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MP247

‘Future Dating of Service Requests for SMETS1 Devices’

Modification Report

Version 0.6

20 January 2026



About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has seven annexes:

- **Annex A** contains the business requirements for the Proposed Solution.
- **Annex B** contains the full Proposed Solution Data Communications Company (DCC) Preliminary Assessment response
- **Annex C** contains the full Proposed Solution DCC Preliminary Assessment costings (**RED**)
- **Annex D** contains the business requirements for the Alternative Solution.
- **Annex E** contains the full Alternative Solution DCC Preliminary Assessment response
- **Annex F** contains the full Alternative Solution DCC Preliminary Assessment costings (**RED**)
- **Annex G** contains the full responses to the Refinement Consultation
- **Annex H** contains the full Alternative Solution DCC Preliminary Assessment response for Future Data Service Provider (Future DSP)
- **Annex I** contains the full Alternative Solution DCC Preliminary Assessment costings (**RED**).

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1. Summary

This proposal has been raised by David Walsh from the DCC.

It is possible for the majority of Smart Metering Equipment Technical Specifications (SMETS) 1 Devices to receive Future Dated Service Requests and hold them at the Device to be executed at the specified time and date. However, there is also a clause within the Smart Energy Code (SEC) that states that Future Dated Requests for SMETS1 Devices are required to be held by the DCC and released accordingly to meet their specified date. This means that even if a DCC User sends a Service Request (SR) in advance of the execution date, these requests are held at the DSP and released once the execution date and time of the request is due.

Whilst there is existing functionality within DCC systems to control the rate at which these requests are released; there is no obligation for Suppliers to send Future Dated Requests and Supplier behaviour seen by the DCC is to send the SRs as on-demand requests.

The DCC has investigated Device capability with Manufacturers and advised that all of the SMETS1 Devices currently have some capacity to support Future Dated Service Requests, but it is prevented by the clause in SEC Appendix AD 'DCC User Interface Specification' (DUIS).

In times of peak traffic, such as Price Cap Update Events (PCUE), there are a large number of SRs sent through DCC systems in a very short period of time. This short-term peak in capacity usage has caused incidents for SMETS1 Service Providers (S1SP) during previous events, although work is on-going to mitigate this.

The Proposed Solution is to allow DCC Users to send Future Dated Service Requests for six specific SRVs to SMETS1 Devices without being held at the DSP.

The Alternative Solution is to allow DCC Users to send Future Dated Service Requests to SMETS1 Devices without being held at the DSP. The Alternative Solution would only impact two specific SRVs.

This modification will impact Large and Small Suppliers, as well as the DCC. If approved, this modification is targeted for the June 2029 SEC Release and will be progressed as a Self-Governance Modification. The estimated cost of the DCC System changes up to the end of Pre-Integration Testing (PIT) for the Proposed Solution is between £3,500,000 and £3,800,000, and the Alternative Solution is between £1,250,000 and £2,100,000. These costs were based on an implementation for the current DSP. The estimated costs up to the end of PIT for the Alternative Solution for the future DSP is between £1,460,000 and £2,200,000.

2. Issue

What are the current arrangements?

Service Requests sent by DCC Users are either 'on-demand', 'future-dated' or 'scheduled'. The DCC User Interface Services Schedule (UISS) identifies these SRs as:

- 'future-dated' - User specifies the relevant time and date for execution (also known as "Future-Dated Services");

- ‘scheduled’ User sends specifies the initial time and date for execution as well as the frequency at which execution is to recur (“Scheduled Services”); or
- ‘on-demand’ – User specifies the SR to be executed immediately.

However, SEC Appendix AD ‘DUIS’ 1.4.4 states:

Future Dating of Service Requests for SMETS1 Devices:

Where, as identified in clause 3.1 (Service Request Matrix), a SMETS1 Service Request has a Future Dated Response Pattern of ‘Device’, the DCC, and not the Device, shall undertake the required processing to implement the future dating, in line with the requirements of the Service Request Processing Document.

