

SMETS1 Conclusions Various 2

A SMETS1 conclusion on proposals by DCC: to provide partial Migration for MOC (MDS), exclude certain categories of SMETS1 Installations from Migration, and unblock Migration of SMETS1 Installations.

Filename: CON_SMETS1_Conclusion_Various2_ISSUED

Date: 25 May 2022

Author: consultations@smartdcc.co.uk

Classification: DCC Public

Table of Contents

1. Introduction and Context	4
2. Stakeholder Engagement.....	4
2.1. Questions	5
2.2. Responses.....	5
2.3. Additional Engagement	6
3. Analysis of Responses	6
3.1. Proposed Excluded Category – Unable to Attempt Firmware Upgrade where GroupID = “AA”, “BA”, or “CA” (Various 2 Q1).....	6
3.1.1. Respondents’ Comments / DCC Analysis / Clarifications.....	6
3.1.2. Areas of Unresolved Disagreement.....	7
3.1.3. Summary	7
3.2. Proposed Excluded Categories – Firmware Upgrade / Configuration Failure where GroupID = “CB” and Firmware Upgrade / Configuration Failure where GroupID = “AA”, “BA”, or “CA” (Various 2 Q2).....	7
3.2.1. Respondents’ Comments / DCC Analysis / Clarifications.....	7
3.2.2. Areas of Unresolved Disagreement.....	8
3.2.3. Summary	8
3.3. Proposed Excluded Categories – Data Issues & Duplicate MPANs and MPRNs (Various 2 Q3)	8
3.3.1. Respondents’ Comments / DCC Analysis / Clarifications.....	8
3.3.2. Areas of Unresolved Disagreement.....	9
3.3.3. Summary	9
3.4. Partial Migration for MOC (MDS) (Various 2 Q4)	10
3.4.1. Respondents’ Comments / DCC Analysis / Clarifications.....	10
3.4.2. Areas of Unresolved Disagreement.....	10
3.4.3. Summary	10
3.5. Unblocking – Data Issues (Ceased Trading and Non-live User) (Various 2 Q5).....	11
3.5.1. Respondents’ Comments / DCC Analysis / Clarifications.....	11
3.5.2. Areas of Unresolved Disagreement.....	11
3.5.3. Summary	11
3.6. Unblocking – Data Issues (Duplicate MPxNs) (Various 2 Q6).....	11
3.6.1. Respondents’ Comments / DCC Analysis / Clarifications.....	12
3.6.2. Areas of Unresolved Disagreement.....	12
3.6.3. Summary	12
3.7. Re-designation Date for the TMAD (Various 2 Q7)	13

3.7.1. Respondents' Comments / DCC Analysis / Clarifications..... 13
3.7.2. Areas of Unresolved Disagreement..... 13
3.7.3. Summary..... 13

4. Summary of Drafting Changes 13

5. Conclusions..... 13

6. Next Steps..... 14

7. Attachments 14

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 Migrating SMETS1 Installations into DCC's systems.

The detailed technical and procedural requirements of the Migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The TMAD is Appendix AL of the Smart Energy Code (SEC). The latest version of the SEC was published on 24 March 2022 as v59.0.

In December 2020, the Department for Business, Energy and Industrial Strategy (BEIS) consulted¹ on changes to the TMAD to provide a framework to develop options for the Migration of SMETS1 Installations comprising Device Model Combinations (DMCs) which DCC consider currently blocked. In February 2021, BEIS concluded² on these changes, introducing Clauses 1.4 to 1.9 in the TMAD which provide a transparent process for promptly assessing SMETS1 Installations currently blocked for Migration. There have been several consultations and TMAD amendments consequently bringing in regulatory solutions to maximise Migrations and to introduce Excluded Categories which are available on the DCC website³.

DCC issued the Various 2 Consultation⁴ proposing a number of additional Excluded Categories covering the following circumstances:

1. unable to attempt Firmware Upgrade for IOC;
2. firmware upgrade / configuration failures for IOC and MOC (MDS); and
3. data issues & duplicate MPANs and MPRNs across all cohorts.

DCC is also proposing some unblocking TMAD changes covering:

1. provision of partial Migration for MOC (MDS) in relation to firmware failure; and
2. unblocking Migration due to data issues (Ceased Trading / Non-live User / Duplicate MPxNs).

