

## SMETS1 Consultation - Migration DUST Closure for FOC (NP)

A SMETS1 consultation on proposals by DCC to end the provision of Migration DUST for the FOC (NP) cohort (where GroupID = "EB").

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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 a detailed approach for migrating SMETS1 Installations into DCC's systems.

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 latest version of the SEC was published on 1 August 2022 as v63.0.

This consultation covers changes to the MTAD.

In the context of SMETS1, it is important to note that this consultation distinguishes between aspects of the FOC cohort as some of the detailed arrangements differ and these are described as:

- FOC (BG) where GroupID = "EA"; and
- FOC (NP) where GroupID = "EB".

This consultation proposes the closure of the Migration DUST testing service solely in respect of the FOC (NP) cohort.

## 2. Closure of Migration DUST for FOC (NP) (where GroupID = "EB")

The Various 2 conclusion<sup>1</sup> provided for the closure of Migration DUST for the IOC and MOC (MDS) cohorts via an amendment to the MTAD. This consultation now proposes that Migration DUST is closed for the FOC (NP) cohort via a further amendment to Table 17.6 in the MTAD.

The existing SMETS1 SVTAD, requires DCC to provide Migration DUST consistent with the details set out in the MTAD. Migration DUST is an element of the suite of Testing Services provided by DCC. Migration DUST allows a Testing Participant to test the interactions between their own solution and the systems and processes used by DCC to Migrate Active and Mixed SMETS1 Installations.

Migration DUST is a relatively expensive Testing Service with little routine utilisation as Migration is an activity that doesn't need additional testing where there is no new Migration product development envisaged, unlike the broader DUST. Migrations are now nearing completion for the FOC (NP) cohort, with consultation for closure of the relevant Requesting Party also expected later this year. A limited number of additional entries on the EPCL are planned for this cohort ahead of Requesting Party closure (to allow for a limited number of additional Migrations) but DCC does not consider this is a factor that should delay closure of Migration DUST for this cohort.

Also, DCC has no further changes to the Migration solution planned as a result of any unblocking proposals for this cohort. Thus, DCC is proposing to close the Migration DUST service for this cohort as it is expensive to maintain and therefore not economically efficient. Generally, the number of Testing Participants wishing to perform Migration DUST has dropped significantly

<sup>1</sup> <https://www.smartdcc.co.uk/consultations/snets1-conclusion-various-2/>

compared to when it was first introduced. DCC has discussed the closure of Migration DUST with the only Responsible Supplier operating Active Meters for FOC (NP) who has confirmed that it has no further demand for Migration DUST for the FOC (NP) cohort.

In the case of FOC (NP), DCC is proposing that the end date for Migration DUST is set in the MTAD at Friday 30 September 2022 (captured in an amendment to Table 17.6 in the MTAD) as this aligned to existing commercial commitment to procure the service and thus there are no efficiency savings from closing earlier. This date may slip by up to one month if there are delays in concluding this consultation, noting that any such delay would require DCC to re-contract for these services.

There is a very unlikely edge case whereby a need for further testing via Migration DUST for FOC (NP) arises following a termination date for it being specified in the MTAD. This requirement could only arise from the sole Responsible Supplier operating Active Meters for FOC (NP) who has already confirmed they have no demand for such testing service. Nevertheless, should such an edge case arise, the cost of either continuing, or re-providing Migration DUST for the cohort would be considered against the likely value to be derived from it. DCC considers that it would be likely to be economically inefficient, as in order for Migration DUST to be re-started for FOC (NP), DCC would need to do the following:

- undergo an expensive re-procurement exercise for the provision of the service; and
- consult on a further amendment to the MTAD to expand the scope of Migration DUST.

Nonetheless, in the unlikely event that such edge case arose, a SEC Modification would need to be raised by the party seeking the service requiring DCC to provide the service again.

As previously explained in the Initial Closure Consultation<sup>2</sup>, Testing Participants should note that once the Migration DUST service for a cohort has ended then the ability to enrol (Migrate) new test devices in respect of that cohort for other Testing Services in User Interface Testing (UIT) environments such as Device and User System Testing (DUST) and User Entry Process Testing (UEPT) would cease. This is because the ability to enrol new SMETS1 devices into the UIT environment is linked commercially to the provision of the Migration DUST service for each cohort. The prior consultation also explained that ceasing to have a mechanism to migrate new devices sets into the UIT environments could limit DCC's ability to support other Testing Services as described in Section H14 of the SEC. Consistent with the approach for IOC and MOC (MDS), to mitigate this DCC are currently migrating all of DCC's remaining SMETS1 test stock for FOC (NP) into DCC's UIT environments to ensure the maximum number of usable devices for Testing Participants is maintained post closure of Migration DUST. DCC envisages a similar activity will take place for the remaining cohorts in due course.

#### MDUST Close FOC (NP) Q1

Do you agree with DCC's proposals to close Migration DUST for FOC (NP) from Sunday 30 September 2022 (or within one month thereafter) 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. Next Steps

DCC is proposing to modify the MTAD regarding the partial closure of Migration DUST using the procedure set out in Clause 4.2 of the SMETS1 SVTAD. The provisions in the SMETS1 SVTAD allow DCC to modify the MTAD directly following stakeholder consultation / provision of a

<sup>2</sup> <https://www.smartdcc.co.uk/consultations/smetics1-consultation-initial-closure-matters/>

conclusion report to the Secretary of State. DCC can then amend the MTAD so long as the Secretary of State does not direct DCC otherwise.

Following this consultation, DCC will ensure it builds in sufficient time for BEIS to take a view on the merit of the changes to the MTAD, providing first a summary of responses received and detail on how DCC have addressed any concerns raised.

DCC expects to issue its conclusion to this consultation, along with any necessary amendments to the MTAD on or before 16 September 2022. Unless the Secretary of State directs otherwise, DCC proposes to modify the MTAD through the draft direction at Attachment 1, on 23 September 2022 (or, if necessary, as soon as reasonably practicable within one month thereafter).

#### MDUST Close FOC (NP) Q2

Do you agree with the proposed modification date of 23 September 2022 (or within one month thereafter) for the changes to the MTAD?

## 4. How to Respond

Please provide responses in the attached template by 16:00 on 2 September 2022 to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk). This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

Consultation responses may be published on our website [www.smartdcc.co.uk](http://www.smartdcc.co.uk). Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation, please contact DCC via [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).

## 5. Attachments

Attachment / Title
1. Draft Modification Text on MTAD
2. Response Template - Migration DUST Closure for FOC (NP)
3. MTAD 3.FOCNP Draft Redlined

Table 1 – Attachments

## Attachment 1

This attachment contains the text that DCC plans to use for direction of changes to the MTAD.

### **MTAD Draft Modification Text**

*Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.*

*Pursuant to Clause 4.2 of Appendix AK of the SEC (the SEC Variation Testing Approach Document for SMETS1 Services), DCC directs that, with effect from [DD MM YYYY], the Migration Test Approach Document is hereby modified in the form set out in Annex [TBC] of this direction.*

*For the avoidance of doubt such modification of the Migration Test Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this first being established, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).*

*This direction is also being notified to the SEC Administrator.*