

SMETS1 Closure

Proposal to close migrations for MOC (Secure), Requesting Party Decommissioning, and Commissioning Party Decommissioning

Version: 1.0 Date: 28th July 2025 Closure Date: 26th August 2025 Author: DCC Regulation

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1. Executive Summary

- 1. This document presents DCC proposals to close the migration services for the MOC (Secure) cohort and decommission the Requesting Party service. Since this is the final SMETS1 Cohort, we also consider the requirements to decommission the Commissioning Party service that has been supporting SMETS1 migrations.
- 2. In anticipation of completion of a sufficient number of Devices having been migrated in the MOC (Secure) cohort we propose a draft timetable for closing the Requesting Party service in respect of MOC (Secure). This would allow decommissioning of the service to commence in October 2025 and to be complete before SEC Appendix AL SMETS1 Transitional Migration Approach Document, which provides the regulatory framework for SMETS1 enrolment, expires at the end of 2025.
- 3. We welcome feedback from Parties on the proposals set out in this consultation.
- 4. This consultation closes at 17:00 on 26th August 2025, and responses should be sent to <u>consultations@smartdcc.co.uk</u>.

2. Introduction

2.1. Background

- 5. 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.
- 6. 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 operated through suppliers' own contracted service and outside the national smart metering network managed by DCC. This meant that a SMETS1 Device could not always continue to provide smart functionality when operated by another supplier (for example following a consumer changing supplier).
- 7. In 2018 and 2019, the Secretary of State at the time directed changes to the energy supply 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. The enrolment project has enabled millions of consumers to benefit from an interoperable smart metering market. There are more than 11 million SMETS1 meters now operating on DCC systems.
- 8. 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.
- 9. For enrolment and operation purposes SMETS1 eligible meters² had been separated into three groups termed Initial Operating Capacity (IOC), Middle Operating Capacity (MOC) and Final Operating Capacity (FOC). The MOC and FOC cohorts had been further split into smaller cohorts, which includes MOC (Secure)³. Each cohort was allocated a unique GroupID with specific requirements described in the SMETS1 TMAD.
- 10. Migrations in the MOC (MDS) cohort completed in October 2022⁴, migrations in the IOC cohort completed in May 2023⁵, and migrations in the FOC cohort completed in November 2024⁶. The DCC migration services in respect of these cohorts have been decommissioned. The MOC (Secure) cohort is the sole cohort where migration of eligible SMETS1 Devices is ongoing. This process is now reaching completion and DCC is preparing to decommission the services that support the MOC (Secure) migration capability.
- 11. Given the expected migrations completion, DCC is also considering whether any elements of the SMETS1 TMAD are required for the ongoing operation of SMETS1 meters. We will engage Parties on our considerations about this in due course, separately from this consultation.

⁴ SMETS1 Conclusion – Revised Closure Date for MOC (MDS) | Smart DCC

DCC Public: SMETS1 Consultation on MOC (Secure) Decommissioning Timetable

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)

⁵ SMETS1 Publication - Final RP Decommissioning Timetable for FOC (NP) | Smart DCC & SMETS1 Publication - Final RP

Decommissioning Timetable for IOC | Smart DCC

⁶ FOC (BG) RP Decommissioning Timetable | Smart DCC

2.2. Areas for consideration

MOC (Secure) draft Decommissioning Timetable

- 12. Section 3 of this consultation provides details on the MOC (Secure) cohort and process for closing the cohort as we expect migration activities for active and dormant meters in the MOC (Secure) cohort to complete by September 2025.
- 13. The remaining MOC (Secure) meters available for migration are operated by multiple Supplier Parties, with the majority operated by a single Supplier Party. We have been supporting these Parties as they attempt to complete their migration of their residual volume onto DCC systems before the proposed Requesting Party (RP) Decommissioning Date.
- 14. DCC is now consulting on the Draft RP Decommissioning Timetable in respect of the MOC (Secure) cohort. After the Decommissioning Timetable expires it will not be possible to migrate any additional meters in the cohort and DCC will begin work to decommission the service.
- 15. The Commissioning Party (CP) service has been utilised for migrations in all SMETS1 cohorts. Since MOC (Secure) is the final SMETS1 Cohort, the proposed RP Decommissioning Date will also mark the beginning of DCC taking the required steps, including those specified under SMETS1 TMAD, to decommission the CP service

Exclusion Reporting

16. Section 4 considers DCC exclusion reporting. In line with the provisions in SMETS1 TMAD Clause 18.3, DCC currently provides a monthly report to Parties on their meters that have been excluded from migrations. At this stage in the SMETS1 Enrolment programme, all Responsible Suppliers, including those with devices in MOC (Secure), should already have a sufficient overview of their excluded device portfolios. Since no additional meters will be excluded from migrations following the RP Decommissioning Date, we consider that this situation is unlikely to materially change. Except for the final exclusion reports that would follow the proposed RP Decommissioning Date, we therefore consider that such reports are unlikely to be required following RP Decommissioning.

