

SMETS1 Consultation - Migration DUST Closure for FOC (BG)

A SMETS1 consultation on proposals by DCC to end the provision of Migration DUST for the FOC (BG) cohort (where GroupID = "EA").

Date: 8 September 2023

Respond by: noon on 6 October 2023

Expected Conclusion date: 20 October 2023

Author: consultations@smartdcc.co.uk

Classification: DCC Public

Table of Contents

- 1. Introduction and Context3**
- 2. Closure of Migration DUST for FOC (BG) (where GroupID = "EA")3**
- 3. Next Steps4**
- 4. How to Respond5**
- 5. Attachments5**

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 a detailed approach for migrating SMETS1 Installations into DCC's systems.

The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD)¹ sets out the rights and obligations for a range of SMETS1 testing matters, including the provision of a Migration Device and User System Testing (DUST) service. This is an element of the suite of Testing Services provided by DCC and allows a Testing Participant to test the interactions between their own solution and the systems and processes used by DCC to Migrate Active and Mixed SMETS1 Installations. The existing SMETS1 SVTAD requires DCC to provide Migration DUST in line with the details set out in the Migration Test Approach Document (MTAD). DCC has previously concluded on amending Table 17.6 in the MTAD to enable closure of the Migration DUST service for other cohorts as follows:

- IOC and MOC (MDS) closed from 17 June 2022²;
- FOC (NP) closed from 30 September 2022³; and
- MOC (Secure) closed from 31 January 2023⁴.

Migration DUST is now only provided for the FOC (BG) cohort. This consultation proposes to further amend Table 17.6 in the MTAD so that the Migration DUST testing service for the FOC (BG) cohort is closed on 31 October 2023.

2. Closure of Migration DUST for FOC (BG) (where GroupID = "EA")

Unlike the broader DUST, Migration DUST is a relatively expensive Testing Service with little routine utilisation as Migration is an activity that doesn't need additional testing by Test Participants where there is no new Migration product development envisaged that would affect how they interact with the DCC's Migration solution. In order to be efficient and economic while supporting the SMETS1 migration process, DCC has progressed closure of Migration DUST for each SMETS1 cohort as soon as it is deemed reasonable to do so.

Migrations are continuing for the FOC (BG) cohort and a date for consulting on closure of the relevant Requesting Party in relation to the cohort is not yet confirmed.

Only one Testing Participant is eligible to use Migration DUST for the FOC (BG) cohort as it is the single Responsible Supplier that is operating Active Meters in that cohort. DCC has discussed the closure of Migration DUST for FOC (BG) with this Testing Participant, which indicated to DCC that it expects to finish using Migration DUST at the end of September 2023.

A limited number of additional entries on the Eligible Product Combinations List (EPCL) are planned for this cohort ahead of Requesting Party closure. DCC does not consider this to be a

¹ The SMETS1 SVTAD is Appendix AK of the Smart Energy Code (SEC)

² <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-2/>

³ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-migration-dust-closure-for-foc-np/>

⁴ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-migration-dust-closure-for-moc-secure/>

material factor that should delay closure of Migration DUST for the FOC (BG) cohort, given that these additional EPCL entries will not impact the DCC's Migration solution for FOC (BG) that Migration DUST allows Testing Participants to test against. DCC plans no further changes to this solution for completing migrations in FOC (BG).

DCC is proposing to amend Table 17.6 in the MTAD to set the end date for Migration DUST for FOC (BG) as 31 October 2023, which is the earliest available time point for closure. If the outcome of this consultation is that Migration DUST should not be closed on the proposed date, or if any delay to closure arises, DCC could further extend the commercial arrangements for this Testing Service on a monthly basis. As the Testing Service is relatively expensive and has little routine utilisation, DCC would seek to close it at the next earliest available point i.e. either Thursday 30 November 2023 or Sunday 31 December 2023. DCC would reconsult on closure if the need for Migration DUST for FOC (BG) extends past 31 December 2023.

