



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

A proposal to end Migrations and stop the DMCT Process in
respect of the MOC (MDS) cohort

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1. Introduction and Context

This document is a further consultation on the draft Requesting Party (RP) Decommissioning Timetable for the Middle Operating Capability (MOC) (MDS) cohort 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 Code¹ (SEC).

On 5 April 2022, DCC issued the Initial Closure Matters Consultation². None of the respondents to this consultation objected to ending Migrations for the MOC (MDS) cohort. This consultation also included a change to the SMETS1 SVTAD (which was subsequently re-designated by the Secretary of State³) such that the DMCT Process for a cohort would cease from the point of decommissioning of the relevant Requesting Party. Following the consultation DCC published the Initial Closure Matters Conclusion⁴ on 25 May 2022. That conclusion set out DCC's view that it was appropriate to end Migrations for the MOC (MDS) cohort as per the timeline presented in the consultation i.e. that it was acceptable that the Requesting Party for the MOC (MDS) cohort is decommissioned on 19 June 2022 (or any following Sunday up to and including Sunday 31 July 2022).

Following publication of the conclusion on 25 May 2022 DCC experienced some delays in progressing final Migrations for the MOC (MDS) cohort. On this basis, DCC wrote to the Secretary of State on 4 July 2022 to recommend that the Requesting Party for the MOC (MDS) cohort be decommissioned from 31 July 2022. A redacted copy of the letter is available on the SECAS website⁵. This letter sought approval of the RP Decommissioning Timetable for the Requesting Party for the MOC (MDS) cohort based on a RP Decommissioning Date of 31 July 2022. There was a five day period for stakeholders to raise any remaining concerns directly with BEIS between 5 July 2022 and 12 July 2022 (as set out on the SECAS website⁶).

On 19 July 2022, DCC withdrew this request for approval of the RP Decommissioning Timetable for the Requesting Party for the MOC (MDS) cohort. A notification of this withdrawal was provided on the SECAS website⁷. DCC withdrew the request because DCC considered that it would be prudent to continue Migration attempts past 31 July 2022 as there remained a material number of SMETS1 Installations for the MOC (MDS) cohort that DCC will not have either Migrated or else demonstrated persistent failure by 31 July 2022. DCC also advised that it had plans to consult on a revised proposed RP Decommissioning Timetable for the Requesting Party for the MOC (MDS) cohort.

This consultation now proposes that the Requesting Party services for the MOC (MDS) cohort cease on Sunday 25 September 2022 (with contingency dates until Sunday 27 November 2022 in case of any further delay).

2. Discussion

DCC had made good progress on finalising Migrations of Dormant Meters. However, by Friday 15 July 2022, DCC identified that there were 4,581 SMETS1 Installations that had not been Migrated and did not fall into an Excluded Category for the MOC (MDS) cohort, most of which had not been attempted for Migration.

¹ The current version of the SEC is available from <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>

² <https://www.smartdcc.co.uk/consultations/smets1-consultation-initial-closure-matters/>

³ <https://smartenergycodecompany.co.uk/latest-news/sec-v60-0-implemented-to-support-the-dcc-smets1-service/>

⁴ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-initial-closure-matters/>

⁵ <https://smartenergycodecompany.co.uk/latest-news/dcc-smets1-conclusion-initial-closure-matters/>

⁶ <https://smartenergycodecompany.co.uk/latest-news/dcc-smets1-conclusion-initial-closure-matters/>

⁷ <https://smartenergycodecompany.co.uk/latest-news/19-july-2022-update-on-moc-mds-requesting-party-rp-decommissioning-timetable-and-letter-to-the-secretary-of-state/>

These 4,581 SMETS1 Installations (containing solely Dormant Meters) include two main elements (which overlap slightly):

- 880 SMETS1 Installations containing Dormant Meters that are in scope as they are partial Migrations (due to GSME firmware failure) where the de-registration of the Gas Meter took longer to progress than originally envisaged; and
- 3,850 SMETS1 Installations recently made 'Dormant' where DCC now needs to attempt migration.

DCC's assessment was that it would not have either Migrated or else demonstrated persistent failure (i.e. 5 retries) for a significant proportion of these 4,581 SMETS1 Installations by 31 July 2022. Given the on-going costs of retaining Requesting Party services for the MOC (MDS) cohort compared to the assumed cost of replacing these SMETS1 Devices with SMETS2+ Devices, DCC considered that it would be economic and efficient to postpone the closure of the Requesting Party for the MOC (MDS) cohort in order to continue to attempt Migration. DCC notes that the proposed approach is in line with DCC's transitional objective with respect to enrolment of eligible SMETS1 meters and BEIS's objective to maximise benefit to end consumers by allowing the restoration of smart services to Dormant Meters where feasible.

