

SMETS1 Consultation on Device Swap Out

Initial consultation on the demand for the Device Swap
Out solution

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Author: consultations@smartdcc.co.uk

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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. SMETS1 Devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers and the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers.

Currently the Smart Energy Code (SEC) requires DCC to support the maintenance of enrolled SMETS1 Smart Metering Systems by allowing individual SMETS1 Devices to be decommissioned and replaced by supporting the commissioning of another SMETS1 Device. The basis for this obligation is set out in Section H5.7 of the SEC, as well as in SEC Appendix AC – Inventory, Enrolment and Decommissioning Procedures, and SEC Appendix AD - DCC User Interface Specification. The benefit of such “Device Swap Out” is that where a Device in a SMETS1 Smart Metering System stops functioning, the individual Device could be replaced without replacing the entire Smart Metering System with a SMETS2 one.

DCC's solution currently does not support Device Swap Out for SMETS1 other than for PPMIDs. DCC can develop a solution that will allow Device Swap Out, but it will take a considerable amount of time and money to develop and implement a solution. The purpose of this consultation is therefore to ascertain whether stakeholders have an interest in a service to swap out SMETS1 devices and to indicate subsequent steps that can be taken if there is a positive response.

2. Device Swap Out

2.1. Background

The focus of the DCC SMETS1 Programme has been on developing a migration solution for SMETS1 Devices at the earliest opportunity in support of delivering enrolment benefits such as allowing consumers to recover smart services and to avoid losing such services on change of supplier. As a result, DCC did not initially develop a “Device Swap Out” solution as it deemed that doing so would result in a delay in providing a solution that would allow SMETS1 Devices to be enrolled into the DCC System. Following Joint Industry Plan (JIP) consultations with Industry, JIP milestones were introduced for GSME and PPMID replacements for all cohorts, which milestones were after the capability releases. These milestones were moved due to delays in the go live of the capabilities, however a solution for PPMID replacement has been delivered for all cohorts. On 26 March 2021 the JIP milestone for FOC for delivery of SMETS1 Services was consulted on, in which it was stated that Device Swap Out for FOC would not form part of Uplift 2.1 and Uplift 2.2. The remainder of the JIP milestones relating to Device Swap Out were removed in version 8.0 by agreement with Industry at the IMF meeting on 10 March 2022.

DCC embarked on its programme of work to deliver the capability in early 2021 once all migration and operational capabilities were in place. DCC began by engaging Suppliers to gauge their appetite for the service and held a webinar that was open to all of DCC's users where DCC outlined the extent of the proposed service with reference to the current regulatory framework. Following the webinar, DCC received feedback from parties, with a limited number of Energy Suppliers expressing an interest in a Device Swap Out service for SMETS1 meters and Communications Hubs (CH). Respondents who did not require this service indicated that they had no stored assets and therefore they had no need for this service. Some Suppliers provided feedback that the development of the solution was not justifiable against their own business case due to the DCC costs as well as their own internal costs to develop and maintain a solution to align with the service. One of the Energy Suppliers who had expressed an interest in this

functionality subsequently withdrew that interest. DCC has established that there is limited energy supplier interest in having the ability to swap out SMETS1 Devices.

2.2. Current Regulatory Framework

Currently, the SEC requires DCC to support the exchange of individual SMETS1 Devices that comprise part of an enrolled Smart Metering System for another SMETS1 Device. The basis for this obligation is set out in Section H5.7 of the SEC as well as in SEC Appendix AC – Inventory Enrolment and Decommissioning Procedures which provides that DCC is required to process all Service Requests relating to commissioning of Devices.

The obligation on DCC extends to support the swap out of the GSME, CH and ESME for all cohorts. The current SMETS1 DCC solution does not support Device Swap Out for any cohort. To build the capability where there is no interest would not be economic or efficient and therefore DCC is proposing to implement Device Swap Out for those devices where it has previously received support.

2.3. Current Situation

DCC currently supports Device Swap Out for all SMETS2 Devices and can support the swap out of a SMETS1 PPMID for another SMETS1 PPMID across all cohorts, but it is not currently possible to swap out any other SMETS1 Device for a new SMETS1 Device. It is not viable to replace a single SMETS1 meter or CH with a SMETS2 meter or CH due to the incompatibility of SMETS1 and SMETS2+ Devices, and this scenario requires a complete SMETS2+ replacement.

