

# Consultation Response

on the 'Go Live' ETMAD, EMRR,  
EMEHRA and consultation on the re-  
designation date of SEC Subsidiary  
Documents

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**Author: [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk)**

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# 1. Introduction

## 1.1. Executive summary

1. On 8 December 2022, DCC issued a consultation seeking stakeholder views on the proposed changes to the 'Go Live' Enduring Change of Supplier (ECoS) Transition and Migration Approach Document (ETMAD), or Smart Energy Code (SEC) Appendix AS, alongside the draft ECoS Migration Reporting Regime (EMRR) and ECoS Migration Error Handling and Retry Approach (EMEHRA). The EMRR and EMEHRA had been developed by DCC as per obligations outlined in the 'Go Live' ETMAD. The consultation closed on 18 January 2023.
2. This document provides a DCC response to the industry comments received in response to the consultation and sets out the current position and next steps regarding the further re-designation of the 'Go Live' ETMAD. We have discussed the contents of this consultation response document with the Department for Energy Security and Net Zero (to be referred to as the Department throughout this document) and this document is the submission to the Department as per DCC's obligations under SEC Section G11.6.
3. Under the ECoS Programme, a significant amount of work is ongoing to support testing of the new ECoS Party functionality ahead of ECoS Go Live. DCC is also continuing to assess the option whereby the Transitional Change of Supplier (TCoS) Certificate private keys are transferred to the ECoS Party. Further engagement with industry will take place in due course regarding this outstanding activity.
4. Through this conclusions document, and on behalf of the Department, DCC is seeking agreement from SEC Parties that the amendments to the SEC Subsidiary Documents as agreed in the consultation response document published on 9 February 2022<sup>1</sup>, shall be designated on 29 June 2023 or as soon as reasonably practicable within one month thereafter.

## 1.2. Background

5. The ECoS arrangements are changes to the process that DCC follows when a consumer changes Supplier Party and the new Supplier Party seeks to take over control of the Smart Meter and other Devices in the consumer premises.
6. When a gas or electricity consumer with a Smart Meter switches Supplier Party, the security information held on the Smart Meter needs to be changed so that it relates to the new Supplier Party and not the old one. The processes that are currently in place for managing the change of security information held on Smart Meters are referred to as the TCoS processes and they are administered by a part of the DCC Systems known as the "Change of Supplier Party" (CoS Party).
7. The existing TCoS processes were intended to be temporary. Changes to replace the existing TCoS arrangements with the enduring ECoS solution are underway. Following a direction issued by the Secretary of State under condition 13A of the DCC Licence, on 1 August 2019 the DCC published a consultation on its draft plan for its delivery of the ECoS arrangements.
8. In 2021, DCC undertook a replanning exercise, resulting in changes to the ECoS Joint Industry Plan (JIP) milestones being issued for consultation in January 2022. The outcome from this replanning exercise and subsequent consultation was a revised set of JIP milestones, including an ECoS Service Live Date of 29 June 2023.

<sup>1</sup> <https://www.smartdcc.co.uk/consultations/conclusions-on-the-sec-subsidiary-document-changes-required-for-the-enduring-change-of-supplier-ecos-arrangements-and-consultation-on-date-for-re-designation-of-certain-documents/>