Given the prior consultation only had provision for contingency until 31 July 2022, DCC is now consulting on a revised draft RP Decommissioning Timetable for the MOC (MDS) cohort via this consultation document. This revised timetable proposes closure for MOC (MDS) on Sunday 25 September 2022 which allows for up to five retries for these remaining SMETS1 Installations (once per week from w/c 29 July 2022 to w/c 22 August 2022) and thus either provides for successful Migration or else clear demonstration of persistent failure. Given the delay, DCC has undertaken a further internal assurance to provide confidence the closure of the MOC (MDS) cohort is possible within the timeline set out in this consultation.

Stakeholders should note that DCC would look to submit for approval to the Secretary of State a later RP Decommissioning Date for MOC (MDS) if there are any delays in expected processes and outcomes that means that the 25 September 2022 date cannot be met. To avoid the need for further consultation should this occur, DCC is also consulting now on contingency dates for the draft RP Decommissioning Timetable of each Sunday up to and including Sunday 27 November 2022.

3. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to the Department for Business, Energy and Industrial Strategy (BEIS) a conclusions report for the Secretary of State consistent with the regulatory requirements for preparing the RP Decommissioning Timetable for the MOC (MDS) cohort as per Clause 7 of the TMAD. This conclusions report will contain updated evidence that the criteria for decommissioning of the Requesting Party for the MOC (MDS) cohort has been met.

DCC is planning to provide a conclusions report to BEIS no later than 2 September 2022. At the same time, DCC will also formally submit the RP Decommissioning Timetable for the MOC (MDS) cohort to the Secretary of State. Consistent with the previous submission, this will take the form of a covering letter setting out the following four matters to support the recommendation (noting that some elements may be confidential and thus not set out in the public domain):

- **Closure Statement 1 (Prior Consultation)** – confirmation that DCC has engaged appropriately with stakeholders on these closure matters;

- **Closure Statement 2 (Migration Status)** – updated 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 Requesting Party service and also 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 Requesting Party service operational for the cohort.

DCC understands that BEIS will provide a period of five days for stakeholders to raise concerns directly to them which is expected to be from Monday 5 September 2022 to Monday 12 September 2022.

When the Secretary of State approves the RP Decommissioning Timetable, DCC will take steps to decommission the relevant Requesting Party. DCC has discussed approval of the RP Decommissioning Timetable with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise and the five-day period (mentioned above), BEIS will approve the RP Decommissioning Timetable on Wednesday 14 September 2022. Following approval DCC understands that these closure dates will be reflected into the Joint Industry Plan (JIP) via the IMF, updating those introduced at consultation stage as necessary.

The table below presents the remaining elements within the revised schedule.

Date	Activity
1600 on Thursday 18 August 2022	Deadline for responses to this consultation.
Friday 2 September 2022	DCC will conclude on the consultation findings for MOC (MDS) Requesting Party closure and submit a draft RP Decommissioning Timetable to Secretary of State for approval.
Monday 5 September 2022 to Monday 12 September 2022	BEIS have advised there will be a five day period for any stakeholders to raise further concerns directly to BEIS.
Wednesday 14 September 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).

Date	Activity
Thursday 15 September 2022	<p>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:</p> <ul style="list-style-type: none"> ▪ 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, Migrations will continue to be processed by DCC as usual.
w/c Monday 19 September 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 25 September 2022	DCC doesn't usually process Migrations on weekends. RP Decommissioning Date will be on this Sunday.
Monday 26 September 2022	<p>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 SMETS1 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.</p> <p>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.</p>
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 1 – Detailed Closure Activities for MOC (MDS) – further consultation

Closure 1 V2 Q1

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.

4. How to Respond

Please provide responses in the attached template by 1600 on Thursday 18 August 2022 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 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 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. RP Decommissioning Timetable for MOC (MDS) v3.0
2. Response Template

Table 2 – Attachments

Attachment 1

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

TMAD Draft Direction Text

This direction is made for the purposes of the smart meter communications 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 Transition and Migration Approach Document (TMAD) previously designated and incorporated into the SEC as Appendix AL 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 TMAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in 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.