

ANNEX A: Government response to March 2018 consultation on proposed amendments to the Smart Energy Code, DCC Licence and energy supply licence conditions related to the provision of a DCC SMETS1 Service, and updates to the regulatory framework around transition

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Executive Summary

- 1.1. On 27 March 2018 BEIS published a consultation seeking stakeholder views on proposed changes to the smart metering regulatory framework to enable the delivery of a SMETS1 Service by the Smart DCC Ltd (DCC), as well as updates to the regulatory framework relating to the transition to industry-led governance of smart metering. Revised Smart Energy Code (SEC), DCC and energy supply licence drafting was provided with the consultation for comment. During the consultation period, the proposals were widely promulgated across smart metering governance groups, and a number of meetings were held with individual stakeholders to explain the proposals and address particular questions.
- 1.2. The consultation closed on 26 April 2018 and we received 12 written responses from a range of stakeholders; including energy suppliers, Energy UK, Citizens Advice, the SEC Panel and the DCC.
- 1.3. The principal conclusions set out in this Government response document are summarised below:
 - **Chapter 1 – Smart Metering System Requirements:** We have concluded that the Certified Products List should be re-named to the Central Products List. We have also decided to implement the proposed ‘all reasonable steps’ obligation on the Lead Supplier with regard to the management of SMETS1 Communications Hubs at split supply premises, and made a number of minor drafting amendments to Section F of the SEC.
 - **Chapter 2 – Security:** We have concluded that the proposed changes to Section G of the SEC, including the transposition of a number of existing security obligations from the energy supply licences into the SEC, are broadly appropriate. We have, however, made some changes to clarify the requirements in relation to the setting of Anomaly Detection Thresholds, and to avoid the potential need for duplicate security assessments.
 - **Chapter 3 – DCC Services:** We have concluded that the proposed drafting changes to Section H of the SEC are broadly appropriate, and made some minor amendments to reflect stakeholder comments. We have provided for Section H7 of the SEC (Elective Communication Services) to take effect from 1 October 2018.
 - **Chapter 4 – Service Management:** Having considered consultation responses, the Government has determined that no changes to the proposed drafting are required.
 - **Chapter 5 – Testing:** We have removed a provision that would have prevented Pending Product Combinations Testing disputes from being referred to the SEC Panel, and added a new provision enabling the ETAD to set out rules around the types of information (if any) that may be shared in relation to issues identified during PPC Testing. We have also provided for the Pending Product Combinations Testing Service, and Device and User System Testing Services, to be made available in respect of SMETS1 Devices from 31st August (or such later

date as the Secretary of State may direct following consultation on a revised date by the DCC).

- **Chapter 6 – Transition:** Having considered consultation responses, the Government has determined that no further changes to the proposed drafting are required.
- **Chapter 7 – Migration:** Having considered consultation responses, the Government has concluded that it is appropriate to include a new provision requiring the TMAD to provide for a date from which it will no longer apply.
- **Chapter 8 – Other proposed changes:** We have concluded that the other proposed changes to the SEC, DCC Licence and energy supply licences are broadly appropriate, and made a number of minor definitional changes to Section A of the SEC (including the addition of a definition for DCO).

Introduction

Background

- 1.4. A number of energy suppliers have been installing first-generation (SMETS1) smart meters for their customers. Like second-generation SMETS2 meters, SMETS1 meters provide consumers with the benefits of accurate bills and near real-time energy consumption information. However, SMETS1 meters currently operate via data and communications systems put in place by individual energy suppliers, as opposed to a single data and communications infrastructure which is easily accessible to all energy suppliers, and that is now in place in the form of the DCC. As such, SMETS1 meters installed by one energy supplier are not always compatible with another energy supplier's systems, and may lose smart functionality when a consumer switches supplier.
- 1.5. Enrolment of SMETS1 meters with the DCC would provide a number of benefits to consumers and the energy market, in particular:
 - Retention of smart services for consumers when they switch supplier.
 - Reduction of stranding risk for existing SMETS1 assets.¹
 - A number of security benefits arising from enrolling these metering cohorts into the national data and communications service.
 - Efficiencies from rationalisation of smart metering interfaces and processes within supplier businesses.
- 1.6. In April 2018 BEIS consulted on whether to require the DCC to offer a SMETS1 Service and, if so, in respect of which SMETS1 meter cohorts.² In parallel, BEIS also consulted on proposals to require energy suppliers to enroll SMETS1 meters with the DCC, or failing that to replace them with SMETS2 meters.³ Both of these consultations closed on 24 May 2018, and the Government will publish its responses in due course.
- 1.7. BEIS will publish a further consultation to consider whether to require the DCC to offer a SMETS1 Service in respect of SMETS1 meter cohorts that were not covered by the April 2018 consultation (Secure Meters and EDM1 meters) once sufficiently mature information is available from existing and prospective service providers, and the DCC.
- 1.8. This document is the Government response to the 27 March 2018 consultation on proposed changes to the SEC, energy supply licence conditions, and the DCC Licence that are required to enable the delivery of a SMETS1 Service by the DCC; as well as updates to the smart metering regulatory framework relating to the

¹ Namely the risk of energy suppliers replacing their SMETS1 meters with SMETS2 meters before the SMETS1 meter's end of life.

² <https://www.gov.uk/government/consultations/enrolment-of-smets1-meter-cohorts-with-the-data-communications-company>

³ <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>

transition to industry-led governance of smart metering. We proposed to align the service provision for SMETS1 meters with that for SMETS2 meters wherever possible, and so the 27 March 2018 consultation focussed on a number of specific instances where changes to the regulatory framework would be required as a result of differences between SMETS1 and SMETS2 smart metering systems.

Consultation responses

- 1.9. The consultation closed on 26 April 2018 and we received a total of 12 written responses from the following organisations:

Organisation type	Respondents
Energy suppliers	Centrica EDF EON First Utility Npower Scottish Power SSE
Network operators	Western Power
Other organisations	Citizens Advice Energy UK DCC SEC Panel

- 1.10. During the consultation period a number of bilateral meetings were held with individual respondents, in addition to engagement with stakeholders through the Technical and Business Design Group (TBDG).