## Development of SEC provisions

9. The introduction of the ECoS arrangements requires changes to the SEC main body as well as to several SEC Subsidiary Documents. The Department published a consultation document on changes to the SEC main body required for the ECoS arrangements on 1 April 2021. The Department's response to its consultation was published on 15 June 2021<sup>2</sup>. The SEC main body changes and the initial version of the ETMAD came into effect on 25 October 2021. The effect of the initial version of ETMAD was primarily to suspend these main body SEC changes prior to ECoS Live.
10. Additionally, in early 2022, DCC concluded a consultation on the SEC Subsidiary Document changes required for the ECoS arrangements. This covered changes to a number of SEC Appendices including the Service Request Processing Document, Threshold Anomaly Detection Procedures, DCC User Interface Specification, DCC User Interface Services Schedule and the Inventory, Enrolment and Decommissioning Procedures. This consultation ran from 24 September 2021 to 5 November 2021 and DCC published its conclusions document on 9 February 2022.
11. Finally, DCC issued the draft 'Go Live' ETMAD for industry consultation on 11 April 2022 and subsequently published a consultation response document<sup>3</sup>. A response document, rather than a conclusions document was published, on the basis that further work needed to be undertaken as a result of industry feedback to that consultation. The updated 'Go Live' ETMAD document that was more recently issued for consultation made changes to the 'Go Live' ETMAD that DCC initially consulted on in early 2022. These changes were based on responses to the initial consultation on the 'Go Live' ETMAD, discussions with the Department and further work that has subsequently been undertaken by DCC, including the development of the EMRR and EMEHRA.
12. Based on the conclusions from this consultation, the 'Go Live' version of the ETMAD will be re-designated to take effect at the commencement of the ECoS Migration. The 'Go Live' ETMAD will be used to control the process of transition and migration to the new ECoS arrangements and will:
  - a) cease the suspension of the ECoS main body changes that have been introduced into the SEC;
  - b) set out the arrangements whereby 'Update Security Credentials (CoS)' Service Requests (SRV 6.23) are processed differently by DCC depending on whether the target Device holds Device Security Credentials that are ECoS related or TCoS related;
  - c) introduce the EMRR and EMEHRA documents, including details of the ongoing maintenance requirements; and
  - d) deal with other migration related matters.
13. The re-designation of SEC Subsidiary Documents to support the new ECoS arrangements (including the 'Go Live' ETMAD) is due to take place at the new ECoS Service Go Live Date of 29 June 2023, which marks the point at which TCoS to ECoS migration can legally commence. This is also the point where the EMRR and EMEHRA will become effective.

## 2. Summary of Consultation Responses

### 2.1. Consultation questions asked in the consultation

<sup>2</sup> <https://smartenergycodecompany.co.uk/latest-news/beis-consultation-response-on-changes-to-the-sec-for-the-ecos-and-certain-security-provisions-and-direction-to-re-designate-the-smki-interface-design-specification/>

<sup>3</sup> <https://www.smartdcc.co.uk/consultations/response-to-the-dcc-consultation-on-the-draft-go-live-version-of-the-ecos-transition-and-migration-approach-document-etmad-sec-appendix-as/>

14. Within its consultation document, DCC asked industry to consider seven questions, as set out below.

Q1	Do you agree with the additional changes proposed to the 'Go Live' ETMAD? Please indicate any areas of disagreement and the reasons for them.
Q2	Do you agree with the proposed scope of the EMRR and the content of the reports defined? Please indicate any areas of disagreement and the reasons for them.
Q3	Do you agree with the approach proposed regarding reporting relating to Gas Proxy Function Devices as set out in paragraph 25 of this document?
Q4	Do you believe any additional reporting is required that is not currently specified within the EMRR? Please provide details of the required reporting and the rationale for inclusion.
Q5	Do you agree with the proposed content of the EMEHRA? Please indicate any areas of disagreement and the reasons for them.
Q6	Do you have any further comments to make regarding the Go Live ETMAD, EMRR or EMEHRA documents?
Q7	Do you agree that the accompanying version of ETMAD should be re-designated at the ECoS Service Live Date (29 June 2023), or as soon as practicable within one month thereafter?

15. In total, eight organisations (comprised of Meter Asset Providers, Energy Suppliers and Communications Service Providers) responded, providing direct responses to some, or all the questions. A summary of responses to the consultation questions and the DCC conclusions are provided below.

## 2.2. Question 1 – Consultation response summary

Question 1	Do you agree with the additional changes proposed to the 'Go Live' ETMAD? Please indicate any areas of disagreement and the reasons for them.
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16. All respondents expressed broad support for the proposed changes to the 'Go Live' ETMAD, with specific reference to the inclusion of reporting to Meter Asset Providers and removal of the requirement on Supplier Parties to cease installation of TCoS Devices on a particular date. A few areas of disagreement to specific clauses were raised in some responses and DCC's response is provided in the following paragraphs.
17. One respondent highlighted concerns regarding the liabilities in clause 3.8, stating that as DCC holds the contractual relationship with DCC Service Providers responsible for delivering ECoS Migration, DCC should be responsible for liabilities associated with Device failures caused directly by ECoS Migration. In response to this comment, DCC recognises that it is responsible for ensuring that DCC Service Providers carry out ECoS Migration in accordance with the terms of

the ETMAD, which has been developed by DCC and the Department in consultation with industry. However, if DCC carries out ECoS Migration in accordance with the ETMAD and a Device failure (such as loss of data or loss of functionality) occurs despite DCC having complied with the ETMAD (and Good Industry Practice), then liability for Device failure would be limited as per the terms in the ETMAD.

