

SMETS1 Conclusions Initial Closure Matters

A SMETS1 conclusion on a proposal by DCC: amend the rules for RP Decommissioning, change the PPCT rules following RP Decommissioning, end the provision of Migration DUST for IOC & MOC (MDS), and stop the DMCT Process in respect of the MOC (MDS) cohort

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Author: consultations@smartdcc.co.uk

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1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 Services involves an approach for migrating SMETS1 Installations into DCC's systems.

In this document DCC concludes on its proposals to amend a range of regulatory documents (TMAD, SMETS1 SVTAD, ETAD and MTAD) in support of SMETS1 service delivery. 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 Code¹ (SEC). The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process. It also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the SEC. The procedural and technical details related to the enduring Testing Services provided by DCC are set out in the Enduring Testing Approach Document (ETAD). The ETAD is Appendix J of the 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) consulted² 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 concluded³ 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 prior consultations / conclusions looking at maximising migrations / introducing Excluded Categories which are available on the DCC website⁴.

DCC issued the Initial Closure Matters Consultation⁵ to seek views on a range of regulatory matters related to closing aspects of the SMETS1 Migration service:

- changes to the process in the TMAD for decommissioning each Requesting Party;
- a proposal to decommission the Requesting Party for MOC (MDS);
- decommissioning of the DMCT Process in respect of DMCs that would migrate from the MDS SMSO, aligned to closure of the relevant Requesting Party;
- restrictions on PPCT for each cohort aligned to decommissioning of the relevant Requesting Party; and
- partial decommissioning of Migration DUST for IOC and MOC (MDS).

The Initial Closure Matters Consultation was issued on 5 April 2022 with responses due by noon on 3 May 2022. This document provides a response to that consultation consistent

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

² The BEIS consultation is available via <https://smartenergycodecompany.co.uk/latest-news/secretary-of-state-direction-on-the-smets1-tm-ad-and-further-smets1-tm-ad-consultation/>

³ The BEIS conclusion is available via <https://smartenergycodecompany.co.uk/latest-news/sec-v35-0-implemented-to-support-the-dcc-smets1-service/>

⁴ <https://www.smartdcc.co.uk/consultations/>

⁵ <https://www.smartdcc.co.uk/consultations/smets1-consultation-initial-closure-matters/>

with the regulatory requirements for amending the TMAD, SMETS1 SVTAD, MTAD and ETAD.

2. Stakeholder Engagement

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

2.1. Questions

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

Closure 1 Q1	Do you agree with DCC's proposal to amend Clause 3.6, and the range of amendments to Clause 7 of the TMAD (and related definitions) regarding decommissioning of each Requesting Party? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Closure 1 Q2	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 19 June 2022 (or any following Sunday up to and including Sunday 31 July 2022)? Do you have any detailed comments on the RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.
Closure 1 Q3	Do you agree with DCC's proposal to introduce Clause 20.1A of the SMETS1 SVTAD to stop the DMCT Process where a Requesting Party has been decommissioned? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Closure 1 Q4	Do you agree with DCC's proposal to include Clause 9.6A and 9.6B in ETAD to limit PPCT to existing test devices where a Requesting Party has been decommissioned and to relieve obligation of DCC to test where no devices available? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Closure 1 Q5	Do you agree with DCC's proposal to amend Clause 9.7 of the ETAD to provide that test devices only need to be provided where requested by DCC? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Closure 1 Q6	Do you agree with DCC's proposals to enable Migration DUST for a cohort to be closed earlier than the Requesting Party decommissioning based on changes to Clause 17 of the MTAD. Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Closure 1 Q7	Do you agree with DCC's proposals to close Migration DUST for IOC and MOC (MDS) from 20 May 2022 as captured by the proposed changes to the MTAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Closure 1 Q8	Do you agree with DCC's proposal to amend Clause 8.3 and 8.4 and introduce Clause 8.3A into the ETAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

Closure 1 Q9	Do you agree with the proposed re-designation date of 20 May 2022 for updates to the TMAD, SMETS1 SVTAD, and ETAD within the scope of this consultation?
Closure 1 Q10	Do you agree with the proposed modification date of 20 May 2022 for updates to the MTAD related to partial decommissioning of Migration DUST?
Closure 1 Q11	Do you consider this consultation process provides Energy Suppliers with sufficient notice related to decommissioning the Requesting Party for the MOC (MDS) cohort on Sunday 19 June 2022 (or a subsequent Sunday up to 31 July 2022 if delays in concluding arise)? Please provide a rationale for your views.

Table 1 – Consultation Questions – Initial Closure Matters

2.2. Responses

Stakeholders were invited to respond to the consultation by noon on Tuesday 3 May 2022 using the response template⁶ that was provided.

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

Following closure of the consultation, DCC has spoken to two respondents to confirm some aspects of their responses.