The Various 2 Consultation was issued on 23 March 2022 with responses due by 16:00 on 20 April 2022. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD.

2. Stakeholder Engagement

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

¹ The BEIS consultation is available via <https://smartenergycodecompany.co.uk/latest-news/secretary-of-state-direction-on-the-smets1-tmad-and-further-smets1-tmad-consultation/>

² The BEIS conclusion is available via <https://smartenergycodecompany.co.uk/latest-news/sec-v35-0-implemented-to-support-the-dcc-smets1-service/>

³ <https://www.smartdcc.co.uk/consultations/>

⁴ <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-2/>

2.1. Questions

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

Various 2 Q1	Do you agree with DCC's proposal to exclude dormant SMETS1 Meters for IOC where it is unable to attempt firmware upgrade as captured by Clause 18.9 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Various 2 Q2	Do you agree with DCC's proposal to exclude SMETS1 Installations for IOC & MOC (MDS) from the scope of Migration where firmware upgrade by the MAP / SMETS1 SMSO or the steps in Clause 4.26 (to reconfigure Dormant Meters and associated Devices) have persistently failed, as captured by Clause 18.10 (for MOC (MDS)) and Clause 18.11 (for IOC) of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Various 2 Q3	Do you agree with DCC's proposal to exclude dormant SMETS1 Meters where there are unresolved data issues and duplicate MPANs and MPRNs as captured by Clauses 18.12 and 18.13 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Various 2 Q4	Do you agree with DCC's proposal to amend the TMAD (new Clauses 4.26A, 4.26B and 4.26C and changes to Clause 18.5) to extend partial migration to the MOC (MDS) cohort? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Various 2 Q5	Do you agree with DCC's proposal to amend the TMAD (new Clauses 4.1A and 4.1B) to allow DCC to proceed with migration for these SMETS1 Installations without notification related to a Dormant Meter where the Energy Supplier is reported as "ceased trading" or "not a live user? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Various 2 Q6	Do you agree with DCC's proposal to amend the TMAD (new Clause 4.1C) to allow DCC to commence migration for a SMETS1 Installation where the MPAN and/or MPRN are/is present in more than one SMETS1 SMSO or SMETS2+ devices and DCC is able to verify the last installed installation is the only one communicating? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Various 2 Q7	Do you agree with the proposed re-designation date of 11 May 2022 for updates to the TMAD within the scope of this consultation?

Table 1 - Consultation Questions - Various 2

2.2. Responses

Stakeholders were invited to respond to the consultation issued by 16:00 on Wednesday 20 April 2022 using the response template⁵ that was provided.

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

Following closure of the consultation, DCC spoke to one respondent to confirm some aspects of their response.

⁵ <https://www.smartdcc.co.uk/media/6988/smets1-consultation-various-2-response-template.docx>

2.3. Additional Engagement

Within the Various 2 consultation, DCC set out that it has obligations to advise impacted Energy Suppliers on how the decisions impact them, where DCC reasonably knows this information. The intention was that details on the extent of impact of Various 2 proposals on each Energy Supplier's own dormant portfolio would be provided to them by DCC via the existing DCC SharePoint used for the exchange of SMETS1 Migration information at the time of publication.

This information was not made available during the course of the consultation and whilst no stakeholders raised this with DCC, on Monday 16 May 2022, DCC made this information available via DCC's SharePoint that is used for the exchange of SMETS1 information between DCC and Energy Suppliers. DCC contacted Energy Suppliers to provide a further window to Monday 23 May 2022 to update any prior response or submit a response to the [Various 2 Consultation](#).

DCC received no additional responses during this period.

3. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed each response.

DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement.

3.1. Proposed Excluded Category - Unable to Attempt Firmware Upgrade where GroupID = "AA", "BA", or "CA" (Various 2 Q1)

DCC sought views on a new Excluded Category where DCC is unable to attempt firmware for the IOC cohort asking: *"Do you agree with DCC's proposal to exclude dormant SMETS1 Meters for IOC where it is unable to attempt firmware upgrade as captured by Clause 18.9 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views."*