18. The same respondent also raised concerns regarding the provisions in clause 3.10, stating that DCC should be liable for Non-Migratable Device Models where the issue is solely the result of defective DCC Communications Hubs. In reviewing this response, DCC acknowledges a lack of clarity in the drafting which did not reflect the intent of the clause. We have therefore agreed revised drafting with the Department at a working level, which states:
- “Save for in respect of the Gas Proxy Function Device Model as set out in Clause 1.11 or where explicitly provided in this ETMAD, the DCC shall have no obligation or liability in respect of the ECoS Migration of any Device:
- (a) with a Device Model that is categorised as Non-Migratable); and/or
  - (b) which is deemed to be Ineligible for ECoS Migration until or unless the issue which made the Device Ineligible for ECoS Migration is subsequently resolved and / or no longer applies, such that the Device is no longer Ineligible for ECoS Migration.”
19. A further concern was raised regarding the criteria for determining whether a Device is eligible / ineligible for ECoS Migration, stating that Supplier Parties need certainty of the criteria. DCC acknowledges the concern highlighted. However, DCC does not consider it is appropriate for the criteria to be set out within the ETMAD itself. Clause 2.1.3 of the EMEHRA defines a list of possible criteria that may be applied to support selection of Devices for ECoS Migration. This approach allows flexibility for DCC to manage the ECoS Migration in the most cost-effective manner. Where DCC identifies a Device that is ineligible for ECoS Migration and the issue cannot be resolved by DCC or its Service Providers, the Responsible Supplier will be informed through business-as-usual discussions with the Responsible Supplier.
20. This respondent also requested that a list of Devices and Communications Hub Device Models functionally capable of ECoS Migration should be provided by DCC. DCC does not consider that a list of ‘migratable’ Device Models should be published. ECoS Migration is based on a standard GBCS command, with the assumption that all Device Models should be capable of processing this command. The approach that we have discussed and agreed with the Department at a working level, is therefore to publish a list of Non-Migratable Device Models where exceptions are identified with specific Device Models that cannot process the certificate replacement command. To support this rationale, DCC undertook proving activities using TCoS to TCoS certificate replacement during 2022 and did not identify any Device Models that were not capable of certificate replacement. In addition, Supplier Parties can ask Manufacturers for feedback and thus far, no Supplier Party or manufacturer has called out any concern that a Device Model cannot support migration.
21. Another respondent raised a number of questions regarding specific clauses in the updated ‘Go Live’ ETMAD. These have been summarised below, together with DCC’s response:
- a. Clause 1.12 – the respondent requested clarity on where the list of Non-Migratable Devices will be published. DCC can confirm that this list will be published on the SECAS website, under the ‘products and reporting’ tab. An initial list has been published based on the feedback received to date. There are currently no Device Models categorised as Non-Migratable, therefore this list is empty.
  - b. Clause 1.13 – the respondent requested clarity on where and how the Department appeals process would be documented. DCC has discussed this question with the Department, and they have confirmed that any party wishing to appeal a decision relating to the categorisation of a Device Model as Non-Migratable should do so in the first instance by

sending an email to the Secretary of State specifying the Device Model in question and the rationale for appealing the categorisation decision or raising their concerns via an industry governance meeting.