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 Changes to the TMAD (Closure Q1)

DCC sought views on amending the TMAD provisions in relation to decommissioning each Requesting Party. These changes allowed each Requesting Party closure to be considered separately, provide for clarity on closure process to specify the last Migration Week, and allow the scope for closure before 12 months after the last EPCL entry. Also, pre-migration activities are no longer to be undertaken by DCC in respect of Migrations that would not be capable of commencing until after the final Migration Day in the final Migration Week. There is also a change to Clause 3.6 to remove a variation to Section F2.10A of the SEC related to the EPCL as this will fall away once the RP is closed. These changes were covered by the following question: *“Do you agree with DCC's proposal to amend Clause 3.6, and the range of amendments to Clause 7 of the TMAD (and related definitions) regarding decommissioning of each Requesting Party? 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 of the respondents supported the proposed amendments and one disagreed.

From the supportive respondents, three respondents provided no further comments and the remaining four respondents provided further details within their response.

⁶ <https://www.smartdcc.co.uk/media/7057/smets1-consultation-initial-closure-matters-response-template.docx>

- One of these respondents expressed support on the basis of increased efficiency and flexibility. The respondent also indicated that other cohorts may require an extension to the Requesting Party depending on progress for each cohort. DCC can confirm it will assess each cohort separately and make a recommendation to close each Requesting Party based on the factors that are relevant to that cohort.
- One of these respondents proposed that DCC provides a clear and transparent timetable for closure of each Requesting Party to enable effective and efficient planning for Energy Suppliers. DCC will be bringing forward such plans for other cohorts as soon as it is reasonably practical.
- DCC notes that one of these respondents welcomes the approach as it will allow for discussions between MAPs and Energy Suppliers on plans for replacement of SMETS1 devices with SMETS2+ devices.
- One of these respondents supported the idea to consult on a range of dates and sought clarity on what would happen if the date range could not be achieved. As set out in the consultation document, in the unlikely event that the RP Decommissioning Date slips beyond 31 July 2022, DCC would re-consult on the RP Decommissioning Date.

One respondent disagreed with the proposal to amend the TMAD regarding decommissioning of each Requesting Party. This respondent objected to the proposal to remove Clause 7.2 of the TMAD that currently provides that each RP Decommissioning Date should not be earlier than 12 months from the last EPCL entry for each GroupID. The respondent noted that Clause 7.2 has been in place since initial designation of the TMAD and programme timelines have been set accordingly. The respondent expressed a view that altering such clauses prior to their completion equates to poor governance practice. DCC discussed these concerns with the Respondent who confirmed support for the early closure of MOC (MDS) and the range of other regulatory changes, recognising the need for economic efficiency. This respondent expressed concern that the removal of Clause 7.2 would remove an important marker from the TMAD (which references closure after 12 months following the last EPCL entry). On this basis, this respondent would prefer that the marker remained in TMAD and that the Secretary of State could grant DCC a derogation to be in breach of this Clause i.e. if DCC deemed it appropriate, it could ask for the 12 month period to be shortened for a particular cohort. DCC recognised this concern and noted that 'earlier' was a new requirement arising for cohorts that are nearing completion and 'earlier' may not be appropriate for all cohorts. Given this concern, DCC will not remove Clause 7.2 but will instead amend TMAD to provide that the clause is inapplicable to the MOC (MDS) cohort. DCC expects to consult on amending Clause 7.2 to allow early closure for IOC and FOC (NPW) in the short term. This respondent confirmed to DCC that it had no remaining concerns with the proposals within this consultation on the basis that Clause 7.2 was retained but amended to no longer apply to the MOC (MDS) cohort.

3.1.2. Areas of Unresolved Disagreement

n/a

3.1.3. Summary

DCC concludes it is appropriate to amend Clause 3.6 and Clause 7 of TMAD including the amendments to restrict Clause 7.2 to exclude the MOC (MDS) cohort.

DCC proposes that the Secretary of State re-designates the relevant amendments to the TMAD to amend the process for closure of each Requesting Party.

3.2. Ending Migrations for the MOC (MDS) Cohort (Closure Q2)

DCC sought views on decommissioning the Requesting Party for the MOC (MDS) cohort asking: *“Do you agree with DCC’s proposed RP Decommissioning Timetable document for the MOC (MDS) cohort that sets out the proposed date for the Requesting Party to be decommissioned for the MOC (MDS) cohort to be 19 June 2022 (or any following Sunday up to and including Sunday 31 July 2022)? Do you have any detailed comments on the RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.”*

3.2.1. Respondents’ Comments / DCC Analysis / Clarifications

All respondents provided a response to this question.

Five respondents supported the proposal to end Migrations for the MOC (MDS) Cohort. Two of these respondents made no further comment.

