



Department for
Business, Energy
& Industrial Strategy

Department for Business,
Energy & Industrial Strategy
1 Victoria Street,
London SW1H 0ET

www.gov.uk/beis

26 July 2019

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

Dear Colleague,

**SMART METERING IMPLEMENTATION PROGRAMME: CONSULTATION RESPONSE
AND DIRECTION ON SMART ENERGY CODE SUBSIDIARY DOCUMENT
AMENDMENTS SUPPORTING GO LIVE OF INITIAL DCC SMETS1 SERVICE
OPERATING CAPABILITY**

1. This letter constitutes the Government response to the consultation of 18 June 2019 on amendments to Smart Energy Code (SEC) subsidiary documents (SSDs) to support the enrolment and operation of SMETS1 devices in the DCC national communications network.
2. This letter also directs the incorporation of the new and amended SSDs into the SEC on 28 July 2019. The versions of the SSDs that are being incorporated into the SEC are included as Annexes to this letter, together with versions showing changes made further to those published as part of our June consultation (where applicable).

BACKGROUND

3. Government has already made modifications to the smart metering regulatory framework to enable the provision of a SMETS1 Service by the DCC. This includes changes to SEC Sections and to energy supply licences. Several SSDs have already been amended and brought into legal effect. These include amendments to SEC Appendix Z – CPL Requirement Document and SEC Appendix B – Organisation Certificate Policy. Ahead of the June consultation proposing to designate or re-designate SSDs most had already been subject to consultation and baselined through transitional governance¹.

CONSIDERATION AND DECISION

4. The consultation of 18 June 2019 closed on 9 July. There were six responses from five energy supply companies and the DCC. The first question in the BEIS consultation

¹ Baselined versions were published on <https://smartenergycodecompany.co.uk/the-developing-sec/>

sought views on the designation date for the suite of SSDs. All six respondents supported the proposed date of 28 July.

5. One respondent noted concerns on three of the SSDs previously baselined:
 - a. Regarding the Inventory Enrolment and Decommissioning Procedures (IEDP) concern was expressed that clause 3.6 appears to mandate the reconfiguration of a replacement SMETS1 asset prior to its installation, which was suggested to be practically difficult to deliver. We would note that Clause 13.1 of SMETS1 Supporting Requirements (S1SR) only refers to configuration of Devices prior to migration of the relevant SMETS1 installation and there are no current obligations in relation to installations already migrated. We will, through the Technical and Business Design Group, give further consideration to clause 3.6 of the IEDP, and its relevance.
 - b. On the Incident Management Policy concern was raised on the proposed DCC Mitigations for Disaster Recovery (specifically IDs D15 and D15(b) in Table 5.2 relating to loss of both primary data centres), given the critical role undertaken by the Dual Control Organisation (DCO). We recognise the concern expressed and note that wider mitigations for these disaster scenarios exist. For instance, DCC is obliged by SEC Section H to carry out BCDR testing and the DCO is included in the BCDR testing regime. We do not consider that these need to be specifically referenced in the mitigations here.
 - c. Regarding the DCC User Interface Service Schedule (UISS), clarity was sought on whether the Monthly Service Metrics and Monthly Service Thresholds would ever apply to SMETS1. We can confirm that through Clause 9, UISS disapplies these specific calculations listed (which relate only to SMETS2 Target Response Times) from SMETS1.
6. The second consultation question sought views on proposed amendments to DUIS. These amendments would act to support Users to add devices to both SMETS1 and SMETS2 HAN device logs and to ensure the correct alignment of provisions relating to alert codes for quarantined messages.
7. All respondents supported the proposals. One respondent helpfully highlighted an error whereby the proposed DUIS amendment extending the allowable size of the Install Code needed to be mapped to another cell in the relevant table (table 285) to be consistent. We agree and have amended the relevant cell in the version to be designated.
8. The third consultation question sought views on minor clarificatory amendments to TMAD. All respondents agreed with the proposals. One respondent helpfully noted some typographical errors and sought further clarity on the nature of clause 5.12. We can confirm that it is not the intention for this section to imply that Responsible Suppliers of Dormant meters are now responsible for applying the appropriate configuration to those meters and have amended 5.12 to clarify this alongside addressing the errors.
9. On 5 July, DCC issued a consultation proposing further minor amendment to the SMETS1 Supporting Requirements document. The consultation closed on 12 July and

six responses were received. DCC published its response² on 23 July 2019. The DCC has now submitted the updated S1SR to BEIS together with its consultation conclusions and copies of the responses received from stakeholders. Two respondents to the DCC consultation expressed opposition to the proposed amendment as they would be precluded from having a standing charge that is greater than the maximum that the meter could accommodate, and one of the two opposed the designation of the S1SR at this time as a result.