Implementation of conclusions

- 1.11. The final draft legal text implementing the regulatory changes concluded in this document will be laid before Parliament on 4 June 2018 in line with the procedure under section 89 of the Energy Act 2008.
- 1.12. Subject to no objection being raised during the 40-day laying period, we expect to bring the relevant modifications to the Smart Energy Code (SEC), DCC and energy supply licences into effect in July 2018. Although the changes will come into effect at that point, the majority will have no immediate practical application as:
- The majority of the changes apply in respect of enrolled SMETS1 smart metering systems, which will not exist prior to Initial Operating Capability (IOC) for a DCC SMETS1 Service (which DCC expect to deliver at the end of November 2018, in line with their SMETS1 Service Delivery Plan). The

detailed procedures by which SMETS1 meters that are already installed are enrolled with the DCC from IOC onwards will be set out in the Transition and Migration Approach Document (TMAD); and

- In the case of other changes, notably in relation to the Testing Services that the DCC must provide in respect of SMETS1 meters, the timing of these changes coming into effect will be set out in the SEC itself.

- 1.13. Should the Secretary of State determine, following consultation, that the DCC is not required to provide a SMETS1 Service in respect of any meter cohorts, these modifications adapting the regulatory framework for the purposes of SMETS1 meters would be removed at the next available opportunity.
- 1.14. In addition to this Annex A, there are 3 further annexes to this Government Response:
- Annex B – modifications to the Smart Energy Code
 - Annex C – modifications to energy supply licence conditions
 - Annex D – modifications to the DCC Licence
- 1.15. Annexes B-D set out the final draft legal text as it would look combined with the most recently published versions of the licence conditions and SEC. The text that has been laid before Parliament is marked up for clarity. The version of the licence conditions and the SEC published at Annexes B-D alongside this document should therefore not be read as the latest in legal effect versions. The legally effective version of the supply licence conditions and the DCC licence can be found on the Ofgem website⁴, and the legally effective version of the SEC is available on the SECAS website⁵.
- 1.16. In addition to the proposed licence modifications and changes to the main body of the SEC, the 27 March 2018 consultation invited views on associated changes to the Inventory, Enrolment and Withdrawal Procedures (IEWP) document. We propose to re-designate this document with the changes made using the power under Condition 22 of the DCC licence and Section X5 of the SEC. We will consult separately on the timing for these changes.

⁴ <https://www.ofgem.gov.uk/licences-codes-and-standards>

⁵ <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>

Chapter 1: Smart Metering System Requirements (Section F)

Issue under consideration

2.1. A number of changes were proposed to Section F of the SEC in order to:

- Rename the 'Certified Products List' to the 'Central Products List' and reflect the different requirements that apply to SMETS1 Devices being added to the Central Products List (CPL).
- Expand the current concept of the Deployed Products List (DPL) for SMETS2+ Devices, and include the additional concepts of SMETS1 Eligible Product Combinations (EPC) and SMETS1 Pending Product Combinations (PPC).
- Set out the obligations regarding operational functionality, interoperability and remote access to SMETS1 Communications Hubs.
- Clarify that Sections F5-F10 do not apply in relation to SMETS1 Communications Hubs as, unlike SMETS2 Communications Hubs, they are not provided by the DCC pursuant to the Communications Hub Service.

2.2. The consultation sought views on the proposed changes to the legal drafting of Section F of the SEC, and asked specific questions in relation to:

- Proposals to rename the Certified Products List, and whether this would have any adverse impacts (for example, on stakeholders' contractual arrangements).
- Proposals to create new obligations on the Lead Supplier at split supply premises with regard to the management of SMETS1 Communications Hubs (CHs).

Question 1: Do you agree with the proposal to amend the name of the Certified Products List to the Central Products List?

- 2.3. Of the 10 stakeholders who responded to this question, nine agreed with the proposal and one large energy supplier disagreed. Those who agreed suggested that they understood the rationale for the proposed change, and believed that it would have little or no adverse impact. The large supplier that disagreed suggested the creation of a separate SMETS1 list to avoid creating confusion around the assurance that devices listed on the CPL are subject to.
- 2.4. A number of additional comments were received requesting greater clarity on the process for adding SMETS1 devices to the CPL and details of how the new list would be structured. We additionally received a suggestion that the current definition of Certified Products List could be amended to refer to the SMETS2+

device entries on the Central Products List in order to minimise the need for further change.

- 2.5. The Government recognises the differences between the assurance regimes that apply to SMETS1 and SMETS2 meters. While SMETS1 meters need to be secured by energy suppliers in accordance with their licence obligations, SMETS2 devices are only added to the CPL once they have received Commercial Product Assurance (CPA) certification. It is precisely to avoid confusion around these differing requirements that the Government is proposing to re-name the 'Certified Products List' to the 'Central Products List'. The consultation responses reinforce our view that this is an appropriate and proportionate step.
- 2.6. We are keen, however, to minimise the need for change to existing contracts that energy suppliers and other parties may have entered into. We therefore propose to amend the current Section A definition of Certified Products List so that it refers to the SMETS2+ device entries on the new Central Products List. References to the Certified Products List contained in the SEC Subsidiary Documents will be amended to refer to the Central Products List at the point they are re-designated by the Secretary of State for the purposes of enabling SMETS1 enrolment, using the power under Condition 22 of the DCC licence and Section X5 of the SEC.
- 2.7. Greater detail on the process for adding SMETS1 device models to the CPL is set out in the baselined release 3 version of the CPL Requirements Document⁶, and we expect that the structure of the list itself will not need to change to accommodate SMETS1 devices (although certain fields, such as the GBCS version number, will need to be left blank for SMETS1 devices).

Question 2: Do you agree with the proposal to create new obligations on the Lead Supplier at split supply premises with regard to the management of SMETS1 CHs?

- 2.8. All 11 stakeholders who responded to this question agreed with the proposed obligations on the Lead Supplier with regards to the management of SMETS1 Communications Hubs at split supply premises. While there was a general consensus that the proposed approach was the right one, a number of concerns were raised about the ability of the Lead Supplier to discharge their obligations in respect of Communications Hubs they have inherited from another energy supplier. Furthermore, there were questions around:
 - data protection obligations with respect to gas meter data stored on the Gas Proxy Function (which is integral to the electricity meter);
 - the interpretation of the proposed obligation to take 'all reasonable steps' to ensure that the SMETS1 Communications Hub Function (CHF) is not configured in a way that restricts the minimum functions of the Smart Metering System; and

⁶ Available from the Smart Energy Code website here:
<https://smartenergycodecompany.co.uk/the-developing-sec/>

