



# Conclusion to SMETS1 Consultation

Clause retention beyond  
SMETS1 TMAD expiry and  
proposed amendments to the  
SEC Appendix AM

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Author: DCC Regulation  
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# 1. Executive Summary

1. This document presents the conclusions from DCC's October 2025 consultation<sup>1</sup> on two SMETS1 topics: first, updates to SMETS1 Device behaviour; and second, any SMETS1 requirements that should endure following the December 2025 expiry of SEC Appendix AL SMETS1 Transition and Migration Approach Document (SMETS1 TMAD). We proposed amendments to SEC Appendix AM SMETS1 Supporting Requirements (S1SR) document and SEC Appendix AC (Inventory, Enrolment and Decommissioning Procedures) to deal with each of those topics.
2. The S1SR contains clauses that explain SMETS1 Device behaviour where that behaviour does not align to GBCS. The behaviours and their description relate to SMETS1 Devices. Annex A<sup>2</sup> of the S1SR is the Device Model Variations to Equivalent Steps Matrix (DMVESM) which identifies the specific SMETS1 Device (or Devices) that each S1SR clause relates to. We proposed an addition to the S1SR to detail as yet undocumented SMETS1 Device behaviour.
3. The SMETS1 TMAD sets out the requirements and obligations for migrating SMETS1 Devices on to DCC systems. Migration of SMETS1 meters was completed following Secretary of State approval of the Requesting Party Decommissioning Timetable for the final SMETS1 cohort, MOC (Secure)<sup>3</sup>.
4. The SMETS1 TMAD expires on the 31<sup>st</sup> December 2025 and will no longer apply. DCC has reviewed the document to understand whether there is a requirement to retain any of its provisions, and proposed for a range of SMETS1 TMAD clauses to be moved to the SMETS1 Supporting Requirements (S1SR) as well as proposing minor changes to SEC Appendix AC.
5. Consultation responses have provided support for DCC's proposed changes in relation to SMETS1 Device behaviour and the SMETS1 TMAD clauses that DCC had proposed to be retained. DCC has now concluded on these proposals and recommended to the Secretary of State that the proposed changes be approved and included in the updated versions of SEC Appendix AM and SEC Appendix AC.

<sup>1</sup> <https://www.smartdcc.co.uk/consultations/clause-retention-beyond-smets1-tmad-expiry/>

<sup>2</sup> <https://smartenergycodecompany.co.uk/documents/sec-subsiary-documents/sec-appendix-am-annex-a-device-model-variations-to-equivalent-steps-matrix-v12-2/>

<sup>3</sup> [Confirmation of the Requesting Party Decommissioning Timetable for MOC \(Secure\) | Smart DCC](#)

## 2. Introduction

### 2.1. Background

6. 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.
7. 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 initially operated through suppliers' own systems and not connected to DCC Services. This meant that a SMETS1 Device could not always continue to provide smart functionality when operated by another supplier (for example following a change of supplier event).
8. In 2018 and 2019, the Secretary of State directed changes to the energy supplier 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. This has enabled consumers to access the benefits of an interoperable smart metering market. There are more than 12 million SMETS1 meters now operating on DCC systems.
9. SEC Appendix AL – SMETS1 Transition and Migration Approach Document (SMETS1 TMAD)<sup>1</sup> 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.
10. SMETS1 eligible meters<sup>2</sup> have been separated into three groups termed Initial Operating Capacity (IOC), Middle Operating Capacity (MOC) and Final Operating Capacity (FOC), the MOC and FOC cohorts split in to further smaller cohorts<sup>3</sup>. Each cohort was allocated a unique GroupID with specific requirements described in the SMETS1 TMAD. Those GroupIDs are referenced for specific migration requirements within the S1SR.
11. The SEC Appendix AM SMETS1 Supporting-Requirements<sup>4</sup> (S1SR) document provides supporting requirements, including communications, in relation to SMETS1 Devices, and in particular where this differs from SMETS2 equivalents and the GB Companion Specifications (GBCS)<sup>5</sup>.
12. The Great Britain Companion Specification<sup>6</sup> (GBCS) describes the detailed requirements for communications between Smart Metering Devices. Whilst SMETS1 services are substantively equivalent to SMETS2, in some cases the behaviour of the SMETS1 Device does not align to the detail within GBCS. To allow Parties to understand the behaviour of their SMETS1 Devices and operate them with efficiency the S1SR describes that specific SMETS1 Device behaviour.
13. There have been a number of iterations of the S1SR, as new SMETS1 Device behaviours, which vary from GBCS, have been identified over time. We proposed an amendment to the S1SR where additional SMETS1 Device behaviour, not already described in the S1SR, had been identified.

