

SMETS1 Conclusion - revised closure date for MOC (MDS) migrations and the associated DMCT Process

A SMETS1 conclusion on a proposal by DCC to end Migrations and stop the DMCT Process in respect of the MOC (MDS) cohort

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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.

DCC issued the Revised Closure Date for MOC (MDS) Consultation¹ to seek views on a revised proposed RP Decommissioning Timetable for the Requesting Party for the MOC (MDS) cohort. The consultation proposed to end Migrations and stop the DMCT Process in respect of the MOC (MDS) cohort on Sunday 25 September 2022 (with contingency dates until Sunday 27 November 2022 in case of any further delay).

This document provides a response to that consultation consistent with the requirements set out in Clause 7 of the SMETS1 Transition and Migration Approach Document (TMAD) which is Appendix AL in the Smart Energy Code² (SEC).

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed regulatory changes.

2.1. Questions

Table 1 below details the questions that were presented in the public consultation.



Do you agree with DCC's proposed RP Decommissioning Timetable document for the MOC (MDS) cohort that sets out the proposed date for the Requesting Party to be decommissioned for the MOC (MDS) cohort to be Sunday 25 September 2022 (or any following Sunday up to and including Sunday 27 November 2022)? Do you have any detailed comments on the RP Decommissioning Timetable document and information presented in this consultation document? Please provide a rationale for your views.

Table 1 – Consultation Questions

2.2. Responses

Stakeholders were invited to respond to the consultation by 16:00 on Thursday 18 August 2022 using the response template³ that was provided.

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

3. Proposed Closure of the MOC (MDS) Cohort

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed each response. This section provides an analysis of the responses to the questions set out in the consultation, providing an overview of the comments received and DCC's reply including a statement on any areas of unresolved disagreement.

¹ <u>https://www.smartdcc.co.uk/consultations/smets1-consultation-revised-closure-date-for-moc-mds/</u>

² The current version of the SEC is available from <u>https://smartenergycodecompany.co.uk/the-smart-energy-code-2/</u> ³ <u>https://www.smartdcc.co.uk/media/wcekof5g/smets1-consultation-updated-closure-for-moc-mds-response-</u> template.docx

3.1. Closing MOC (MDS) Cohort (Closure 1 V2 Q1)

DCC sought views on decommissioning the Requesting Party for the MOC (MDS) cohort asking: "Do you agree with DCC's proposed RP Decommissioning Timetable document for the MOC (MDS) cohort that sets out the proposed date for the Requesting Party to be decommissioned for the MOC (MDS) cohort to be Sunday 25 September 2022 (or any following Sunday up to and including Sunday 27 November 2022)? Do you have any detailed comments on the RP Decommissioning Timetable document and information presented in this consultation document? Please provide a rationale for your views.".

3.2. Respondents' Comments / DCC Analysis / Clarifications

Both respondents provided a response to this question.

The first respondent indicated that they had no objection to the proposal to close the MOC (MDS) cohort without providing further details.

The second respondent indicated agreement for the decommissioning of the Requesting Party for the MOC (MDS) cohort.

This second respondent also set out concerns regarding the schedule for decommissioning. The respondent expressed the view that the timescales for the decommissioning activity should have been more aggressive given the limited numbers of remaining SMETS1 Installation that are likely to be successfully enrolled. This respondent expressed the view that the remaining 4,581 SMETS1 installations described in the consultation will have factors that impact either their enrolment viability or the length of time that they will remain installed. The respondent also considered that DCC's attempts to Migrate these SMETS1 Installations are unlikely to result in significant levels of success as this group should also be targeted for SMETS2 replacement. This respondent also indicated that the requirements and implications of the SMETS1 Replacement Obligation must be considered by the DCC when it is determining the duration of Requesting Party services. The respondent expressed the view that retaining Requesting Party services when energy suppliers will be actively targeting the same sites for SMETS2 replacement does not appear appropriate or economically prudent.

As set out in the consultation document, DCC's decision to defer closure reflected an assessment that DCC would not have either Migrated or else demonstrated persistent failure (i.e. 5 retries) for a significant proportion of these 4,581 SMETS1 Installations. Whilst a proportion of these remaining SMETS1 Installations are now in an Excluded Category, DCC has successfully Migrated 3,552 of the SMETS1 Installations which demonstrated the benefit of continuing. At present, DCC has 248 SMETS1 Installations containing Dormant Meters where it has not exhausted Migration attempts but these will be completed (either attempts exhausted or Migrated successfully) before the proposed RP Decommissioning Date. DCC understands the concerns raised by the respondent in relation to the SMETS1 Replacement Obligation and notes that these factors are matters for BEIS to consider.