Whilst DCC’s current focus is MOC (MDS), one respondent (that expressed support) stressed the importance of expediting the closure of the other cohorts. DCC agrees that it is important for DCC to progress closure for the other cohorts in an economically efficient manner.

Whilst expressing general support for the closure proposal, another respondent set out a view that the closure decision should be made by DCC and affected Energy Suppliers. DCC accepts that obtaining views from affected Energy Suppliers is an important aspect of any closure decision. However, within the regulatory framework, closure of each Requesting Party is not a decision by DCC and the affected Energy Supplier; there is a requirement for public consultation and sign-off by the Secretary of State. Within this process BEIS will be directly reaching out to Installing Suppliers and there is an ability for stakeholders to directly raise concerns with BEIS after DCC has made its recommendation; in this regard BEIS have indicated to DCC that a 5 day standstill period will be made available to stakeholders to raise any concerns after DCC has issued its final recommendation.

One of the respondents that expressed support asked for evidence on the number of SMETS1 Installations that will not be migrated due to the closure of MOC (MDS). DCC has shared this information related to Dormant Meters with the Secretary of State but did not include this in the public consultation given confidentiality concerns. DCC understands that BEIS will be reaching out directly to relevant Energy Suppliers in relation to Active Meters as these are not within DCC’s remit. The respondent also sought information on the extent of failed Migrations for other cohorts, expressing concern that it may be a challenge to replace all of them with SMETS2+ devices by the end of 2022 if the information needed to flag the requirement to replace is not provided promptly. DCC notes that, given DCC is prioritising the Migration of Dormant Meters, the Migration of Dormant Meters is expected to be completed shortly (excluding those that persistently fail to migrate successfully). Thus, all Dormant Meters requiring replacement will be identified (except newly Dormant Meters following churn) shortly and covered by the regular month end Excluded Category reporting. The information will be available in the next few months as the relevant Excluded Categories are extended into the TMAD for all cohorts (by the planned Various 3 consultation, which is expected to be issued in June 2022) and for any further sufficient Migrations to be attempted such that any SMETS1 Installations persistently failing to migrate will fall under the Excluded Categories prescribed in Clause 18 of the TMAD. Furthermore, each Energy Supplier can form their own view on their Active Meters.

One respondent indicated that they have insufficient information on the MOC (MDS) cohort to comment in detail on the proposal to decommission the Requesting Party on 19 June 2022.

One respondent did not indicate support or otherwise for the proposal; expressing a view that there should be a longer period to allow for discussions between MAPs and Energy Suppliers in relation to the RFI information on Unaccounted SMETS1 Devices. DCC has provided each impacted Energy Supplier with a detailed breakdown covering an assessment of their RFI information on Unaccounted SMETS1 Devices in order to resolve this matter. DCC notes that the 10,537 SMETS1 Installations in the consultation document is the total for MOC (MDS) across all Energy Suppliers and that where this respondent is the Energy Supplier, all of the Unaccounted SMETS1 Devices were no longer a concern for the MOC (MDS) cohort. DCC also notes that no other stakeholders asked for an extension to review their RFI information. DCC discussed this matter with the respondent who accepted that a delay is not needed for the closure of MOC (MDS).

One respondent indicated they had no specific comments regarding this question.

3.2.2. Areas of Unresolved Disagreement

n/a

3.2.3. Summary

DCC concludes it is appropriate to end Migrations for the MOC (MDS) cohort as per the timeline presented in the consultation although the delay in concluding on this consultation will delay the closure date from the first proposed date in the timeline.

DCC will make a formal proposal on the RP Decommissioning Timetable for the MOC (MDS) cohort to the Secretary of State as set out in Section 6.3 below.

3.3. Closing the DMCT Process when the Requesting Party is Decommissioned (Closure Q3)

DCC sought views on amending the SMETS1 SVTAD to align the closure of the DMCT Process (for each cohort) to decommissioning of the Requesting Party asking: *“Do you agree with DCC’s proposal to introduce Clause 20.1A of the SMETS1 SVTAD to stop the DMCT Process where a Requesting Party has been decommissioned? 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 respondents provided a response to this question.

Seven respondents supported the proposed amendments, with six of these respondents making no further comment. The other supportive respondent indicated their support was on the basis that the DMCT Process will have no purpose once the relevant Requesting Party has been decommissioned.

One respondent indicated they had no specific comments regarding this question.

3.3.2. Areas of Unresolved Disagreement

n/a

3.3.3. Summary

DCC concludes it is appropriate to amend the SMETS1 SVTAD to align the closure of the DMCT Process (for each cohort) to decommissioning of the Requesting Party.

DCC proposes that the Secretary of State re-designates the relevant amendments to the SMETS1 SVTAD.

