

SMETS1 Conclusions Closure 2 – Part D IOC Closure

A SMETS1 conclusion on proposals by DCC to end Migrations for the IOC cohort.

Filename: CON_2D_IOC_SMETS1_Conclusion_Closure2_v008

Date: 5 April 2023

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Classification: DCC Public

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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.

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). This document set out DCC's conclusion on the proposal to cease Migrations for the IOC cohort in accordance with the TMAD.

The Closure 2 Consultation² was issued on 16 December 2022 with responses due by noon on 10 February 2023. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD. DCC will have concluded on the Closure 2 matters in four parts:

- the Closure 2 Part A Conclusion³ covering the TMAD amendment for partial Migration was published on 15 February 2023 and the TMAD was re-designated⁴ by the Secretary of State on 21 February 2023;
- the Closure 2 Part B Conclusion⁵ covering the remaining TMAD changes was submitted to the Secretary of State on 15 March 2023 and the TMAD is expected to be re-designated by the Secretary of State no later than 21 March 2023;
- the Closure 2 Part C Conclusion⁶ covering the Requesting Party (RP) closure for the FOC (NP) cohort was submitted to the Secretary of State 16 March 2023; and
- this Closure 2 Part D Conclusion covers the RP closure for the IOC cohort.

This document sets out that the current planned date for RP closure for the IOC cohort is Sunday 28 May 2023 but this is subject to formal approval by the Secretary of State.

2. Stakeholder Engagement

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

2.1. Questions

The consultation set out eleven questions across a range of topics. This Part D Conclusion only provides a response to Closure 2 Q9 (covering the proposed closure of the IOC cohort). All the other questions were previously covered by the separate conclusions. Table 1 below details this question as presented in the public consultation.

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

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

³ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-a/>

⁴ <https://smartenergycodecompany.co.uk/latest-news/sec-v68-0-implemented-to-support-the-dcc-smets1-service/>

⁵ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-b/>

⁶ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-c/>

Number	Question
Closure 2 Q9	For the IOC cohort, do you agree with DCC's draft RP Decommissioning Timetable document that sets out the proposed date for the Requesting Party for the IOC cohort to be decommissioned to be Sunday 26 March 2023 (or alternatively Sunday 30 April 2023 or Sunday 28 May 2023)? For the IOC cohort, do you have any detailed comments on the draft RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.

Table 1 – Consultation Questions – Closure 2 – Part D Conclusion

2.2. Responses

Stakeholders were invited to respond to the consultation by noon on Friday 10 February 2023 using the response template⁷ that was provided.

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

One respondent only provided a few comments and did not provide an explicit response to any of the questions. This respondent expressed broad support for the proposals outlined in the consultation document.

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

2.3. Analysis of Responses

The following section provides an analysis of responses for Closure 2 Q9, which DCC subject matter experts have reviewed, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement.

3. Ending Migrations in the IOC Cohort (Closure 2 Q9)

Consistent with Clause 7 of the TMAD, DCC sought views on a proposal to close the Requesting Party service for the IOC cohort from 26 March 2023. These changes were covered by the following question: ***“For the IOC cohort, do you agree with DCC's draft RP Decommissioning Timetable document that sets out the proposed date for the Requesting Party for the IOC cohort to be decommissioned to be Sunday 26 March 2023 (or alternatively Sunday 30 April 2023 or Sunday 28 May 2023)? For the IOC cohort, do you have any detailed comments on the draft RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.”***

3.1. Respondents' Comments / DCC Analysis / Clarifications

Seven respondents provided a response to this question with six expressing broad support.

Three respondents expressed support without further comment.

One respondent expressed caveated support; stressing the importance that all actions have been taken by DCC to validate data and exhaust attempts to Migrate or else exclude. This respondent also noted the importance of DCC informing impacted Energy Suppliers of the final SMETS1 Installations which cannot be enrolled. DCC accepts these points.

⁷ <https://www.smartdcc.co.uk/media/Oldfs5ok/smets1-consultation-closure-2-response-template-v2.docx>

One respondent expressed support stating that the IOC cohort should be closed as soon as possible.

One supportive respondent believes that the closure for the IOC cohort should be expedited by DCC to minimise DCC costs that are passed through to energy consumers.

One respondent objected to the proposed closure of the IOC cohort on 26 March 2023. This respondent expressed the view that the timescales for closure of the IOC cohort are inadequate. They continue to have concerns as they are not able to assess how many of their devices are in an unknown enrolment state and thus the level of risk they face. The respondent stated that, while DCC's delivery of SEC Modification 181⁸ (MAP Reporting) will allow Meter Asset Providers (MAPs) from February to access data to identify which of their devices have been enrolled and thus are not in an unknown enrolment state, MAPs cannot currently access such data. DCC can confirm that SEC Modification 181 has been implemented and the first reports to MAPs issued on 15 February 2023. Further details are available by contacting dccopsreporting@smartdcc.co.uk. This respondent stated that, on the basis that the earliest it expected to have access to the data was late February, the earliest that the IOC cohort should close is the end of May 2023, and that a further delay (in closing the IOC cohort) may be needed if this data revealed a wider issue.