- the application of the proposed regulations to situations where the SMETS1 Communications Hub is replaced with a SMETS2 Communications Hub.
- 2.9. In light of the broad support for these proposals, the Government remains of the view that the proposed ‘all reasonable steps’ obligation on the Lead Supplier is proportionate. We would also note that, in compliance with this obligation, we would expect the Lead Supplier to refrain from taking any steps that would restrict the minimum functions of the Smart Metering System, and to comply with any configuration requirements set out in the SMETS1 Supporting Requirements document. Suppliers will need to establish appropriate mechanisms for ensuring that they are able to comply with their regulatory obligations in respect of inherited meters.
- 2.10. With respect to other consultation feedback, we can clarify that:
- With regard to data protection obligations relating to gas meter data stored on the GPF; if the electricity supplier is acting as a data processor on behalf of the gas supplier (as data controller) in respect of the data held on the SMETS1 GPF, then the gas supplier is obliged under GDPR to include a number of contractual obligations on the electricity supplier in respect of such processing. We will consult further on this issue and propose drafting for incorporation into the SEC in due course.
 - The interpretation of ‘all reasonable steps’ will always depend on the precise circumstances of the dispute in question, and what constitutes ‘reasonable’ in that context. As such it cannot be defined in the abstract.
 - The draft regulatory provisions are not intended to apply to scenarios where the SMETS1 Communications Hub is replaced with a SMETS2 Communications Hub. The drafting at Section F4.1B addresses this by referring to the upgraded/replacement SMETS1 CHF or GPF.

Question 3: Do you agree with the proposed changes to the legal drafting of SEC Section F regarding various Smart Metering System requirements?

- 2.11. Nine of the 10 stakeholders who responded to this question agreed with the proposed drafting, and one large energy supplier neither agreed nor disagreed. A small number of comments were made:
- F6.20: There were some concerns that this provision may exempt the DCC from delivering Communications Hubs that are CHTS compliant and sufficiently within their Installation Validity Period.
 - There were some questions relating to the data to be populated on the EPC and PPC, and how frequently these would be updated by DCC.
 - F2.2B: One large energy supplier stated that they do not believe the current obligations placed on suppliers for the security of SMETS1 devices are sufficient.

- 2.12. The consultation responses generally supported the Government's view that the proposed amendments to Section F of the SEC are appropriate. We wish to clarify that the drafting proposed for inclusion at Section F6.20 does not exempt the DCC from the requirement to deliver Communications Hubs that comply with CHTS; but simply clarifies that the SEC does not require the DCC to ensure compliance with CHTS at the point of installation. Existing requirements in relation to the Installation Validity Period of Communications Hubs will continue to apply. These state that the DCC is responsible for ensuring CHTS compliance at the point of delivery, while the supplier is responsible for ensuring compliance at the point of installation (recognising that installation can take place sometime after delivery).
- 2.13. Furthermore, the addition of Section F2.2B is simply intended to clarify the established policy position in relation to Assurance Certificates for SMETS1 Device Models (i.e. that there are none). The security architecture of DCC's SMETS1 Service is being developed to provide appropriate mitigation for any security risks, and we are making a number of amendments to Section G of the SEC in order to deliver that outcome. However, should individual suppliers wish to gain additional assurance we would note that there is nothing to prevent them from doing so.
- 2.14. We concur with stakeholder feedback that the DCC should be required to keep the SMETS1 EPC and PPC up-to-date (as opposed to just 'reasonably' up-to-date) given the significance of these lists, and have amended the regulatory drafting accordingly.
- 2.15. We have additionally made minor amendments to Section F2.10 to reflect that devices may not be enrolled Smart Metering Systems at the point they are added to the EPC list or PPC list, and to clarify that Devices may not be added to the EPC until first permitted under TMAD.

Conclusions

- 2.16. Following consideration of the responses to consultation questions 1-3, we have determined that the Section A definition of Certified Products List should be amended to refer to the SMETS2+ device entries on the Central Products List, and made a small adjustment to F2.1(a) to incorporate a reference to the new Certified Products List definition. We have also strengthened the requirement on the DCC to keep the SMETS1 EPC and PPC up-to-date.
- 2.17. Additionally, we have made minor amendments to the drafting at Section F2.10 to reflect the fact that the devices in question may not yet be enrolled Smart Metering Systems when added to the EPC list or PPC list. We have also provided that Devices may not be added to the EPC until first permitted under the TMAD.

Summary of final legal text affected

SEC Section	Content
A	Updated definition of Certified Products List
F2.1(a)	Inclusion of a reference to the Certified Products List
F2.10A	• Provided that devices may not be added to the EPC until first permitted under TMAD • Strengthened the requirement for DCC to keep the EPC and PPC up-to-date. • Amended the drafting to reflect the fact that the devices in question may not be Smart Metering Systems at the point referred to.

Chapter 2: Security (Section G)

Issue under consideration

3.1. Changes to Section G of the SEC were proposed in order to:

- Extend the requirements of Section G to include new or amended functionality used for the purposes of communicating with enrolled SMETS1 devices.
- Accommodate differences in roles and responsibilities between SMETS1 and SMETS2 equipment (e.g. Communications Hub ownership).
- Transpose a number of security obligations relating to unenrolled devices from the energy supply licences into the SEC to ensure they continue to apply in respect of enrolled devices.
- Bring SMETS1 devices and systems into the remit of the SEC Panel Security Sub-Committee (SSC), and existing artefacts such as the Security Risk Assessment, Security Requirements and the End-to-End Security Architecture.

3.2. The consultation sought views on the proposed changes to the legal drafting of Section G of the SEC.

Question 4: Do you agree with the proposed changes to the legal drafting of Section G?

3.3. Eight respondents agreed with the proposed changes to Section G of the SEC, while one large energy supplier disagreed. The main concerns raised about the proposed drafting were that:

- The proposals attempt to replicate SMETS2 security arrangements for SMETS1, which was seen as disproportionate.
- There are a number of ambiguous terms included in the proposed drafting, such as 'Secure' and 'Appropriate Standard'.
- There are additional challenges for suppliers when managing the security of devices for which they are not the installing supplier.
- Users will be required to set Anomaly Detection Thresholds (ADTs) for all SMETS1 Service Requests (as opposed to only critical commands).
- The new obligations regarding Smart Metering Systems that have been transposed from the energy supply licences now effectively require two independent security assessments under Section G.

3.4. Having considered stakeholder responses, we do not believe that the proposals represent an attempt to replicate SMETS2 security arrangements for SMETS1. We have instead transposed existing obligations from the supply licence conditions into the SEC. This includes terms, such as 'Appropriate Standard'. As these terms

simply replicate the wording of existing SMETS1 security obligations, we do not believe it would be appropriate to vary them at this stage.