3.4. Limits on PPCT aligned to Requesting Party Decommissioning (Closure Q4)

DCC sought views on amending the ETAD to stop the introduction of new test devices for PPCT once the relevant Requesting Party is decommissioned asking: “*Do you agree with DCC’s proposal to include Clause 9.6A and 9.6B in ETAD to limit PPCT to existing test devices where a Requesting Party has been decommissioned and to relieve obligation of DCC to test where no devices available? 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.

Seven respondents supported the proposed amendments, with five of these respondents making no further comment.

One respondent expressed support for the principle that PPCT should be restricted to existing test devices. This respondent stressed the importance of allowing testing of new firmware for SMETS1 devices in order to maintain operational integrity and asset life. Given this matter, the respondent requested early visibility of the DCC’s proposed ‘pool’ of enduring test assets (i.e. test devices migrated prior to decommissioning the Requesting Party). For IOC and MOC (MDS), DCC expects to have a pool of around 500 device sets across the UIT environments which reflects the available devices. DCC intends to advise Test Participants via a testing notice to confirm the stock of devices when each cohort closes.

Whilst expressing broad support, one respondent expressed concern about device availability moving forward and that care should be taken to maximise the use of existing test devices and preserve their life. DCC notes that the availability of SMETS1 test devices isn’t a new risk. From the outset of the SMETS1 programme, DCC identified the finite nature of SMETS1 test devices and accordingly looks to carefully manage stock in all test environments and maximise reuse. DCC is proposing an amendment to the ETAD to require the DCC to maximise asset re-use and use assets in accordance with Good Industry Practice to reflect this commitment (via a new Clause 13.8 in the ETAD). DCC has discussed this matter with the respondent who expressed the view that DCC’s proposed approach addressed the points raised by the respondent. In UIT, if there are issues with a device set this mainly occurs in initial registration and migration. Post migration, devices are stable and burn rate is low. DCC also asks Testing Participants not to undertake destructive tests with DCC devices and to discuss firmware upgrades with DCC to ensure stock is maintained. DCC would welcome engagement with parties to understand if improvements can be made to process to increase the shelf life of test devices.

One respondent indicated that they had no specific comments regarding this question.

3.4.2. Areas of Unresolved Disagreement

n/a

3.4.3. Summary

DCC concludes it is appropriate to amend the ETAD to stop the introduction of new test devices for PPCT once the relevant Requesting Party is decommissioned.

DCC proposes that the Secretary of State re-designates the relevant amendments to the ETAD including the new Clause in 13.8.

3.5. Provision of Test Devices by Testing Participants (Closure Q5)

DCC sought views on proposals to amend the ETAD to reflect the current process for the provision of test Devices (i.e. these are only provided where DCC asks the Testing Participant to do so) asking: ***“Do you agree with DCC’s proposal to amend Clause 9.7 of the ETAD to provide that test devices only need to be provided where requested by DCC? 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.

Six respondents supported the proposed amendments, with four of these respondents making no further comment.

One respondent that expressed support indicated that DCC should ensure existing devices are maintained and used rationally to ensure their longevity. DCC agrees and has amended the ETAD drafting to reflect this comment and include an obligation on DCC to maximise asset re-use and use assets in accordance with Good Industry Practice to capture this commitment (as described in Section 3.4 above).

One respondent indicated support for the proposals on the basis that PPCT can continue to support the introduction of a new IHD/PPMID. DCC can confirm that the existing drafting covers this as a new IHD/PPMID can be commissioned via the relevant service request. In this circumstance DCC can request just the new IHD/PPMID device from the Testing Participant and commission these with pre-existing test meter sets.

One respondent did not indicate support or otherwise for the proposal. This respondent set out a scenario where there are no devices available for PPCT and wished to understand how this is covered and whether devices could be reserved. DCC accepts this scenario is possible and notes that it could happen today due to limited nature of SMETS1 devices. This is covered in the new Clause 9.6B of the ETAD; the proposal is to inform the Test Participant of the issue. DCC will retain the ability to commission new SMETS1 devices in the SIT test environment to support PPCT until closure of the relevant Requesting Party as this is distinct from Testing Participants installing devices in Migration DUST via the UIT environment.

DCC has spoken to Installing Suppliers for the IOC and MOC (MDS) cohorts ahead of issuing this consultation and engaged via forums such as TDEG and TAG to advise of the limitations of the ability to commission new SMETS1 devices in the test environments. DCC will continue to encourage Testing Participants to migrate remaining test stock for all cohorts given this ability will be removed once Migration DUST is closed for each cohort. DCC will reach out after the publications of this conclusion to engage with Installing Suppliers for the IOC and MOC (MDS) cohorts on migrating their remaining test stock prior to closure of Migration DUST for those cohorts. Testing Participants would not be able to reserve devices from DCC stock as this is shared resource across all Testing Participants. Requesting the use of DCC devices will continue to be managed via the current processes.

One respondent indicated they had no specific comments regarding this question.

