

ANNEX A: Government response to November 2018 consultation on amendments to the Smart Energy Code and energy supply licence conditions related to the provision of a DCC SMETS1 Service, and changes to the CPA and CPL management processes for SMETS2 Devices

21 January 2019

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1. Executive Summary

- 1.1. On 5 November 2018 BEIS published a consultation seeking stakeholder views on proposed changes to the smart metering regulatory framework to enable the delivery of data and communications services in respect of SMETS1 meters (a SMETS1 Service) by Smart DCC Ltd (DCC), as well as to streamline the management of the Central Products List (CPL) in the event that a SMETS2 Device Model's Commercial Product Assurance (CPA) certificate expires or is withdrawn, and to transfer responsibility for maintaining the CPA Security Characteristics to the Security Sub-Committee (SSC) for enduring industry management.
- 1.2. Proposed drafting changes to the Smart Energy Code (SEC) and energy supply licence conditions were provided with the consultation for comment. In addition, the consultation sought stakeholder views on the proposed date and draft direction for re-designation of the amended Inventory Enrolment and Decommissioning Procedures (IEDP) document. During the consultation period the proposals were widely promulgated across smart metering governance groups, including the Technical and Business Design Group (TBDG) and the Independent Supplier Forum, and a number of bilateral meetings were held with stakeholders to discuss the proposals.
- 1.3. The consultation closed on 3 December 2018 and we received 11 written responses from a range of stakeholders; including energy suppliers, Energy UK, Citizens Advice, and the DCC.
- 1.4. The principal conclusions set out in this Government response document are summarised below:
 - **Chapter 3 – Enrolment eligibility:** We have concluded that the proposed amendments in relation to enrolment eligibility are broadly appropriate; however in response to stakeholder comments we have included a further requirement for each entry on the SMETS1 Eligible Product Combinations (EPC) list to include the date on which that entry was first added. We have additionally made a minor amendment to the drafting to specify that each EPC or SMETS1 Pending Product Combinations (PPC) list entry must identify the provider of communications services in relation to that entry.
 - **Chapter 4 – Driving early enrolment of SMETS1 Smart Metering Systems:** Having considered consultation responses, we have concluded that the proposed obligation on energy suppliers to take all reasonable steps to facilitate the SMETS1 Smart Metering Systems for which they are responsible becoming Eligible for Enrolment as soon as reasonably practicable is appropriate.
 - **Chapter 5 – SMETS1 Wide Area Network (WAN) communications services:** Having considered consultation responses, we have concluded that no changes to the proposed drafting amendments are required. Should DCC Users consider it useful, the DCC has indicated that it would be willing to make typical end-to-end

SMETS1 Service Response Target Response Times (TRTs) available on a purely indicative basis.

- **Chapter 6 – Changes to the CPA and CPL management process for SMETS2 Devices:** Having considered consultation responses, we have concluded that the proposed drafting is broadly appropriate. However, in response to stakeholder feedback we have included an additional obligation on the SSC to notify relevant Parties when it determines that a CPA Certificate Remedial Plan is required to be developed. We have also added a requirement for the SSC to provide any information or documents reasonably requested by Ofgem in respect of any decision to remove or not remove a Device Model from the CPL, or to not approve a CPA Certificate Remedial Plan that is referred to the Authority for determination.
- **Chapter 7 – Other changes:** In response to stakeholder comments we have withdrawn proposed drafting changes to Section X of the SEC in relation to GFI Testing, as well as the majority of the proposed Section I amendments in relation to gas consumption data stored on the Gas Proxy Function (which forms part of the electricity meter) at split-supply premises. Some other changes are also made.

2. Introduction

Background

- 2.1. The development of a world-leading smart energy system delivering secure, cheap and clean energy is an important part of the Government's Industrial Strategy¹. As our Clean Growth Strategy highlights, smart technologies and services will play a vital role in decarbonising the energy sector². Smart meters are an essential upgrade to our energy infrastructure, enabling a smarter energy system, and energy consumers to be better informed and engaged.
- 2.2. A number of energy suppliers have been installing first-generation (SMETS1) smart meters for their customers. Like second-generation (SMETS2) smart 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 accessible to all energy suppliers. 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.
- 2.3. Enrolment of SMETS1 meters with the DCC will rectify this and will provide a number of benefits to consumers and the energy market, in particular:
 - Retention of smart services for consumers when they switch energy supplier.
 - Reduction of stranding risk for existing SMETS1 assets.³
 - The application of a number of additional security controls core to the national data and communications service, such as Threshold Anomaly Detection, would be extended to these meters.
 - Efficiency gains from rationalisation of smart metering interfaces and processes within energy supplier businesses.
- 2.4. In October 2018 the Government concluded, following public consultation, that the DCC should be required to provide a SMETS1 Service in respect of four of the six SMETS1 meter cohorts (Aclara, Honeywell Elster, Itron and Landis + Gyr) that were within the scope of the Initial Enrolment Project Feasibility Report (IEPFR)⁴. The Government intends to publish a further consultation on whether a SMETS1 Service

¹ See: <https://www.gov.uk/government/topical-events/the-uks-industrial-strategy>

² See: <https://www.gov.uk/government/publications/clean-growth-strategy>

³ Namely the risk of suppliers replacing their SMETS1 meters with SMETS2 meters before the SMETS1 meter's end of life.

⁴ See: <https://www.smartdcc.co.uk/about-dcc/future-service-development/enrolment-and-adoption/>

should be provided in respect of the remaining two meter cohorts (Secure and EDMI) in early 2019.

- 2.5. The Government has made new requirements on energy suppliers to take all reasonable steps to enrol SMETS1 Smart Metering Systems in the DCC within 12 months of those meters first becoming Eligible for Enrolment⁵; and as a backstop to take all reasonable steps to replace any unenrolled SMETS1 Smart Metering Systems with SMETS2 by the end of 2020⁶. These changes are intended to help ensure that by the end of the roll-out all customers with smart meters are able to retain smart services when they change energy supplier.
- 2.6. This document is the Government response to the consultation published on 5 November 2018 on proposed changes to the SEC and energy supply licence conditions that are required to enable the delivery of a SMETS1 Service by the DCC; as well as to streamline the management of the Central Products List (CPL) in the event that a SMETS2 Device Model's Commercial Product Assurance (CPA) certificate expires or is withdrawn, and to transfer responsibility for maintaining the CPA Security Characteristics to the SSC for enduring industry management. The 5 November consultation also consulted on the proposed re-designation date of 21 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) and draft direction for the amended IEDP to be incorporated into the SEC as Appendix AC.
- 2.7. The consultation closed on 3 December 2018 and we received a total of 11 written responses from the following organisations:

Organisation type	Respondents
Energy suppliers	Centrica EDF Energy E.ON First Utility Npower Scottish Power SSE
Network operators	Electricity North West
Other organisations	Citizens Advice DCC Energy UK

⁵ Where an energy supplier acquires a SMETS1 meter that is Eligible for Enrolment following change of energy supplier and the meter is not enrolled, the new energy supplier will be required to take all reasonable steps to enrol the meter within 12 months of acquiring the meter.