- 3.5. In light of the comments received, we have amended the proposed wording to ensure that there is not a need for separate, potentially duplicative, assessments of the security of SMETS1 Smart Metering Systems (SMETS1 SMSs). Consequently, compliance with the requirement to ensure that SMETS1 SMSs are Secure following enrolment will be covered by the existing security assessments under Section G8, which set out the requirements in relation to User Independent Security Assurance. The scope of these assessments will be extended to include SMETS1 SMSs by virtue of the additional security obligations (which reflect existing obligations in supply licence conditions) now being included at Section G3.26.
- 3.6. We have also amended the drafting that relates to the setting of ADTs to make it clear that energy suppliers do not have to set threshold values for all SMETS1 Service Requests. Instead they are only required to set them for SMETS1 Service Requests that are critical. We have also clarified that the ADTs will apply across SMETS1 and SMETS2+ Service Requests for any particular service.⁷
- 3.7. A number of respondents objected to the fact that, where a SMETS1 Service Provider (S1SP) applies Threshold Anomaly Detection of the type that detects anomalous data values (e.g. an excessively high tariff), the DCC would cease processing the Service Request without quarantining. We appreciate that this differs from the equivalent treatment for SMETS2+ Service Requests; however the Government considers that implementing a solution that involves quarantining in such circumstances would be disproportionate.
- 3.8. A small number of typographical errors identified by respondents have been corrected.

Conclusions

- 3.9. We have amended the drafting that relates to the setting of ADTs to make it clear that energy suppliers do not have to set values for all SMETS1 Service Requests and clarified that ADTs apply jointly across the cumulative total of Signed Pre-Commands and Critical SMETS1 Service Requests for any particular service.
- 3.10. We have amended the drafting such that compliance with the requirement to ensure that SMETS1 SMSs are Secure will be covered solely by the existing security assessments under Section G8.

⁷ This means that, where an ADT is set in relation to a service identified by a particular Service Reference Variant, the DCC will check the total number of Signed Pre-Commands plus the number of critical SMETS1 Service Requests in the relevant time period against the ADT value for that service.

Summary of final legal text affected

SEC Section	Content
G3.27-G3.28	Removal of proposed requirement for separate assurance of SMETS1 Devices.
G6.3 and G6.6	Clarification of application of Threshold Anomaly Detection.
G	Cross reference updates and correction of minor typographical errors.

Chapter 3: DCC Services (Sections H1-7)

Issue under consideration

4.1. A small number of changes to Sections H1-7 of the SEC were proposed in order to:

- Provide for SMETS1 Target Response Times and any restrictions on the Services that are available in relation to SMETS1 Devices to be set out in the DCC User Interface Services Schedule (UISS).
- Clarify that the DCC is only required to Enrol or process Service Requests in respect of SMETS1 Smart Metering Systems that comprise a combination of Device Models that is listed on the SMETS1 Eligible Product Combinations.
- Provide that the Inventory, Enrolment and Withdrawal Procedures Document can set out circumstances under which the SEC Panel may direct the DCC not to Commission a SMETS1 Device.
- Reflect that only the Lead Supplier for a SMETS1 CHF may Decommission such a Device, in line with the general principle that the Lead Supplier is responsible for the SMETS1 CHF.

4.2. We further proposed to activate Section H7 of the SEC on 1 October 2018 in order to allow Elective Communications Services to be requested in respect of both SMETS1 and SMETS2 meters, and proposed one small change to Section H7 itself to clarify that a provision referring to GBCS does not apply in the context of SMETS1.

4.3. The consultation sought views on the proposed changes to the legal drafting of Sections H1-7 of the SEC, and asked whether stakeholders agree with the proposal to activate Section H7 of the SEC on 1 October 2018.

Question 5: Do you agree with the proposed changes to the legal drafting of Section H3 of the SEC?

4.4. Eight of the 10 stakeholders who responded to this question agreed with the proposed changes, while two neither agreed nor disagreed. A small typographical error was identified at Section H3.10A, and respondents indicated a desire to receive a draft version of the DCC User Interface Services Schedule (UISS) as soon as possible following conclusion of this consultation. One large energy supplier expressed concern that Section H3.16 extends the scope of SMETS1 Services beyond those set out in the SMETS1 specification itself, while another requested greater clarity on the approach to SMETS1 service request forecasting.

4.5. The Government acknowledges the desirability of issuing a revised draft of UISS for consultation at the earliest possible opportunity, and intends to publish such a document in due course once the DCC confirms that it has agreed acceptable Target Response Times through commercial negotiations with its SMETS1 service

providers. No enduring regulatory changes are currently anticipated in respect of service request forecasting for SMETS1, beyond the proposed interim requirement for additional forecast data being consulted on by the DCC as part of its consultation on the TMAD. Should the DCC consider that it requires additional forecast data we expect that it would raise a SEC modification proposal.

- 4.6. The Government can also confirm that the proposed drafting amendments do not create any additional requirements in relation to device functionality over and above those already specified by SMETS1. Any additional requirements set out in the SEC Subsidiary Documents (and in particular the SMETS1 Supporting Requirements document) relate purely to the configuration of devices, as opposed to required functionality.

Question 6: Do you agree with the proposed changes to the legal drafting of Sections H5, H6 and H7 of the SEC?

- 4.7. Eight of the 10 stakeholders who responded to this question agreed with the proposed changes, while one respondent neither agreed nor disagreed. One large energy supplier disagreed with the proposed amendment to Section H5.9, which enables the Inventory, Enrolment and Withdrawal Procedures Document to set out circumstances under which the SEC Panel may direct the DCC not to Commission a SMETS1 Device. Other comments principally related to concerns about how Section H7 (Elective Communication Services) will function in practice across an environment with multiple device models, and identification of a small typographical error at Section H7.2. One supplier suggested that existing drafting at H6.6 relating to the Decommissioning of Communications Hubs may not be appropriate to SMETS1 split-supply premises, as the SMETS1 GSME may remain installed for a period after the Communications Hub has been decommissioned.
- 4.8. The Government continues to believe that the proposed amendments to Sections H5, H6 and H7 of the SEC are appropriate. In particular, the drafting proposed for incorporation at Section H5.9 is necessary to enable provisions relating to SMETS1 compliance that have existed in the SEC for a number of years to be moved from Section N2 of the SEC to the Inventory, Enrolment and Withdrawal Procedures Document. This topic is dealt with in greater detail at Chapter 8.
- 4.9. The Government continues to believe that the proposed drafting of Section H7 of the SEC is sufficient to accommodate requests for elective services in respect of either a single device model, multiple device models or SMETS1 device models generally. We consider that the requesting party may determine which elective services they require (and in respect of which device models), with the delivery timeframe for those services to be subsequently determined through bilateral negotiation between the DCC and the requesting party.
- 4.10. In respect of the Decommissioning obligations at Section H6.6, we note that the Devices forming part of a Smart Metering System (other than the Gas Proxy Function) may remain Commissioned notwithstanding the Decommissioning of the Communications Hub Function, if a replacement Communications Hub Function is Commissioned within a reasonable period.