DCC discussed these concerns with this respondent and sought to reassure the respondent that it was prudent to close the IOC cohort as it was the economically efficient outcome based on DCC's assessment of the underlying evidence. Following these discussions, this respondent remained opposed to closure of the IOC cohort earlier than Sunday 28 May 2023. DCC can confirm that closure of the IOC cohort is now proposed for Sunday 28 May 2023.

3.2. Areas of Unresolved Disagreement

Whilst DCC sought to resolve matters with the one respondent that objected to the closure of the IOC cohort, there is potential for these objections to remain notwithstanding that the closure of the IOC cohort is now proposed for Sunday 28 May 2023. Nevertheless, DCC is recommending closure for the reason set out in Section 3.3 below.

3.3. Summary

Given the concerns raised regarding SMETS1 Meters in an unknown enrolment state, DCC considers it prudent to provide further clarification on this matter. The assumption is that such Meters fall within the Meter types prescribed by the Secretary of State's decision(s) on SMETS1 Meters within the scope of enrolment.

DCC's regulatory focus is attempting Migration of all Meters authorised for Migration, plus in the case of Dormant Meters, DCC is responsible for taking the steps to begin the Migration of the SMETS1 Installations (based on a deemed authorisation from the Responsible Supplier as set out in Clause 4.27 of TMAD). Dormant Meters are those with which the SMETS1 SMSO can remotely communicate via the SMETS1 communications hub and the Responsible Supplier doesn't have a relationship with the SMETS1 SMSO for services in respect of the Meter. In contrast, each Energy Supplier explicitly authorises the Migration of SMETS1 Installations of its Active meters (where the Energy Supplier has a relationship with the SMETS1 SMSO for services in respect of the Meter).

DCC will, as part of proposing a draft Decommissioning Timetable (for the IOC cohort) to the Department for approval, provide a statement that it anticipates that no Dormant

⁸ <https://smartenergycodecompany.co.uk/modifications/meter-asset-provider-and-device-manufacturer-access-to-asset-related-data-held-by-the-dcc/>

Meters will remain on the SMETS1 SMSO that have not been processed (i.e. either Migrated or will fall into a Excluded Category) by the proposed RP Decommissioning Date. Of those Meters which are not registered on SMETS1 SMSO systems, DCC considers that, even where these exist and are/can become SMETS1 compliant, it is not in consumers best interest for Migration services to be maintained. This is based on the following assessment.

If these Meters do exist then, as set out in the Closure 2 Consultation, in all circumstances a site visit would be needed to register and commission them (in the SMETS1 SMSO systems) before they could begin their path to a Migration attempt. It is our understanding that Energy Suppliers would in most cases replace the SMETS1 assets with SMETS2+ Devices where a site visit is required. DCC has received no evidence in response to the Closure 2 Consultation that this assumption is incorrect. Additionally, for such unregistered SMETS1 Meters to become Dormant Meters, further investigation would be required by Energy Suppliers and/or the SMETS1 SMSO. This assessment would need to obtain various device information (hardware versions / firmware versions / IMSI / SIM / MAC addresses / serial numbers) to allow for:

1. registration on the SMETS1 SMSO;
2. registration on a communication service provider associated with the relevant SMETS1 SMSO; and
3. commissioning on the SMETS1 SMSO.

The required site visit could also verify what equipment is present if other data sources do not provide the necessary information. The first step of the site visit would be to reboot / commission the communications hub which requires technical input by an appropriate engineer on site (and could not be undertaken by an end customer due to safety risks). This rebooting allows for the communications hub to attempt to initiate a connection with the mobile network and can't be done remotely. Following the successful commissioning of the communications hub, the SMETS1 meters (and in-house display) would be joined to the HAN by the engineer on-site as this can't be performed remotely for SMETS1 meters.

DCC understands that one Energy Supplier undertook a trial based on site visits to re-boot non-communicating communications hub (where the site was already registered with the SMETS1 SMSO). This trial didn't give rise to material successes and was discounted by the relevant Energy Supplier.

Additionally, the existing SMETS1 SMSO systems and processes only allow for devices to be registered by an Energy Supplier that has an agreement in place with the SMETS1 SMSO i.e. to become Active Meters where the Energy Supplier is procuring the SMETS1 SMSO service. Thus, the responsible Energy Supplier would need to put in place arrangements with the SMETS1 SMSO to register such currently unregistered SMETS1 Meters. Alternatively process and system development would be required within the SMETS1 SMSO to allow DCC (on behalf of the Energy Supplier) to register such currently unregistered SMETS1 Meters. Regulatory changes (to the TMAD) would also be required to allow registration by DCC (on behalf of the Energy Supplier).