⁶ See: <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>

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- 2.8. During the consultation period a number of bilateral meetings were held with individual stakeholders, in addition to engagement through the Technical and Business Design Group (TBDG), the Security Sub-Committee (SSC) and the Independent Supplier Forum.

Implementation of conclusions

- 2.9. The final draft legal text set out in Annexes B and C published alongside this consultation response will be laid before Parliament on 21 January 2019 in line with the procedure under section 89 of the Energy Act 2008.
- 2.10. Subject to no objection being raised during the 40-day laying period, we expect to bring the relevant modifications to the main body of the SEC and the energy supply licences into effect in March 2019.
- 2.11. In addition to this Annex A, there are 5 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 SEC Subsidiary Documents (SSDs)
 - Annex E – Inventory Enrolment and Decommissioning Procedures (re-designation version)
- 2.12. Annex B sets out the final draft legal text as it would look combined with the SEC drafting that is currently in legal effect, while Annex C shows the final draft energy supply licence condition modifications on top of the amendments laid before Parliament on 9 October 2018 to implement the Government's conclusions on maximising interoperability for first generation smart meters⁷, which take effect shortly following publication of this Government response. The text that has been laid before Parliament is marked up for clarity. The versions of the energy supply licence conditions and the SEC published at Annexes B and C alongside this document should therefore not be read as the latest in legal effect versions. The 'in legal effect' versions of the energy supply licence conditions can be found on the Ofgem website⁸, and the 'in legal effect' version of the SEC is available on the SEC website⁹.
- 2.13. In addition to the proposed licence condition modifications and changes to the main body of the SEC, the consultation published on 5 November 2018 invited views on proposed associated changes to the Inventory, Enrolment and Decommissioning

⁷ See: <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>

⁸ See: <https://www.ofgem.gov.uk/licences-codes-and-standards>

⁹ See: <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>

Procedures (IEDP) document, the CPL Requirements Document and the DCC User Interface Services Specification (UISS). The covering letter to this Government response issues the direction and re-designation to incorporate into the SEC as Appendix AC the amended IEDP¹⁰ attached at Annex E with effect from 21 January 2019. We propose to baseline a new version of UISS to incorporate the amendments shown at Annex D, which will subsequently be made available from the Developing SEC section of the SEC website¹¹. We intend to consult on bringing this baselined version of UISS into legal effect in advance of DCC's SMETS1 Service being made available.

- 2.14. In the covering letter accompanying this Annex A, we are separately consulting on bringing the concluded upon amendments to the CPL Requirements Document shown at Annex D into legal effect on 11 March 2019 or, if necessary, as soon as reasonably practicable within one month thereafter. This includes amendments to the CPL Requirements Document previously consulted on by the DCC in November 2017 and September 2018 to specify the process for addition of SMETS1 Device Models to the CPL¹².
- 2.15. Every effort has been made to ensure that the explanatory text in the main body of this Government response reflects the legal drafting in Annexes B, C, D and E. We have also sought to ensure that the explanatory text provides a clear and simplified overview of our proposals, however the legal drafting should be considered to be definitive in the event that there is an inconsistency between it and the explanatory text. Where terms defined in the SEC (or in licence conditions) are used in this Government response document, they are capitalised.

¹⁰ The amended IEDP being incorporated into the SEC includes SMETS1-related updates to the document baselined in February 2018 following consultation by the DCC, as well as consequential changes relating to the removal of the DCC opt-out for non-domestic smart metering.

¹¹ See: <https://smartenergycodecompany.co.uk/the-developing-sec/>

¹² See: <https://www.smartdcc.co.uk/smart-future/enrolment-and-adoption/>

3. Enrolment eligibility

Issue under consideration

- 3.1. In October 2018 the Government published its consultation response on maximising interoperability for first generation smart meters¹³. The Government concluded that energy suppliers should be required to take all reasonable steps to enrol eligible SMETS1 Smart Metering Systems in the DCC within 12 months of those systems first becoming Eligible for Enrolment (the “SMETS1 enrolment mandate”)¹⁴.
- 3.2. SMETS1 Smart Metering Systems are considered to be Eligible for Enrolment from the point at which they are eligible to be Enrolled in accordance with the relevant provisions of the SEC. We therefore proposed the insertion of a new provision at Section H5.8 of the SEC stating that a SMETS1 Smart Metering System will be considered eligible to be Enrolled when it comprises all or part of a SMETS1 Installation (see chapter 7) for which all the Devices are of Device Models which either:
- comprise a combination of Device Models that is listed on the SMETS1 Eligible Product Combinations (EPC); or
 - could, as a result of applying an existing firmware upgrade (or upgrades), become a combination of Device Models that is listed on the EPC.
- 3.3. We also proposed to amend the Section F definitions of SMETS1 Eligible Product Combinations and SMETS1 Pending Product Combinations (PPC) to remove the drafting that states that an EPC or PPC entry equates to a Device Model combination that comprises a SMETS1 Smart Metering System. This is because an entry could alternatively equate to a combination of Device Models that comprises two SMETS1 Smart Metering Systems; the electricity Smart Metering System and the gas Smart Metering System.
- 3.4. The consultation sought views on these proposed amendments to Sections H and F of the SEC.

¹³ See: <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>

¹⁴ Where an energy supplier acquires a SMETS1 meter that is Eligible for Enrolment following change of energy supplier and the meter is not enrolled, the new energy supplier will be required to take all reasonable steps to enrol the meter within 12 months of acquiring the meter.

Question 1: Do you agree with the proposed amendments to Sections F and H of the SEC in relation to defining the point from which SMETS1 Smart Metering Systems are considered Eligible for Enrolment?