Question 7: Do you agree with the proposal to activate Section H7 (Elective Communication Services) on 1 October 2018?

- 4.11. Eight of the 11 stakeholders who responded to this question agreed with the proposal to activate Section H7 of the SEC on 1 October 2018. One large energy supplier and the DCC disagreed with the proposal, citing concerns about potential impacts on delivery of the DCC's core functions. A number of stakeholders who agreed with the proposed activation date also expressed similar concerns. One energy supplier neither agreed nor disagreed.
- 4.12. The Government considers that activation of Section H7 of the SEC is an important milestone for the smart metering programme. It enables energy suppliers to make differentiated service offerings available to their customers, and to request any additional services that they wish to receive in respect of enrolled SMETS1 meters. We will therefore activate Section H7 of the SEC on 1 October 2018 as proposed.
- 4.13. We recognise the concerns some parties have raised surrounding the potential impact on delivery of the DCC's core functions. We would note that Condition 13 of the DCC Licence establishes the achievement of an efficient, economical, co-ordinated, timely and secure process to the Completion of Implementation ("the Transition Objective") as the paramount condition of the DCC Licence. In the event of a conflict between provision of the DCC's core functions and the requirements relating to the provision of elective services set out in Condition 17 of the DCC Licence, we therefore expect that the DCC would prioritise delivery of its core functions accordingly.

Conclusions

- 4.14. Following consideration of the responses to consultation questions 5 and 6 we have amended the drafting at H7.4 to clarify that Parties may request an initial evaluation of the technical feasibility and likely charges for a proposed Elective Communication Service, notwithstanding the fact that the Smart Metering Systems in respect of which the service has been requested may not yet be Enrolled.
- 4.15. Section X3.2 has been amended to provide for the activation of Section H7 of the SEC on 1 October 2018.

Summary of final legal text affected

SEC Section	Content
H3.10A	Insertion of 'DCC' ahead of 'User Interface Services Schedule'
H7.4	Correction of a typographical error, and clarification that H7.4 is to apply notwithstanding H7.1
X3.2	Provision for H7 to have effect from 1 October 2018

Chapter 4: Service Management (Sections H8-9)

Issue under consideration

- 5.1. Minor changes were proposed to Sections H8 and H9 of the SEC to clarify that certain provisions apply only in relation to SMETS2+ CHs, and that the Lead Supplier is responsible for resolving Incidents caused by SMETS1 CHs (as they are not provided by the DCC and are in the same physical enclosure as the SMETS1 Electricity Meter). We also proposed that the information DCC is required to make available in respect of the SMETS1 SM WAN will be set out in the Self-Service Interface Design Specification Subsidiary Document.
- 5.2. The consultation sought views on the proposed changes to the legal drafting of Sections H8 and H9 of the SEC.

Question 8: Do you agree with the proposed changes to the legal drafting of Sections H8-H9 of the SEC?

- 5.3. Eight respondents agreed with the proposed changes to Sections H8 and H9, and three neither agreed nor disagreed. The main concerns raised about the proposed drafting were:
 - The ability of Suppliers to diagnose faults and make changes to SMETS1 Communications Hubs, particularly where they have been inherited from other suppliers.
 - The responsibilities of a Gas Supplier who identifies a fault with a SMETS1 Communications Hub are not clearly defined.
- 5.4. We continue to believe that the Lead Supplier is the appropriate party to discharge obligations in relation to the SMETS1 CH, and Suppliers will need to establish appropriate mechanisms for ensuring that they are able to comply with their regulatory obligations.
- 5.5. The ability of Suppliers to diagnose faults is addressed within the SEC by the Communications Hubs diagnostics obtainable through the Self-Service Interface (SEC H8.16(g) and Appendix AH 1.10.7). Should these diagnostics not enable the Supplier to resolve the fault, it is expected that the Supplier would raise an Incident with the DCC Service Desk, which would be assigned to the S1SP to investigate and provide any relevant supporting information to the Supplier as set out in the Incident Management Policy (IMP – SEC Appendix AG clause 2.5.6 (d)). We have identified that the IMP does not necessarily provide for the Supplier to raise an Incident in these circumstances, nor does it require the DCC to supply diagnostic data on SMETS1 equipment for which Suppliers are responsible to which it may

have access. Therefore, we intend to amend the IMP to provide for this as part of the changes that we make to it for SMETS1.

- 5.6. Gas Suppliers (where they are not the Lead Supplier for the Communications Hub) or other Parties suspecting a fault with a SMETS1 Communications Hub should raise an Incident, which will be assigned to the Lead Supplier for resolution in accordance with the procedures set out in the Incident Management Policy.

Conclusions

- 5.7. Following consideration of the responses to consultation question 8, we have concluded that no changes are required to the proposed drafting.

Chapter 5: Testing Services for SMETS1 meters (Section H14)

Issue under consideration

- 6.1. Changes to Section H14 were proposed in order to:
- Expand the existing testing services available under Section H14 so that they apply in respect of SMETS1 meters.
 - Require the DCC to provide a new Testing Service (called “SMETS1 Pending Product Combinations Testing”), which would enable the testing of SMETS1 Device Model combinations that are not currently Eligible Product Combinations (see chapter 1).
- 6.2. The consultation sought views on the proposed changes to the legal drafting of Section H14 of the SEC, as well as on two specific questions related to the provision of SMETS1 Pending Product Combinations Testing:
- We sought views on when the SMETS1 Pending Product Combinations Testing Service should be made available.
 - We sought views on whether, where SMETS1 Pending Product Combinations Testing is not able to be successfully completed, DCC should be obliged to share the issue(s) that arose with other SEC Parties.

Question 9: Do you agree that, where SMETS1 Pending Product Combinations Testing on a combination of Device Models is not able to be successfully completed, the DCC should not be obliged to share with other SEC Parties the issue(s) that arose for reasons of commercial sensitivity?