<sup>1</sup> [SEC Appendix AL - SMETS1 Transition and Migration Approach Document v29.0](#)

<sup>2</sup> [DECC Government response to the consultation on the enrolment of SMETS1 meter cohorts](#)

<sup>3</sup> The MOC cohort consisted of MOC (MDS) and MOC (Secure), the FOC cohort consisted of MOC (NP) and MOC (BG)

<sup>4</sup> [smartenergycodecompany.co.uk/documents/sec-subsidary-documents/sec-appendix-am-smets1-supporting-requirements/](https://smartenergycodecompany.co.uk/documents/sec-subsidary-documents/sec-appendix-am-smets1-supporting-requirements/)

<sup>5</sup> [SEC Schedule 8 – GB Companion Specification](#)

<sup>6</sup> [SEC Schedule 8 – GB Companion Specification](#)

14. Migrations in the MOC (MDS) cohort were completed in October 2022<sup>1</sup>, migrations in the IOC cohort were completed in May 2023<sup>2</sup>, and migrations in the FOC cohort were completed in November 2024<sup>3</sup>. These cohorts have been decommissioned, and their migration service has been removed. Migrations in the MOC (Secure) cohort completed in September 2025<sup>4</sup> and the migration services are currently being decommissioned.
15. The SMETS1 TMAD is due to expire from 31<sup>st</sup> December 2025 after which its provisions will cease to apply. DCC has reviewed the SMETS1 TMAD to understand if any of its provisions are required beyond the document's expiry and has proposed that a number of such provisions are retained.

## 2.2. Areas for consultation

16. We consulted on two topics described below. This conclusion document does not repeat the detail contained in the consultation which can be found on the DCC website<sup>5</sup>.

### 2.2.1. SMETS1 Device Behaviour

17. We described one SMETS1 Device behaviour that has not yet been added to the S1SR. The consultation did not seek to amend that behaviour but proposed the addition of a description of that behaviour in the S1SR.

### 2.2.2. Regulatory Review and SMETS1 TMAD retention

18. In the consultation we described our approach to reviewing obligations enabling SMETS1 enrolment and interoperability in the SEC and its supporting documents.
19. Where the provisions, were ceasing to apply, but pertained to the ongoing operation of SMETS1 Devices and any relevant definitions, rights and obligations, we proposed that those obligations were retained by being moved in the SEC Appendix AM or SEC Appendix AC.
20. We also noted some areas in the SEC and its supporting documents that were appropriate for future consideration.

<sup>1</sup> [SMETS1 Conclusion – Revised Closure Date for MOC \(MDS\) | Smart DCC](#)

<sup>2</sup> [SMETS1 Publication - Final RP Decommissioning Timetable for FOC \(NP\) | Smart DCC](#) & [SMETS1 Publication - Final RP Decommissioning Timetable for IOC | Smart DCC](#)

<sup>3</sup> [FOC \(BG\) RP Decommissioning Timetable | Smart DCC](#)

<sup>4</sup> [Confirmation of the Requesting Party Decommissioning Timetable for MOC \(Secure\) | Smart DCC](#)

<sup>5</sup> [SMETS1 Consultation - Clause retention beyond SMETS1 TMAD expiry and proposed amendments to the SMETS1 Supporting Requirements | Smart DCC](#)

### 3. Consultation responses.

21. We received four of responses to the consultation. These were from one Supplier Party, two network Parties and one from SEC Panel. All the responses supported our proposals.