DCC envisages that Device Swap Out, in line with regulatory requirements, would be used to replace a single Device within a SMETS1 Installation with a new version of the Device, or with a refurbished Device, that has been removed from another SMETS1 Installation. DCC has initiated the development of a solution that would allow for the most cost-effective solution for Device Swap Out for the limited number of Device Models for which Industry has indicated demand, which will be able to help inform a cost benefit assessment. DCC is in the early stages of the development of a solution for a limited number, and subject to the outcome of this consultation will consider and propose any regulatory changes needed to support solution implementation.

2.4. Intended Solution

In order to allow for Device Swap Out, DCC would be required to import the details of all the Devices that may subsequently be used to enact a Device Swap Out into the SMETS1 Service Provider (S1SP), which means that DCC is required to develop a solution that will allow for the transfer of this information from the SMSO or the Installing Supplier. Please note that, in order to limit the costs of the service and ensure deliverability, this will be a one off occurrence and no further devices will be capable of being added or therefore replaced after this process completes.

DCC does not foresee new Service Requests or changes to the DUIS schema being needed but from early consideration it would appear that for the solution to work, some existing Service Request Variants (SRVs) will be required to be sent more than once when compared to a similar SMETS2+ swap out. Details of these changes will be socialised during the Detailed Design phase expected to start in Quarter 3 of 2022. Users should be aware that this might require further changes to their systems.

DCC is of the view that the following would be in scope of the solution:

- SMETS1 Devices can be replaced by new SMETS1 Devices, that have been pre-notified to the DCC S1SP. The devices that would be available are ESME, GSME & CH (for the avoidance of doubt, that the solution already supports S1 PPMID swap out).

- SMETS1 Devices that have been de-commissioned from the S1SP, may be refurbished and reused. The devices that would be available are ESME, GSME & CH (for the avoidance of doubt, that the solution already supports S1 PPMID swap out).

It should be noted that as per SEC a pre-notification of any Device has a finite validity period.

The following is considered out of scope:

- Any warranty replacements by SMETS1 manufacturers, where new devices are procured are not in scope as the details of these devices will not be held on the S1SP. The devices that would be applicable are ESME, GSME & CH (for the avoidance of doubt, that the solution already supports S1 PPMID swap out).
- Procurement of any new assets by the supplier, that has not already been pre-notified to the S1SP during the migration of Devices into the DCC's Systems as the details of any such devices will not be held on the S1SP.

DCC is of the view that the Device Swap Out service should be limited to those Device Models where at least one installing Supplier for the devices has expressed an interest in the Device Swap Out functionality as set out in Section 2.1.

Although the solution might be limited to particular Device Models, the ability to commission new Devices would be available to any Responsible Supplier for a Smart Metering System containing such Device Models, as it would allow any Supplier to maintain such a Smart Metering System as long as in doing so, the Smart Metering System remains aligned to all or part of a Device Model Combination (DMC) on the EPCL (noting that new EPCL entries can arising via the Pending Product Combinations Test Process).

DCC notes that the SEC currently obliges it to provide a Device Swap Out solution. Subject to any consultation responses which suggest otherwise, it appears that the potential use case for any SMETS1 Device replacement service has significantly changed from that envisaged at the outset of the SMETS1 enrolment project. Depending on the outcome of this consultation, DCC might propose that the obligations on DCC to provide a service are amended to be limited to the sets of Device Models where at least one installing Supplier has shown an interest in this functionality, as this will avoid the cost and time associated with developing solutions where no demand for them has been expressed, and this approach aligns with DCC licence obligations. The feedback from industry forums and the webinar indicated generally that industry has concerns about the funding of a solution that may only benefit a limited number of Device Models. Therefore we would additionally welcome any views on whether the charging arrangements associated with the provision of a service should be considered further by the Department for Business, Energy and Industrial Strategy (BEIS).

In considering the cost benefit for any solution, the finite nature of the DCC SMETS1 service should be borne in mind and the consequential result that at some point in the future it will be necessary to replace all SMETS1 Installations with SMETS2 Installation, irrespective of the length of life of any of the SMETS1 assets.

**DSO
Q1**

Do you have an interest in a service to swap out SMETS1 devices? If you are interested in the service, please provide DCC with the applicable Device Models and identify the Installing Supplier. Please provide a rationale for your views.

**DSO
Q2**

Do you consider that the charging arrangements should be further considered? Please provide a rationale for your views.

3. Next Steps

Following the closure of this consultation, DCC will prepare a report. DCC is aiming to provide a report to BEIS by no later than 15 July 2022, along with the consultation responses.

4. How to Respond

Please provide responses by 1600 on 01 July 2022 to DCC at consultations@smartdcc.co.uk.

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 for Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS 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 BEIS 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.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

5. Attachments

- Attachment 1: Response Template