

SMETS1 Consultation

Clause retention beyond
SMETS1 TMAD expiry and
proposed amendments to the
SMETS1 Supporting
Requirements

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1. Executive Summary

1. This document presents two SMETS1 topics: first, updates to SMETS1 Device behaviour, and second, any SMETS1 requirements that should endure following expiry of SEC Appendix AL SMETS1 Transitional Migration Approach Document (TMAD) in December 2025. We propose amendments to the SEC Appendix AM SMETS1 Supporting Requirements (S1SR) document and the SEC Appendix AC Inventory, Enrolment and Withdrawal Procedures to deal with each of those topics.
2. The S1SR contains clauses that explain SMETS1 Device behaviour where that behaviour does not align to GBCS. The behaviours and their description relate to SMETS1 Devices. Annex A¹ 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. We propose additions to the S1SR to detail as yet undocumented SMETS1 Device behaviour.
3. The TMAD sets out the requirements and obligations for migrating SMETS1 Devices on to DCC systems. Migration of SMETS1 meters has completed following Secretary of State approval of the Requesting Party Decommissioning Timetable for the final SMETS1 cohort, MOC (Secure)².
4. Appendix AL expires on the 31st December 2025 and will no longer apply. DCC has reviewed the document for any content that is required to be retained and proposes that those sections are added to the SMETS1 Supporting Requirements (S1SR) along with minor changes to SEC Appendix AC (Inventory, Enrolment and Withdrawal Procedures).
5. We welcome feedback from Parties on the proposals set out in this consultation.
6. This consultation closes at 17:00 on 14th November 2025, and responses should be sent to consultations@smartdcc.co.uk.

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

² [Confirmation of the Requesting Party Decommissioning Timetable for MOC \(Secure\) | Smart DCC](#)

2. Introduction

2.1. Background

7. 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.
8. In the initial stages of the smart meter roll-out across Great Britain, and before DCC was established, a number of energy suppliers installed first generation smart metering devices (known as 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).
9. 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 SMETS1 meters 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 12 million SMETS1 meters now operating on DCC systems.
10. SEC Appendix AL – SMETS1 Transition and Migration Approach Document (SMETS1 TMAD)¹ sets out the regulatory framework, including the bulk of the rights and responsibilities for DCC and Supplier Parties, governing the migration of SMETS1 meters onto DCC network.
11. SMETS1 eligible meters² have been separated into three groups termed Initial Operating Capacity (IOC), Middle Operating Capacity (MOC) and Final Operating Capacity (FOC), the MOC and FOC cohorts split in to further smaller cohorts³. Each cohort was allocated a unique GroupID with specific requirements described in the SMETS1 TMAD. Those GroupIDs are referenced for specific migration requirements within the S1SR.
12. The SEC Appendix AM SMETS1 Supporting-Requirements⁴ (S1SR) document provides supporting requirements, including communications, in relation to SMETS1 Devices, and in particular where this differs from SMETS2 equivalents and the GB Companion Specifications (GBCS)⁵.
13. The Great Britain Companion Specification⁶ (GBCS) describes the detailed requirements for communications between Smart Metering Devices. Whilst SMETS1 services are substantively equivalent to SMETS2, in some 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 specific SMETS1 Device behaviour.
14. There have been a number of iterations of the S1SR, as new SMETS1 Device behaviours, which vary from GBCS, have been identified over time. We propose amendments to the S1SR where additional SMETS1 Device behaviour, not already described in the S1SR, have been identified.

¹ SEC Appendix AL - SMETS1 Transition and Migration Approach Document v29.0

² DECC Government response to the consultation on the enrolment of SMETS1 meter cohorts

³ The MOC cohort consisted of MOC (MDS) and MOC (Secure), the FOC cohort consisted of MOC (NP) and MOC (BG)

⁴ smartenergycodecompany.co.uk/documents/sec-subsidary-documents/sec-appendix-am-smets1-supporting-requirements/

⁵ SEC Schedule 8 – GB Companion Specification

⁶ SEC Schedule 8 – GB Companion Specification

15. Migrations in the MOC (MDS) cohort completed in October 2022¹, migrations in the IOC cohort completed in May 2023², and migrations in the FOC cohort completed in November 2024³. These cohorts have been decommissioned, and their migration service has been removed. Migrations in the MOC (Secure) cohort completed in September 2025⁴ and the migration services are currently being decommissioned.
16. The SMETS1 TMAD is due to expire from 31st December 2025 after which it will cease to apply. DCC has reviewed the SMETS1 TMAD for any clause or definition that is required beyond the expiry and has proposed that such clauses are retained.

2.2. Areas for consultation

2.2.1. SMETS1 Device Behaviour

17. In Section 3 we describe one SMETS1 Device behaviour that has not been added to the S1SR. This consultation does not seek to amend that behaviour but proposes the addition of a description of that behaviour in the S1SR.