In addition to the aforementioned steps, for the IOC cohort, DCC will incur material additional costs in extending the Requesting Party service if a decision was made to delay closure to explore the scope for site visits to attempt to commission any unregistered SMETS1 meter. DCC also notes that two of the other respondents explicitly stated that DCC should promptly close the IOC cohort. One of these supportive respondents sought for DCC to minimise the costs that are passed through to energy consumers by expediting closure of the IOC cohort.

DCC also notes that this respondent's view differs from evidence collated from Energy Suppliers via the prior DCC led RFIs⁹ which indicates that no such unregistered SMETS1 Meters remain unaccounted for.

DCC concludes, for the reasons set out above, that it is appropriate to close the IOC cohort within the schedule set out in the consultation document i.e. on Sunday 28 May 2023.

DCC plans to recommend closure of the IOC cohort to the Secretary of State. DCC will make a formal proposal on the RP Decommissioning Timetable for the IOC cohort to the Secretary of State as set out in Section 5 below.

4. Conclusions

DCC intends to submit a draft RP Decommissioning Timetable for the IOC cohort 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 IOC cohort.

DCC is confident that the draft RP Decommissioning Timetable for the IOC cohort 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 the IOC cohort and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations in relation to closure of a Requesting Party capability. In relation to the proposal to decommission the Requesting Party for the IOC cohort, the obligations included consulting on this with parties and to address the points they may raise.

In summary, DCC considers that the draft RP Decommissioning Timetable for the IOC cohort is appropriate.

5. Next Steps

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 plans to formally submit the draft RP Decommissioning Timetable for the IOC cohort with a date of Sunday 28 May 2023 to the Secretary of State on Friday 28 April 2023. This recommendation to the Secretary of State will be based on four closure criteria as described in the Closure 2 Consultation. Where the Secretary of State approves the RP Decommissioning Timetable for the IOC cohort DCC will take the necessary steps to decommission the Requesting Party.

At the time of publication, for the IOC cohort, DCC has 13,157 SMETS1 Installations in the IOC cohort that are being progressed to either successful Migration or inclusion within an Excluded Category. DCC will provide the Secretary of State with updated evidence on the status of the IOC cohort as it progresses towards closure. At the envisaged closure date for the IOC cohort, DCC expects that there will be no further SMETS1 Installations that will be eligible and that they will either all have been Migrated or will fall into an Exclusion

⁹ DCC issued two RFIs on SMETS1 - <https://www.smartdcc.co.uk/consultations/smets1-request-for-information-unaccounted-smets1-devices/> and <https://www.smartdcc.co.uk/consultations/smets1-second-request-for-information-unaccounted-smets1-devices/>.

Category. The envisaged date for decommissioning is Sunday 28 May 2023. The table below presents the remaining elements within the updated schedule.

Date	Activity
Friday 28 April 2023	DCC will formally submit the Draft RP Decommissioning Timetable for the IOC cohort (including updated evidence and current status of any final migration activity) to the Secretary of State for approval.
Monday 1 May 2023 to 1700 on Tuesday 9 May 2023	The Department for Energy Security and Net Zero has advised there will be a five-day period for any stakeholders to raise further concerns directly to the Department.
Wednesday 17 May 2023	Prior to the proposed RP Decommissioning Date, a decision by the Secretary of State is expected no later than this date on the closure of the Requesting Party for the IOC cohort for the RP date to be met.
Thursday 18 May 2023	<p>9 calendar 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. For the IOC cohort, 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.
w/c Monday 22 May 2023	DCC will commence the final Migrations during the final Migration Week which will be based on submissions made on the prior Thursday. Migration will be attempted once for each Installation. All Migrations taking place during the week are expected to have finished processing (successful / failed / rolled back) before the Sunday.
Sunday 28 May 2023	<p>DCC doesn't usually process Migrations on weekends.</p> <p>RP Decommissioning Date will be on this Sunday.</p>

Date	Activity
Monday 29 May 2023	<p>From the point of expiry of the RP Decommissioning Date and once all final Migrations have finished processing (successful / failed and rolled back), DCC will instruct each service provider to enact the required steps to shut down the Requesting Party for the respective cohort, confirming to DCC when decommissioning is complete. This is expected to take up to 20 working days to fully complete for the IOC cohort. By 28 June 2023, DCC will also communicate to all Responsible Suppliers in the IOC cohort the breakdown of the final number of devices under their remit falling into the Exclusion Categories.</p> <p>From the RP Decommissioning Date the DMCT Process will also be closed for the IOC cohort as per Clause 20.1A of the SMETS1 SVTAD.</p>
Q3 2023	<p>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 and then provided to the SMKI PPA.</p>

Table 2 – Detailed Closure Activities for IOC – updated post consultation.