

SMETS1 Consultation on changes to the SMETS1 Supporting Requirements for FOC – April 2022

A consultation on changes to the S1SR that records certain Device Specific Behaviours

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1. Introduction and Context

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers installed first generation smart metering devices (known as SMETS1 Devices), in households and small/medium non domestic premises. 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 intends to offer the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers.

The DCC solution relies on a common DCC User interface, defined in the DCC User Interface Specification (DUIS) for users of both SMETS1 and SMETS2 devices. The SMETS1 Supporting Requirements (S1SR) – Appendix AM of the Smart Energy Code (SEC), describes supplementary rules for how DCC will process SMETS1 Service Requests / Service Reference Variants (SRs/SRVs) and includes the accommodation of behaviours that are specific to particular SMETS1 Device Models. The latest version of the S1SR came into effect on 17 December 2021.

DCC has identified changes that are required to the S1SR and is consulting on the changes identified below. Once feedback has been evaluated, DCC will update the S1SR as necessary and then submit the revised S1SR to the Department for Business, Energy and Industrial Strategy (BEIS) for re-designation into the SEC on 30 June 2022 (subject to consultation feedback).

2. S1SR Changes Related to FOC

This consultation is seeking views on the changes to the S1SR that records certain device specific behaviours as set out in the Table below.

On 5 February 2021, DCC consulted on changes related to the half hourly profile read data for FOC.¹ DCC has further identified a behaviour related to the processing and buffering of profile data from the Profile Data Log (with its SMETS1 meaning) by the S1SP as per Table 1 below.

Fuel	Data being pushed (SMETS terminology)	Retention Period
Gas	Last days entries in the Profile Data Log	25 hours
Electricity	Last days entries for Active Energy Imported (Consumption in the Profile Data Log)	25 hours
Electricity	Last days entries for Reactive Energy Imported in the Profile Data Log)	25 hours
Electricity	Last days entries for Active Energy Exported in the Profile Data Log)	25 hours
Electricity	Last days entries for Reactive Energy Exported in the Profile Data Log)	25 hours

Table 1 – FOC Behaviours

The SMETS1 FOC solution is bounded by the constraints of the Trilliant architecture employed globally whereby communication with devices is limited to once per day and the CHF pushes to the Head-End System ESME and GSME data on a daily basis. To fulfil User demands for regular Profile Data reads in line with consumer preferences there is a need to buffer the profile data over a 25 hour period. Alternative options would require significant change and investment and would significantly extend enrolment timescales. This design promotes efficiency and system stability as requests for Profile Data can be satisfied from pushed data and avoids a further request to the meter.

The change implemented in Uplift 2.4 will, where a schedule is created with a Schedule End Date (as per DUIS) for SRV 4.8.1 - Retrieve Active Import Profile Data, cause the S1SP to configure the CH so that all the data from the Profile Data Log that has not previously been sent is read from the devices and pushed by the CH on a daily basis. Once buffered, any data that has a timestamp that is older than 25 hours will be removed. DCC has updated its Data Processing Impact Assessment (DPIA) in line with the above changes.

¹ <u>www.smartdcc.co.uk/media/5894/foc_tmad_u2and21_consultation-v013.pdf</u>

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We propose to amend the S1SR to reflect that Profile Data will be sent to the S1SP on a daily basis when a schedule is created to read the data and, once buffered, deleted once 25 hours has elapsed.

As agreed with the Security Sub-Committee (SSC) and in line with our DPIA, DCC considers any residual risk to be low but shall be building on existing data processing protections by implementing encryption on the S1SP buffered Profile Data as soon as practical. The level of data collected, the low buffering period and its inaccessibility also support a low risk design.