3.5.2. Areas of Unresolved Disagreement

n/a

3.5.3. Summary

DCC concludes it is appropriate to amend the ETAD to reflect the current process for the provision of test Devices (i.e. these are only provided where DCC asks the Testing Participant to do so).

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

3.6. Closure of Migration DUST de-coupled from Requesting Party Decommissioning (Closure Q6)

DCC sought views on changing the MTAD to allow early closure of the Migration DUST testing service by removing the link to Requesting Party closure asking: ***“Do you agree with DCC’s proposals to enable Migration DUST for a cohort to be closed earlier than the Requesting Party decommissioning based on changes to Clause 17 of the MTAD. 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 respondents supported the proposed amendments, with five of these respondents making no further comment.

One respondent expressed support for closure of Migration DUST by cohort and indicated that it should be done with consultation/consent with the affected participants for each individual cohort closer to the time of each proposed closure. The respondent considers that each participant will have their own view on the extent to which Migration DUST could be required (based on testing and operational experience to date; specific device functionality used; etc). DCC agrees with the respondent; as set out in the consultation document, DCC will consult separately on the end dates for the remaining cohorts once there is no longer demand for Migration DUST related to MOC (Secure) and FOC.

Another respondent expressed general support for the closure of Migration DUST where there is clear evidence that it is not being utilised. When responding to this question, this respondent also raised comments about prioritisation of UEPT, which are addressed in section 3.8 below.

One Respondent objected to this proposal. This respondent referred to their objection to amending Clause 7 (see Section 3.1, Closure Q1); indicating that if their concerns (regarding the removal of Clause 7.2) were addressed then they would not be opposed to the amendments to the MTAD related to early Migration DUST closure. DCC discussed the respondent’s concern in relation to Closure Q1 on removal of Clause 7.2 from the TMAD and those matters are now resolved (see Section 3.1). During the discussion with the respondent, they indicated they had no objections to the other proposals within the scope of this consultation.

3.6.2. Areas of Unresolved Disagreement

n/a

3.6.3. Summary

DCC concludes it is appropriate to amend the MTAD to allow early closure of the Migration DUST testing service by removing the link to Requesting Party closure.

DCC proposes that it brings forward the relevant modification to the MTAD.

3.7. Closure of Migration DUST for the MOC (MDS) and IOC cohorts (Closure Q7)

DCC sought views on plan to close Migration DUST for IOC and MOC (MDS) as there is now no demand for this testing service asking: “*Do you agree with DCC’s proposals to close Migration DUST for IOC and MOC (MDS) from 20 May 2022 as captured by the proposed changes to the MTAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.*”.

3.7.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Five respondents supported the proposed amendments, with all five providing no further comment.

One Respondent indicated that they had no objections to the proposal to close Migration DUST for IOC and MOC (MDS) without expressing support for the proposal.

One respondent provided no view on this proposal as they do not have devices in IOC and MOC (MDS). The respondent stated that DCC should focus on the views of Energy Suppliers that were Installing Suppliers for the MOC (MDS) and IOC cohorts as they are directly affected by the closure of Migration DUST for these cohorts. DCC can confirm that it engaged with Installing Suppliers to understand their plans prior to issuing the consultation and will look to do the same for other cohorts prior to proposing closure of Migration DUST for other cohorts.

One respondent indicated they had no specific comments regarding this question.

3.7.2. Areas of Unresolved Disagreement

n/a

3.7.3. Summary

DCC concludes it is appropriate to close Migration DUST for IOC and MOC (MDS) from 20 May 2022 as captured by the proposed changes to the MTAD. The specific date for closure of Migration DUST for IOC and MOC (MDS) is expected to be 17 June 2022 as set out in Section 6.2 below.

DCC proposes that it brings forward the relevant modification to the MTAD.

3.8. Restrictions to DUST and UEPT (Closure Q8)

DCC sought views on introducing restrictions into DUST and UEPT following the decommissioning of Migration DUST for a cohort asking: “*Do you agree with DCC’s proposal to amend Clause 8.3 and 8.4 and introduce Clause 8.3A into the ETAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.*”.

3.8.1. Respondents’ Comments / DCC Analysis / Clarifications

All eight respondents provided a response to this question.

Six respondents expressed support for the proposed amendments, with three respondents making no further comment.

One respondent expressed general support and indicated that DCC should take steps to ensure that:

- Test Participants are aware of the stock that DCC intends to hold; and
- Test Participants are able to manage their own stock (including enrolment of devices into the correct state for future testing) while the facilities to do this still exist.