SEC Appendix AD categorises Future-Dated Services further:

- Future Dated Response Pattern (Device) - The DCC immediately sends the Command associated with the received SR to the Device. The Command is then stored on the Device and to be executed at the specified date/time in the future by the Device.
- Future Dated Response Pattern (DSP) - The DCC holds the SR and sends the Command to the specified Device at the specified date/time in the future.

This means that all Future Dated Requests for SMETS1 Devices are effectively Future Dated Response Pattern (DSP).

The following diagram from DCC User Gateway Interface Design Specification (DUGIDS) Section 2.3 shows the interactions between DCC Users and Devices of the variations of Service Request:

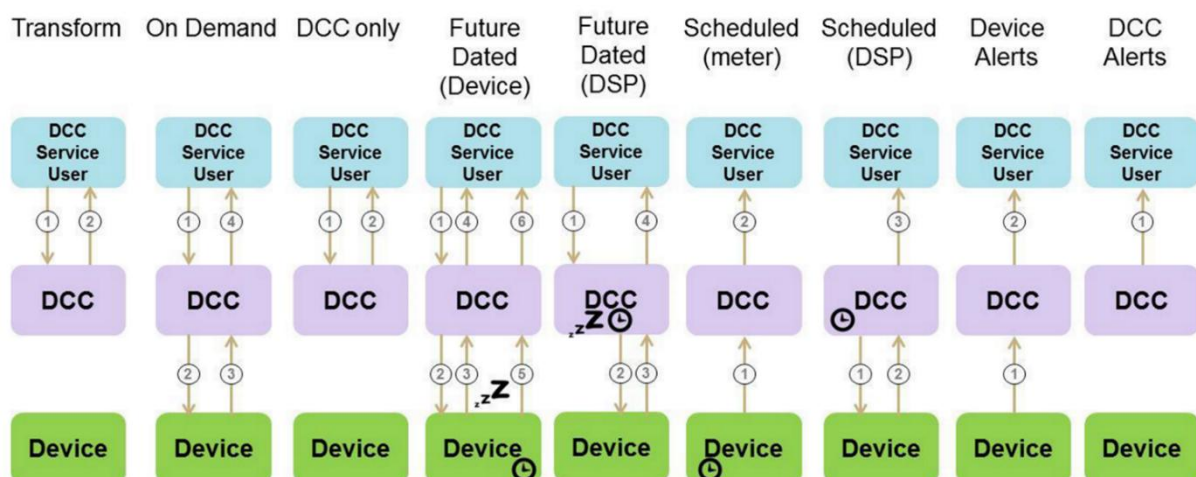


Diagram 1: DUGIDS Section 2.3 – Interaction between DCC Users and Devices for variations of Service Requests

There is existing functionality within DCC systems to control the rate at which the SMETS1 requests are released to Devices, however when the volumes are very high, it takes a considerable time to run through all the SRs for that day. Current User behaviour seen by the DCC is to send both SMETS1

and SMETS2 requests as on-demand requests, which could potentially be due to a User's mixed Device portfolio.

What is the issue?

The DCC has investigated Device capability with Manufacturers and advised that all SMETS1 Devices currently have some capacity to support Future Dated SRs. If Devices can receive Future Dated SRs, it would be sensible that the SEC wording does not hinder this capability.

The DCC is currently in the process of migrating SMETS1 Devices onto their network. Once this migration is confirmed as complete, it is expected there will be approximately 13-15 million SMETS1 Devices that could possibly use Future Dated SRs which will go direct to the Devices. Without the proposed change, these Service Requests will continue to be held with the DSP and handled as an On-Demand Service Request when the date on the Service Request is reached. This will continue to contribute to large spikes in DCC traffic.

The DCC currently has SMETS1 Smart Metering System (SMS) Overage charges to support spikes in traffic, and this modification would help reduce the need for some of this.

What is the impact this is having?