Summary of responses

- 3.5. Of the nine stakeholders who responded to this question, six agreed with the proposed changes, while one energy supplier disagreed and two energy suppliers neither agreed nor disagreed. While a number of respondents welcomed the additional clarity provided by these changes, a number of questions and concerns were also raised. In particular:
- A number of parties expressed concerns about the process for approving the addition of new Device Model combinations to the EPC. In particular these respondents noted that, while the draft Transition and Migration Approach Document (TMAD) specifies that the DCC shall not add entries to the EPC other than to the extent that it has approval from the Secretary of State to do so, the criteria that would inform this decision have not yet been shared with industry. These respondents were keen that the decision to add a Device Model combination to the EPC should not be taken by BEIS or the DCC in isolation, and argued that sufficient end-to-end testing should be undertaken by energy suppliers before a Device Model combination progresses to the EPC.
 - A number of parties expressed concerns that new drafting at Section H5.8(b)¹⁵ could be used to force energy suppliers to reduce the number of Device Model combinations that they operate prior to enrolment, driving an increased volume of firmware upgrades. One energy supplier additionally questioned the position where a later firmware version than the one currently being tested by the DCC has been installed on a Device.
 - Additional clarity was requested in relation to the process for notifying suppliers of the addition of a new Device Model combination to the EPC, and one energy supplier suggested that the EPC should include a reference to the date that each entry was first added.

¹⁵ Section H5.8(b) states that a SMETS1 Smart Metering System is eligible to be Enrolled when the combination of SMETS1 Devices of which it is comprised form all or part of a SMETS1 Installation for which all the Devices are of Device Models which could, as a result of the application of an existing firmware upgrade or upgrades, become a combination of Device Models listed on the EPC. As a consequence, the requirement for suppliers to take all reasonable steps to enrol any such SMETS1 Smart Metering Systems in the DCC within 12 months takes effect from that point (or from the point the supplier acquires any such meter that is not enrolled following change of energy supplier).

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- One supplier requested further clarification around how the DCC will list Device Model combinations (and subsets of those Device Model combinations) on the EPC.
- 3.6. In addition to these comments, the DCC stated its understanding that, in the case of a dual-fuel SMETS1 Installation at split-supply premises (which would likely include both an 'active' meter and a 'dormant' meter¹⁶), the Responsible Supplier for the 'active' meter will be able to access up-to-date information on the Device Model of the associated 'dormant' meter from either its own asset management system or the relevant SMETS1 SMSO's system in order to determine whether the SMETS1 Installation as a whole comprises an eligible product combination. Where the SMETS1 SMSO maintains Device firmware on the energy supplier's behalf, the DCC anticipates that the energy supplier in question would request the SMETS1 SMSO to confirm to it that the relevant SMETS1 Installation is an eligible product combination.

Government response

- 3.7. BEIS is committed to establishing robust governance arrangements in relation to the decision to add a new Device Model combination to the EPC (which has the effect of putting the DCC's SMETS1 Service live in respect of that Device Model combination). At the December meeting of the SEC Panel BEIS proposed a set of Live Services Criteria to assess the readiness of the DCC to provide a SMETS1 Service in respect of each operating capability. These criteria include:
- Readiness and scalability of the DCC's migration and service management capabilities.
 - Successful completion of testing (including regression and security testing) of DCC's SMETS1 Service in respect of the relevant Device Model combinations.
 - Assurance of required business continuity and disaster recovery plans.
- 3.8. It is envisaged that the DCC will provide evidence (including independent assurance where relevant) that it has met these criteria, and that the SEC Panel will provide a recommendation on the basis of that evidence, prior to BEIS approving the addition of relevant Device Model combinations to the EPC. Where an initial 'go live' decision has already been taken in respect of a DCC operating capability (i.e. the criteria have already been met in respect of at least one Device Model combination that forms part of the capability release in question), it is envisaged that BEIS will nonetheless request a Live Services Criteria response from the DCC for each additional new Device Model combination to be added to the EPC. However, it is anticipated that the DCC's response to each of these further requests will be proportionate to the decision being taken, and will focus on the incremental

¹⁶ A meter is considered to be 'dormant' where the Responsible Supplier does not have arrangements with a SMETS1 Smart Metering System Operator to provide data and communication services in respect of that meter. This situation most often arises where a consumer has switched energy supplier away from the supplier that originally installed the meter.

changes being made to the DCC's systems, and confirming that no disruption will be caused to the DCC's pre-existing service provision.

- 3.9. We do not consider, however, that completion of supplier end-to-end testing or piloting should be included as part of the criteria for a SMETS1 Smart Metering System to become Eligible for Enrolment. In the October 2018 Government response to our consultation on maximising interoperability for first generation smart meters¹⁷, we increased the period of time within which energy suppliers are required to take reasonable steps to enrol eligible SMETS1 Smart Metering Systems from our initial proposal of 6 months to 12 months. It was noted that this would provide energy suppliers sufficient time to undertake piloting and end-to-end testing prior to commencing mass-migration of meters into the DCC. We consequently do not consider that completion of these activities should be considered a pre-requisite for the addition of Device Model combinations to the EPC.
- 3.10. With regard to the potential for the new provision at Section H5.8(b) to require suppliers to carry out unnecessary additional firmware upgrades, we do not expect this to be the case in practice. The SMETS1 SVTAD requires the DCC to select the Device Model combinations that are used in testing the DCC solution with the objective of facilitating the enrolment of all SMETS1 Smart Metering Systems that are in scope for enrolment as soon as reasonably practicable. As part of this the DCC has recently published a consultation¹⁸ on which Device Model combinations are to be used in Systems Integration Testing (SIT) for the Initial Operating Capability (IOC) cohort, which also explains the rationale for its selection. Following this consultation the DCC will publish its decision on the Device Model combinations to use in SIT for IOC. If an energy supplier disagrees with any of the DCC's Device Model combination selection decisions it has the right to refer the matter to the Secretary of State within 10 Working Days of the DCC's decision for a final and binding determination.
- 3.11. These provisions have been put in place to ensure the DCC carries out testing in a manner designed to enable the enrolment of SMETS1 Smart Metering Systems as soon as reasonably practicable, and to that end suppliers should ensure that they have provided accurate and up-to-date information to the DCC regarding the Device Model combinations they intend to enrol. To cater for a scenario where an energy supplier wishes to enrol a SMETS1 Smart Metering System that is running later firmware version(s) than those specified by the relevant existing EPC entry, we propose to require the DCC to make a Device Model Combination Testing (DMCT) service available. This service will also enable the testing of any Device Model combinations not represented in SIT that do not have the potential to be upgraded to a Device Model combination that is listed on the EPC, should any such Device Models exist. In due course the DCC will consult on a further iteration to the SVTAD

¹⁷ See: <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>

¹⁸ See: <https://www.smartdcc.co.uk/smart-future/enrolment-and-adoption/>

to make provision for this testing, and in its draft LC13 plan DCC proposed that it would make DMCT available in respect of the IOC cohort from 9 May 2019. The DCC anticipates that, where successful, testing of a new Device Model combination through DMCT will take approximately 3 days from the installation of the relevant Device Model combination in its test labs.