2.3. Consultation closure

17. We welcome feedback from Parties on Draft Decommissioning Timetable. This consultation closes at 17:00 on 26th August 2025, and responses should be sent to <u>consultations@smartdcc.co.uk</u>.

3. MOC (Secure)

3.1. Overview

- 18. Consistent with SMETS1 TMAD Clause 7, this section sets out the rationale for DCC's proposal to set a Decommissioning Timetable for MOC (Secure)
- 19. Enrolling the meters in this cohort is facilitated by Secure Smart Meter System Operator (SMSO). Of these meters, approximately ~5,279,000 (five million, two hundred and seventy-nine thousand) have been successfully migrated onto DCC systems to date. At publication, there were approximately ~154,000 (one hundred and fifty-four thousand) meters available for migration in the MOC (Secure) cohort, of which a significant number were operated by a single supplier. The remaining meters are operated by multiple supplier Parties, including across mixed sites. The responsible Suppliers for all remaining meters are working to complete migrations by the end of September 2025.
- 20. Active meters are those SMETS1 meters that are operated with smart functionality where the Responsible Supplier has a contractual agreement for smart services with the SMSO. Where the Responsible Supplier does not have a contractual agreement with the SMSO those SMETS1 meters are operated without smart functionality and a considered Dormant Meters.
- 21. DCC is working with all supplier Parties that operate Active Meters in the MOC (Secure) cohort, and which are available for migration, to ensure migrations are maximised before migrations end by the proposed Decommissioning Date.
- 22. By the proposed RP Decommissioning Date for this cohort DCC also expects that there will be no further unmigrated solely dormant SMETS1 installations that will be eligible to be enrolled. Each of these installations will have had the opportunity for exhaustive attempts to be Migrated. Any unenrolled dormant meters will have been notified to suppliers under the various Exclusion Categories, as set out in SMETS1 TMAD Clause 18, as part of the ongoing monthly reporting to suppliers.

3.2. Active / Mixed Installations

- 23. Where sites contain two SMETS1 meters (gas and electricity) they can be provided with energy by a single supplier or two suppliers. Those sites provided with energy by more than one Supplier Party are referred to as mixed sites.
- 24. There are, therefore, a range of operational scenarios that can occur at any installation depending on the Responsible Supplier for each meter and the operational mode of those meters, including Active Active installations and Active Dormant installations.
- 25. Migration of SMETS1 active and mixed installations can only be triggered through a Migration Authorisation request to DCC by the Responsible Suppliers that operate the Active Meters, which are contained in the installations. In cases where an installation contains two active SMETS1 meters available for migration but operated by different Responsible Suppliers, the Migration Authorisation must be provided by both Supplier Parties within a week of each other. Where a mixed site contains an Active and a Dormant Meter, a Migration Authorisation needs only to be provided by the Supplier Party that is responsible for the Active Meter and DCC takes all the required actions relating to the Dormant Meter.
- 26. Based on discussions with the Responsible Suppliers that operate the Active Meters in such installations, the migration forecasts and plans provided by them to DCC, and the migrations progress made to date by the Responsible Suppliers, in regard to the MOC (Secure) cohort, DCC understands that by the proposed RP Decommissioning Date all Migration attempts for SMETS1 installations containing Active Meters within the cohort will have been exhausted, including where DCC works to migrate Dormant Meters installed at mixed installations.

DCC Public: SMETS1 Consultation on MOC (Secure) Decommissioning Timetable

27. DCC has arrangements in hand with the SMETS1 SMSO, which is involved in progressing migrations in the MOC (Secure) cohort, to progress any mixed SMETS1 installation as soon as a Migration Authorisation is provided for the Active Meters. After the final date for Migration Authorisations, as confirmed in the final Decommissioning Timetable, it will not be possible to provide any further Migration Authorisations for Active Meters for the cohort. This also means that no further mixed SMETS1 installations can be migrated.