Based on DCC's engagement with the only Testing Participant that currently uses Migration DUST for FOC(BG) (as stated above), there is a very unlikely edge case whereby there is a need for further Migration DUST testing for FOC (BG) after the closing of the testing service. This requirement could only arise from the only Responsible Supplier operating Active Meters for FOC (BG), being the only Testing Participant who uses this service. Nevertheless, for Migration DUST to be re-started for the FOC (BG) cohort, the following elements would be required:

- a consultation to reverse the currently proposed amendment to Table 17.6 in the MTAD (where overall progress may take up to three months); and
- an exercise, which would be expected to have a minimum lead time of six weeks under DCC's existing commercial arrangements, by DCC to procure additional provision of the service from the range of existing service providers.

Testing Participants should note that once the Migration DUST service for a cohort has ended, DCC's ability to enrol (Migrate) new test devices in respect of that cohort for other Testing Services in User Interface Testing (UIT) environments such as DUST and User Entry Process Testing (UEPT) would cease. This is because the ability to enrol new SMETS1 devices into the UIT environment is linked commercially to the provision of the Migration DUST service for each cohort. Ceasing to have a mechanism to migrate new device sets into the UIT environments could limit DCC's ability to support other Testing services as described in Section H14 of the SEC. Consistent with the approach for the other cohorts, to mitigate this, DCC is currently migrating all of DCC's remaining SMETS1 test stock for FOC (BG) into DCC's UIT environments to ensure the maximum number of usable devices for Testing Participants is maintained post closure of Migration DUST.

MDUST Close FOC (BG) Q1

Do you agree with DCC's proposals to close Migration DUST for FOC (BG) at the earliest available time point from Tuesday 31 October 2023 (or, if delays arise, from either Thursday 30 November 2023 or Sunday 31 December 2023) as captured by the proposed changes to the MTAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

3. Next Steps

The SMETS1 SVTAD allows DCC to modify the MTAD directly following stakeholder consultation and provision of a conclusion report to the Secretary of State. DCC can then amend the MTAD so long as the Secretary of State does not direct DCC otherwise. DCC is proposing to modify the MTAD to enable the partial closure of Migration DUST for FOC (BG) using the procedure set out in Clause 4.2 of the SMETS1 SVTAD. At this point Migration DUST will be closed for all cohorts.

Following this consultation, DCC will provide the Department for Energy Security and Net Zero (the Department) with a summary of responses received and detail on how DCC has addressed any concerns raised. DCC will then ensure it builds in sufficient time for the Secretary of State to take a view on the merit of the proposed changes to the MTAD.

DCC expects to issue its conclusion to this consultation, along with any necessary amendments to the MTAD on or before 20 October 2023. Unless the Secretary of State directs otherwise, DCC proposes to modify the MTAD through the draft direction at Attachment 1, on 27 October 2023 (or, if necessary, as soon as reasonably practicable within two months (27 November or 27 December) thereafter if delays to closure arise).

MDUST Close FOC (BG) Q2

Do you agree with the proposed modification date of 27 October 2023 (or within two months thereafter i.e. between 27 October 2023 and 27 December 2023) for the changes to table 17.6 of the MTAD?

4. How to Respond

Please provide responses in the attached template by noon on 6 October 2023 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

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 and/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.

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

5. Attachments

Attachment / Title
1. Draft Modification Text on MTAD
2. Response Template - Migration DUST Closure for FOC (BG)
3. MTAD 5.FOCSBG Draft Redlined

Table 1 – Attachments

Attachment 1

This attachment contains the text that DCC plans to use for direction of changes to the MTAD.

MTAD Draft Modification Text

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Clause 4.2 of Appendix AK of the SEC (the SEC Variation Testing Approach Document for SMETS1 Services), DCC directs that, with effect from [DD MM YYYY], the Migration Test Approach Document is hereby modified in the form set out in Annex [TBC] of this direction.

For the avoidance of doubt such modification of the Migration Test Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this first being established, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).

This direction is also being notified to the SEC Administrator.