There are certain periods where the DCC receives a very large amount of traffic. In a scenario where there is a PCUE for example, there are a large number of Service Requests sent through DCC Systems in a very short period of time as Suppliers seek to update pricing and/or tariff information on Devices on the same date. This short-term peak in capacity usage has caused incidents for S1SPs during previous events (though work is on-going to mitigate this). Due to the short-term nature of the increased load, capacity that was provisioned to support it would be unnecessary at other times. This would result in an increased cost to industry with there being little benefit realised.

Historically, PCUE occur at infrequent intervals, and Ofgem stated its desire in August 2022 to move to a four-monthly PCUE per year, and this has been the case for the last three years and is expected to continue. While the price change events were initially thought to be relatively short-term, there are no signs of this changing nor ending. Therefore, the DCC has suspended specific daily reads as a mitigation.

Impact on consumers

There is impact on all consumers if there is a delay in receiving the relevant tariff change SRs on time as there would be a risk of consumers not being charged accurately. The mitigation carried out by the DCC is a short-term solution, and an enduring solution should be implemented.

3. Solutions

Proposed Solution

The Proposed Solution is to allow DCC Users to send Future Dated Service Requests to SMETS1 Devices without being held at the DSP (applicable to both DSP1 and DSP2), for the below list of Service Requests:

Service Requests		
SRV Ref	SRV Name	Device Type
1.1.1	Update Import Tariff (Primary Element)	ESME / GSME
1.2.1	Update Price (Primary Element)	ESME / GSME
1.6	Update Payment Mode	ESME / GSME
2.1	Update Prepay Configuration	ESME / GSME
6.4.1	Update Device Configuration (Load Limiting General Settings)	ESME
11.3	Activate Firmware	ESME / GSME / HCALCS

Alternative Solution

The Alternative Solution is to allow DCC Users to send Future Dated SRs to SMETS1 Devices without being held at the DSP (applicable to both DSP1 and DSP2), for the below list of Service Requests:

Service Requests		
SRV Ref	SRV Name	Device Type
1.1.1	Update Import Tariff (Primary Element)	ESME / GSME
1.2.1	Update Price (Primary Element)	ESME / GSME

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties	✓	DCC

All Service Requests targeted for this modification can only be sent by Suppliers.

As both solutions will require the DSP to process the Future Dated Service Requests targeted in a different way, the DCC is also impacted by this modification.

DCC Systems

DCC System changes

Both solutions will have impacts on the DSP to cancel all Future Dated (Device) Service Requests when there's a Change of Supplier (CoS) and the timeout for affected Service Request Variants (SRV) to be extended.

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the full Proposed Solution DCC Preliminary Assessment response in Annex B and the Alternative Solution DCC Preliminary Assessment response in Annex D.

DCC System traffic

The DCC notes this will significantly reduce system load at times of peak network traffic such as PCUEs, may avoid the need to update S1SP infrastructure, and reduce the likelihood of scheduled Service Requests that are not in place by the end of the price change event days.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix AD 'DCC User Interface Specification'

The changes to the SEC will be provided as part of the DCC Impact Assessment.

Technical specification versions

This modification will impact Appendix AD 'DCC User Interface Specification' (DUIS). The proposed changes will be made clear after the Impact Assessment is returned by the DCC.

Devices

Devices impacted			
✓	Electricity Smart Metering Equipment	✓	Gas Smart Metering Equipment
	Communications Hubs		Gas Proxy Functions
	In-Home Displays		Prepayment Meter Interface Devices
	Standalone Auxiliary Proportional Controllers	✓	Home Area Network Connected Auxiliary Load Control Switches
	Consumer Access Devices		Alternative Home Area Network Devices

The Proposed Solution impacts Electric Smart Metering Equipment (ESME), Gas Smart Metering Equipment (GSME) and Home Area Network Connected Auxiliary Load Control Switches (HCALC), as the SRs included in the solution only target these Devices.

The Alternative Solution would only impact ESMEs and GSMEs, as SRVs 1.1.1 and 1.2.1 only target these Devices.