- c. Clause 1.15 and 1.16 – the respondent raised concerns with the requirement on Supplier Parties to prioritise the installation and commissioning of TCoS Devices over ECoS Devices on the basis that there are no indicators on individual Devices to identify whether they hold ECoS or TCoS Certificates. DCC recognises the challenges associated with this requirement. This was a topic discussed at the Technical and Business and Design Group (TBDG) in December 2022 and as was discussed, DCC does not consider it is appropriate or cost effective to include markings on ECoS Devices associated with Communications Hubs or to require that markings are included on other types of Device. When Communications Hubs are shipped, DCC provides an Advanced Shipping Notification (ASN) file. This file includes the manufacturing date of the Communications Hubs being shipped. DCC believes that Suppliers Parties should be able to prioritise installation and commissioning of TCoS Devices ahead of ECoS Devices by ensuring that they prioritise on the basis of manufacturing date. When DCC switches manufacturing of Communications Hubs from TCoS to ECoS, we plan to make available to Supplier Parties a record as to when each product line was changed. This record may be used, in conjunction with the Manufacturing Date supplied in the ASN, in order to distinguish TCoS Communications Hubs from ECoS Communications Hubs within stock. However, we do recognise the difficulties highlighted by Supplier Parties in managing stock once it has left the warehouse. Therefore, we are proposing an amendment to Clause 1.15 of the Go Live ETMAD that introduces the caveat that Supplier Parties are required to take ‘all reasonable steps’ to meet this obligation. We note that this would align to the existing provisions in Clause 8.3 of SEC Appendix H ‘CH Handover Support Materials’ to take all reasonable steps to install Communications Hubs from stock on a first in first out basis.
  - d. Clause 3.3 – the respondent queried why there are clauses in this section which are numbered 8.x. DCC has reviewed this clause and can confirm that Clause 3.5 (b) includes provisions which should replace clause 8 of the SEC Appendix AB (Service Request Processing Document). The references to clauses beginning with 8.x show the revised drafting for this replacement clause 8 of SEC Appendix AB.
  - e. Clause 4.4 – the respondent queried whether it was correct to reference the EMRR being updated on the website or whether this should reference SharePoint. DCC can confirm that the approved EMRR document containing the report definitions will be published on the SECAS website. The reports themselves will be shared with Supplier Parties via SharePoint.
  - f. Clause 5.1 – the respondent requested clarity on the process that they should follow if they are requested to provide data under this clause and do not believe the request is reasonable. DCC notes that this is an existing ETMAD clause, not specifically being introduced as part of the Go Live ETMAD. Should any Supplier Party believe a request is not reasonable, in the first instance they may raise this with the Department by sending an email to the Secretary of State or raising their concerns via an industry governance meeting. If multiple disputes are being raised post ECoS Go Live, a Supplier Party could raise a change to the ETMAD via the standard SEC Modification Process to introduce a process for managing disputes. However, this is not currently deemed necessary.
22. A revised version of the ‘Go Live’ ETMAD has been agreed with the Department at a working level and is available as Attachment 1, published alongside this response document. The agreed changes reflect the revision to clause 3.10 explained in paragraph 18 above and also introduces a new defined term for Gas Proxy Function Device Model; and a minor cross-referencing error identified in the definition of Bulk Migration.

## 2.3. Question 2 – Consultation response summary

### Question 2

Do you agree with the proposed scope of the EMRR and the content of the reports defined? Please indicate any areas of disagreement and the reasons for them.