#### 3.1. SMETS1 Device Behaviour

22. SEC Appendix AM contains clauses that explain SMETS1 Device behaviour where that behaviour does not align to GBCS. The behaviours and their description relate to specific SMETS1 Devices. Annex A<sup>1</sup> of the S1SR is the Device Model Variations to Equivalent Steps Matrix (DMVESM) which identifies the specific SMETS1 Device (or Devices) that each S1SR clause relates to. The proposed changes in this consultation cover both amendments to S1SR clauses and amendments to the DMVESM.
23. The S1SR references Electricity Smart Metering Equipment as ESME, Gas Smart Metering Equipment as GSME, and the Communications Hub Function as CHF.

##### 3.1.1. Itron ESME SRV 4.4.2 (Retrieve Change Of Mode / Tariff Triggered Billing Data Log) – alert when no data found

24. For Itron ESME Devices the SRV 4.4.2 will fail and provide ALM Ref ID: 200434: S1CE2003 / Security Warning where there is no data for the requested times.
25. We proposed that a new clause 18.17p is added to SEC Appendix AM to describe this behaviour and detailed in DMVESM for Itron ESME Devices.

#### Question One

Do you agree with the proposed amendments to the S1SR as set out above, which describe, as yet undocumented, behaviour of SMETS1 Devices highlighted? Please give a rationale for your response.

26. Four responses were received to this question, and all those responses supported the proposed amendments to the SEC Appendix AM as provided. They noted the addition would clarify the operation of SMETS1 Devices.
27. DCC has recommended that the Secretary of State designate this proposed change into SEC Appendix AM.

#### 3.2. Regulatory Review and SMETS1 TMAD retention

28. The SMETS1 TMAD is due to expire from 31<sup>st</sup> December 2025 after which it will cease to apply. The SMETS1 TMAD focused on providing the rights, obligations and operational mechanisms that would enable SMETS1 Devices to be enrolled on to DCC systems. It was drafted in recognition of the wider regulatory framework relating to smart metering operation in GB, from which it would be removed after expiry.
29. DCC therefore considered it prudent to review the SMETS1 TMAD to identify any obligations that may be required for the ongoing operation of SMETS1 Devices before they expire on 31<sup>st</sup> December 2025. In that review we have found a small number of obligations which we consider are beneficial to be retained to support the ongoing operation of SMETS1 Devices.

<sup>1</sup> <https://smartenergycodecompany.co.uk/documents/sec-subsidary-documents/sec-appendix-am-annex-a-device-model-variations-to-equivalent-steps-matrix-v12-2/>

### 3.2.1. Clauses proposed for retention in SEC Appendix AM and SEC Appendix AC

30. We identified five definitions contained within the SMETS1 TMAD where the defined term is also used elsewhere in the SEC. Since these other references utilise the SMETS1 TMAD definition we consider that the five definitions need to be retained. Without their retention, the other obligations that may use these definitions, may become ambiguous or irrelevant. To avoid this, we proposed retaining the five definitions from SMETS1 TMAD in SEC Appendix AM and in SEC Appendix AC, where applicable.
31. SMETS1 TMAD 3.14E and 3.14F provide obligations on DCC to ensure that any SMETS1 Service Provider systems, which are no longer required for the provision of Services, are disconnected from DCC Systems and the SMETS1 Service Provider. At the time of writing, these disconnection activities are ongoing and for the avoidance of doubt, we propose that these obligations are retained in SEC Appendix AM to support secure operation of SMETS1 Devices. These obligations include additional defined terms (beyond those already highlighted) in the SMETS1 TMAD which should therefore also be retained.
32. SMETS1 TMAD 7.9A – 7.9D provide rights and obligations in relation to the deletion or retention of data used for migration purposes. Since DCC continues to hold data, and where that data may be required for the continued operation of SMETS1 Devices, we consider that these obligations should be retained in the S1SR. Retaining these rights and obligations provides clarity about DCC's ability to retain data that is needed to support ongoing operation of SMETS1 Devices and to delete data where it is no longer required.
33. We have provided details of these proposed changes in Appendix One.

#### Question Two

Do you agree with the proposed retention of SMETS1 TMAD definitions within the SEC Appendix AM and SEC Appendix AC as provided? Please give a rationale for your response.

