



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

21 March 2023

Dear Colleague,

Smart Metering Implementation Programme: direction to redesignate the SMETS1 Transition and Migration Approach Document in support of SMETS1 enrolment.

1. On 15 March 2023 the DCC published a consultation response¹ in relation to certain aspects ('Part B') of its 16 December 2022 'SMETS1 Consultation – Closure 2' consultation document.² The Part B consultation response recommended that the Secretary of State further amend the SMETS1 Transition and Migration Approach Document (TMAD) in support of the SMETS1 enrolment project.
2. In its Part B consultation response, DCC is proposing a range of TMAD changes which primarily introduce new or extended exclusion categories where SMETS1 meters face insurmountable communication or technical reasons why they cannot be migrated. DCC also proposes to introduce a change which would allow them to make a recommendation to the Secretary of State to close the IOC and FOC (NP) Requesting Party services before the end of the final 12-month EPCL migration window. Further details can be found in DCC's the Part B consultation response document.
3. We note that seven of the eight respondents to this consultation supported all proposals, including the proposed TMAD re-designation period. Some of these respondents asked DCC for assurance on several areas including that all reasonable steps were taken to ensure that the DCC obtains correct data on all relevant devices from Responsible Suppliers, has exhausted all possible attempts to migrate the devices before excluding them, that impacted Responsible Suppliers are informed of the final numbers of excluded devices, and that 'non-standard' device migration failures would not be considered during migration attempts. We recognise that the DCC has provided the requisite assurance and clarifications on these matters in its consultation response.
4. One of the eight respondents objected to several of the proposals consistent with its concern that these proposals could lead to the closure of the IOC and FOC (NP) cohorts before all meter migration attempts had been exhausted. This concern stemmed from a view that the SMSO data the DCC is relying on may be incomplete and that the DCC had not provided cost benefit analysis of its proposals. We note that the DCC engaged this respondent to address the concerns raised but was unable to assuage these. In particular, we note that DCC:

¹ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-b/>

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

- confirmed its continued focus on validating all the required data ahead of device migration including with Responsible Suppliers and SMSOs;
 - noted it provides Responsible Suppliers with the final numbers of excluded devices in each cohort a month after RP close;
 - provided a statement that its operational evidence showed limited success in migrating devices across all cohorts after five valid attempts and that this was consistent in approach across all cohorts;
 - noted that relevant Responsible Suppliers may request the DCC to continue migrating after 5 attempts where they have reason to believe something has changed to allow it to be successful; and
 - made clear that any cost data is provided to the Department when they propose a Decommissioning Timetable for a Requesting Party and that only a small number of IOC meters are still caught by an EPCL12 month migration window.
5. Government considers it is appropriate to re-designate the TMAD today with the amendments proposed by DCC, and the direction to give effect to this can be found below. We recognise the concerns raised by one of the respondents but consider that DCC has responded to these effectively and that, overall, the amendments to TMAD are in consumers' best interests and helping ensure they have smart services at the earliest point. This decision has no bearing on migration service closure, which will be considered on its own merits and using relevant evidence in due course.

Direction

This direction is made for the purposes of the smart meter communications licences granted 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 21 March 2023 the SMETS1 Transition and Migration Approach Document previously designated and incorporated into the SEC as Appendix AL is hereby re-designated and incorporated in the form set out in Annex A of this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).

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

Deputy Director & Head of Delivery
Smart Metering Implementation Programme

(An official of the Department for Energy Security & Net Zero authorised to act on behalf of the Secretary of State)

Annexes

Annex A: [SEC Appendix AL – SMETS1 Transition and Migration Approach Document v25.0](#)

Annex B: [SEC Appendix AL – SMETS1 Transition and Migration Approach Document v25.0 showing tracked changes compared to v24.0](#)