23. All respondents expressed broad support for the proposed scope of the EMRR, with specific reference to the inclusion of reporting to Meter Asset Providers. Two key challenges were raised by Supplier Parties:
- a. Whether reports regarding failed ECoS Migration need to be provided on a 6 hourly basis; and
  - b. Whether reporting is available to provide Supplier Parties with information on the Devices left to migrate.
24. In response to these comments, DCC is proposing further changes to the EMRR. We agree the position raised by respondents regarding 6 hourly reports and confirm that there is no obligation on parties to monitor reports on a 24/7 basis. Therefore, we are proposing to amend the frequency of 6 hourly reports and instead issue these on a daily basis. In terms of reporting Devices left to migrate, we are proposing the addition of a new monthly summary report (included as report ECOSMIG-007 as defined in Appendix A of this document) which will include the number of Devices that have been migrated; those that have failed migration; the number of Devices installed with ECoS Certificates and the number of Devices remaining with TCoS Certificates and the number of Devices which are of a Non-Migratable Device Model. Based on the proximity of the ECoS Go Live date, this report will not be available until after Go Live and therefore hasn't been included in this version of the EMRR. An updated version of the EMRR will be provided once this additional report has been developed. As this report is being delivered as a result of the EMRR consultation, and the contents are defined in Appendix A of this response document, we intend to follow the process defined in Clause 4.4 of the ETMAD i.e. we do not believe this additional report will have a material effect on the rights and obligations of Parties.
25. In addition to the points outlined in the preceding paragraphs the following comments were raised:
- a. One respondent questioned how Supplier Parties will know if a report is missing, suggesting that an empty report or a null response via email might be useful. DCC has considered this proposal and we do not consider the sending of empty reports to be an efficient approach. In addition, there is no mechanism for sending information via email as reporting is managed through SharePoint. We note that weekly reconciliation reports will always be issued (even if there are zero migrations) allowing Supplier Parties to identify missing data.
  - b. Minor comments were raised regarding the format of the 'ECoS Status' data item, suggesting that this should have a maximum length of 9 to accommodate the enumeration 'Installed'. DCC agrees that this change is required. This has been reflected in the updated EMRR.
  - c. Two respondents queried whether the Nominated Contact List would be used for sending ECoS Migration reports. DCC can confirm that the existing 'Reporting' contact within the Nominated Contacts List will be used for ECoS Migration reporting. The existing process for updating the contacts will also apply.
26. A revised version of the EMRR has been agreed with the Department at a working level and is available as Attachment 2, published alongside this response document. The agreed changes reflect the revision to reporting requirements explained in paragraph 24 and 25(b) above.



## 2.4. Question 3 – Consultation response summary

### Question 3

Do you agree with the approach proposed regarding reporting relating to Gas Proxy Function Devices as set out in paragraph 25 of this document?

27. The majority of respondents agreed with the proposed approach regarding reporting relating to Gas Proxy Function Device Models. Two Supplier Parties raised concerns with the position that the Electricity Supplier would receive reporting where no Gas Smart Metering Equipment (GSME) is connected to the Communications Hub. One respondent was seeking clarity on the action to be taken by the Electricity Supplier in this circumstance and the other suggested that the reports should also be sent to the registered Gas Supplier associated with the Metering Point as many GSMEs are installed but not connected due to issues with the Communications Hub.
28. DCC understands the concern raised by these respondents; however, the approach set out within the EMRR and ETMAD aligns with existing operational reporting activities with responsibilities for resolution of issues aligned to the existing arrangements for managing issues with Communications Hubs. From a SEC perspective, the registered Gas Supplier does not have any obligations in relation to the Gas Proxy Function before the GSME has been commissioned.

## 2.5. Question 4 – Consultation response summary

### Question 4

Do you believe any additional reporting is required that is not currently specified within the EMRR? Please provide details of the required reporting and the rationale for inclusion.

29. One respondent requested that there should be a weekly report with a cumulative list of successful and unsuccessful ECoS migrations. DCC has considered this response and does not believe this report is required. We are applying the same principle as for SMETS1 i.e. data is only provided once. We believe Supplier Parties already have access to the required data within reports ECOSMIG-001 and ECOSMIG-002 with summary counts provided in report ECOSMIG-005 for reconciliation purposes. As set out in response to question 2, we intend to introduce a new monthly report after Go Live providing the number of Devices with TCoS and ECoS Certificates (see Appendix A).
30. This respondent also asked DCC to confirm that the convention used to report Device Type, Device Model, Manufacturer, and Firmware is consistent to all other DCC reporting e.g., RSMI002 report. In response to this query, we can confirm that the EMRR convention will be consistent with other reporting.

## 2.6. Question 5 – Consultation response summary

### Question 5

Do you agree with the proposed content of the EMEHRA? Please indicate any areas of disagreement and the reasons for them.

31. Respondents were broadly supportive of the proposed content of the EMEHRA. The following specific comments / queries were made:
- a. One respondent requested clarity on the approach to ECoS Migration, where a firmware upgrade is required. DCC can confirm that the EMEHRA only explicitly references a firmware upgrade as a potential course of action if it's determined that the Device Model is Non-Migratable and where the Device manufacturer recommends a firmware upgrade to resolve the underlying issue. In this scenario we would not make further attempts until the firmware has been upgraded. DCC will be aware when the upgrade has taken place and it will then become eligible for migration and a further attempt initiated. Similarly, a Supplier Party may choose to upgrade the firmware to support resolution of other ECoS Migration failures and this will be captured through subsequent migration attempts.  
  