2.2.2. Regulatory Review and SMETS1 TMAD retention

18. In Section 4 we describe our approach in reviewing SMETS1 related obligations in the SEC and it's supporting documents, including:
 - a. Variations made to the SEC through the SMETS1 TMAD
 - b. Obligations identified in the SMETS1 TMAD that are required on an enduring basis and proposals for their retention
 - c. Amendments that are out of scope for this consultation (and proposed for future SEC Modification)

2.3. Consultation closure

19. We welcome feedback from Parties on Draft Decommissioning Timetable and the proposed S1SR changes. This consultation closes at 17:00 on 14th November 2025, and responses should be sent to consultations@smartdcc.co.uk.

¹ [SMETS1 Conclusion – Revised Closure Date for MOC \(MDS\) | Smart DCC](#)

² [SMETS1 Publication – Final RP Decommissioning Timetable for FOC \(NP\) | Smart DCC](#) & [SMETS1 Publication – Final RP Decommissioning Timetable for IOC | Smart DCC](#)

³ [FOC \(BG\) RP Decommissioning Timetable | Smart DCC](#)

⁴ [Confirmation of the Requesting Party Decommissioning Timetable for MOC \(Secure\) | Smart DCC](#)

3. SMETS1 Device Behaviour

20. 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 A¹ 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 this consultation cover both amendments to S1SR clauses and amendments to the DMVESM.
21. The S1SR references Electricity Smart Metering Equipment as ESME, Gas Smart Metering Equipment as GSME, and the Communications Hub Function as CHF.

3.1. Device Issues Recommendation Forum recommended amendments

22. 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.
23. Through that engagement the meter behaviours have been highlighted as not aligned to GBCS and over time have been described in the S1SR.
24. As meters continue to be operated on DCC systems the volume of new behaviours highlighted as not aligning to GBCS has peaked and reduced over time.
25. There is one outstanding behaviour which is considered by DIRF as suitable for inclusion into the S1SR and we propose to add that behaviour to the S1SR. We consider that the addition will allow Parties to understand the behaviour of their devices better and manage them more effectively.
26. This section presents the issue identified for S1SR inclusion. Since the solution is not to amend the Device behaviour but to describe it in the S1SR we focus on the description of the SMETS1 Device behaviour.
27. A tracked changes version of the S1SR has been published with this consultation in which the proposed wording for amendments can be viewed.

3.1.1. Itron ESME SRV 4.4.2 (Retrieve Change Of Mode / Tariff Triggered Billing Data Log) – alert when no data found

28. For Itron ESME Devices the SRV 4.4.2 will fail and provide ALM Ref ID: 200434: S1CE2003 / Security Warning where there is no data for the requested times.
29. It is proposed that a new clause 18.17p is added to the S1SR to describe this behaviour and detailed in DMVESM for Itron ESME Devices.

Question One

Do you agree with the proposed amendments to the S1SR as set out above, which describe, as yet undocumented, behaviour of SMETS1 Devices highlighted? Please give a rationale for your response.

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

4. Regulatory Review and SMETS1 TMAD retention

4.1. DCC Review of SMETS1 TMAD and SMETS1 related obligations

30. The SMETS1 TMAD is due to expire from 31st December 2025 after which it will cease to apply. It is noted that SEC Section N6.8, while requiring a mechanism for the TMAD to cease to apply, also confirms that the rights and obligations up to the expiry date remain applicable.
31. The SMETS1 TMAD was designed and written to be transitional and focused on providing the rights, obligations and operational mechanisms by which SMETS1 Devices would be enrolled on to DCC systems. It was drafted cognisant of the wider regulatory framework and which it would be removed from at expiry.
32. It is prudent to review the SMETS1 TMAD to ensure that the obligations which cease to apply from its expiry are not required on an enduring basis for continued operation of SMETS1 Devices. In that review we have found a small number of obligations which we consider are beneficial to be retained.
33. We consider that those clauses, such as definitions, identified for retention will provide clarity regarding ongoing obligations, or clarify DCC obligations where actions are ongoing. We consider that the majority of clauses in the SMETS1 TMAD are no longer required and their ceasing to apply will not cause any disruption or confusion to the ongoing operation of SMETS1 Devices.
34. We have focused our review on obligations which are coming to an end while also considering wider implications of SMETS1 TMAD expiry. We have completed a line-by-line review of the SMETS1 TMAD in efforts to identify clauses that are required beyond its expiry. We have also considered main body SEC references, and Appendices, referenced in the SMETS1 TMAD.

4.2. Review findings and proposals

4.2.1. TMAD variations to the main body SEC

35. As part of our review we have considered SMETS1 TMAD obligations that are referenced within other areas of the SEC. Section 3 of the SMETS1 TMAD provides transitional variations applied of various main body SEC sections, which are valid for the period the TMAD remains applicable.
36. We provide details of the variations below.