3.1.1. Respondents' Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Seven respondents supported the proposed amendments. One of these respondents stated that this Excluded Category was a reasonable proposition, noting that only a limited quantity of SMETS1 Installations would be impacted. Another respondent indicated that there was little else that could be done and thus, this exclusion was appropriate. A third respondent that was supportive expressed concern that the consultation document stated *"DCC has verified with the SMETS1 SMSO that there are no known issues should the firmware on the device be downgraded"* and expressed the view that the meter manufacturer should be engaged. DCC can confirm that the SMETS1 SMSOs work closely with meter manufacturers and have successfully performed firmware downgrades in the past where the 'before' and 'after' firmware versions are known in advance. However, the approach DCC is taking here is a little different. DCC are effectively applying a firmware image to a meter that has an unknown state, and therefore can give no guarantees of success and wouldn't expect any meter manufacturer to be able to provide such guarantees either. DCC has assessed the likelihood of any negative consequences on the ability of a device to provide smart services and consider it to be low risk. DCC observes that without taking the approach explained above the device could not be made eligible for Migration and would require a SMETS2+ replacement.

One respondent stated they had “*no additional comments*” without indicating support or objection to the proposal.

3.1.2. Areas of Unresolved Disagreement

n/a

3.1.3. Summary

DCC concludes it is appropriate to amend the TMAD to include a new Excluded Category where DCC is unable to attempt firmware upgrade for the IOC cohort.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.2. Proposed Excluded Categories – Firmware Upgrade / Configuration Failure where GroupID = “CB” and Firmware Upgrade / Configuration Failure where GroupID = “AA”, “BA”, or “CA” (Various 2 Q2)

DCC sought views on the proposal for two separate Excluded Categories where there are firmware upgrade and configuration failures covering the MOC (MDS) and IOC cohorts asking: “*Do you agree with DCC’s proposal to exclude SMETS1 Installations for IOC & MOC (MDS) from the scope of Migration where firmware upgrade by the MAP / SMETS1 SMSO or the steps in Clause 4.26 (to reconfigure Dormant Meters and associated Devices) have persistently failed, as captured by Clause 18.10 (for MOC (MDS)) and Clause 18.11 (for IOC) of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.*”.

3.2.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Seven respondents supported the proposed amendments. One of these respondents stated that this Excluded Category is acceptable so long as Energy Suppliers are made aware of such persistent failures. DCC can confirm that a regime is in place to advise each Energy Supplier on the impact of each Excluded Category on their portfolio. Another respondent indicated that there was little else that could be done and thus exclusion was appropriate.

One respondent indicated that they were unable to support the proposal without additional information. This respondent sought confirmation on the detailed process for attempting firmware upgrades and configuration to gain assurance that the various attempts were not compressed into a limited number of days and indicated that they were unable to support the exclusion without this information. DCC has discussed this element with the respondent to provide them with reassurance in this area (that was accepted by the respondent) as these attempts are over an extended period. DCC highlighted that this information was included in more detail in the Various 1 Consultation⁶.

For the dormant devices in IOC, a single instruction from DCC to the SMETS1 SMSO related to firmware upgrade / configuration instigates a range of activity:

- *the retry process makes 36 attempts to upgrade firmware over 6 days and this is repeated 3 times totalling 108 attempts;*

⁶ <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-1/>

- *for configuration there are 23 attempts to reconfigure over 3 days which is also repeated 3 times totalling 69 attempts; and*
- *confirmation of success is sought from the devices but such confirmation may not be received, where the confirmation has timed out there are 10 attempts over 10 days which is repeated 3 times totally 30 attempts.*

Also, DCC agrees with one respondent's observations that partial Migration due to GSME firmware upgrade failures is needed for the IOC cohort. As described in the consultation, DCC is presently pursuing a similar partial Migration change across other cohorts.

3.2.2. Areas of Unresolved Disagreement

n/a

3.2.3. Summary

DCC concludes it is appropriate to amend the TMAD to include two new Excluded Categories where there are persistent firmware upgrade and configuration failures for the MOC (MDS) and IOC cohorts.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.3. Proposed Excluded Categories – Data Issues & Duplicate MPANs and MPRNs (Various 2 Q3)

DCC sought views on a proposal for two Excluded Categories where data issues and duplicate MPAN / MPRNs are preventing Migration asking: ***“Do you agree with DCC’s proposal to exclude dormant SMETS1 Meters where there are unresolved data issues and duplicate MPANs and MPRNs as captured by Clauses 18.12 and 18.13 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”***

3.3.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Four respondents supported the proposed amendments without further comment.