If the firmware upgrade cannot be completed within the ECoS migration period, the Device will retain its TCoS Certificates. We are aware of concerns regarding stranded Devices in this situation which is why DCC is investigating the risk mitigation option of transferring the TCoS private keys to the ECoS Party.
  - b. Another respondent highlighted a concern regarding NP005 which sets out a potential criterion to be applied to the selection of Devices for ECoS Migration. This criterion suggests Devices will not be selected where the Device has not communicated in the last 'x' days. DCC recognises the concern raised, that there are examples where the DCC has not been able to communicate with their Communications Hubs but the Responsible Suppliers is receiving daily reads from meters that are on the Home Area Network (HAN) of that hub. We agree that non communicating Devices should not be excluded from ECoS Migration and therefore whilst this check is part of the defined functionality within the Device Candidate Selection Engine (DCSE), we do not currently expect this configurable check to be used in such a way as to exclude Devices permanently from selection. We will therefore seek to ensure that all such Devices have at least one ECoS Migration attempt.
  - c. A further respondent questioned whether the Supplier Party would be informed where an incident is raised as a result of an 'auto stop' being triggered (clause 2.5.2). DCC can confirm that this incident would be internal to DCC and its Service Providers. Impacted Supplier Parties would only be notified if the issue was linked to a high priority incident under business-as-usual processes.
  - d. This respondent also requested clarity on clause 3.2.2 where a Device is deemed to be ineligible for ECoS Migration. DCC notes that this section of the EMEHRA explains the steps that will be taken where the various issues are encountered, with their associated error codes. If the outcome is that DCC is not able to make further attempts, the Responsible Supplier will be informed through business as usual discussions to allow them to determine next steps
  - e. The same respondent also requested clarity on clauses 6.1.2 and 6.2 and why resolution of issues identified in these clauses are the responsibility of the Supplier Party. In response to the query, DCC's position is that the errors identified in clauses 6.1.2 & 6.2 relate to technical issues with the Device and would result in the Device being non-compliant with the SEC e.g. the standard GBCS command cannot be processed. Responsibility for resolving technical issues with Devices (excluding Communications Hubs) therefore sits with the Responsible Supplier.
32. A revised version of the EMEHRA has been agreed with the Department at a working level and is available as Attachment 3, published alongside this response document. The agreed changes reflect minor revisions to clarify the criteria for selecting Devices as explained in paragraph 31(b) above and to confirm that Supplier Parties will be informed where DCC investigation into an issue concludes that the Device cannot be migrated as explained in 31(d). Minor changes have also been made to the information that will be published within the list of Non-Migratable Device Models.

## 2.7. Question 6 – Consultation response summary

### Question 6

Do you have any further comments to make regarding the Go Live ETMAD, EMRR or EMEHRA documents?

33. A few specific points were raised by respondents. Some of these related to items already covered in other sections of this document and have therefore not been repeated. New comments raised are as follows:
- a. One respondent requested further clarity on when a decision to transfer TCoS Party private keys will be taken. DCC recognises this is an area where parties are keen to understand the approach; however, we are not currently in a position to provide firm dates for the conclusion of this work. Updates on this area of work will continue to be provided through the relevant SEC governance groups, e.g. TBDG.
  - b. Another respondent highlighted that once the private keys transfer process has been agreed, this should be documented within the ETMAD or an equivalent document. As stated above, DCC continues to consider the option to transfer the TCoS Party private keys. This includes consideration of any changes required to the ETMAD or other SEC documentation.
  - c. One respondent stated that it is unclear whether the Smart Meter Inventory will be updated to hold migration information. DCC can confirm that the Smart Meter Inventory will show whether the Device contains a TCoS or ECoS Certificate but will not contain information on failed migrations.

## 2.8. Question 7 – Consultation response summary

### Question 7

Do you agree that the accompanying version of ETMAD should be re-designated at the ECoS Service Live Date (29 June 2023), or as soon as practicable within one month thereafter?

34. All respondents agreed that the accompanying version of the 'Go Live' ETMAD should be re-designated at the ECoS Service Live Date (29 June 2023), or as soon as practicable within one month thereafter. One respondent caveated their response, noting that this should be done once the comments from the consultation have been addressed. Another respondent stated that re-designation should take place sooner, if required.