- 6.3. Of the 10 stakeholders who responded to this question, six agreed with the proposed approach and four disagreed. Those who agreed underscored the potential for any issues identified during Pending Product Combinations Testing to be commercially sensitive, and one large energy supplier suggested that details could be shared as suppliers consider appropriate through commercial arrangements with smart meter system operators, meter manufacturers and meter asset managers. Those who disagreed tended to see merit in sharing details of testing issues as widely as possible, while acknowledging that some details may need to be redacted for reasons of commercial sensitivity. A third approach was suggested by a number of parties, under which the DCC would inform suppliers planning to test a specific device model combination where issues have already been encountered by another party during Pending Product Combination Testing. It would then be for the testing participant to ascertain the details of the issues

encountered through their relationships with meter manufacturers, asset managers and other parties.

- 6.4. The Government acknowledges the wide range of views expressed in response to this question, and continues to recognise the importance of protecting information that may be commercially sensitive in nature. However, we also accept that there may be benefits to disclosing where issues have been encountered in respect of particular device model combinations. Given the range of responses received on this topic, further consideration is required of the types of information that might be commercially sensitive and the approach to be adopted in disseminating such information, if at all. We have therefore asked the DCC to consider this matter further and propose any associated procedures/rules in the changes to the Enduring Testing Approach Document (ETAD) that DCC will be consulting upon, and which will set out more detailed provisions supporting the Pending Product Combination Testing Service.

Question 10: Please provide views on when you consider the SMETS1 Pending Product Combinations Testing Service should be made available.

- 6.5. The nine stakeholders who responded to this question provided a variety of views on when the DCC should be required to provide a SMETS1 Pending Product Combination Testing Service, ranging from as soon as possible to six months prior to closure of the relevant cohort enrolment window. One large energy supplier and the DCC considered that the service should be made available from the start of the testing phase known as User Testing Services (UTS), while two other large energy suppliers considered that it should be made available from the start of User Integration Testing (UIT).
- 6.6. In the responses to the consultation reference was made to the use of Pending Product Combinations Testing for any device model combinations that the DCC does not take through Systems Integration Testing (SIT). We note that this is in the context of recent presentations by the DCC, including at the SEC Panel's Testing Advisory Group, where the DCC has set out an approach for IOC whereby DCC is proposing to test in SIT against device model combinations that represent approximately 80% of the SMETS1 meters in scope for IOC. BEIS is of the view that Pending Product Combination Testing is not the appropriate route for testing the additional approximately 20%, as similar governance arrangements to those utilised for SIT may need to be applied to the testing of these additional IOC device model combinations. As such, separate provision in the transitional testing documents (specifically the SVTAD) for the testing by DCC of these SMETS1 device model combinations is likely to be required.
- 6.7. Pending Product Combinations Testing has been designed to provide an enduring testing service in respect of device model combinations that have already been tested against in SIT (and are on the EPC list), and where a Supplier is seeking to move to a new device model combination; for example, as a result of upgrading the firmware on the device. The governance arrangements for Pending Product

Combinations Testing are set out at a high level in Section H14 of the SEC and will be set out in more detail in the Enduring Testing Approach Document (ETAD). Consequently, this testing service needs to be made available on an enduring basis and we do not consider that an end date for this service should be specified.

- 6.8. With respect to a start date, we note that the DCC considers that it will be able to provide Pending Product Combinations Testing from the start of UTS (which is the equivalent of UIT for SMETS1). Furthermore, given that initial versions of SMETS1 device model combinations will be tested for interoperability with the DCC Systems during SMETS1 System Integration Testing (SIT) prior to their migration into the DCC, we do not consider that the Pending Product Combinations Testing Service needs to be made available prior to the end of SIT.
- 6.9. The Government additionally recognises the need for the DCC to be obliged to provide Device and User Testing Services in respect of SMETS1 Devices (as a means by which end to end testing can be undertaken) as soon as possible. We have therefore specified that both Device and User Testing Services and Pending Product Combinations testing shall be made available from 31st August 2018, or such later date as the Secretary of State may direct further to a recommendation from the DCC to the Secretary of State, following a consultation by the DCC on the revised date with SEC Parties and the SEC Panel.

Question 11: Do you agree with the proposed changes to the legal drafting of Section H14 of the SEC?

- 6.10. Of the 10 stakeholders who responded to this question, seven agreed and one large energy supplier disagreed. Two respondents neither agreed nor disagreed. A number of respondents raised concerns about the proposed drafting at Section H14.36E, which prevents testing participants from referring the DCC's decision on the outcome of Pending Product Combination Testing to the SEC Panel in the event of a dispute. A clear majority of respondents felt that, where DCC determines that a SEC Modification or material change to its systems would be required to address an issue, there should be a means of challenging that assessment. There were a number of related concerns about whether the SEC Modifications process would be an effective route for the resolution of testing failures. One large energy supplier and Energy UK additionally considered that device model combinations should not be added to the Eligible Product Combinations unless they have been successfully tested end-to-end by the supplier.
- 6.11. Where a testing issue arises because the current definition (scope) of the DCC Services is not compatible with the way in which a particular Device Model Combination operates, it may be determined that a change to the SEC would be required to expand/amend the scope of the DCC's service provision, which would have the effect of resolving the issue and enabling the DCC to successfully complete testing against the new device model combination. The Government understands stakeholder concerns around their ability to challenge the DCC's view that a SEC modification is required in these circumstances. We have therefore removed the provision originally proposed for inclusion at H14.36E, which has the effect of enabling any such disputes to be referred to the SEC Panel. We continue

to believe, however, that where a change to the SEC is required in order to resolve a testing issue, any such change should be pursued through the SEC Modifications process.

- 6.12. With regards to the view that device model combinations should be tested end-to-end by suppliers prior to their addition to the Eligible Product Combinations, the pre-requisite for adding a Device Model Combination to the list of Eligible Product Combinations is assurance that the Device Model Combination interoperates with the DCC System such that the DCC will be capable of successfully providing Services in respect of it following enrolment. The Government does not therefore consider that successful end-to end-testing is a pre-requisite. However, once a new Device Model Combination has been added to the list of Eligible Product Combinations, a Supplier can choose to undertake its own end to end testing before (in the case of active meters) it provides authorisation for its devices comprising that Device Model Combination to be migrated to the DCC. It will also be able to undertake end-to-end testing in respect of dormant meters (i.e. those that have lost smart functionality following a change of supplier) once those have been added to the list of Eligible Product Combinations. Similarly, where a new device model combination is on the list of Eligible Product Combinations and a Supplier wants an existing enrolled Smart Metering System to be updated to reflect that new device model combination (e.g. due to a firmware upgrade), then a Supplier is free to undertake the end-to-end testing it requires prior to updating the Smart Metering System.