DCC has considered such matters. DCC has spoken to Installing Suppliers for the IOC and MOC (MDS) cohorts ahead of issuing this consultation and also engaged via forums such as TDEG and TAG to advise of the limitations of the migration service. DCC has previously undertaken an activity to maximise the test stock that DCC has available, and this is the stock that is being migrated. For IOC and MOC (MDS), DCC expects to have a pool of around 500 device sets across the UIT environments which reflects the available devices. DCC intends to advise Test Participants via a testing notice to confirm its stock of devices when each cohort closes. Separately, DCC will reach out post the conclusion to engage with Installing Suppliers on migrating their remaining test stock.

One supportive respondent stated this change was a sensible suggestion to ensure that all SMETS1 Devices continue to be available in the DCC UIT environment for any testing requirements.

Another supportive respondent indicated that it is important for DCC to take steps to ensure it maintains sufficient operable SMETS1 devices to avoid unduly constraining the availability of testing facilities. DCC agrees and is of the opinion that it does have a robust device management process to support maintaining operable SMETS1 devices. In UIT, if there are issues with a device set this mainly occurs in initial registration and migration. Post migration, devices are stable and burn rate is low. DCC is also asking Testing Participants not to undertake destructive tests with DCC devices and to discuss firmware upgrades with DCC to ensure stock is maintained.

One respondent indicated that they have no objections to the proposed change to ETAD clause 8.4 but did not express explicit support for the proposal. This respondent considered that it was a good suggestion for DCC to recommend that Energy Suppliers migrate any remaining stock to help to build a deep portfolio of devices that would be available for testing once Migration DUST has ceased.

When responding to Closure Q6, one respondent raised concerns about indefinite prioritisation of UEPT. Given there is a limited time window for the UEPT test phase, DCC considers the risk of indefinite prioritisation of UEPT to be very low as UEPT has a defined set of tests which are required of new DCC Users, and DCC is not expecting a large number of new Users. Also, DCC considers that the proposed dispute regime will address / avoid any such concerns.

One respondent indicated they had no specific comments regarding this question.

3.8.2. Areas of Unresolved Disagreement

n/a

3.8.3. Summary

DCC concludes it is appropriate to amend the ETAD to introduce restrictions into DUST and UEPT following the decommissioning of Migration DUST for a cohort.

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

3.9. Re-designation Date for the TMAD, SMETS1 SVTAD, and ETAD (Closure Q9)

DCC sought views on the Secretary of State's plans for re-designation of these documents into the SEC between 20 May 2022 and 20 June 2022 asking: "*Do you agree with the proposed re-designation date of 20 May 2022 for updates to the TMAD, SMETS1 SVTAD, and ETAD within the scope of this consultation?*".

3.9.1. Respondents' Comments / DCC Analysis / Clarifications

Eight respondents provided a response to this question.

Seven respondents supported the proposed date for re-designation without further comment.

One respondent disagreed with the proposed date for re-designation of the TMAD, SMETS1 SVTAD, and ETAD until their concerns related to Closure Q1 and Closure Q6 are addressed. DCC discussed the respondent's concern in relation to the removal of Clause 7.2 from the TMAD and those matters are now resolved (see Section 3.1 and 3.6).

3.9.2. Areas of Unresolved Disagreement

n/a

3.9.3. Summary

DCC concludes it is appropriate for the Secretary of State to re-designate the TMAD, ETAD, and SMETS1 SVTAD between 20 May 2022 and 20 June 2022.

DCC proposes that the Secretary of State re-designates these documents into the SEC.

3.10. Modification Date for the MTAD (Closure Q10)

DCC sought views on DCC's plans for modification of the MTAD between 20 May 2022 and 20 June 2022 asking: "*Do you agree with the proposed modification date of 20 May 2022 for updates to the MTAD related to partial decommissioning of Migration DUST?*".

3.10.1. Respondents' Comments / DCC Analysis / Clarifications

Eight respondents provided a response to this question.

Seven respondents supported the proposed date for modification without further comment.

One respondent disagreed with the proposed date for modification of the MTAD until their concerns related to Closure Q1 and Closure Q6 are addressed. DCC discussed the respondent's concern in relation to the removal of Clause 7.2 from the TMAD and those matters are now resolved (see Section 3.1 and 3.6).

3.10.2. Areas of Unresolved Disagreement

n/a

3.10.3. Summary

DCC concludes it is appropriate for it to modify the MTAD between 20 May 2022 and 20 June 2022. Given the delay in concluding, it is now proposed to close Migration DUST on Friday 17 June 2022.

3.11. Notice to Close the Requesting Party (Closure Q11)

DCC sought views on whether this consultation process gave sufficient notice to Energy Suppliers asking: “*Do you consider this consultation process provides Energy Suppliers with sufficient notice related to decommissioning the Requesting Party for the MOC (MDS) cohort on Sunday 19 June 2022 (or a subsequent Sunday up to 31 July 2022 if delays in concluding arise)? Please provide a rationale for your views.*”.

3.11.1. Respondents' Comments / DCC Analysis / Clarifications

Seven respondents provided a response to this question.