- 3.12. The DCC has an existing obligation to keep the EPC up-to-date and provide it to the SEC Panel for publication on the SECAS website (Section F2.10A(a)). In addition to this, BEIS will write to inform SEC Parties of the Secretary of State's decision to approve (or to not approve) the addition of new Device Model combinations to the EPC. We agree with the suggestion from one energy supplier that EPC entries should include the date that they were first created, given the significance of this information to energy suppliers' licence obligations.
- 3.13. When adding a new Device Model combination to the EPC, the DCC has confirmed that it may also add subsets of that Device Model combination where it considers that the testing carried out on the superset is sufficient to demonstrate that it is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts in respect of the relevant subset. To accommodate this approach, and to additionally enable the DCC to automatically propose the addition of new Device Model combinations to the EPC where it concludes that additional testing is not required because the Device Model combination in question is substantively equivalent to one that's already listed on the EPC, we have made a number of minor clarificatory amendments to Sections F2.10A and H14.36A.

Conclusions

- 3.14. We have amended the drafting to specify that each entry on the EPC must include the date on which that entry was first added.
- 3.15. We have also amended Section F2.10A, and made consequential amendments to Sections H14.36A and H14.31(e), to:
 - a) Specify that each EPC entry must identify a combination of SMETS1 Device Models and communication service provider in respect of which the DCC has demonstrated through testing that it is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts. This change accommodates the potential need for the DCC to carry out testing against each communication service provider before adding the relevant entries to the EPC, and we have made consequential changes to the PPC.
 - b) Clarify that the DCC may add a Device Model combination to the EPC where it considers that testing already carried out against a different Device Model combination is sufficient to demonstrate that it is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts in respect of the new Device Model combination under consideration.

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- 3.16. A further minor amendment has been made to Section H5.8 to align the drafting more closely with the terminology that is used in the relevant energy supply licence conditions.

Summary of changes to the consultation legal drafting

SEC Section	Content
Section H5.8	Changed the reference to 'eligible for Enrolment' to 'eligible to be Enrolled' to align with the language used in the relevant energy supply licence conditions.
Section F2.10A Section H14.36A Section H14.31(e)	Amended the drafting to specify that each EPC or PPC entry must identify a combination of SMETS1 Device Models and communication service provider in respect of which the DCC has demonstrated through testing that it is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts, and to clarify that the DCC may add a Device Model combination to the EPC where it considers that testing already carried out against a different Device Model combination is sufficient for those purposes. Consequential amendments have also been made to Sections H14.36A and H14.31(e).

4. Driving early enrolment of SMETS1 Smart Metering Systems

Issue under consideration

- 4.1. The SMETS1 enrolment mandate, as concluded upon in October 2018¹⁹ and described in chapter 3, requires energy suppliers to take all reasonable steps to enrol eligible SMETS1 Smart Metering Systems in the DCC within 12 months of those systems first becoming Eligible for Enrolment²⁰.
- 4.2. In order for a SMETS1 Smart Metering System to be considered Eligible for Enrolment, and thus for it to be subject to the requirement for energy suppliers to take all reasonable steps to enrol it within 12 months, action may be required on the part of the relevant energy supplier. While we consider that there are commercial and reputational incentives for energy suppliers to work towards early enrolment of their SMETS1 Smart Metering Systems with the DCC, we recognise that these incentives are not necessarily the same across all suppliers. In the case of some energy suppliers greater effort might be required on their part in order to get their SMETS1 Smart Metering Systems into a state where they are capable of interoperating with the DCC's SMETS1 service. It might therefore be the case that, for some energy suppliers, there are benefits to delaying the point at which their SMETS1 Smart Metering Systems become Eligible for Enrolment and consequently fall within the scope of the SMETS1 enrolment mandate.
- 4.3. We therefore proposed the creation of a new licence obligation on energy suppliers to take all reasonable steps to facilitate the SMETS1 Smart Metering Systems for which they are responsible becoming Eligible for Enrolment as soon as reasonably practicable. This would include, where necessary, the procurement of firmware upgrades where these are required in order for the SMETS1 Smart Metering Systems in question to be capable of successfully interoperating with the DCC SMETS1 solution. We consider this new licence obligation would help drive early enrolment of SMETS1 Smart Metering Systems and delivery of benefits to consumers and energy suppliers.
- 4.4. The consultation sought views on the proposed amendments to the energy supply licence conditions to implement this new obligation.

¹⁹ See: <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>

²⁰ Where an energy supplier acquires a SMETS1 meter that is Eligible for Enrolment following change of energy supplier and the meter is not enrolled, the new energy supplier will be required to take all reasonable steps to enrol the meter within 12 months of acquiring the meter.

Question 2: Do you agree with the proposed amendments to the energy supply licence conditions in relation to ensuring early enrolment of SMETS1 smart meters?

Summary of responses

- 4.5. 10 stakeholders responded to this question, of which six agreed with the proposed changes while three neither agreed nor disagreed. One energy supplier disagreed with the proposed changes, arguing that they are unnecessary because existing licence obligations already place sufficient incentives on suppliers to achieve the desired outcomes. Citizens Advice supported the proposals on the grounds that they will enhance SMETS1 consumers' access to the benefits of smart functionality (while cautioning that the quality of the customer experience and value for money should be prioritised over the speed of delivery), and DCC considered that the obligation would be advantageous from a capacity management perspective.
- 4.6. A number of questions and concerns were raised by stakeholders in relation to the proposed obligation:
- Two respondents expressed a view that the legal drafting itself should explicitly include the requirement to procure any firmware upgrades that are required to enable the SMETS1 Smart Metering Systems for which an energy supplier is responsible to become Eligible for Enrolment, and to make those firmware versions available for the DCC to test against.
 - Two respondents requested additional clarity in relation to how 'all reasonable steps' would be interpreted, and the circumstances under which energy suppliers would be judged to be in breach of their obligations.
 - One energy supplier questioned the interaction of the proposed obligation with the draft TMAD that has been consulted on by the DCC, and which requires the DCC to carry out firmware upgrades in respect of 'dormant' SMETS1 Smart Metering Systems.
 - One energy supplier stated that its ability to take reasonable steps to facilitate the SMETS1 Smart Metering Systems for which it is responsible becoming Eligible for Enrolment is dependent on early sight of the Device Model combinations that are listed on the EPC and the PPC.