Conclusions

- 6.13. Following consideration of the responses to consultation questions 9, 10 and 11, we have determined that the following changes to the proposed legal drafting are required:
- Inclusion of provisions requiring the Pending Product Combinations Testing Service, and Device and User System Testing Services, to be made available in respect of SMETS1 Devices from 31st August (or such later date as the Secretary of State may direct following consultation on a revised date by the DCC).
 - Inclusion of a new provision enabling the ETAD to set out rules around the types of information (if any) that may be shared in relation to issues identified during PPC Testing.
 - Removal of the provision originally proposed for inclusion at H14.36E, which would have prevented the DCC's determination that a SEC Modification or material systems change would be required in order for PPC Testing to be successfully completed from being referred to the SEC Panel in the event of a dispute.

Summary of final legal text affected

SEC Section	Content
H14.31 & H14.36A	Inclusion of provisions providing for the activation of a Pending Product Combinations Testing Service, and Device and User System Testing Services in respect of SMETS1 Devices.
H14.36C	Inclusion of a provision for ETAD to specify which types of information may be shared in relation to PPC Testing issues encountered by devices.
H14.36E	Removal of the proposed provision preventing PPC Testing disputes from being referred to the SEC Panel.

Chapter 6: Transition (Section X)

Issue under consideration

- 7.1. Changes to Section X of the SEC were proposed to extend a number of provisions due to expire on 31 October 2018 to the earlier of Completion of Implementation⁸ or 31 December 2020. This would enable them to be used to support delivery of SMETS1 enrolment, should the Secretary of State decide to require the DCC to provide a SMETS1 Service, and to support delivery of the Programme more generally in the run-up to completion of the smart meter rollout in 2020.
- 7.2. Similar changes to the DCC Licence were proposed, including the retention of DCC Licence Condition 13 until the earlier of Completion of Implementation or 31 December 2020. This Licence Condition requires DCC to facilitate an efficient, economical, co-ordinated, timely and secure process of transition to the Completion of Implementation (the Transition Objective), and grants the Secretary of State powers to direct and approve the production of new plans by the DCC.
- 7.3. The consultation sought views on the proposed changes to the legal drafting of Section X and the DCC Licence.

Consideration of responses

- 7.4. Of the 11 stakeholders who responded to this question, eight agreed with the proposed changes to Section X of the SEC and the DCC Licence relating to transition, while three respondents neither agreed nor disagreed. Two respondents noted the need for BEIS to engage with the SEC Panel to ensure a smooth transition to industry-led governance as and when the Secretary of State's powers fall away. Two other parties noted concerns that the proposed extension of the backstop date for a number of transitional provisions could delay the transition to enduring governance arrangements, while one party emphasised that any proposals to use Section X powers should be clearly justified and subject to appropriate consultation.
- 7.5. The Government is cognisant of the need to ensure a smooth transition from Programme-led to industry-led governance of smart metering, and this is part of the rationale for extending the backstop date for a number of transitional provisions. For

⁸ Completion of Implementation occurs on a date designated by the Secretary of State (or by a person appointed by him for that purpose) provided that all the Conditions of the DCC Licence are in full force and DCC is reasonably able to comply with them. The SEC further provides that this will be when the Secretary of State believes that:

- The documents material to the implementation of the SEC have been incorporated into it
- The provisions material to the implementation of the SEC apply in full and without variation
- Each Party that holds an energy licence is reasonably able to perform its obligations and exercise its rights under the Code.

In advance of triggering the Completion of Implementation, the Secretary of State will consult with SEC Parties in respect of a proposed date.

example, the extension of the operation of the Section X5 will allow the Secretary of State to designate and re-designate SEC Subsidiary Documents in order to enable the detailed technical and procedural requirements underpinning SMETS1 enrolment to be put in place ahead of completing the handover to enduring governance arrangements. BEIS will continue to engage closely with both industry stakeholders and the SEC Panel throughout transition.

- 7.6. It should also be noted that, if the Secretary of State considers that the conditions for Completion of Implementation to be triggered have been met, following appropriate consultation with stakeholders, before 31st December 2020, then the transitional provisions of the SEC and/or DCC Licence that we propose to extend will expire at that point.

Conclusions

- 7.7. Following consideration of the responses, we have concluded that no changes are required to the draft amendments that were consulted upon in respect of Section X and the DCC Licence relating to transition.

Chapter 7: Migration of SMETS1 Meters to the DCC and associated Transitional Arrangements

Issue under consideration

- 8.1. The creation of a new Section N6 of the SEC was proposed to provide for the scope, development and eventual application of a new Transition and Migration Approach Document (TMAD)⁹. It was proposed that this new SEC Subsidiary Document would be used to set out the detailed processes, pre-conditions, rules and requirements surrounding the migration of pre-existing SMETS1 meters into the DCC's systems. It was proposed that this should include the ability for the TMAD to vary provisions of the SEC to the extent required to support the migration of SMETS1 meters into the DCC's systems.
- 8.2. The consultation asked whether stakeholders agree with the proposed scope and content of Section N6 of the SEC.

Consideration of responses

- 8.3. Of the 11 stakeholders who responded to this question, four agreed and two disagreed. Five respondents neither agreed nor disagreed. The primary issues raised by stakeholders in respect of the proposed drafting fell into two categories:
 - A view that stakeholders need to review TMAD in order to comment effectively on whether the proposed scope of the document is acceptable.
 - A concern that the scope of TMAD set out in the proposed Section N6 drafting is too broad. In particular, there was concern about the potential for TMAD to include provisions that vary services in respect of SMETS2 devices, vary limitations on liability for a transitional period, or grant SMETS1 SMSOs rights to enforce certain provisions of TMAD. A number of stakeholders also expressed concern about the lack of a fixed expiry date after which TMAD would cease to apply.
- 8.4. Those who agreed with the proposed Section N6 drafting acknowledged that the proposed scope of TMAD was largely necessary, and considered the proposals to be appropriate subject to adequate consultation by the DCC on the draft TMAD itself.
- 8.5. The Government notes that the DCC published a draft version of TMAD for consultation on 3 May 2018, and expects that this will alleviate a number of

⁹ A draft version of the TMAD is currently being consulted on by the DCC and is available at: <https://www.smartdcc.co.uk/about-dcc/future-service-development/enrolment-and-adoption/>

concerns relating to the scope of the document. Any concerns about specific provisions of the draft TMAD should be addressed by the DCC in their consultation response, ahead of any decision by the Secretary of State on whether to designate the document into the SEC.