Four respondents supported the proposed amendments, with two of these respondents providing no further comment.

One respondent expressed support and stated that the evidence suggests that there is sufficient notice related to decommissioning the Requesting Party for the MOC (MDS) cohort on Sunday 19 June 2022, given the contingency dates and limited number of devices remaining. This respondent also stated that the final decision should be between DCC and the affected Energy Suppliers not all of whom are party to this response. DCC notes that the respondent considers the closure decision should be made by DCC and affected Energy Suppliers. Closure of each Requesting Party is not a decision by DCC and the affected Energy Suppliers; there is a requirement for public consultation and sign-off by the Secretary of State. Within this process there is an ability for stakeholders to directly raise concerns with BEIS after DCC has made its recommendation; in this regard BEIS have indicated to DCC that a 5 day standstill period will be made available to stakeholders to raise any concerns following DCC conclusion (as set out in the consultation document).

One respondent expressed support for the closure of MOC (MDS) given the lower quantity of meters within this cohort and restated its concerns expressed in response to Closure Q2 (see Section 3.2). The respondent expressed concern that future consultations for the larger cohorts of meters will not leave the respondent with enough time to meet their obligation to replace all SMETS1 meters that cannot be migrated by the end of 2022. DCC notes this concern and thus plans to expedite consultations on the closure for the other cohorts given the 31 December 2022 end date reflected in the Supply Licence Conditions. Also, DCC notes that, given DCC is prioritising the Migration of Dormant Meters, all those requiring replacements will be known (except newly Dormant Meters following churn) given that Migration of Dormant Meters is expected to be completed shortly. Such information will be available shortly and thus allows time for relevant Excluded Categories to be extended into the TMAD for all cohorts and for any further sufficient migrations to be attempted such that any SMETS1 Installations the persistently fail to migrate will fall under the Excluded Categories given in Clause 18 of the TMAD. Furthermore, each Energy Supplier can form their own view on their Active Meters.

One respondent did not provide a view on this question, stating that they have insufficient information on the MOC (MDS) cohort to comment on whether this consultation process provides Energy Suppliers with sufficient notice related to decommissioning the Requesting Party for the MOC (MDS) cohort. The respondent stated that DCC should focus on the views of Energy Suppliers that were Installing Suppliers for the MOC (MDS) cohort as they are directly affected by decommissioning of this Requesting Party. This respondent also noted that different notice periods may be appropriate for other cohorts depending on the issues faced within that cohort at the point of consultation and accordingly that this consultation should not be considered as a precedent for other cohorts. DCC can confirm that it will assess each cohort separately and make a recommendation to close each Requesting Party based on the factors that are relevant to each cohort.

One respondent did not indicate support or otherwise for the proposal; expressing a view that there should be longer to allow discussions between MAPs and Energy Suppliers in relation to RFI information on Unaccounted SMETS1 Devices. DCC notes that the 10,537 SMETS1 Installations in the consultation document is the total for MOC (MDS) across all Energy Suppliers and the concerns of this respondent have been resolved for the MOC (MDS) cohort. DCC also notes that no other stakeholders asked for an extension to review their RFI information. DCC discussed this matter with the respondent who accepted that a delay is not needed for the closure of MOC (MDS).

One respondent indicated they had no specific comments regarding this question.

3.11.2. Areas of Unresolved Disagreement

n/a

3.11.3. Summary

DCC concludes that the consultation process gave sufficient notice to Energy Suppliers in relation to the closure of the Requesting Party for the MOC (MDS) cohort.

4. Summary of Drafting Changes

There is a change to Clause 7.2 of the TMAD to only remove this requirement for the MOC (MDS) cohort. Stakeholders should note that DCC envisages that the TMAD changes from this conclusion may be consolidated with other changes and so the clause references may change once the TMAD is re-designated.

New Clause 13.8 is included in the ETAD to require DCC to maximise re-use of test devices.

There are no changes to the MTAD or SMETS1 SVTAD arising from the consultation.

5. Conclusions

5.1. TMAD, SMETS1 SVTAD, and ETAD

DCC is confident that the version of the TMAD, SMETS1 SVTAD, and ETAD submitted to the Secretary of State reflect the requirements for document submission.

DCC is of the opinion that it has undertaken appropriate consultation with industry regarding these changes to the TMAD, SMETS1 SVTAD and ETAD.

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, SMETS1 SVTAD, and ETAD revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised TMAD, SMETS1 SVTAD, and ETAD are defined to a sufficient level of detail for re-designation into the SEC;

- the revised TMAD, SMETS1 SVTAD, and ETAD provide 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, SMETS1 SVTAD, and ETAD are materially complete, and the content is technically accurate.

In summary, DCC considers that the revised TMAD, SMETS1 SVTAD, and ETAD are fit for purpose.

