

SMETS1 Conclusion TMAD - Duplicate Excluded Category

A SMETS1 conclusion on proposals by DCC for amendments to the TMAD covering a correction to the duplicate Excluded Category

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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 SMETS1 Consultation - TMAD - Duplicate Excluded Category² was published via DCC's website on 21 April 2023 (with an email notification sent to SEC Parties and other interested stakeholders) with responses due by 16:00 on 5 May 2023. The consultation proposed amendments to correct an omission and improve clarity in the drafting of TMAD Clause 18, in respect of 'Excluded Category - Duplicate MPANs and MPRNs'. The consultation also set out that, subject to the outcome of the consultation, DCC wishes to use the amended Excluded Category to enable DCC to proceed with its plans for recommending to the Department for Energy Security and Net Zero (the Department) the closure of the Requesting Party capability in respect of the IOC cohort on Sunday 28 May 2023. To facilitate this, the consultation also proposed to re-designate the proposed amendments to TMAD Clause 18 into the TMAD between 17 May 2023 and 17 June 2023.

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

The consultation set out two questions and this document provides a response to these two questions. Table 1 below details these questions as presented in the public consultation.

Number	Question
Duplicate Q1	Do you support the proposal to amend the Excluded Category titled 'Excluded Category - Duplicate MPANs and MPRNs' to address the shortcomings identified by DCC? Do you have any detailed comments on the relevant changes to the legal drafting in Clauses 18.13 (b) and 18.13 (c) of the TMAD? Please provide a rationale for your views.
Duplicate Q2	Do you agree with the proposed re-designation date of 17 May 2023 (or within one month thereafter) for the changes to the TMAD within this consultation? Please provide a rationale for your views.

Table 1 - Consultation Questions - TMAD - Duplicate Excluded Category

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-tm-ad-duplicate-excluded-category/>

2.2. Responses

Stakeholders were invited to respond to the consultation by 16:00 on Friday 5 May 2023 using the response template³ that was provided.

During this period DCC received a written response from two respondents regarding this consultation.

2.3. Analysis of Responses

DCC reviewed the responses, analysed the feedback to the consultation and included a statement on any areas of disagreement as set out in the Sections below.

3. Amendment to ‘Excluded Category – Duplicate MPANs and MPRNs’ (Duplicate Q1)

DCC sought views on proposals to amend ‘Excluded Category – Duplicate MPANs and MPRNs’ to correct an omission and improve clarity in the way that this Excluded Category had been drafted. These changes were covered by the following question: *“Do you support the proposal to amend the Excluded Category titled ‘Excluded Category – Duplicate MPANs and MPRNs’ to address the shortcomings identified by DCC? Do you have any detailed comments on the relevant changes to the legal drafting in Clauses 18.13 (b) and 18.13 (c) of the TMAD? Please provide a rationale for your views.”*

3.1. Respondents’ Comments / DCC Analysis / Clarifications

Two respondents responded to this question, expressing support without further comment.

3.2. Areas of Unresolved Disagreement

n/a.

3.3. Summary

DCC’s initial introduction⁴ of ‘Excluded Category – Duplicate MPANs and MPRNs’ into TMAD Clause 18.13 received support from those stakeholders who responded.

Given the support for the proposed amendments to Clauses 18.13 (b) and 18.13 (c) and the minor technical nature of these changes, DCC concludes it is appropriate to amend both Clauses, as proposed.

DCC therefore proposes that the Secretary of State re-designates the relevant amendments to the TMAD to implement the changes to the Excluded Category for duplicates.

³ <https://www.smartdcc.co.uk/media/rdpgs1py/smets1-consultation-tmad-duplicate-excluded-category-response-template.docx>

⁴ In March 2022, the SMETS1 Various 2 Consultation process (see <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-2/> and <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-2/>) proposed to include ‘Excluded Category - Duplicate MPANs and MPRNs’ within Clause 18.13 of the TMAD, which was re-designated (<https://smartenergycodecompany.co.uk/latest-news/sec-v60-0-implemented-to-support-the-dcc-smets1-service/>) to include this amendment on 10 June 2022.

4. TMAD Re-designation (Duplicate Q2)

DCC sought views on re-designating the TMAD between 17 May 2023 and 17 June 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 17 May 2023 (or within one month thereafter) for the changes to the TMAD within this consultation? Please provide a rationale for your views.*”.

4.1. Respondents’ Comments / DCC Analysis / Clarifications

Two respondents provided a response to this question, expressing support without further comment.

4.2. Areas of Unresolved Disagreement

n/a.

4.3. Summary

Given the respondents’ support for the proposed re-designation period, DCC concludes it is appropriate to re-designate the TMAD between 17 May 2023 and 17 June 2023 and proposes that the Secretary of State re-designates the TMAD on 17 May 2023. In doing so, DCC notes the alignment between this and its plans to progress recommending the closure of the RP capability in respect of the IOC cohort on Sunday 28 May 2023.

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.

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. 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 the report's publication. DCC will publish the report on DCC's website and notify SEC Parties.

The Secretary of State is expected 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 on which the proposed amendments to the TMAD could be re-designated is 17 May 2023 and the latest date is 17 June 2023 without requiring a further consultation on the designation date.

8. Attachments

Attachment	Title
1.	TMAD v26.0 draft delta against current version v25.0
2.	TMAD v26.0 draft clean

Table 2 - Attachments