10. The DCC response addresses the concern raised and clarifies that this is a device specific behaviour of the meter in question for which the DCC solution will provide an alert to the relevant Supplier in the event of their sending in a Service Request that is beyond the meter's capability.
11. BEIS does not believe this device specific behaviour is reason enough not to enrol these devices though recognises that firmware would need to be deployed post enrolment to amend this constraint. We also note the minor clarificatory amendments proposed by DCC as a response to comments received to its consultation. We have concluded that it is therefore appropriate to designate the amended S1SR.
12. The versions of the SSDs that will be incorporated into the SEC on 28 July 2019 are included at Annex A – K to this letter. At Annex L – N we provide for reference track-changed versions of the three SSDs that have been amended since the consultation.
13. This letter is being issued together with a separate BEIS letter of the same date, approving the addition of the first SMETS1 Device Model Combination to the Eligible Product Combinations List.

Direction

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

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

- a) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **Threshold Anomaly Detection Procedures** previously designated and incorporated into the SEC as Appendix AA of the SEC is hereby re-designated and incorporated in the form set out in Annex A of this direction.
- b) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that,

² See: <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-conclusion-on-changes-to-the-smets1-supporting-requirements-document/>

with effect from 28 July 2019, the **Service Request Processing Document** previously designated and incorporated into the SEC as Appendix AB of the SEC is hereby re-designated and incorporated in the form set out in Annex B of this direction.

- c) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **Inventory Enrolment and Decommissioning Procedures** previously designated and incorporated into the SEC as Appendix AC of the SEC is hereby re-designated and incorporated in the form set out in Annex C of this direction.
- d) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **DCC User Interface Specification Version 3.0** is approved into the SEC within Appendix AD of the SEC in the form set out in Annex D of this direction.
- e) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **Message Mapping Catalogue Version 3.0** is approved into the SEC within Appendix AF of the SEC in the form set out in Annex E of this direction.
- f) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **Incident Management Policy** previously designated and incorporated into the SEC as Appendix AG of the SEC is hereby re-designated and incorporated in the form set out in Annex F of this direction.
- g) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **Self Service Interface Design Specification** previously designated and incorporated into the SEC as Appendix AH of the SEC is hereby re-designated and incorporated in the form set out in Annex G of this direction.
- h) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **SMETS1 Transition and Migration Approach Document** previously designated and incorporated into the SEC as Appendix AL of the SEC is hereby re-designated and incorporated in the form set out in Annex H of this direction.
- i) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **SMETS1 Supporting Requirements**, is approved into the SEC as Appendix AM of the SEC in the form set out in Annex I of this direction.

- j) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **DCC User Interface Service Schedule** previously designated and incorporated into the SEC as Appendix E of the SEC is hereby re-designated and incorporated in the form set out in Annex J of this direction.
- k) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 28 July 2019, the **CH Installation and Maintenance Support Materials** previously designated and incorporated into the SEC as Appendix I of the SEC is hereby re-designated and incorporated in the form set out in Annex K of this direction.

For the avoidance of doubt any re-designation of the Subsidiary Documents shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated, or to the continuing effectiveness of anything done under these documents prior to their re-designation (which shall have effect as if done under the re-designated documents).

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

Yours faithfully,



Duncan Stone

Head of Delivery, Smart Metering Implementation Programme

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

Annexes:

- Annex A: SEC Appendix AA -Threshold Anomaly Detection Procedures Version 1.1
- Annex B: SEC Appendix AB - Service Request Processing Document Version 1.2
- Annex C: SEC Appendix AC – Inventory Enrolment and Decommissioning Procedures Version 1.4
- Annex D: SEC Appendix AD – DCC User Interface Specification Version 3.0

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| Annex E: | SEC Appendix AF – Message Mapping Catalogue Version 3.0 |
| Annex F: | SEC Appendix AG – Incident Management Policy Version 1.2 |
| Annex G: | SEC Appendix AH – Self Service Interface Design Specification Version 1.2 |
| Annex H: | SEC Appendix AL – SMETS1 Transition and Migration Approach Document Version 1.3 |
| Annex I: | SEC Appendix AM – SMETS1 Supporting Requirements Version 1.0 |
| Annex J: | SEC Appendix E – DCC User Interface Service Schedule Version 1.2 |
| Annex K: | SEC Appendix I – CH Installation and Maintenance Support Materials Version 1.3 |
| Annex L: | SEC Appendix AD – DCC User Interface Specification Version 3.0 (post consultation changes tracked) |
| Annex M: | SEC Appendix AM – SMETS1 Supporting Requirements Version 1.0 (post consultation changes tracked) |
| Annex N: | SEC Appendix AL – SMETS1 Transition and Migration Approach Document Version 1.3 (post consultation changes tracked) |