One respondent provided caveated support for the proposed Excluded Category. DCC notes that the respondent provided support for the exclusion category related to:

- duplicated devices i.e. two devices with the same GUID;
- no prepayment key; and
- Unable to Identify Responsible Supplier.

This respondent however expressed concern about duplicate SMETS1 Installations and sought confirmation that DCC would only exclude such SMETS1 Installations where DCC can demonstrate that the Energy Supplier has been engaged. DCC agrees with this observation and is actively engaging with all impacted Energy Suppliers (except those that are not DCC Users) in relation to duplicate SMETS1 Installations. This respondent also considers that this exclusion should only apply once other unblocking activities have been completed. DCC agrees that unblocking actions should be the priority for each cohort before exclusions are applied, and DCC also notes that the existing TMAD obligations require this approach i.e. consider unblocking activity before exclusion.

One respondent did not indicate its support or objection to the proposal. This respondent stated that data issues are complex to resolve and SMETS2+ replacement is best. This respondent also indicated that they would be receptive to engaging with DCC to attempt to resolve some of these issues. DCC welcomes the offer to engage; DCC is actively engaging with impacted Energy Suppliers in relation to duplicate SMETS1 Installations.

One respondent did not answer this question and referred to their response to question Various 2 Q6 which set out their concerns on the approach to duplicate MPANs and MPRNs and suggested that the scope of unblocking should be extended. This respondent considers that where only one SMETS1 Installation is communicating, then it should be attempted for Migration irrespective of whether it was the last installed Device, noting that industry data errors were a known issue. DCC's proposal based on being linked to the last installed Device is suggested in order to minimise the risk of inadvertent data access i.e. where the Meters are Migrated to the incorrect MPAN and MPRN as this may give the wrong Energy Supplier access to the consumer's data, which alongside being a poor outcome for the consumer would place Energy Suppliers and DCC at risk of data protection breach. DCC notes that the respondent has a different view of the risk.

One respondent objected to the proposal. This respondent disagreed with the exclusion where there are duplicate MPANs and MPRNs, indicating that the SMETS1 Installation that is communicating should be attempted for Migration irrespective of whether it was the last installed device. This Excluded Category is proposed to minimise the risk of inadvertent data access given these data issues. This respondent also indicated that where there are unresolved data issues, they could not agree with the proposal without some insight into how these data issues might have been resolved. DCC agrees with the observation that it is important to attempt to reconcile the data issues; on this basis, DCC has been working with impacted Energy Suppliers (and other stakeholders) in an attempt to find a resolution to such issues. As set out in the consultation document, where MPxNs have been found to appear in more than one SMETS1 SMSOs' data, DCC has worked extensively with the SMETS1 SMSOs, Responsible Suppliers, and MAPs to correct and remove the data where possible, to allow for the successful Migration of the device. This activity has had considerable success. DCC has also contacted the device manufacturers who have indicated that the information held by the SMETS1 SMSO is correct and that there are multiple devices with the same GUID.

3.3.2. Areas of Unresolved Disagreement

DCC disagrees with the suggestion from two respondents that where there are duplicate MPANs and MPRNs and the SMETS1 Installation is communicating, that these Devices should be attempted for Migration irrespective of whether it was the last installed device. The check on last installed devices is included to minimise the risk of inadvertent data access given these issues (i.e. where the Meters are Migrated to the incorrect MPAN and MPRN) as this may give the wrong Energy Supplier access to the consumer's data, which alongside being a poor outcome for the consumer would place Energy Suppliers and DCC at risk of data protection breach.

3.3.3. Summary

DCC concludes it is appropriate to amend the TMAD to include two new Excluded Categories where there are unresolved data issues and duplicate MPANs and MPRNs.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.4. Partial Migration for MOC (MDS) (Various 2 Q4)

DCC sought views on the proposal to extend partial Migration to the MOC (MDS) cohort asking: *“Do you agree with DCC’s proposal to amend the TMAD (new Clauses 4.26A, 4.26B and 4.26C and changes to Clause 18.5) to extend partial migration to the MOC (MDS) cohort? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”*

3.4.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Six respondents indicated support for the proposal. Five respondents supported the proposed amendments without further comment. The other supportive respondent expressed concern regarding the costs of leaving Requesting Party services open longer than absolutely necessary and stressed the importance of expediting closure of the MOC (Secure) and FOC cohorts. DCC notes the concern expressed and can confirm that it is firmly focused on making recommendations to BEIS to close each Requesting Party in an economically efficient manner.