Drafting Reference	Description
18.18(l)	ESMEs with an EPCL GroupID of "EA" have a slightly different configuration to other L+G devices. These devices have not been configured to allow a snapshot to be generated when the billing calendar is configured to be "daily" and therefore, if the billing calendar is set to "daily", no entries will be seen in the Billing Data Log.
18.22(h) 18.23(f) 18.24(f)	An addition to the S1SR to describe the S1SP processing of profile data. When the Supplier sets up a schedule with a Schedule End Date (as per DUIS), to collect ½ hourly profile data (using SRV 4.8.1) from the device, the S1SP configures the device to push the relevant data to the S1SP on a nightly basis. This data contains the previous day's (in local time) ½ hourly profile data from the GSME and/or the Active and Reactive Import and Active and Reactive Export profile data from the ESME and is buffered by the S1SP. Any subsequent request for data using SRV 4.8.1, 4.8.2 and 4.8.3 from any User will first use the data from the S1SP buffer. If the request cannot be fully satisfied by using the data from the S1SP buffer, then the S1SP will collect the missing data directly from the device. When the Schedule is removed, (e.g. on a Change of Tenancy, or Change of Supplier) then all of the profile data is removed from the S1SP and the push is disabled. The S1SP will only keep the last 25 hours of profile data in its buffer to allow for differences in data capture in British Summer Time and for any failures in sending the profile data from the devices.
18.22(i)	Some dormant FOC Devices have been configured to perform their daily push of profile data after 5:30 in the morning and before 11:30 in the evening. These Devices will be configured to push their profile data in line with all other FOC Devices between 00:30 in the morning and 05:30 in the morning when a Supplier sets up a schedule to retrieve their normal scheduled reads using SRV 4.8.1.
18.27(p)	After feedback, this clause which was previously removed, has now been reinstated. The Non-Disconnection Calendar cannot be read from the device, and therefore the S1SP keeps a copy when the user sets it using SRV2.1. Accordingly, until an SRV2.1 is sent to the GSME after migration, the User will get an error when trying to read the prepayment configuration using SRV 4.13.

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Table 2 - Overview of Drafting Changes

This consultation invites views from stakeholders on the proposed amendments to the S1SR that are identified in Table 2 above. In particular, we are inviting responses to the following consultation questions:

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C	21

Do you agree with the proposed amendments to the SMETS1 Supporting Requirements Document (S1SR), that have been added to describe the device specific behaviours?

S1SR Q2

Do you agree with mappings of S1SR to the relevant Device Models in DMVES?

3. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views. DCC will amend the S1SR and DMVES as appropriate and will submit an amended version of the S1SR to BEIS that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC is aiming to provide a report to BEIS by no later than 16 June 2022. This report will contain DCC's consideration of the consultation and its responses as well as a version of the S1SR that DCC considers is appropriate to designate into the SEC.

DCC has discussed the re-designation of the S1SR with BEIS and it is proposed that, subject to timely receipt of DCC's report and copies of relevant stakeholder responses to this consultation, BEIS will re-designate the S1SR on the date of the Maintenance Release which will allow this functionality to go live being 30 June 2022 (or as soon as reasonably practicable within one month thereafter).

In order to expedite the re-designation of the S1SR, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the S1SR as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

S1SR Q3 Do you agree with the proposed re-designation date of 30 June 2022 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR using the draft notification at Attachment 1?

4. How to Respond

Please provide responses by 1600 on 31 May 2022 to DCC at consultations@smartdcc.co.uk.

Consultation responses may be published on our website <u>www.smartdcc.co.uk</u>. 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

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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 <u>consultations@smartdcc.co.uk</u>.

5. Attachments

- Attachment 1: S1SR Draft Direction Text
- Attachment 2: SEC Appendix AM SMETS1 Supporting Requirements v12.1 draft redlined
- Attachment 3: SEC Appendix AM Annex A Device Model Variations to Equivalent Steps Matrix v12.1 draft
- Attachment 4: S1SR April 2022 consultation Response Template

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the S1SR.

S1SR Draft Direction Text

This direction is made for the purposes of the smart meter communication licences granted under the *Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").*

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

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DD MM YYYY], the SMETS1 Supporting Requirements previously designated and incorporated into the SEC as Appendix AM is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Supporting Requirements shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.