3.3. Dormant Meters

- 28. In this context, DCC's consideration is whether, for SMETS1 installations containing solely Dormant Meters, DCC has migrated all SMETS1 installations that are not subject to being placed in an Exclusion Category, as defined by SMETS1 TMAD Clause 18. DCC is of the view that for the MOC (Secure) cohort all Migrations of solely Dormant installations will be completed (i.e. either excluded from the migration path by being placed into a defined Exclusion Category or migrated) before the proposed RP Decommissioning Date. The volume of Dormant Meters in this cohort is low and is only likely to increase slightly where a customer changes to a supplier that does not have a contract with the Secure SMSO, and so we are confident that these meters can be migrated by the proposed RP Decommissioning Date.
- 29. It should be noted that before the RP Decommissioning Date, a SMETS1 installation may become 'newly' Dormant following a Change of Supplier event. There may be some scenarios where there is insufficient time remaining for DCC to undertake the actions necessary that would enable commencement of Migration of such an installation prior to the end of the final Migration Week.
- 30. Where time allows, DCC will continue to attempt Migrations for all SMETS1 installations containing Dormant Meters (including SMETS1 installations containing newly Dormant Meters) up to and including the final Migration week.

3.4. Technical Closure Steps - Requesting Party and Commissioning Party

- 31. The RP and the CP are roles that DCC performs to enable and process SMETS1 migrations. Each SMETS1 cohort has had its own RP System while all cohorts have been serviced by a single CP System. The roles and responsibilities for each are described in the SMETS1 TMAD.
- 32. The only remaining active RP service is specific to the MOC (Secure) cohort and therefore will no longer be required following the end of migrations in MOC (Secure). Consequently, the CP will also no longer be required.
- 33. DCC confirms that it has the technical and process matters in hand to enable it to comply with its obligations to ensure that the RP in respect of the MOC (Secure) cohort does nothing further to commence Migrations once the RP Decommissioning Date has expired.
- 34. Once notified and implemented, the MOC (Secure) RP Decommissioning Date will be the final RP Decommissioning Date for any SMETS1 cohort. In this respect, DCC are prepared and ready to begin CP Decommissioning as required in SMETS1 TMAD Clause 7.10.
- 35. In line with the requirements in SMETS1 TMAD Clauses 7.7 to 7.12 DCC must delete security keys and revoke certificates that are used for data encryption and message signing within the TMAD processes. SMETS1 TMAD Clause 7.13 also requires DCC to procure an audit covering the RP Decommissioning and CP Decommissioning for the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to consider. For the MOC (Secure) cohort, DCC can confirm that its plans to deliver these matters are in hand and will be undertaken in respect of the RP and CP following the decommissioning process to gather evidence to support the audit. DCC can confirm that there are no requirements on energy Suppliers related to the Decommissioning process for the RP or CP covering the MOC (Secure) cohort or the following audit process.

- 36. In shutting down the RP in respect of the MOC (Secure) cohort, and the CP in respect of all SMETS1 cohorts, DCC will ensure that the RP:
 - completes the Migrations relating to all SMETS1 installations where they have been commenced (where completion constitutes either successful commissioning or successful rollback to the SMETS1 SMSO);
 - shuts down the Secure File Transfer Protocol (SFTP) interfaces to DCC and removes any associated cryptographic material whilst retaining evidence for audit purposes (as required by the TMAD);
 - destroys Private Key Material and decommissions RP Hardware Security Model (HSM) and CP HSM, whilst retaining evidence for audit purposes;
 - extracts any required data and submits it to DCC; and
 - finally, shuts down their RP and CP environments.
- 37. DCC will also ensure that:
 - any DCC accounts in use by the RP and the CP are removed; and
 - any of the above changes have no impact on the other services provided to Energy Suppliers and/or consumers other than preventing DCC from continuing with Migrations relating to the MOC (Secure) cohort or any other SMETS1 Device.
- 38. Once the RP in respect of the MOC (Secure) cohort is decommissioned, the services in respect of the cohort, which the RP provides to DCC under the existing contract, will have ended. It will not be possible to re-enable the services of the RP other than by re-procurement by DCC of such RP services.
- 39. When a RP Service is removed, DCC is no longer required to provide the Device Model Combination Testing (DMCT) Process as described in the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD)¹.
- 40. Following our SMETS1 consultation issued in September 2024² and the subsequent consultation conclusion issued in October 2024³, and Secretary of State non-objection to the proposed change, the DMCT Process was amended to being provided only on request where directed by the Secretary of State on the basis that the service was no longer being utilised. In line with the requirements in SMETS1 SVTAD Clause 20.1A the DMCT Process in respect of the MOC (Secure) cohort will now be closed after the proposed RP Decommissioning Date in respect of the MOC (Secure) cohort.