Consumers

This modification should have a positive impact on Consumers as it would help to ensure Consumers tariffs are accurately reflected on their Devices before, during and after a PCUE with minimal to no delay.

Other industry Codes

This modification will not impact any other industry Codes.

Greenhouse gas emissions

This modification will not impact greenhouse gas emissions.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is set out below. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs – Proposed Solution	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£3.5m - £3.8m
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

More information can be found in the full Proposed Solution DCC Preliminary Assessment response in Annex B and the full Proposed Solution DCC Preliminary Assessment costings in Annex C (**RED**).

Breakdown of DCC implementation costs – Alternative Solution	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£1.25m – £2.1m
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

More information can be found in the full Alternative Solution DCC Preliminary Assessment response in Annex E and the full Alternative Solution DCC Preliminary Assessment costings in Annex F (**RED**).

Breakdown of future DSP DCC implementation costs – Alternative Solution	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£1.46m – £2.2m
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

More information can be found in the full future DSP Alternative Solution DCC Preliminary Assessment response in Annex H and the full future DSP Alternative Solution DCC Preliminary Assessment costings in Annex I (**RED**).

The DCC have indicated that the Proposed Solution and Alternative Solution would expect to incur significant regression testing costs for S1SPs.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one days of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

One Refinement Consultation respondent (Large Supplier) highlighted an estimated £250,000 and £500,000 of costs would be incurred by their organisation as a result of the implementation of this modification. This is due to the Large Supplier undertaking system changes. They further stated that the estimated figures provided are only an estimate as the problem has not been properly sized at this stage.

Another Refinement Consultation respondent (Large Supplier) stated that it anticipates an estimated amount of under £50,000 of costs incurred by their organisation as a result of the implementation of this modification. This is due to relatively minor changes to operational processes, as they will be able to reuse existing code and logic.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **28 June 2029** (June 2029 SEC Release) if a decision to approve is received on or before 24 June 2028; or

- **27 June 2030** (June 2030 SEC Release) if a decision to approve is received after 24 June 2028 but on or before 28 June 2029.

This modification will impact the DUIS. For efficiency, it should be implemented in a scheduled SEC Release along with other DUIS changes, also minimising SEC Party costs. Therefore, the June 2029 SEC Release is the earliest available Release whilst allowing the DCC sufficient time to complete the required build and testing.

7. Assessment of the proposal

Areas for assessment

Current Future-Dating usage

The DCC noted that some Users already use Future Dated Service Requests for SMETS2+ Devices, however the DCC is working with DCC Users to encourage them to move to Future-Dated Service Requests as much as they possibly can. Initial feedback indicated that current User behaviour for not using Future Dated Service Requests could be linked to either DCC User internal system restrictions or lack of resource. [MP253 'Traffic Management for Price Cap Update Events – User Actions Required'](#) implemented in the November 2024 SEC Release added obligations on DCC Service Users to follow a Price Cap Instructions Document (PCID) during PCUE. During the Refinement Consultation, respondents confirmed that the implementation of this modification would require further work on their own systems and processes to adopt the Future-Dated usage.

Business case

The Smart Energy Code Administrator and Secretariat (SECAS) questions whether industry consider it more economical to upgrade DCC System capacity now, which will accommodate large volume events such as PCUEs. As SMETS1 installations decrease this capacity will then be available for SMETS2 messages. As opposed to industry paying for a SMETS1 system change which will then become obsolete as SMETS1 installations decrease. Although SMETS1 SMS' are decreasing and will eventually cease in 2033, it is envisaged that SMETS1 Devices in the Smart Metering ecosystem will remain in use and relevant until 2033. The Proposer believes that investing now to accommodate Future-Dated Service Requests for SMETS1 Devices will help smooth out events of high network traffic across the DCC system for the medium-term.