34. Four responses were received to this question, and all those responses supported the proposed amendments to SEC Appendix AC and SEC Appendix AM as provided. They noted that the retention of the clauses identified would provide ongoing clarity for the continued operation of SMETS1 Devices. One response noted that retaining these clauses would maintain transparency and avoid ambiguity while safeguarding the continuity of smart metering operations.
35. DCC has recommended that the Secretary of State designate the proposed changes to retain the identified SMETS1 TMAD clauses in SEC appendix AC and SEC Appendix AM.

#### Question Three

Do you consider there to be any other SMETS1 TMAD clauses that should be considered for retention beyond 31<sup>st</sup> December 2025? Please give a rationale for your response.

36. Four responses were received to this question. Those responses confirmed that they had not highlighted any other SMETS1 TMAD clauses that should be retained beyond the 31<sup>st</sup> December 2025.
37. DCC welcomes the respondents review and confirmation that no other SMETS1 TMAD clauses that should be considered for retention have been identified.

### 3.3. Proposed Secretary of State Designation

38. We note the broad support for the proposed changes. In parallel to this conclusion document, we have submitted an amended version of SEC Appendix AM and SEC Appendix AC to the Department of Energy Security and Net Zero (the Department) for consideration.
39. We have also recommended that they are suitable for re-designation into the SEC by the Secretary of State on 12th December 2025 (or within one month thereafter).

#### Question Four

Do you agree with the proposed re designation date of 12<sup>th</sup> December 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to SEC Appendix AM and SEC Appendix AC?

40. Four responses were received to this question, and all those responses supported the proposed designation date.
41. DCC has recommended that the Secretary of State designate the change to SEC Appendix AC and SEC Appendix AM on the 12<sup>th</sup> December 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter).

## 4. Next Steps

42. DCC has provided a copy of all the responses to its consultation, and a summary of these responses, to the Department for review. We have also provided the Department with a copy of this report and our recommendations for designation.
43. Given the support, which DCC's proposals have received from the consultation responders, and the benefits of providing clarity about SMETS1 Device behaviour and the ongoing operation of SMETS1 Devices, we consider that the proposals, as set out in our consultation, should be progressed.
44. DCC has provided an updated copy of SEC Appendix AC and of SEC Appendix AM that we consider suitable for designation by the Secretary of State and recommends that the Secretary of State designates that version on the 12<sup>th</sup> December 2025 or as soon as practicable within one month thereafter.



## 5. Appendix One – Proposed amendments to the SEC Appendix AM and SEC Appendix AC

Current reference	Item description	Logic	Proposed reference
SEC Appendix AL SMETS1 TMAD Defined Terms and Interpretations	Definition of GroupID Definition of Group Definition of Group Device Model Combination List	GroupID Referenced in the SEC Appendix AM and required for those obligations, where each definition provides additional information	SEC Appendix AM 2 Defined Terms
SEC Appendix AL SMETS1 TMAD Defined Terms and Interpretations	Definition of SMETS1 CAD Definition of SMETS1 PPMID	Referenced in SEC Appendix AC and required for those obligations	SEC Appendix AC Section 13 Definitions
SEC Appendix AL SMETS1 TMAD  3.14E – 3.14F	RP Separation requirements	Avoidance of doubt on the obligation to disconnect	SEC Appendix AM  2A Application of Section G (Security)  2A 1.1 – 1.2
SEC Appendix AL SMETS1 TMAD Defined Terms and Interpretations – related to 3.14E – 3.14F	RP Decommissioning Date Requesting Party Commissioning Party	Term contained in 3.14E – 3.14F which are proposed for retention.	SEC Appendix AM 2 Defined Terms
SEC Appendix AL SMETS1 TMAD 7.9A – 7.9D	Rights and obligations relating to DCC's continued use or deletion of data collected for migration purposes	To ensure that data required for the continued operation of SMETS1 Devices can be retained, while also providing a clear obligation on the deletion of data no longer required	SEC Appendix AM 2B Decommissioning of a Requesting Party or the Commissioning Party 2B 1.1 – 1.4