3.5. Proposed Decommissioning Timetable

- 41. Based on the available information relating to the MOC (Secure) cohort, DCC considers that it is appropriate to propose the below draft RP Decommissioning Timetable in respect of the cohort, which will allow Migrations in this cohort to be completed, and for the migration service to be decommissioned in the most cost-effective manner. This includes allowing the Responsible Suppliers in the cohort to exhaust all Migration attempts for the cohort's SMETS1 installations containing Active Meters.
- 42. SMETS1 TMAD 7.2 stipulates that a proposed decommissioning date in a draft Decommissioning Timetable in respect of a RP cannot be earlier than 12 months after the last date on which the

² <u>SMETS1 Consultation: FOC (BG); Unenrolled L&G meters not included in FOC (BG) or FOC (NP) cohorts; SMETS1 TMAD;</u> <u>DMCT and MDUST | Smart DCC</u>

DCC Public: SMETS1 Consultation on MOC (Secure) Decommissioning Timetable

¹ <u>smartenergycodecompany.co.uk/documents/sec-subsidiary-documents/sec-appendix-ak-sec-variation-testing-approach-</u> document-for-smets1-services/

³ conclusion-to-smets1-consultation-v10.pdf

DCC Public

Eligible Product Combination List (EPCL) was updated by the DCC to include Device Model Combination (DMC) entries for enrolment in each meter cohort, which is supported by the relevant RP. The last EPCL entry for meters in the MOC (Secure) cohort was in October 2023. The decommissioning date proposed below is more than 12 months after this date, which complies with SMETS1 TMAD 7.2.

43. As per TMAD Clause 7.3, DCC plans to recommend to the Secretary of State one RP Decommissioning Date, and its corresponding RP Decommissioning Timetable, as proposed in the below table. We will consider consultation responses before finalising our recommendation to Secretary of State, and the dates proposed below may be amended depending on consultation responses.

MOC (Secure) Decommissioning Stage	Date			
The final date for submission of a Migration Authorisation in relation SMETS1 installations	Thursday 18 September 2025			
The final Migration Week applicable to the SMETS1 SMSO for the MOC cohort	Week commencing Monday 22 September 2025			
The Requesting Party Decommissioning Date for the Requesting Party for the MOC cohort	Sunday 28 September 2025			
Table 1 – Draft RP Decommissioning Timetable submission to Secretary of State				

Question one

Do you agree with the proposed draft RP Decommissioning Timetable for MOC (Secure)? Please give a rationale for your response.

4. Excluded Meter Reporting

- 44. Clause 18 of the SMETS1 TMAD sets out the requirements relating to Excluded Categories for SMETS1 meters. Where a SMETS1 Meter is Excluded under one of the described categories, that meter is not considered to be In-Scope for Enrolment and therefore cannot be migrated on to DCC systems.
- 45. SMETS1 TMAD 18.3 requires DCC to provide a monthly report detailing those meters that have been Excluded from migrations. The contract for the provision of that data expires in October 2025 after which the report cannot be produced without additional cost.
- 46. Since we are proposing the closure of the final cohort, and with it, the decommissioning of the CP service, it will not be possible to migrate any other SMETS1 Device on to DCC systems. As such no further meters will be excluded or added to the exclusion list..
- 47. Therefore, DCC expects that after the final report on excluded devices, which would follow the proposed RP Decommissioning Date, further exclusion reporting would no longer be useful or required, and therefore we will not be providing the report after the final report following RP Decommissioning.
- 48. We will consider separately whether any changes to the SMETS1 TMAD are required to formalise this.

5. Next Steps

- 49. Following closure of this consultation, DCC will review the responses to it and provide copies of those responses to the Department (as required through SMETS1 TMAD section 7).
- 50. DCC will review the responses received and consider if any amendments to the draft RP Decommissioning Timetable are required. It is anticipated that by late August 2025 we will provide a draft RP Decommissioning Timetable to the Department for approval by the Secretary of State. Based on prior discussion with the Department, and in line with the recommendation for the prior Decommissioning, this submission to the Secretary of State will take the form of a separate letter for covering the following four matters to support the recommendation:
 - Closure Statement 1 (Prior Consultation) confirmation that DCC has engaged appropriately with stakeholders on these closure matters;
 - Closure Statement 2 (Migration Status) updates of the evidence presented in this consultation document on any remaining SMETS1 installation still in scope for Migration and expectation at the proposed closure date;
 - Closure Statement 3 (Technical Readiness) confirmation that DCC and the relevant service providers are ready to close the RP service and undertake the post-event audit activities; and
 - Closure Statement 4 (Economic Efficiency) confirmation that DCC considers it is economically efficient to close, supported by details on the on-going costs that DCC will incur to keep the RP service operational for the cohort were it not to close.
- 51. Where the Department's direction is to proceed with the proposed Decommissioning Timetable, DCC will confirm the timetable and work through the decommissioning steps to completion. DCC aims to provide the final Decommissioning Timetable, as approved by the Secretary of State, in early September.

6. How to Respond

- 52. Please provide responses by 1700 on 26th August 2025 to DCC at consultations@smartdcc.co.uk.
- 53. 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.
- 54. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.