Sub-Committee input

SECAS has engaged with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA), the Privacy Sub-Committee (PSC), the Performance Assurance Board (PAB) and Testing Advisory Group (TAG) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Input on Proposed Solution and would it support reduction in system traffic by driving behaviour changes for Suppliers
PSC	We do not believe this has any PSC impacts
SMKI PMA	We do not believe this has any SMKI impacts
SSC	Feedback on any security impacts based on the Proposed Solution developed
TABASC	Feedback on any potential Technical or Business Architecture impact if the DSP controls where and when the Future Dated SR is sent
TAG	We do not believe this has any testing impacts
PAB	We do not believe this has any PAB impacts

Observations on the issue

Early feedback

SECAS has received feedback from Parties querying why there is a request to make changes to SMETS1 Devices. SMETS1 Devices will be replaced with SMETS2 Devices due to 2G/3G sunsetting, and SMETS1 numbers will reduce over the next five to ten years.

SECAS has also received feedback from SEC Parties noting their support of this modification. One SEC Party noted that over 40% of Devices connected to the DCC are SMETS1 Devices and it would be sometime before SMETS1 meters are a negligible minority. Another SEC Party noted that the Smart Metering estate will likely experience a significant number of SMETS1 Future-Dated price changes over the next five to ten years, and this modification would provide business benefit if such a capability were enabled. They added that their customers experienced failure of timely price changes in July 2023 due to a Middle Operating Capability (MOC)¹ time-out issue caused by the large spike in network traffic for the SMETS1 price changes. They noted that prepayment consumers suffered financial detriment which needed to be remedied.

SMETS1 Device with Future-Dating Capabilities

The DCC highlighted that all SMETS1 Devices have some future dating capabilities; however, it is unclear if all SMETS1 Devices have full or partial Future-Dating Service Request capabilities. In the development stage, the DCC and SECAS investigated further and all but one SMETS1 Device manufacturer has confirmed their SMETS1 Devices have partial Future-Dating Service Request capabilities (one SMETS1 Device manufacturer noted it has full Future-Dating Service Request capabilities). The SRs available in the partial capability are those used in high volumes during PCUEs and therefore the Proposer believes this is strong enough to support the business case to proceed with the modification.

¹ The DCC has set out the meaning of Middle Operating Capability in its delivery plan for its SMETS1 services pursuant to Condition 13 of the DCC Licence.

Solution development

The Proposer has noted a high-level Proposed Solution whereby the DSP will filter incoming Future Dated Response Pattern (DSP) SRs, if the targeted Device has the capability to accept the Future Dated Response Pattern (Device) Service Requests, the DSP will send the SR down to the Device. If the Device is unable to accept Future Dated Response Pattern (Device) Service Requests, the SR will be held at DSP to be sent as per current business as usual (BAU) process. Therefore, the Proposer believes there will be no DCC User business process nor System impact.

Business Requirements

Working Group

In March 2024, the Working Group queried the value of the proposal due to projections that SMETS1 Devices would all be replaced in the next 4-5 years. They added that if this took another 18 months, there is likely no cost benefit to industry, unless the solution was cheap. The Working Group agreed that the business requirements addressed the issue. The Working Group agreed the modification should proceed with the request of the DCC Preliminary Assessment and requested the DCC to provide costs split per S1SP.

TABASC views

In March 2024, the TABASC discussed the relative benefits of the Modification, in particular Energy Suppliers and the way they would view their business processes which involve the use of Future Dated Device SRVs. The TABASC queried if the DCC had factored in how it will handle the Alerts triggered from Devices at the same time due to the Future Dated SRVs. The DCC noted that this will be reviewed as part of the DCC Assessments and solution design. The TABASC noted that it was not clear whether Suppliers will need to make changes to any back-office interfaces or processes to align to the proposals in the modification, SECAS agreed to ensure that a question on expected changes is included in the Refinement Consultation.

The DCC noted the Working Group feedback, in that there could be benefits in breaking down the costs per SMETS1 cohort, although not DSP costs. The DCC noted to target individual cohorts could reduce the overall cost by DCC SPs, therefore, it would be possible to describe costs for individual S1SPs and to provide an indication of the relative costs per cohort under a RED document.