Government response

- 4.7. We continue to consider that the proposed obligation will help drive early enrolment of SMETS1 Smart Metering Systems with the DCC, and consequently maximise benefits for both consumers and energy suppliers. We further consider that the scope of the obligation as currently drafted is appropriate as we consider that it requires energy suppliers to take steps including (but not necessarily limited to) the

procurement of firmware upgrades that are required to enable the SMETS1 Smart Metering Systems for which they are responsible to become Eligible for Enrolment, and to make those firmware versions available for the DCC to test against. We note that, where BEIS has not decided to require the DCC to provide a SMETS1 Service in respect of a cohort of meters, there are no steps that a supplier could take that would result in the relevant SMETS1 Smart Metering Systems becoming Eligible for Enrolment, as BEIS would not approve the addition of any such Device Models to the EPC.

- 4.8. The interpretation of ‘all reasonable steps’ is a matter for Ofgem if and when it comes to take enforcement action.
- 4.9. Where an energy supplier has inherited ‘dormant’ meters that were originally installed by another supplier, the draft TMAD (which DCC has submitted to the Secretary of State for designation) makes the DCC responsible for carrying out any necessary firmware upgrades to those devices and subsequently migrating them following the process set out in the TMAD. Under these circumstances, the TMAD places obligations on the Installing Supplier regarding provision of the firmware that is required by the DCC in order to enable enrolment. Where the necessary firmware to enable enrolment of any such ‘dormant’ meters does not yet exist, however, we consider that the responsible supplier would be required to take any steps that are considered reasonable under the particular circumstances to procure that firmware upgrade to enable the SMETS1 Smart Metering Systems for which they are responsible to become Eligible for Enrolment.
- 4.10. The DCC is subject to obligations in the SEC to keep the EPC and the PPC up-to-date and provide them to the Panel for publication on the SECAS website. The DCC has recently published a consultation²¹ on which Device Model combinations are to be used in Systems Integration Testing for the IOC cohort, and will do the same for the Device Model combinations to be tested for later capability releases in due course. This provides an early indication of the likely constituents of the first version of the EPC for each capability release.

Conclusions

- 4.11. Having considered stakeholder responses and the broad support for the proposed obligation, we consider that no further changes to the proposed drafting are required. We will continue to work closely with the DCC and energy suppliers to ensure early progress towards SMETS1 enrolment and the safeguarding of consumers’ interests.

²¹ See: <https://www.smartdcc.co.uk/smart-future/enrolment-and-adoption/>

5. SMETS1 Wide Area Network (WAN) communications services

Issue under consideration

- 5.1. The DCC service requirements set out in the SEC were drafted with SMETS2 in mind, and do not apply to the existing SMETS1 service provision that has been developed by suppliers and SMETS1 Smart Metering System Operators (SMSOs). The Government recognises that, in order to avoid incurring additional unnecessary time and cost in the delivery of a DCC SMETS1 Service, certain provisions of the SEC may require amendment to reflect differences in the service provision that has been agreed in respect of SMETS1 Devices.
- 5.2. A number of changes were therefore proposed to the DCC User Interface Services Schedule (UISS), and Sections H and G of the SEC:
- Create a distinct SMETS1 Service Response Target Response Time (TRT) of 16 seconds, which excludes WAN processing time but is specifically designed to account for processing across the Data Service Provider (DSP), Dual Control Organisation (DCO) and SMETS1 Service Provider (S1SP), as well as an allowance for transfer time between SMETS1-specific elements of the DCC's system.
 - Create a longer SMETS1 TRT of 5 days in respect of the Activate Firmware (11.3) Service Request, which is used to both distribute firmware to SMETS1 Devices and subsequently activate that firmware.
 - Clarify the period being measured by TRTs that apply in respect of SMETS1 Sequenced Services, Scheduled Services, Future Dated Services and SMETS1 and S1SP Alerts.
 - Clarify which service requests are not available in respect of SMETS1 Devices, update the Monthly Service Metrics to reflect that they only apply in respect of SMETS2+ Devices, and clarify that for scheduled services a TRT of 24 hours applies in respect of SMETS2+ Devices.
 - Provide that specific provisions in Sections H8 (Service Management, Self-Service Interface and Service Desk), H9 (Incident Management) and H10 (Business Continuity) of the SEC should only apply to the SMETS1 SM WAN and SMETS1 Service Providers' Systems subject to any contrary provisions in the SEC Subsidiary Documents.
 - Enable the DCC to comply with an alternative standard or methodology that reflects Good Industry Practice, and is capable of verification as such by the DCC Independent Security Assurance Service Provider, in respect of SMETS1 Communications Service Providers (CSPs) for certain Section G security standards.

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- 5.3. The consultation sought views on the proposed amendments to UISS, and Sections H and G of the SEC.

Question 3: Do you agree with the proposed changes to the DCC User Interface Services Schedule (UISS), and Sections H and G of the SEC to reflect differences between the SMETS1 and SMETS2 communications infrastructure?

Summary of responses

- 5.4. Of the nine stakeholders who responded to this question, six agreed with the proposed changes, while one energy supplier disagreed and two energy suppliers neither agreed nor disagreed. Those who agreed with the proposals expressed support for the principle of applying different service levels to SMETS1 systems where seeking to apply the existing SMETS2 provisions would prove technically infeasible or disproportionately costly.
- 5.5. A number of questions and concerns were raised by stakeholders in relation to the proposed amendments:
- Four respondents requested further clarity on what the DCC's SMETS1 WAN processing times were likely to be, in the absence of a binding TRT. These respondents noted that this information would be used to inform timeout and retry strategies, and backstop processing times. Two respondents considered that this information would be useful even if not included in the SEC.
 - Three energy suppliers stated their expectation that current service levels for unenrolled SMETS1 meters and systems should be maintained following enrolment. One energy supplier further noted that they would incur additional development costs if response times for SMETS1 service requests were to exceed the SMETS2 TRT of 30 seconds.
 - A number of respondents requested further clarity on the variations to Sections H8, H9 and H10 of the SEC that will apply in respect of SMETS1 meters and systems.
 - With respect to the proposed amendments to Section G of the SEC, one energy supplier queried how equivalence with the relevant standards would be determined, while another asked how 'good industry practice' would be evaluated.