SEC Section	Description of variation
SEC Section A (Definitions and Interpretations)	Amendments required specifically for migration. For example, the definition of DCC Live Systems was amended to include the migration services of the Requesting Party and Commissioning Party services which have or will be decommissioned by the time of SMETS1 TMAD expiry. These variations allowed for clarity on migration services or obligations and are not required post migration end.
SEC Section F (Smart Metering System Requirements)	Requirements for the entry of additional data in the SMETS1 Pending Product Combinations and SMETS1 Eligible Products Combinations, including the Smart Meter System Operator for the Device and its status. This data was required to allow migrations to be processed. This information is not required past migration end and the variation is therefore no longer required.
SEC Section G (Security)	Security obligations relating to the Requesting Party and Commissioning Party migration. Since these services have either been decommissioned or will be decommissioned by SMETS1 TMAD expiry these obligations are no longer required.

SEC Section H (DCC Services)	Additional rights and obligations for Maintenance on DCC Migration Service. Since the migration service will be decommissioned and is no longer in use, these rights and obligations are no longer required.
SEC Section L (Smart Metering Key Infrastructure and DCC Key Infrastructure)	The addition of SMKI signing requirements for Commissioning Party, Requesting Party and Migration. Since the migration service will be decommissioned and is no longer in use, these rights and obligations are no longer required.
SEC Section M (General)	Variations and clarifications to SEC M liabilities that may arise as a result of migration actions / processes. Migration activities have completed, and these rights and obligations are no longer required.
SEC Section AG (Incident Management Policy)	Obligations and rights related specifically to incidents related to migrations. Since the migration service will be decommissioned and is no longer in use, these rights and obligations are no longer required.

37. The variations described above provide for rights and obligations specifically related to the migration of SMETS1 Devices. Since migration services are no longer required following the completion of migration, we do not consider that any of these variations need to persist. Neither will their expiry cause any issue for the ongoing operation of SMETS1 Devices.

4.2.2. SMETS1 TMAD required documents

38. The SMETS1 TMAD requires the production and publication of documents and policies required for the purposes of migration. We consider that these policies are no longer required and cease to apply from the expiry of SMETS1 TMAD. These documents include the following:
- Migration Scaling Methodology
 - Migration Authorisation Mechanism
 - Migration Reporting Regime
 - Migration Error Handling and Retry Strategy
39. We do not believe that the documents need to be retained since they relate specifically to SMETS1 migrations and do not apply to any future processes or procedures.

4.2.3. Clauses proposed for retention in SEC Appendix AM and SEC Appendix AC

40. We have identified five definitions contained within the SMETS1 TMAD that are required since they are referenced elsewhere in the SEC. Since those obligations utilise the SMETS1 TMAD definition we consider that those definitions need to be retained in other SEC documents. Without their retention other obligations may become ambiguous or irrelevant. We propose that these definitions are added to the SEC Appendix AM and to the SEC Appendix AC, where applicable.
41. SMETS1 TMAD 3.14E and 3.14F provide obligations on DCC to ensure that any SMETS1 Service Provider systems, not required for the provision of Services, are disconnected from DCC Systems and the SMETS1 Service Provider. At the time of writing these disconnection activities are ongoing and for the avoidance of doubt we propose that these obligations are retained in the SEC Appendix AM. These obligations also include terms defined in the SMETS1 TMAD.
42. SMETS1 TMAD 7.9A – 7.9D provide rights and obligations in relation to the deletion or retention of data used for migration purposes. Since DCC continues to hold data, and where that data may

be required for the continued operation of SMETS1 Devices, we consider that these obligations should be retained in the S1SR. Retaining these rights and obligations provides clarity on the allowance of data retention for the purposes of operating SMETS1 Devices, and on the requirement to delete data where it is no longer required.

43. We have provided details of these proposed changes in Appendix One. We have also provided redlined versions of the SEC Appendix AM and to the SEC Appendix AC.
44. No other SMETS1 TMAD clauses were identified that are required beyond the SMETS1 TMAD expiry. All other obligations are those that relate specifically to migration requirements and are no longer required or are definitions that are only referenced in the SMETS1 TMAD.

Question Two

Do you agree with the proposed retention of SMETS1 TMAD definitions within the SEC Appendix AM and Appendix AC as provided? Please give a rationale for your response.

Question Three

Do you consider there to be any other SMETS1 TMAD clauses that should be considered for retention beyond 31st December 2025? Please give a rationale for your response.

4.2.1. Out of scope changes for future consideration

45. We have not identified any clause beyond SMETS1 TMAD that requires immediate amendment as a result of TMAD expiry. However, there are a number of clauses related to SMETS1 throughout the SEC which are no longer required where their retention will not impact the obligations or requirements for the continued operation of SMETS1 Devices.
46. DCC will engage with SECAS in due course on how to best manage a SEC Modification to consider removing SMETS1 migration related obligations that are no longer required.