OPSG views

SECAS presented the issue and business requirements to the OPSG, of which OPSG members had no comments.

Proposed Solution DCC Preliminary Assessment

Working Group

In June 2024, the Working Group stated that there is resistance from some DCC Users to use Future Dated SRs and noted even if this modification went ahead, it might not be used. They queried the practical difference this change would make to warrant the cost. The Working Group also noted links to [MP253 'Traffic Management for Price Cap Update Events – User Actions Required'](#) which would mandate change in DCC User behaviour to use Future Dated SRs, and this modification could help.

The Working Group recommended an Alternative Solution DCC Preliminary Assessment be requested, as they noted if costs were reduced enough, it might make this modification be worth pursuing.

TABASC views

In June 2024, the TABASC noted that they do not currently see any impact on technical and business architecture and were supportive for another request for a DCC Preliminary Assessment with reduced scope.

Alternative Solution DCC Preliminary Assessment

Working Group

In August 2024, one member of the Working Group was in support of the modification as the current DSP Future Dating does not benefit Prepayment Consumers. They added that during PCUEs they would want consumers on their new rates as soon as possible, as this would significantly reduce back-office processes for refunds and adjustments to Prepayment Consumers.

The Working Group noted that the number of SMETS1 meters are likely to reduce after SMETS1 migration ends and 4G transition begins. They queried what is the value of taking the peak load off the DCC systems during PCUEs, as they are aware some DCC Users are doing their best to smooth the peaks. They added that with Market-wide Half-Hourly Settlement (MHHS) Programme, the load will only be going upwards.

The Working Group noted that it was not financially clear and would like to see more quantitative benefits before spending the money for the DCC Impact Assessment.

The Working Group were slightly in favour of there being a positive business case with the Alternative Solution, and only one Working Group member was supportive for the Alternative Solution Impact Assessment to be requested.

TABASC views

In August 2024, the TABASC expected Alternative Solution cost to be much lower and noted that any spend on SMETS1 will need to be scrutinised due to finite benefit. They added that using SMETS1 Future Dated (DSP) and change in DCC User behaviour to follow Panel guidance might be sufficient to mitigate peaks in DCC Network traffic.

Proposer/DCC views

The DCC noted the Alternative Solution costs reduced by approximately 55%, and there could still be a business case for the MOC cohort, which will be in place till approximately 2033. They added that the Initial Operating Capability (IOC) cohort costs significantly reduced, could benefit for the next four plus years. The DCC noted that that a majority of Large Suppliers already follow Panel guidance, however the DSP Future Dating is not enough to mitigate the existing peaks and does not help Prepayment Consumers during PCUEs.

SSC views

The SSC has an interest in this Modification and expressed to review the DCC Impact Assessment when it is returned.

Refinement Consultation responses

Two Refinement Consultation respondents (Large Suppliers) agreed that the solution put forward will resolve the issue outlined in this modification.

One respondent (Large Supplier) stated that this modification could help smooth congestion of SRs during high traffic events. However, they questioned if there have been any problems in the most recent PCUEs, the Respondent highlighted that their current internal system cannot future date commands to SMETS1 Meters. The Respondent further highlighted that the Proposed Solution includes SRs that provide little benefit to SMETS1 Meters, as they will be removed in the next five to ten years, as 2G/3G networks are switched off.

SECAS responded stating that this modification aims to provide a longer-term solution to the underlying issue of potential traffic congestion during high demand periods. SECAS also stated that there are millions of SMETS1 Devices still in operation and that this modification will ensure continued reliability in managing SRs, reducing risks for any future disruptions. SECAS highlighted the Alternative Solution allows DCC Users to send Future Dated SRs to SMETS1 Devices without being held at the DSP.