One respondent did not indicate support or object to the proposal. This respondent expressed concern that the proposed partial Migration (based on deregistering the Dormant GSME) was only proposed for MOC (MDS), indicating it should also apply to IOC. The respondent indicated that they have applied the same approach for similar Active GSMEs in the IOC cohort. DCC agrees with the respondent’s observations; as set out in the consultation, DCC is presently pursuing a similar partial Migration change across other cohorts.

One respondent objected to the proposal. This respondent set out their objection to the principle of partial Migration as it may lead to a poor customer experience (with only the ESME providing smart services) and the customers will not experience a fully working smart service ‘first time’. This respondent indicated their view that these SMETS1 Installations will be replaced with SMETS2+ dual fuel devices. The consultation document set out that DCC considers the approach proposed for partial Migration (based on an objective test) is the appropriate way forward as this will maximise Migration of Dormant Meters thereby expediting the restoration of interoperable smart services to the ESME. This approach was proposed as it was in line with DCC’s transitional objective with respect to enrolment of eligible SMETS1 meters and BEIS’s objective to restore smart services to Dormant Meters where feasible (as this maximises benefit to consumers). DCC considers the benefit provided to the end customer from expediting the restoration of smart services to the ESME outweighs the potential impact as highlighted in responses to prior consultations. DCC also 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. Furthermore, partial Migration has already been introduced for the IOC cohort by the Various 1 / Various 1A conclusions.

3.4.2. Areas of Unresolved Disagreement

DCC notes that one respondent objects to partial Migration. DCC continues to support partial Migration for the reasons set out above.

3.4.3. Summary

DCC proposes that partial Migration should be extended to the MOC (MDS) cohort where there are firmware / configuration failures for the Dormant GSME.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.5. Unblocking – Data Issues (Ceased Trading and Non-live User) (Various 2 Q5)

DCC sought views on the proposal to allow DCC to proceed with Migration of Dormant Meters where DCC is unable to contact the Responsible Supplier asking: “*Do you agree with DCC’s proposal to amend the TMAD (new Clauses 4.1A and 4.1B) to allow DCC to proceed with migration for these SMETS1 Installations without notification related to a Dormant Meter where the Energy Supplier is reported as “ceased trading” or “not a live user? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”*”.

3.5.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question. Seven of the respondents expressed support for the proposal to Migrate where DCC is unable to contact the Responsible Supplier.

Five respondents supported the proposed amendments without further comment.

One respondent that expressed support stated that Migration in this situation is a positive step and would also support any additional activity that DCC feels empowered to take in order to identify the ‘live’ Energy Supplier for such SMETS1 Installations.

One respondent expressed support and observed that it should allow for more Migrations which is the best outcome for end customers and the wider SMETS1 Programme. This respondent expressed concern that a notification to the Energy Supplier is not generated. The respondent noted that such notification may be the ‘event’ used by the Energy Supplier to commence smart services. DCC notes that the respondent accepted that on balance this remained a prudent approach given the limited number of impacted SMETS1 Installations and the benefits provided. DCC also notes that the only alternative is to not Migrate and thus replace with SMETS2+ devices in all such circumstances.

One respondent stated they had “*no additional comments*” without indicating support or objection to the proposal.

3.5.2. Areas of Unresolved Disagreement

n/a

3.5.3. Summary

DCC proposes that it should proceed with Migration for Dormant Meters where DCC is unable to contact the Responsible Supplier.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.6. Unblocking – Data Issues (Duplicate MPxNs) (Various 2 Q6)

DCC sought views on the proposal to allow Migration to commence where the last installed SMETS1 Installation is the only one communicating asking: “*Do you agree with DCC’s proposal to amend the TMAD (new Clause 4.1C) to allow DCC to commence migration for a SMETS1 Installation where the MPAN and/or MPRN are/is present in more than one SMETS1 SMSO or SMETS2+ devices and DCC is able to verify the last installed installation*”.

is the only one communicating? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”.

3.6.1. Respondents' Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question. Seven of the respondents expressed support for the proposal to resolve duplicate MPANs and MPRNs where the last installed SMETS1 Installation is the only one communicating.

Four respondents supported the proposed amendments without further comment.