## 3. Next Steps

35. In parallel with the publication of this document, DCC has provided a summary of responses to the Department. As outlined in the executive summary, DCC has also discussed the current position regarding the re-designation of the 'Go Live' ETMAD with the Department and provided an updated version of the 'Go Live' ETMAD in accordance with Section G11.6(c) of the SEC .
36. As part of the development of the 'Go Live' ETMAD, DCC has considered the requirements in relation to SEC Section G11.7 and potential impacts on the End-to-End Security Architecture or the risks identified in the Security Risk Assessment. Whilst we do not anticipate any security

issues relating to the ETMAD, this clause in the SEC will be captured for consideration as part of the overall ECoS Live Service Criteria.

37. It is therefore DCC's view that the 'Go Live' ETMAD included as Attachment 1 should be re-designated at the ECoS Service Live Date (29 June 2023) alongside the wider changes to other SEC Subsidiary Documents previously issued for consultation in September 2021. In addition, the EMRR and EMEHRA documents included as Attachments 2 and 3 should be baselined and published alongside the 'Go Live' ETMAD.

#### New question for Parties

Overall, do you agree that the amended version of the Service Request Processing Document, Threshold Anomaly Detection Procedures, DCC User Interface Specification, DCC User Interface Services Schedule and the Inventory, Enrolment and Decommissioning Procedures as outlined in the conclusions document published on 9 February 2022 should be re-designated on 29 June 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter)? If you do not, please indicate any areas of disagreement and the reasons for them. DCC will forward these responses to the Department. Please provide responses by 16:00 on Thursday 27 April 2023 to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).

## Appendix A: Proposed New Summary Report

### ECOSMIG-007 - Summary Report: ECoS Total Counts

The report is provided to inform Responsible Supplier of the total number of Devices that have been migrated from the beginning of migration, the number of migration failed attempts, the number of Devices installed with ECoS Certificates, the number of Devices remaining with TCoS Certificates and number of Devices of a Device Model categorised as Non Migratable.

Note that an ECoS Migration can start several times for the same Device, and thus the total numbers of successfully migrated and total number of failures reported here may be greater than the total number of Devices eligible to be migrated.

Frequency	Delivered to	Reporting End Period	Trigger
Monthly on the 1st of every month 06:00 UTC	Responsible Supplier	23:59:59 Last day of the previous month	Time based

#### Header record:

Data element	Mandatory/Optional	Field Type and format	Max Length
Record type ('00')	M	Text	2

Report Identifier (‘ECOSMIG-007’)	M	Text	11
Report Recipient (Responsible Supplier SEC Party ID)	M	Text	6
Report Sequence Number	M	Integer	6
Report Title	M	Text	100
Report Creation DateTime	M	DateTime (YYYYMMDDThhmmss)	15
Report Applicable Start DateTime	M	DateTime (YYYYMMDDThhmmss)	15
Report Applicable End DateTime	M	DateTime (YYYYMMDDThhmmss)	15
DCC Classification (‘DCC Controlled’)	M	Text	14

### **Detail record**

Exactly one detail record is supplied including total numbers with:

- Cumulative counts reported as Quantity of Migrations Successfully Completed and Quantity of Failed Migration Attempts in ECoSMIG-005
- Cumulative count of ECoS Installed Devices reported in ECoSMIG-006
- Total Number of remaining for ECoS Migration Devices with known TCoS Credentials
- Number of Devices of a Device Model categorised as Non Migratable reported in ECoSMIG-004

Data element	Mandatory/ Optional	Field Type and format	Max Length
Record type (‘10’)	M	Text	2

Total Number of Migrations Successfully Completed	M	Integer	9
Total Number of Failed Migration Attempts	M	Integer	9
Total Number of ECoS Installed Devices	M	Integer	9
Total Number of remaining TCoS Devices	M	Integer	9
Total Number of Non-Migratable Devices	M	Integer	9

**Trailer record:**

Data element	Mandatory/ Optional	Field Type and format	Max Length
Record type ('99')	M	Text	2
Rows Count	M	Integer	6
DCC Classification ('DCC Controlled')	M	Text	14