One Large Respondent (Large Supplier) highlighted that the Proposed Solution including the wider range of SRVs presents greater flexibility in ensuring Energy Consumers meters have the correct prices, mode and settings at all times. This would ensure continuity of supply, accurate billing and fulfilment of the terms of service the Energy Consumer signed up to, while also giving Suppliers the tools necessary to reduce their impact on times of peak traffic load across the DCC System, SECAS noted the respondent's preference being the Proposed Solution.

Working Group views

In the November 2024 Working Group, SECAS questioned if an Impact Assessment should be requested for the Alternative Solution. Working Group members voted against requesting an Impact Assessment. This was largely down to the cost of the modification, as well as the time required to implement the solution that the solution options would depreciate. A Working Group member stated that the value is not visible given the temporary nature of SMETS1 Devices and that if this modification is implemented in 2026 or 2027, SMETS1 meters would likely have only a few years left in service. This limited remaining lifespan raised questions within the industry about the cost-effectiveness of investing millions in a modification for meters nearing the end of their viability.

Another Working Group member stated they are supportive of this modification and questioned whether it is possible to address a particular cohort of SMETS1 Devices if the costs presented for each current solution are deemed high cost and low benefit. The DCC have provided a breakdown of costs for individual S1SPs and to provide an indication of the relative costs per cohort under a **RED** document.

The Working Group were unanimous in rejecting any Alert or Notification to indicate Future Dated command has arrived at the Device, because they don't want any DSP Message Mapping Catalogue (MMC) change.

Future DSP Working Group discussions

In the December 2025 Working Group, SECAS presented the outcome of a Preliminary Impact Assessment for DSP2. Members of the Working Group questioned the substantial cost quoted for the Full Impact Assessment and requested clarity on the individual elements contributing to the figure. The DCC explained the cost represented the total quotations of Service Providers to conduct the assessment. The Working Group questioned the expected number of SMETS1 Devices that will remain operational by 2029 that could benefit from the modification. The DCC noted that while precise figures were not available, a decline in SMETS1 Devices is to be expected.

The Working Group highlighted that the main benefits for this modification will be derived from PCUEs, which had been running much smoother than it had previously. This put the benefits of the modification into question, alongside the diminishing Devices.

It was also noted during the meeting that the original Enrolment and Adoption program excluded the solution that was now being presented as a technical possibility with a high cost associated.

A RED document was provided detailing the Service Provider cost breakdowns; however, the Working Group did not support the quoted implementation costs. Members of the Working Group also expressed concern over the complexity and variation in impacts across Service Providers which would require Service Users to adopt multiple tailored approaches.

The Working Group did not ultimately support the modification in its presented form. Members agreed that although the business need persists, changes across the industry and the decreasing SMETS1 Devices requires a reassessment of the business case.

8. Case for change

Business case

As stated previously in this report, there is a question around whether industry consider it more economical to upgrade DCC System capacity now, which will accommodate large volume events such as PCUEs. As SMETS1 installations decrease this capacity will then be available for SMETS2 messages. As opposed to industry paying for a SMETS1 system change which will then become obsolete as SMETS1 installations decrease. Although SMETS1 SMS' will eventually cease in 2033, it is envisaged that SMETS1 Devices in the Smart Metering ecosystem will remain in use and relevant until 2033. The Proposer believes that investing now to accommodate Future-Dated Service Requests for SMETS1 Devices will help smooth out events of high network traffic across the DCC system for the medium-term.

Whilst there is a workaround in place for PCUE, the DCC believes that a long-term solution should be implemented. The solution presented in this modification would be a strategic investment in preventing operational challenges during high-traffic events.

Implementing this modification will allow Suppliers to ensure their Consumers are on the correct tariffs as early as possible on Price Control Event days.

Views relating to the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (a) and (c), as it will enable Consumers to have the correct tariffs during Price Control Event days and reduce the need to correct historic billing.

Industry views

The Working Group did not support the modification and noted the high costs associated with the modification with low benefits. Members also noted that this change should have been investigated earlier.