5. Next Steps

47. Following the closure of this consultation, DCC will take into account respondents' views. DCC will amend the SEC Appendix AM and SEC Appendix AC as appropriate. We will submit an amended version of SEC Appendix AM and SEC Appendix AC to the Department of Energy Security and Net Zero (the Department) for consideration and a recommendation as to whether they are suitable for re-designation into the SEC by the Secretary of State.
48. DCC is aiming to provide a report to The Department by no later than 21st November 2025. This report will contain DCC's consideration of the consultation responses as well as a version of Appendix AM and Appendix AC that DCC considers is appropriate to designate into the SEC.
49. DCC has discussed the proposed re-designation of the Appendix AM and Appendix AC with The Department. On that basis, DCC proposes that, subject to timely receipt of DCC's report and copies of relevant stakeholder responses to this consultation, for the Department to re-designate the Appendix AM and Appendix AC on 12th December 2025 (or as soon as reasonably practicable within one month thereafter).

Question Four

Do you agree with the proposed re designation date of 12th December 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to SEC Appendix AM and SEC Appendix AC?

6. How to Respond

50. Please provide responses by 1700 on 14th November 2025 to DCC at consultations@smartdcc.co.uk.
51. 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 and the Gas and Electricity Markets Authority (the Authority). Information provided to The Department 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 The Department 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.
52. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

7. Appendix One – Proposed amendments to the S1SR and SEC Appendix AC

Current reference	Item description	Logic	Proposed reference
SEC Appendix AL. SMETS1 TMAD. Defined Terms and Interpretations	Definition of GroupID Definition of Group Definition of Group Device Model Combination List	GroupID Referenced in the S1SR and required for those obligations, where each definition provides additional information	SEC Appendix AM 2 Defined Terms
SMETS1 TMAD Defined Terms and Interpretations	Definition of SMETS1 CAD Definition of SMETS1 PPMID	Referenced in SEC Appendix AC and required for those obligations	SEC Appendix AC Section 13 Definitions
SMETS1 TMAD 3.14E – 3.14F	RP Separation requirements	Avoidance of doubt on the obligation to disconnect	SEC Appendix AM 2A Application of Section G (Security) 2A 1.1 – 1.2
SMETS1 TMAD Defined Terms and Interpretations	RP Decommissioning Date Requesting Party Commissioning Party	Term contained in 3.14E – 3.14F which are proposed for retention.	SEC Appendix AM 2 Defined Terms
SMETS1 TMAD 7.9A – 7.9D	Rights and obligations on the continued user or deletion of data collected for migration purposes	To ensure that data required for the continued operation of SMETS1 Devices can be retained, while also providing a clear obligation on the deletion of data no longer required	SEC Appendix AM 2B Decommissioning of a Requesting Party or the Commissioning Party 2B 1.1 – 1.4

8. Appendix Two - changes for future consideration

Current reference	Item description	Comment
SEC section N. SMETS1 Meters	SMETS1 Meters, general obligations to evaluate enrolment feasibility and develop enrolment services, including production of the SMETS1 TMAD.	Main body SEC. Continued application not considered to present any issues or risks. Removal, including consideration of any clauses that need to endure, to be considered through SEC Modification.
SEC Section L. Smart Metering Key Infrastructure and DCC Key Infrastructure L3.18	Organisation Certificates only required for migration.	Main body SEC. Continued application not considered to present any issues or risks. Main body SEC. Removal to be considered through SEC Modification.
SEC Section A. Definitions	Definition of High Impact Planned Maintenance that includes a reference to “previously scheduled SMETS1 migrations”	Main body SEC. Continued application not considered to present any issues or risks. Reference to migrations suggested for removal through SEC MP294.
SEC Appendix AK. SEC Variation Testing Approach Document for SMETS1	Testing requirements for SMETS1 Devices and systems. Including SMETS1 Migration testing Approach Document and Device Model Combination Testing.	Implemented through SEC section X with links to main body SEC. Continued application not considered to present any issues or risks. Removal, including consideration of any clauses that need to endure, to be considered through SEC Modification.
SEC Appendix J. Enduring Testing Approach Document	Pending Product Combination Testing requirement.	Continued application not considered to present any issues or risks. For future consideration and where amendments are required through SEC Modification
S1SR Clause 13	Pre migration configuration requirements	Continued application not considered to present any issues or risks. For future consideration and where amendments are required through SEC Modification
SEC Appendix AC - Inventory, Enrolment and Decommissioning Procedures. 3.4 & 3.5	Requirements for enrolment of SMETS1 Meters	Continued application not considered to present any issues or risks. For future consideration and where amendments are required through SEC Modification