



24 November 2020

The Authority (Ofgem), the SEC Panel, SEC Parties and
other interested parties

Dear Colleague,

**SMART METERING IMPLEMENTATION PROGRAMME: RE-DESIGNATION OF SEC
SUBSIDIARY DOCUMENTS TO SUPPORT THE DCC SMETS1 SERVICE**

1. This letter constitutes the Government's response to two consultations undertaken by the Data Communications Company (DCC) on BEIS' behalf and a direction to (re)designate the SMETS1 Supporting Requirements (S1SR) (and Device Model Variations to Equivalent Steps [DMVES]), the DCC User Interface Specification (DUIS) and the Service Request Processing Document (SRPD) into the Smart Energy Code (SEC) to support the enrolment of first-generation smart meter devices (SMETS1) in the national smart meter communications network managed by the Data and Communications Company (DCC).
2. The S1SR describes supplementary rules for how DCC will process SMETS1 Service Requests and Service Reference Variants (SRs and SRVs) and accommodates behaviours that are specific to SMETS1 Device Models. DUIS provides technical details regarding the DCC's User Interface. The SRPD describes how the DCC systems handle Service Requests.

SMETS1 Core Uplift 1.2

3. Between 6 August 2020 and 3 September 2020, DCC issued a consultation on changes to DUIS, the SRPD, Transition Migration Approach Document (TMAD) and the S1SR to provide incremental improvements to the DCC's SMETS1 service¹. DCC considered it beneficial to re-designate the TMAD as early as possible to unlock a volume of dormant SMETS1 meters to migrate. The proposed changes to the TMAD were therefore re-designated separately into the SEC on 12 November 2020 as v8.0 of the TMAD.
4. Changes to DUIS, the SPRD and S1SR were proposed by DCC to support the update of firmware for SMETS1 Prepayment Interface Devices (PPMIDs) so that if issues are encountered in production, the PPMID software can be updated remotely without disruption to the consumer. All five consultation respondents supported this proposal.

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-regulatory-changes-for-smets1-uplift-12/>

5. One respondent sought clarity on why the consultation excluded FOC. BEIS notes DCC's plan to address this as part of the now agreed changes to the JIP (Joint Implementation Plan) for FOC.
6. One respondent suggested that the Gas Supplier be given the right to upgrade PPMID firmware and be notified prior to any deployment of such a firmware upgrade by the Electricity Supplier to allow for its own testing. BEIS notes DCC's response to the Energy Supplier which explains that the approach to PPMID firmware upgrade in SMETS1 Uplift 1.2 is based on extending the regime for SMETS1 Communications Hub firmware upgrades, which makes the Electricity Supplier responsible for the Communications Hub. We note the DCC rationale that this approach was developed following stakeholder consultation and on the basis that there is always an Electricity Supplier at premises where this is a SMETS1 Communications Hub and that extending rights to the Gas Supplier in addition would introduce disproportionate additional complexity in coordinating PPMID management.
7. Another respondent sought clarity on the proposed changes to DUIS. DCC confirmed that this change will not force users to adopt a new version of DUIS unless they intend to use SMETS1 PPMID firmware functionality.

SMETS1 Supporting Requirements to Support DCC's SMETS1 Service

8. Between 24 July 2020 and 21 August 2020, DCC ran its third² consultation on revisions to the S1SR to describe device specific behaviours for Middle Operating Capability (MOC) Secure devices and to define the configuration requirements specific to devices that are planned to be enrolled into the DCC's network.³ This was a result of a number of issues that were brought to the attention of DCC. DCC received four responses to its consultation which were generally supportive of DCC's proposed changes. On 13 November 2020, DCC submitted an amended S1SR to BEIS for re-designation together with its consultation conclusions and copies of the four responses received from stakeholders.
9. In respect of proposed amendments to Section 18 of the S1SR to describe device specific behaviours regarding MOC Secure devices, DCC received three responses, two of which were supportive. One respondent provided detailed drafting that identified several device specific behaviours that require further consultation by the DCC.
10. Three respondents provided feedback to DCC's proposed amendments to Section 23 and the Default Values for Service Requests set out as Annex C. Two of the respondents agreed with the proposed changes; the other respondent sought assurance that they would continue to be able to employ block tariff structures as they do today for SMETS1 Installations in the MOC (Secure) cohort. DCC confirmed that this functionality is supported for MOC Secure devices.

² DCC also consulted on changes to the S1SR on 9 April 2020 (<https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-the-changes-to-the-smets1-supporting-requirements-document/>) and 5 June 2020 (<https://www.smartdcc.co.uk/customer-hub/consultations/further-consultation-on-changes-to-the-smets1-supporting-requirements-for-secure/>) for MOC Secure

³ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-conclusion-on-s1sr-for-moc-secure-and-date-consultation/>

11. Two respondents agreed with the proposed mappings of clauses in Section 18 of S1SR to the relevant Device Models presented in the Device Model Variations to Equivalent Steps Matrix (DMVES).

