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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 the 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.

Between 13 January and 10 February 2023¹, DCC consulted on changes to the S1SR related to device specific behaviours that have been identified. DCC consulted on changes to the S1SR that included clauses to clarify the Daily Push behaviour that were also consulted on in April 2022². DCC is not yet in a position to finalise the proposed changes relating to the Daily Push behaviour and these have therefore been removed from the version of the S1SR that DCC is submitting to the Department for Energy Security and Net Zero (The Department) for designation into the SEC at this time.

In the consultation, the proposals included changes to clarify Clause 17.6A in Section 17 and changes related to the SMETS1 IOC, FOC, and MOC (Secure) cohorts. The change for the Secure cohort relates to Prepayment Interface Devices (PPMIDs), which stops showing gas consumption data once it has been migrated into the DCC Systems. DCC addressed this issue for devices migrated after March 2022, but the issue remained for those devices that were migrated prior to this time. At the time of publication, it was anticipated that, if the proposed solution was supported by respondents, the solution would have been implemented in the March maintenance release. The proposed re-designation date of the S1SR was aligned to this date. DCC has subsequently determined that it is only possible to implement these changes as part of the May maintenance release. DCC is therefore issuing a new consultation on designation of the proposed changes into the SEC that are not related to Daily Push on 23 May 2023 in line with realising the maintenance release.

2. Consultation Questions & Responses

2.1. Questions

The consultation presented the consultation questions as set out in Table 1.

S1SR Q1	Do you agree with the proposed amendments to the S1SR that are set out in this consultation document, that have been added to describe the device specific behaviours? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?
S1SR Q2	Do you agree with mappings of S1SR to the relevant Device Models in Device Model Variations to Equivalent Steps (DMVES)?

¹ SMETS1 Consultation on changes to the SMETS1 Supporting Requirements | Smart DCC

² SMETS1 Consultation - S1SR changes for FOC - April 2022 | Smart DCC

S1SR Q3

Do you agree with the proposed re-designation date of 21 March 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR using draft notification at Attachment 1?

Table 1

2.2. Responses

DCC received a written response from three respondents to the consultation on the S1SR.

DCC provided all written responses to the Secretary of State.

One respondent did not respond directly to the questions but indicated they had no objections to the proposed changes.

3. Analysis of Responses

DCC subject matter experts have analysed the feedback provided by the respondents.

DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:

- an overview of the responses on the topic;
- where appropriate a DCC response; and
- areas where DCC disagrees with the view presented by respondents, as the regulation requirements require DCC to report on this.

3.1. S1SR Question 1

DCC sought views on proposals to amend the S1SR asking "Do you agree with the proposed amendments to the S1SR that are set out in this consultation document, that have been added to describe the device specific behaviours? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?".

3.1.1. Respondent View

DCC received two responses to this question. The respondents agreed with the proposals to amend the S1SR.

One respondent noted that the proposed wording in 18.22(i) does not make it clear that the change from the random collection timeframe to the more condensed period of 00:30:00 – 05:30:00 will only update on the setting of a new schedule. The respondent sought clarity on when the change to timeframe will triggered.

3.1.2. DCC Response

This clause has been removed from the version of S1SR that DCC is proposing for designation into the SEC, but DCC will bear this response in mind when considering any potential changes related to Daily Push.

3.2. S1SR Question 2

DCC sought views on proposals to amend the DMVES asking: "Do you agree with mappings of S1SR to the relevant Device Models in Device Model Variations to Equivalent Steps (DMVES)?".

3.2.1. Respondent View

Two respondents agreed with this question.

3.2.2. DCC Response

As respondents agreed with the proposal, DCC has no further comments.

3.3. S1SR Question 3

DCC sought views on proposals to re-designate the S1SR asking: "Do you agree with the proposed re-designation date of 21 March 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR using draft notification at Attachment 1?".

3.3.1. Respondent View

Two respondents agreed with this question.

3.3.2. DCC Response

As respondents agreed with the proposal, DCC has no further comments. DCC notes that it is consulting on a new date for designation of the S1SR³ as the date of the code release has changed and is beyond the original designation window.

4. Conclusions

DCC is of the opinion that it has had appropriate engagement and consultation with industry on the changes that have been proposed to the S1SR in this consultation. DCC will submit the proposed changes to the Department for designation into the SEC. At the same time as publishing these conclusions, DCC will be issuing a consultation on the subsequent designation of the S1SR.

DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed by the respondents to the consultation, which was conducted between 13 January and 10 February 2023, result in fundamental amendments to the S1SR and, as such, further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations.

The proposed S1SR revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

In summary, DCC considers that the revised S1SR is fit for purpose as DCC considers that the revised S1SR:

- is defined to a sufficient level of detail for re-designation into the SEC;
- provides an overarching framework which sets out clearly and unambiguously SEC parties' rights and obligations which are consistent and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- is materially complete, and the content is technically accurate.

³ Pl. add link to consultation.

5. Next Steps

DCC will submit its conclusions to the consultation on regulatory changes to SEC Appendix AM – SMETS1 Supporting Requirements to the Secretary of State when it publishes this consultation response on its website.

DCC notes that there is yet to be a decision on the proposals relating to the Daily Push and has accordingly not published its conclusions.

DCC will be publishing a consultation on the designation of the S1SR at the same time as it publishes this consultation response on the DCC website.

6. Attachments

Attachment 1: SEC Appendix AM SMETS1 Supporting Requirements

Attachment 2: SEC Appendix AM Annex A - Device Model Variations to Equivalent Steps