3.3. Areas of Unresolved Disagreement

n/a

3.4. Summary

DCC concludes it is appropriate to end Migrations for the MOC (MDS) cohort within the period of time as presented in the consultation i.e. a Sunday between Sunday 25 September 2022 and Sunday 27 November 2022. The delay in concluding on this consultation will delay the closure date from the first proposed date in the timeline.

DCC will make a formal proposal on the RP Decommissioning Timetable for the MOC (MDS) cohort to the Secretary of State as set out in Section 5 below.

4. Conclusions

DCC intends to submit the proposed RP Decommissioning Timetable for MOC (MDS) to the Secretary of State given the responses received.

Consistent with the requirements set out in Clause 7 of the TMAD, DCC has undertaken appropriate consultation with stakeholders in relation to the proposal to decommission the Requesting Party for the MOC (MDS) cohort.

DCC is confident that the RP Decommissioning Timetable for MOC (MDS) reflects the requirements for such a document. DCC does not believe that the views expressed result in fundamental amendments to the RP Decommissioning Timetable for MOC (MDS) and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised in relation to the proposal to decommission the Requesting Party for the MOC (MDS) cohort and identify those comments that have not been resolved. DCC is of the view that it has met its regulatory obligation as set out in the SEC.

In summary, DCC considers that the proposed RP Decommissioning Timetable for MOC (MDS) is appropriate and DCC should proceed to close the relevant Requesting Party.

5. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document. DCC will publish its conclusions report on the DCC Website and notify SEC Parties.

DCC intends to submit the RP Decommissioning Timetable for the MOC (MDS) cohort to the Secretary of State on 30 September 2022 with a proposed date of Sunday 23 October 2022 as the RP Decommissioning Date applicable to the Requesting Party for the MOC (MDS) cohort. This letter will be supported by updated evidence on the status of the MOC (MDS) cohort. DCC also expects to provide the Secretary of State with further updates on the status of the MOC (MDS) cohort prior to the decision that is envisaged on Wednesday 12 October 2022.

Where the Secretary of State approves the RP Decommissioning Timetable for MOC (MDS), DCC will take steps to decommission the Requesting Party for MOC (MDS).

The envisaged date for decommissioning is Sunday 23 October 2022. The table below presents the remaining elements within the updated schedule.

Date	Activity
Thursday 29 September 2022	DCC concludes on the consultation findings for MOC (MDS) Requesting Party closure i.e. this conclusion document
Friday 30 September 2022	DCC will submit a draft RP Decommissioning Timetable to Secretary of State for approval.

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Date	Activity
Monday 3 October 2022 to 1700 on Sunday 9 October 2022	BEIS have advised there will be a five day period for any stakeholders to raise further concerns directly to BEIS.
Wednesday 12 October 2022	10 calendar days prior to the RP Decommissioning Date, a decision by the Secretary of State is expected on the closure of the Requesting Party for MOC (MDS).
Thursday 13 October 2022	 9 Days prior to the RP Decommissioning Date and assuming Secretary of State approval has been given, any final Migration Authorisations submitted authorising Migrations to commence in the following (final) Migration Week as per the Migration Authorisation Mechanism. DCC will no longer process: further instructions to the SMETS1 SMSO to configure devices (where migrations are not able to commence during the final Migration Week); notifications to Migrate; and Demand Commitments.
	Up to the point of the week preceding the final migration week i.e. w/e Friday 14 October 2022, Migrations will continue to be processed by DCC as usual.
w/c Monday 17 October 2022	DCC will commence the final Migrations during final Migration Week based on submissions made on Thursday in the previous week. All migrations taking place during the week are expected to have finished processing (successful / failed / rolled back) before the Sunday.
Sunday 23 October 2022	DCC doesn't usually process Migrations on weekends. RP Decommissioning Date will be on this Sunday.
Monday 24 October 2022	From the point of expiry of the RP Decommission Date and once all final migrations have finished processing (successful / failed / rolled back), DCC will instruct the SMET1S SMSO to enact the required steps to shut down the MOC (MDS) Requesting Party, confirming to DCC when decommissioning is complete. This is expected to take 20 working days to fully complete. The DMCT Process for the MOC (MDS) cohort will also cease from this point as per Clause 20.1A of the SMETS1 SVTAD as this is linked to decommissioning of the relevant Requesting Party.

Date	Activity
No later than Wednesday 23 November 2022	DCC to advise each impacted energy supplier on their SMETS1 Installations that are in an Excluded Category for this cohort.
Q4 2022	To confirm decommissioning of the Requesting Party has been carried out appropriately, an independent audit of aspects of the close down process will be carried out and reported back to DCC consistent with the requirements of Clause 7 in the TMAD.

Table 2 - Detailed Closure Activities for MOC (MDS) - updated post further consultation.