Re-designation date – Core Uplift 1.2

12. As part of its consultation on SMETS1 Core Uplift 1.2, DCC proposed a re-designation date of 29 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter). No respondents opposed this date. However, DCC were only willing to provide a partial PPMID upgrade service at this point. DCC ran a 'transitional tool' from early October that, for the IOC and MDS devices that have already been migrated, updates the DCC systems with the relevant PPMID keys. The Secure cohort follows a different process and did not require the transition tool processing. BEIS was only willing to re-designate the documents which set the rights and obligations for the firmware upgrade service to PPMIDs once this additional process had been concluded so that all live capabilities were treated equally. DCC has now provided evidence to BEIS that this process is materially complete and that it is in a position to support firmware upgrades to all IOC and MOC PPMID devices.
13. We have been made aware as part of this evidence that a small number of sites (0.3% of those subject to the transition tool) have, as a consequence of what are likely intermittent communications issues during the transitional tool process, failed to update DCC systems with the PPMID keys. Around two thirds of these sites continue to be re-tried whilst others are confirmed as requiring investigation on a case by case basis via DCC's existing incident management process. We have asked DCC to contact impacted energy suppliers and to update BEIS on their status and options thereafter. We do not consider however that this should delay the consumer and business benefits arising from allowing DCC to stand up a PPMID upgrade service and that we should proceed with designation.
14. DCC re-consulted⁴ on a new designation date of 3 November 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for introducing updates relating to SMETS1 Core Uplift 1.2. DCC received one written response which was provided to the Secretary of State once the consultation closed. The respondent supported the proposal and underlined that the functionality offered through SMETS1 Core Uplift 1.2 should be delivered as soon as possible. DCC also checked with other energy suppliers post-consultation that they did not have concerns about the designation date, several of whom responded with supportive emails.

Re-designation date – Secure device-specific S1SR changes

15. For the S1SR proposals specific to MOC (Secure), DCC proposed a re-designation date of 16 November 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR.⁵ DCC received four responses – all of which supported DCC's proposed re-designation date. This designation comprises the material changes required to provide a sufficient baseline to support the addition of the first active

⁴ <https://www.smartdcc.co.uk/customer-hub/consultations/further-smets1-consultation-on-dates-for-re-designation/>

⁵ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-conclusion-on-s1sr-for-moc-secure-and-date-consultation>

Secure DMC entry to the Eligible Product Combinations List⁶ (EPCL). A further DCC consultation on additional changes to the S1SR for Aclara and MOC (Secure) devices has just concluded⁷. However, BEIS considers it appropriate to designate now rather than wait, in support of the Government's ambition to facilitate early consumer enrolment benefits.

Conclusion

16. We conclude that it is appropriate for the new versions of S1SR (and DMVES), DUIS and SRPD to be designated today, as they appear in the annexes below. Marked-up versions of the documents showing changes relative to the versions previously in legal effect are also provided.

Direction

This direction is made for the purposes of the smart meter communication licences granted to Smart DCC Ltd under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

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

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that with effect from 24 November 2020 the SMETS1 Supporting Requirements (S1SR) and Device Model Variations to Equivalent Steps Matrix (DMVES), previously designated and incorporated into the SEC as Appendix AM, are hereby re-designated and incorporated in the form set out at Annexes A and C of this direction respectively.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that with effect from 24 November 2020 the Device User Interface Specification (DUIS) v3.0 and 3.1, previously designated and incorporated into the SEC as Appendix AD v3.0 and 3.1, are hereby re-designated and incorporated in the form set out at Annex D and Annex F of this direction respectively.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that with effect from 24 November 2020 the Service Request Processing Document (SRPD), previously designated and incorporated into the SEC as Appendix AB, is hereby re-designated and incorporated in the form set out at Annex H of this direction.

For the avoidance of doubt, any re-designation of the S1SR, DMVES, DUIS or SRPD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

⁶ <https://smartenergycodecompany.co.uk/smets1-eligible-products-combination-list-epcl/>

⁷ <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-consultation-on-additional-changes-to-the-s1sr-for-aclara-and-moc-secure/>

This direction is also being notified to the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SEC website in due course.

Yours faithfully,



Duncan Stone

Head of Delivery, Smart Metering Implementation Programme

(An official of the Department for Business, Energy & Industrial Strategy authorised to act on behalf of the Secretary of State)

ANNEXES (separate documents)

Annex A: SEC Appendix AM – SMETS1 Supporting Requirements (S1SR) v5.0

Annex B: SEC Appendix AM – SMETS1 Supporting Requirements (S1SR) v5.0 – marked up against v4.0

Annex C: SEC Appendix AM – Annex A - Device Model Variations to Equivalent Steps Matrix v5.0

Annex D: SEC Appendix AD – DCC User Interface Specification v3.0 – updated

Annex E: SEC Appendix AD – DCC User Interface Specification v3.0 – marked up against v3.0 previously in legal effect

Annex F: SEC Appendix AD – DCC User Interface Specification v3.1 – updated

Annex G: SEC Appendix AD – DCC User Interface Specification v3.1 – marked up against v3.1 previously in legal effect

Annex H: SEC Appendix AB – Service Request Processing Document v4.0

Annex I: SEC Appendix AB – Service Request Processing Document v4.0 marked up against v 3.0