One respondent to the Refinement Consultation believed that this modification better facilitates General SEC Objective (e)². Another respondent believed it would better facilitate General SEC Objectives (a)³ and (c)⁴. The third respondent did not believe the modification would facilitate any of the General SEC Objectives.

Views relating to the consumer areas

Improved safety and reliability

This modification will be neutral against safety and reliability for consumers.

Lower bills than would otherwise be the case

This modification will have an indirect positive impact against this consumer benefit area, as it will reduce additional costs that will not be further passed onto consumers.

Reduced environmental damage

This modification will be neutral against reduced environmental damage.

Improved quality of service

This modification will have a positive impact against this consumer benefit area, as Consumers will be on the correct tariffs at the right time.

Benefits for society as a whole

This modification will be neutral against this area.

² To facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy

³ To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers premises within Great Britain

⁴ To facilitate Energy Consumers management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	12 Sep 2023
Presented to CSC for initial comment	19 Sep 2023
Obtained feedback from Device Manufacturers and Suppliers	Sep 2023
CSC converts Draft Proposal to Modification Proposal	21 Nov 2023
Business requirements developed with Proposer	22 Nov – 31 Dec 2023
Modification discussed with the Working Group	6 Mar 2024
Business requirements discussed with TABASC	7 Mar 2024
Business requirements discussed with OPSG	12 Mar 2024
Proposed Solution Preliminary Assessment requested	19 Mar 2024
Proposed Solution Preliminary Assessment returned	30 May 2024
Proposed Solution Preliminary Assessment discussed with Working Group	5 Jun 2024
Proposed Solution Preliminary Assessment discussed with TABASC	6 Jun 2024
Alternative Solution Preliminary Assessment requested	24 Jun 2024
Alternative Solution Preliminary Assessment returned	18 Jul 2024
Alternative Solution Preliminary Assessment discussed with TABASC	1 Aug 2024
Alternative Solution Preliminary Assessment discussed with Working Group	7 Aug 2024
Preliminary Assessment discussed with SSC	28 Aug 2024
Refinement Consultation	18 Sep – 9 Oct 2024
Modification discussed with Working Group	6 Nov 2024
Modification on hold pending Future DSP PIA request	November 2024 – November 2025
Impact Assessment options discussed with Working Group	3 Dec 2025
<i>Impact Assessment costs approved by Change Board</i>	<i>28 Jan 2026</i>
<i>Impact Assessment requested</i>	<i>29 Jan 2026</i>
<i>Impact Assessment returned</i>	<i>9 Apr 2026</i>
<i>Modification discussed with Working Group</i>	<i>6 May 2026</i>
<i>Modification discussed with TABASC</i>	<i>4 Jun 2026</i>
<i>Modification discussed with OPSG</i>	<i>9 Jun 2026</i>
<i>Modification discussed with SSC</i>	<i>10 Jun 2026</i>
<i>Modification Report approved by CSC</i>	<i>16 Jun 2026</i>
<i>Modification Report Consultation</i>	<i>17 Jun – 8 Jul 2026</i>
<i>Change Board Vote</i>	<i>22 Jul 2026</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
BAU	Business as usual
CoS	Change of Supplier
CSC	Change Sub-Committee
DCC	Data Communications Company
DSP	Data Service Provider
DUGIDS	DCC User Gateway Interface Design Specification
DUIS	DCC User Interface Services
ESME	Electricity Smart Metering Equipment
GSME	Gas Smart Metering Equipment
HCALCS	Home Area Network Connected Auxiliary Load Control Switches
IOC	Initial Operating Capability
MHHS	Market Half-Hourly Settlement
MMC	Message Mapping Catalogue
MOC	Middle Operating Capability
OPR	Operational Performance Regime
OPSG	Operations Group
PAB	Performance Assurance Board
PCUE	Price Cap Update Event
PIT	Pre-Integration Testing
PSC	Privacy Sub-Committee
S1SP	SMETS1 Service Provider
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specifications
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMS	Smart Metering System
SR	Service Request
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group
UISS	User Interface Services Schedule
UIT	User Integration Testing