The three other supportive respondents provided additional observations. One of these respondents supported this proposal as it allows for Migration to be attempted for more sites. This respondent indicated support for the logic to only Migrate where the last installed SMETS1 Installation is the only one communicating. This respondent also recommended that duplicate SMETS1 Installations, where both are communicating, be omitted from this as this emphasises industry issues such as crossed meters. Another respondent agreed with the approach and indicated that it was a reasonable reward for low risk providing that where DCC have verified the meter they are attempting to Migrate is the last one that communicated, this will likely be more accurate than the meter details. This respondent set out that there is a potential risk that some erroneous SMETS1 Installations could be Migrated, but that the respondent considers this to be a minor risk. The third such respondent sought confirmation on what DCC has done to resolve these issues. As set out in Section 4 of the consultation document, where MPxNs have been found to appear in more than one SMETS1 SMSO's data, DCC has worked extensively with the SMETS1 SMSOs, Responsible Suppliers, and MAPs to correct and remove the data where possible to allow for the successful Migration of the device. However, this isn't successful in all circumstances.

One respondent did not indicate support or object to the proposal. In order to confirm the respondent's view, DCC contacted the respondent and discussed the proposal to resolve duplicate MPXNs i.e. to allow Migration to commence where the last installed SMETS1 Installation is the only one communicating. This respondent confirmed their view that where only one SMETS1 Installation is communicating then it should be attempted for Migration irrespective of whether it was the last installed device, noting that industry data errors were a known issue. DCC notes that the respondent has a different view of the risk in that this may result in an Energy Supplier, who is not the Energy Supplier for the consumer, inadvertently obtaining access to the data contained in the SMETS1 Installation.

3.6.2. Areas of Unresolved Disagreement

DCC notes that one respondent considers that the proposal should be expanded such that where only one SMETS1 Installation is communicating then it should be attempted for Migration irrespective of whether it was the last installed device. DCC does not support such an extension given the risk of inadvertent data access.

3.6.3. Summary

DCC proposes to resolve duplicate MPANs and MPRNs by attempting Migration of the last installed SMETS1 Installation if it is the only one communicating.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD.

3.7. Re-designation Date for the TMAD (Various 2 Q7)

DCC sought views on the date for amending the TMAD asking: “*Do you agree with the proposed re-designation date of 11 May 2022 for updates to the TMAD within the scope of this consultation?*”.

3.7.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Seven respondents supported the proposed amendments without further comment.

One respondent stated they had “*no additional comments*” without indicating support or objection to the proposal.

3.7.2. Areas of Unresolved Disagreement

n/a.

3.7.3. Summary

DCC proposes that the Secretary of State re-designates the TMAD amendments in line with the schedule presented in the consultation document. Given this consultation process, DCC notes that the earliest date that the amendments to the TMAD could be re-designated is 11 May 2022 and the latest date is 11 June 2022 without requiring a further consultation on the designation date.

4. Summary of Drafting Changes

There were no drafting changes proposed by respondents to the consultation.

There are some minor drafting changes to Clause 4.26A to capture the policy intent. The consultation document set out that the focus was certain SMETS1 Installations containing solely Dormant Meters where the firmware upgrade or configuration process is successful for the ESME but fails for the GSME. However, the TMAD drafting did not capture this intent as it only referred to firmware failures. This has now been amended for the conclusion version of the drafting.

Stakeholders should note that DCC envisages that the TMAD changes from this conclusion may be consolidated with changes proposed in other DCC consultations and so the clause references may change once the TMAD is re-designated.

5. Conclusions

DCC is confident that the version of the TMAD submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has undertaken appropriate consultation with industry regarding these changes to the TMAD.

DCC has, where necessary, addressed the comments that have been received from industry and, where appropriate, sought additional feedback from respondents. DCC does not believe that the views expressed by respondents result in fundamental amendments to the TMAD and as such further consultation is neither necessary nor appropriate.

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

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

DCC considers that:

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

In summary, DCC considers that the revised TMAD is fit for purpose.

6. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document.

DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD into the regulatory framework for both the unblocking and exclusion amendments.

Given this consultation process DCC notes that the earliest date that the amendments to the TMAD could be re-designated is 11 May 2022 and the latest date is 11 June 2022 without requiring a further consultation on the designation date.

7. Attachments

Attachment	Title
1.	TMAD v20.v2 draft delta against current version v19.0
2.	TMAD v20.v2 draft clean

Table 2 - Attachments