5.2. MTAD

DCC intends to amend the MTAD with the changes proposed in this consultation given the responses received.

Consistent with the requirements set out in Clause 4.2 of the SMETS1 SVTAD, DCC is of the view that it has undertaken appropriate consultation with stakeholders in relation to the proposed amendments to the MTAD.

DCC is confident that the MTAD submitted to the Secretary of State reflects the requirements for document submission. DCC has, where necessary, addressed the comments that have been received from industry and where appropriate, has sought additional feedback from respondents. DCC does not believe that the views expressed result in fundamental amendments to the MTAD and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised and identify those comments that have not been resolved. DCC is of the view that it has met its regulatory obligation as set out in the SEC.

The updated MTAD is in line with the overall testing design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the updated MTAD is defined to a sufficient level of detail for amendment by DCC;
- this document 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
- this document is materially complete, and the content is technically accurate.

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

5.3. RP Decommissioning Timetable for MOC (MDS)

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

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

DCC is confident that the RP Decommissioning Timetable for MOC (MDS) reflects the requirements for such a document. DCC does not believe that the views expressed result in

fundamental amendments to the RP Decommissioning Timetable for MOC (MDS) and as such further consultation is neither necessary nor appropriate.

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

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

6. Next Steps

The next steps vary as per the sections below.

6.1. TMAD, SMETS1 SVTAD, and ETAD

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

DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD, SMETS1 SVTAD, and ETAD into the regulatory framework for the amendments in the scope of this consultation.

Given this consultation process, DCC notes that the earliest date that the amendments to the TMAD, SMETS1 SVTAD, and ETAD could be re-designated is 20 May 2022 and the latest date is 20 June 2022 without requiring a further consultation on the designation date.

6.2. MTAD

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

DCC considers that, having followed the process in Clause 4.2 of the SMETS1 SVTAD, it is appropriate to amend the MTAD.

Subject to the Secretary of State not directing otherwise, DCC plans to issue a notice to modify the MTAD on 10 June 2022 with the MTAD being modified and Migration DUST to close on Friday 17 June 2022 for the IOC and MOC MDS cohorts. DCC will notify the SEC Administrator and an updated version of the MTAD to reflect these changes will be available on the SEC website in due course.

6.3. RP Decommissioning Timetable

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

Given delays in concluding, DCC plans to formally submit the RP Decommissioning Timetable for the MOC (MDS) cohort to the Secretary of State on 13 June 2022 (three weeks later than planned).

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

provide the Secretary of State with updated evidence on the status of the MOC (MDS) cohort.

The envisaged date for decommissioning is Sunday 10 July 2022 (three weeks later than planned). The table below presents the remaining elements within the updated schedule.

Date	Activity
Thursday 26 May 2022	DCC will conclude on the consultation findings for MOC (MDS) Requesting Party closure.
Friday 10 June 2022	Provided the DCC's conclusion is that RP closure should be enacted and the regulatory changes are supported, the Secretary of State will re-designate the TMAD, SMETS1 SVTAD and ETAD and DCC will modify the MTAD.
Monday 13 June 2022	DCC will formally submit a decommissioning timetable for MOC (MDS) to the Secretary of State (include prior conclusion evidence and current status of any final migration activity)
Tuesday 14 June 2022 to Tuesday 21 June 2022	BEIS have advised there will be a five day period for any stakeholders to raise further concerns directly to BEIS.
Wednesday 29 June 2022	10 calendar days prior to the RP Decommissioning Date, a decision by the Secretary of State is expected on the closure of the Requesting Party for MOC (MDS)
Thursday 30 June 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.

Date	Activity
w/c Monday 3 July 2022	DCC will commence the final Migrations during final Migration Week based on submissions made on Thursday 30 June 2022. All migrations taking place during the week are expected to have finished processing (successful / failed / rolled back) before the Sunday.
Sunday 10 July 2022	DCC doesn't usually process Migrations on weekends. RP Decommissioning Date will be on this Sunday.
Monday 11 July 2022	From the point of expiry of the RP Decommission Date and once all final migrations have finished processing (successful / failed / rolled back), DCC will instruct MDS 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.
Q3 2022	To confirm decommissioning of the Requesting Party has been carried out appropriately, an independent audit of the close down process will be carried out and reported back to DCC.

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

7. Attachments

Attachment	Title
1.	TMAD v20.icm draft delta against current version v19.0
2.	TMAD v20.icm draft clean
3.	SMETS1 SVTAD v10.icm draft delta against current version v9.0
4.	SMETS1 SVTAD v10.icm draft clean
5.	ETAD J6.icm draft delta against current version J5.0
6.	ETAD J6.icm draft clean
7.	MTAD v2.icm draft delta against current version v1.3
8.	MTAD v2.icm draft clean

Table 3 - Attachments