Government response

- 5.6. Having considered stakeholders' responses, we have concluded that there would be limited value in requiring the DCC to disclose estimated SMETS1 WAN

processing times where they are non-binding, and hence cannot be relied upon by energy suppliers to inform timeout and retry strategies. However, the DCC has indicated that it would be willing to make typical end-to-end SMETS1 Service Response TRTs available to Users on a purely indicative basis. Should stakeholders consider that this information would be useful, we encourage them to engage with the DCC through the SEC Panel Operations Group. It should be noted, however, that the DCC will be unable to make any such estimates available until after its SMETS1 Service has gone live. In the lead up to enrolment energy suppliers and SMSOs are the only potential sources of this information, and BEIS will encourage engagement through the TBDG E&A sub-group to establish whether this information is capable of being shared.

- 5.7. Where possible we have sought to align the design requirements for DCC's SMETS1 service with its existing SMETS2 service in order to minimise costs to suppliers and enable them to operate a single set of business processes. Given technical differences between the DCC's SMETS1 and SMETS2 services, however, this is not always feasible or cost effective. As the DCC has confirmed that the TRTs that apply to SMETS1 service responses cannot be aligned with those that have been put in place for SMETS2 within acceptable parameters of time and cost, we continue to consider that it is appropriate for a different set of SMETS1-specific TRTs to apply (a position supported by the majority of consultation responses). We can confirm, however, that we see no reason why existing SMETS1 service users should experience a deterioration in their service as a result of these changes.
- 5.8. With regard to the potential variations to aspects of Sections H8, H9 and H10 of the SEC, the DCC confirmed in its consultation response that it will consult on the necessary SSD provisions once it has sufficient confidence in the service levels that will be provided by SMETS1 CSPs. We note that this consultation will need to be undertaken by DCC sufficiently in advance of IOC to enable the changes to be concluded on and brought into legal effect within the requisite timeframes. Before designating or re-designating the date from which an SSD introducing any such provisions is to be incorporated into the SEC, the relevant parties will be consulted in accordance with the requirements of Section X5 of the SEC.
- 5.9. With regard to the proposed amendments to Section G of the SEC, equivalence with the relevant security standard will be assessed with reference to whether the DCC complies with an alternative standard or methodology that reflects Good Industry Practice in respect of the subject matter of the relevant security standard, and that is capable of verification as such by the DCC Independent Security Assurance Service Provider in accordance with Section G9 of the SEC. Good Industry Practice in this context is defined in Section A of the SEC as meaning "in respect of a Party, the exercise of that degree of skill, diligence, prudence and foresight which would reasonably and ordinarily be expected from a skilled and experienced person engaged in a similar type of undertaking as that Party under the same or similar circumstances." The output of the DCC Independent Security Assessment, which will include a review of any alternative standards or

methodologies complied with by the DCC in line with the Section G requirements, will be made available for the SSC to review.

Conclusions

- 5.10. Having considered stakeholder responses, we consider that no changes to the proposed drafting are required.

6. Changes to the CPA and CPL management process for SMETS2 meters

Issue under consideration

- 6.1. Currently, if a SMETS2 Device Model that has been subject to Commercial Product Assurance (CPA) becomes non-compliant with the CPA requirements and isn't remediated to the satisfaction and within timescales set by the National Cyber Security Centre (NCSC), the CPA certificate will be withdrawn; causing the Device Model in question to be removed from the Central Products List (CPL). At this point, the DCC will give the affected Device(s) an SMI Status of 'suspended', meaning that most smart services will cease. This may have a consumer impact as it prevents the energy supplier from being able to communicate with such Devices except for certain actions, such as to update the firmware. This consumer impacting approach to a CPA non-compliance issue may not be the desired outcome in all circumstances, depending on the severity of the issue in question.
- 6.2. We proposed amendments to the SEC to move away from the automatic removal of Device Models from the CPL due to a CPA certificate being removed or withdrawn, towards a risk-based approach which involves the SSC considering a number of factors (including compliance and stakeholder views) prior to providing a decision as to the next steps that should be undertaken.
- 6.3. In addition, we proposed to transfer responsibility for maintaining the CPA Security Characteristics to the SSC for enduring industry management.
- 6.4. The consultation sought views on the proposed amendments to Sections A, F and G of the SEC, and the CPL Requirements Document.

Question 4: Do you agree with the proposed changes to the CPA and CPL management process for SMETS2 meters?

Summary of responses

- 6.5. Nine stakeholders responded to this question, of which eight agreed with the proposed changes. One energy supplier neither agreed nor disagreed, and a number of detailed comments were made:
 - One energy supplier noted that the proposed expansion of the SSC's remit could impact on other time-critical SSC activities and responsibilities. Another

energy supplier expressed a view that SSC members do not possess the specialist knowledge and expertise required to assess the types of vulnerability that may give rise to CPA non-compliance or to maintain the CPA Security Characteristics, and consequently requested that the SSC is provided with comprehensive information by the NCSC to help inform its decisions. One supplier further suggested that any decisions should be taken by the SEC Panel on the basis of advice provided by the SSC.

- One energy supplier noted that under circumstances where a Device Model's CPA certificate has expired or been revoked, a large proportion of the SSC's voting members are likely to have a conflict of interest, which may require decisions to be taken by a small subset of the overall membership.
- One energy supplier questioned which party (or parties) would be responsible for producing a CPA Certificate Remedial Plan where there are multiple responsible suppliers for Devices of the Device Model in question. Another energy supplier questioned how they would be made aware of Devices that require a CPA Certificate Remedial Plan to be put in place where they are not the installing supplier.
- One energy supplier emphasised the importance of ensuring that sensitive information about security vulnerabilities is not shared more widely than is absolutely necessary.
- One energy supplier noted that the proposed drafting continues to allow Device Models to be automatically removed from the CPL as a result of withdrawal or cancellation of any other type of Assurance Certificate (other than a CPA certificate).
- One energy supplier requested further information in relation to the policy that Supplier Parties are required to put in place to manage compliance with CPA Certificate Remedial Plans under Section G8.64.
- The DCC highlighted that the proposed amendments impact not only SMETS2 meters, but also other SMETS2 Devices (such as Communications Hubs).
- A small number of typographical errors were also identified.

