacted SMETS1 Devices.