- 8.6. We would further note that the scope of TMAD provided for in the proposed Section N6.3 drafting is permissive rather than prescriptive, in that it simply sets out the range of provisions that the document may include. The current draft of TMAD does not include any provisions that vary service levels for SMETS2 devices or limitations on liability, nor does it grant any additional rights to SMETS1 SMSOs. If it were considered necessary for TMAD to incorporate any such provisions, these would only be included following appropriate consultation with stakeholders.
- 8.7. The Government acknowledges, however, that it would be appropriate to provide for TMAD to expire after the purpose for which it was intended has been achieved. We have therefore included a provision stating that the TMAD shall provide for a date from which it will no longer apply.

Conclusions

- 8.8. Following consideration of the responses, we have concluded that it is appropriate to include a new provision requiring the TMAD to provide for a date from which it will no longer apply.

Summary of final legal text affected

SEC Section	Content
N6.8	New requirement for the TMAD to provide for a date from which it will no longer apply

Chapter 8: Other changes

Issue under consideration

- 9.1. A range of additional changes were proposed to the SEC, and DCC and energy supply licence conditions. These were principally:
- Changes to Section A to incorporate new definitions and update existing definitions to accommodate SMETS1 smart meters and systems.
 - Amendments to the definition of Legacy Procurement Contracts in the DCC Licence to ensure it includes contracts entered into by the DCC for the purposes of providing communications or data services in respect of SMETS1 Smart Metering Systems.
 - Changes to Section N to remove the requirement on the DCC to maintain and publish the SMETS1 Eligible Products List, and to move provisions relating to SMETS1 compliance to the Inventory, Enrolment and Withdrawal Procedures Document.
 - The addition of new Remote Party Role Codes to Section L.
 - Clarification that energy supply licence conditions relating to Prepayment Meter Interface Devices, HAN Connected Auxiliary Load Control Switches and Alt HAN apply only to SMETS2+ Smart Metering Systems.
 - Clarification that provisions relating to Parse and Correlate software only apply in relation to SMETS2+ devices (Section H11).
 - Clarification that all references to Communications Hubs in Section Z mean SMETS2+ Communications Hubs.
- 9.2. The consultation sought views on the proposed changes.

Question 14: Do you agree with the proposed changes to Sections A, H11, L, N and Z, energy supply licence conditions, the DCC Licence and the Inventory, Enrolment and Withdrawal Procedures Document?

- 9.3. Of the 10 stakeholders who responded to this question, eight agreed and two neither agreed nor disagreed with the proposed changes. Stakeholder comments were focussed in a number key areas:
- In Section A, a number of stakeholders pointed out that there was no reference to Dual Control Organisation (DCO). There were also a number of questions about the proposed definition of DCC Live Systems and DCC Individual Systems, and a suggestion that DCO should be incorporated into these definitions.

- There was a concern that the responsible supplier may be unable to ensure that Smart Metering Systems inherited from another supplier are SMETS1 compliant at the time of enrolment, as required by the SMETS1 compliance obligations we have proposed to move to the Inventory Enrolment and Withdrawal Procedures Document.
 - One respondent proposed that the definition of Legacy Procurement Contact in the DCC Licence should be modified to include the systems that the DCC uses to support the processes in TMAD.
 - A number of other detailed comments were made on the definitions.
- 9.4. The Government agrees that a definition of DCO should be included in Section A of the SEC, and that it should be incorporated within the definitions of DCC Live Systems and DCC Individual Systems. We have therefore added a definition, noting that the detail of the actions of the DCO will be set out in SEC Subsidiary Documents (principally TMAD and the SMETS1 Supporting Requirements document). As part of this, we have modified the definitions of DCC Live Systems and DCC Individual Live Systems (which we have also sought to simplify slightly) to add in references to the DCO.
- 9.5. While the Government recognises the difficulties that energy suppliers may face when attempting to verify the SMETS1 compliance of meters they have inherited from other suppliers, we continue to believe that it is appropriate for the responsibility for ensuring SMETS1 compliance at the time of enrolment to fall on the party seeking to enrol the Smart Metering System. We would note that these obligations have existed in the SEC for a number of years, and they are simply being moved from Section N of the SEC to the Inventory, Enrolment and Withdrawal Procedures document to ensure they are located alongside the pre-conditions for commissioning a SMETS1 meter. In doing so, the text has been updated to more accurately reflect terminology in Section H of the SEC.
- 9.6. With regards to the question of whether the definition of Legacy Procurement Contact in the DCC Licence should be modified to include the systems that the DCC uses to support the processes in TMAD, we would note that the principal function of the definition of Legacy Procurement Contract is its use in the definition of Fundamental Service Capability. The DCC is required to re-procure Fundamental Service Capability on a competitive basis from External Service Providers under Condition 16 of the DCC Licence. In the case of systems required to support TMAD, it is not envisaged that there would be any re-procurement of the Relevant Service Capability as we consider the TMAD processes to be a one-off event. We therefore do not think it is appropriate to include such contracts in the definition of Legacy Procurement Contracts.
- 9.7. In light of the detailed comments made by respondents, we have made the following additional changes to Section A:
- Clarification that the SMETS1 CH is not part of the SMETS1 ESME or GSME, and that the SMETS1 GPF excludes any SMETS1 GSME.
 - A reference to the Transition and Migration Approach Document in the definition of Commissioned to reflect that Devices maybe Commissioned via processes set out in TMAD.

- A modified definition of SMETS1 PPMID.

Conclusions

9.8. We have amended a number of definitions at Section A of the SEC in response to stakeholder comments. In particular, we have added a definition of DCO and made consequential amendments to the definitions of DCC Live Systems and DCC Individual Live Systems. A number of other adjustments to definitions have been made, as summarised in the table below.

Summary of final legal text affected

SEC Section	Content
A	• Addition of a definition of DCO; and consequential updates and clarifications to the definitions of DCC Live Systems and DCC Individual Live Systems. • Minor clarifications in respect of the definitions of SMETS1 ESME, SMETS1 GSME and SMETS1 GPF. One minor correction to the definition of SMETS1 ESMS (Electricity Smart Metering System). • Addition of a reference to TMAD in the definition of Commissioned. • Modified definition of SMETS1 PPMID.

General information

Purpose of this document

This document sets out the Government's response to the consultation on proposed amendments to the Smart Energy Code, DCC Licence and energy supply licence conditions related to the provision of a DCC SMETS1 Service, and updates to the regulatory framework around transition, published on 27 March 2018.

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