Government response

- 6.6. With regard to the concerns about SSC capacity and capability that were expressed by some respondents, BEIS continues to consider that the SSC is the appropriate body to take decisions on CPL removal as a result of CPA non-compliance, and to maintain the CPA Security Characteristics on an enduring basis. Members of the SSC are required to have sufficient relevant security expertise, and the SSC will be expected to review all evidence and guidance available, which could include input from the NCSC, to inform its decisions. This will include guidance as to any applicable security risks that arise as a result of any CPA non-compliance. In

addition, the SSC has the ability to invite any other technical experts as considered appropriate to advise it as per Section G7.16(b). The SSC will need to ensure it has sufficient resource in place to enable any such decisions to be taken swiftly, and to avoid any impacts on its routine business. Furthermore we note that, while the SSC will be empowered to work with the NCSC to develop and maintain the CPA Security Characteristics, the NCSC will retain overall responsibility for publishing the CPA Security Characteristics.

- 6.7. We consider that the decision on whether to suspend a Device Model from the CPL or to impose a CPA Certificate Remedial Plan should be informed primarily by security considerations (which would need to be evaluated in the context of any operational impacts of suspension), and consequently the SSC is better placed than the SEC Panel to take such a decision. Members of the SSC attend as individuals rather than representatives of their employers, and we consider that there are appropriate mechanisms in place to prevent conflicts of interest from arising. In the event that a Party disagrees with the SSC's decision to remove (or not to remove) a Device Model from the CPL, or not to approve a CPA Certificate Remedial Plan, it is entitled to refer the matter to the Authority for its final and binding determination.
- 6.8. Where multiple energy suppliers are responsible for Devices of a Device Model in respect of which the SSC has required a CPA Certificate Remedial Plan to be put in place (which is likely in most such circumstances), each supplier will be required to put an appropriate plan in place for the remediation of Devices for which they are responsible. We expect that any such plans would be proportionate to the severity of the issue and the number of devices affected, and consequently do not expect the working arrangements in relation to this requirement to be unnecessarily onerous. In order to facilitate this process, and having considered consultation responses, we have included an additional requirement on the SSC to notify Parties of their obligation to produce a CPA Certificate Remedial Plan should one be required.
- 6.9. In relation to other comments raised by respondents:
- We recognise the importance of not sharing the details of any potential security vulnerability identified by the NCSC more widely than is strictly necessary, and believe the SSC have suitable processes in place to assess this risk to ensure it is managed appropriately.
 - The intention of our amendments is to enable a risk-based approach to CPL removal for CPA non-compliance only, and the existing process (which involves automatic removal from the CPL) will continue to apply where other types of required Assurance Certificates expire or are cancelled or withdrawn.
 - Each Supplier Party is required to put in place an appropriate policy for creating and managing compliance with CPA Certificate Remedial Plans. BEIS does not consider it appropriate to unnecessarily constrain suppliers by prescribing the detailed content that such a plan must contain, which should instead be driven

by each supplier's individual circumstances, organisational structures and business processes.

Conclusions

- 6.10. Having considered stakeholder responses, we intend to amend clause 6.3 of the CPL Requirements Document to require the SSC to notify relevant Parties when it determines that a CPA Certificate Remedial Plan is required to be developed.
- 6.11. We have added a new provision at Section G7.21(j) to require the SSC to provide any information or documents reasonably requested by the Authority in respect of any decision to remove or not remove a Device Model from the CPL or not to approve a CPA Certificate Remedial Plan that is referred to the Authority for determination.
- 6.12. We have also made minor further corrections to Section A to reflect the re-naming of the CESG to the NCSC, as well as the re-naming of the CESG Certified Listed Advisor Scheme (CLAS) as the Certified Cyber Professional (CPP) scheme. Consequential changes have been made to Section G to reflect these definition changes, and we have corrected a minor typographical error at Section F2.7A(b).

Summary of changes to the consultation legal drafting

SEC Section	Content
Sections A & G	Minor updates and consequential changes to reflect the re-naming of the CESG as the National Cyber Security Centre (NCSC), and the re-naming of the CESG Certified Listed Advisor Scheme (CLAS) as the Certified Cyber Professional (CPP) scheme.
Section F2.7A(b)	Corrected a minor typographical error
Section G7.21(j)	Added a requirement for the SSC to provide support and advice to the Authority in relation to any matter referred to the Authority for determination pursuant to Section F2.7B.
CPL Requirements Document	Added a requirement at clause 6.3 to require the SSC to notify relevant Parties when it determines that a CPA Certificate Remedial Plan is required to be developed.

7. Other changes

Issue under consideration

7.1. A number of further changes were proposed to the SEC. These were:

- Amendments to Section A to incorporate new definitions and update existing definitions to accommodate SMETS1 smart meters and systems.
- Amendments to Section N2.2 to update the meaning of SMETS1 Services so that it refers to the communications services that are set out in the amendments to the SEC pursuant to which the SMETS1 Meters in question become capable of Enrolment.
- Removal of the requirement in Section N2.13 for any amendments to the SEC to facilitate Enrolment of SMETS1 Meters to include provisions updating Section I of the SEC where necessary, and further minor amendments to Section N to align with terminology used elsewhere in the SEC.
- Amendments to Section H14 to remove the obligation on the DCC to provide a connection to a simulation of the SMETS1 SM WAN during Device and User System Testing, and to align Sections H14.31(e) and H14.36A with the definition of SMETS1 Eligible Product Combinations.
- A minor amendment to Section G3.15(a) to reflect the fact that Users do not process Commands and Instructions.
- Amendments to the baselined version of the CPL Requirements Document to remove the requirement on energy suppliers to confirm the sub-version of SMETS1 with which a Device Model complies prior to the addition of that Device Model to the CPL.
- Amendments to the baselined version of the Inventory Enrolment and Decommissioning Procedures Document (IEDP) to remove the requirement on energy suppliers to provide a written statement of compliance prior to seeking to Commission Devices of a Device Model with the DCC, and to ensure that testing has been carried out to that effect (and for DCC not to Commission Devices of a Device Model until it has received such a written statement). We also proposed to remove a related requirement stating that a Party has a right to raise a compliance dispute under Section F3 of the SEC (as that right exists independently of the current IEDP drafting).
- Minor amendments to Section P to replace references to the Certified Products List with references to the Central Products List.
- Minor amendments to Section L to include new Remote Party Role Codes for the Commissioning Party, Requesting Party and S1SP in relation to the migration of SMETS1 meters into the DCC under the process set out in TMAD.

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- Amendments to Section I to reflect the relationship between the Gas Supplier and the Electricity Supplier at split supply premises, where the Electricity supplier will be responsible for storing Personal Data on the Gas Proxy Function (GPF) (in this case gas consumption data) on behalf of the Gas Supplier.
 - Deletion of historic provisions relating to GFI Testing from Section X.
- 7.2. We additionally proposed to re-designate the amended IEDP as Appendix AC to the SEC on 21 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter), in order to incorporate both SMETS1-related changes and a number of previously consulted on consequential amendments²² relating to the removal of the DCC opt-out for non-domestic smart metering.
- 7.3. The consultation sought views on the proposed changes to Sections A, N, H14, G, X, I, P and L of the SEC, the IEDP and the CPL Requirements Document, and the proposed re-designation date of 21 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the amended IEDP to be incorporated into the SEC as Appendix AC.

Question 5: Do you agree with the proposed changes to Sections A, N, H14, G, X, I, P and L of the SEC, the IEDP and the CPL Requirements Document?

Summary of responses

- 7.4. Seven of the nine stakeholders who responded to this question generally agreed with the proposed changes, while two energy suppliers neither agreed nor disagreed. A number of comments were made in relation to specific amendments:
- One energy supplier disagreed with the proposed amendments to Section I on the grounds that the data privacy issues in question are not unique to SMETS1 and the necessary data processing requirements in their case are already covered outside the SEC. They additionally argued that it is for each party to consider its obligations under data protection legislation, and to take the necessary steps to comply. Another energy supplier suggested that, given the onerous nature of some of the proposed requirements, they would expect compensation where they are storing gas consumption data at split supply premises on behalf of the gas supplier. Two further suppliers raised concerns about how they would comply with specific aspects of the proposed Section I drafting.
 - One energy supplier observed that references to the relevant paragraphs of the DCC Live Systems definition included in the proposed amendments to Section L3.18 were incorrect. Another energy supplier suggested that the proposed

²² See:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/641220/Non_dom_consultation_policy_proposals_and_draft_legal_text.pdf

changes should be validated with the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) before they are made.

- One energy supplier noted that Appendix AJ to the SEC cross-refers to Section X provisions relating to GFI testing, which were proposed for deletion.
- A small number of typographical errors were identified in the proposed drafting amendments to Section A of the SEC and the CPL Requirements Document.

Government response

- 7.5. Having considered the concerns that were raised by stakeholders about the proposed amendments to Section I, we have decided not to proceed with the majority of the proposed changes to this Section. In the absence of consensus about what contractual provisions should apply between the gas and electricity supplier where their respective meters share a Communications Hub at SMETS1 split-supply premises (or even whether any contractual provisions are actually necessary in the SEC), we consider that energy suppliers are best placed to establish what is required to enable them to comply with their obligations under wider data protection legislation. Should energy suppliers consider that it would be most efficient to incorporate any such obligations into the SEC, they may of course choose to bring forward a Modification Proposal to that effect.
- 7.6. We have, however, retained the proposed drafting at Section I1.13(a), in respect of which no objections were raised by respondents. This involves the Import Supplier agreeing to allow the Gas Supplier to store gas consumption data on a the Gas Proxy Function.
- 7.7. We have decided to amend the proposed changes to Section L3.18 to remove incorrect references to the DCC Live Systems definition. The correct references will be included in Section L following designation of the TMAD, which has been consulted on by the DCC and expands the definition of DCC Live Systems to reflect transitional changes relating to the migration of SMETS1 meters into the DCC. We note that we consulted publicly on the draft amendments to Section L, and that SMKI PMA has obligations to periodically review the SMKI PMA Document Set (which includes Sections L1 – L12) and may raise a Modification Proposal should it consider that any changes to the documents are required.
- 7.8. We note the references in the Release 2 SVTAD to the GFI Testing provisions set out in Section X9 of the SEC, and having discussed the interactions between these two sets of provisions with the DCC we agree that the Section X9 provisions that were proposed for deletion should be retained until such time as release 2 testing is fully complete.

Question 6: Do you agree with the proposed re-designation date of 21 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the amended IEDP to be incorporated into the SEC as Appendix AC?

- 7.9. All nine of the stakeholders who responded to this question agreed with the proposal to re-designate the amended IEDP as Appendix AC to the SEC on 21 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter), and no further comments were provided.

Conclusions

- 7.10. We have decided not to proceed with the majority of the proposed Section I amendments; with the exception of Section I1.13(a), which is now included as a stand-alone provision at Section I1.13.
- 7.11. We have determined that the Section X9 provisions that were previously proposed for deletion should be retained, and consequently do not propose to make any amendments to Section X of the SEC at this point in time.
- 7.12. We have also corrected a number of typographical errors and incorrect cross-references in Sections L and A of the SEC, and the CPL Requirements Document, and made a minor amendment to the Section A definition of Threshold Anomaly Detection to reflect the DCC's proposed approach to implementing DCO.
- 7.13. The covering letter to this consultation response re-designates the IEDP for incorporation into the SEC as Appendix AC in the form set out at Annex E with effect from 21 January 2019.

Summary of changes to the consultation legal drafting

SEC Section	Content
Section A	<ul style="list-style-type: none">• Corrected small typographical errors in the definitions of DCC Systems and DCC Total System.• Minor amendment to the definition of Threshold Anomaly Detection to reflect the DCC's propose approach to implementing DCO.• Updated the definition of SMETS1 Supporting Requirements to refer to Appendix AM of the SEC²³.

²³ We intend to consult on bringing the baselined version of S1SR into legal effect in advance of DCC's SMETS1 Service being made available.

CPL Requirements Document	Corrected minor typographical errors at clauses 2.1(e) and 6.5.
Section L	Removed incorrect cross-references from Section L3.18.
Section I	Removed the majority of the proposed amendments, apart from a provision at Section I1.13 which grants permission to the Gas Supplier to store Data on the SMETS1 GPF.
Section X	Retained the Section X9 provisions that were previously proposed for deletion.

8. General information

Purpose of this document

This document sets out the Government's response to the consultation on amendments to the Smart Energy Code and energy supply licence conditions related to the provision of a DCC SMETS1 Service, and changes to the CPA and CPL management processes for SMETS2 Devices, published on 5 November 2018.

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