



Department for
Business, Energy
& Industrial Strategy

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

www.gov.uk/beis

18 February 2020

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

Dear Colleague,

**SMART METERING IMPLEMENTATION PROGRAMME: CONSULTATION ON RE-
DESIGNATION DATE OF TRANSITION AND MIGRATION APPROACH DOCUMENT TO
SUPPORT DCC's SMETS1 SERVICE**

1. This letter constitutes a consultation on dates to incorporate into the Smart Energy Code (SEC) a new version of the SMETS1 Transition and Migration Approach Document (TMAD) to support the enrolment of first generation smart meter devices in the national smart meter communications network managed by the Data Communications Company (DCC).
2. Government has made various modifications to the smart metering regulatory framework to support the provision of a SMETS1 service. The latest versions of the relevant SEC subsidiary documents are set out in the Testing Baseline Requirements Document¹. We expect that the regulatory framework, including the TMAD, will continue to need to be amended from time to time notably in support of different operating capabilities being stood up by DCC.
3. The current TMAD was first designated by the Secretary of State on 21 June 2019 and included in the Smart Energy Code (SEC) from versions 6.14 onwards as Appendix AL of the SEC. Between 9 August 2019 and 6 September 2019, the DCC ran a consultation '*Consultation on changes to the SMETS1 Transition and Migration Approach Document FOR MOC (MDS)*'². The DCC published the relevant '*Conclusions and Report to the Secretary of State*'³ on 22 November 2019, providing an overview of stakeholder responses. There were six responses to the consultation and where concerns were raised, DCC amended TMAD appropriately or addressed these concerns in its response.
4. DCC has recently established that for certain Honeywell Elster gas meters an additional step is needed the first time that it changes from credit to prepayment mode, which requires additional cryptographic processing. This additional step requires DCC to generate the prepayment wrapper key from an alternative initial key where this is not

¹ <https://smartenergycodecompany.co.uk/the-developing-sec/>

² https://www.smartdcc.co.uk/media/3317/tmad_v1_4_consultation_document_v1_0.pdf

³ https://www.smartdcc.co.uk/media/3453/tmad-v1_4_moc-mds-response-document.pdf

already present on the device. This alternative initial key is provided by the SMSO during the migration of the device in the Migration Group Encrypted File (MEF). DCC therefore proposes to make provision for this process in the TMAD. The proposed TMAD amendments are marked up as part of Annex B.

5. The result of this additional step is that the first time the impacted Honeywell Elster gas meters are changed to prepayment mode it may take longer to execute SRV 1.6 (Update Payment Mode). As a result, the time taken may exceed the current timeout for this SRV as defined in the DCC Retry and Timeout Configuration – UIT and Production document⁴. This will cause the request to return a response indicating that the timeout period has been exceeded as no response has been received from the device within a set timescale. In order to prevent this and ensure that the switch to prepayment can happen, the timeout period for the execution of SRV 1.6 must be increased from 3780 seconds to 7800 seconds.
6. As a consequence of this change all enrolled Honeywell Elster meters will be capable of having their mode changed to prepayment from credit, thereby protecting both energy consumer and industry interests.
7. We propose that the TMAD is re-designated on 13 March with the amendments set out in this consultation. This would support the first MDS Capability Release which is scheduled for 15 March.
8. A draft direction letter is set out at **Annex A** and a marked-up version of the TMAD (showing changes from those in legal effect) is set out at **Annex B**.

Consultation questions	
Q1	Do you agree with the proposed amendments in support of Update Payment Mode?
Q2	Do you agree with the proposed re-designation date of 13 March 2020 (or, if the Secretary of State considers it necessary, within one month thereafter) for the incorporation of SEC Appendix AL – SMETS1 Transition and Migration Approach Document?

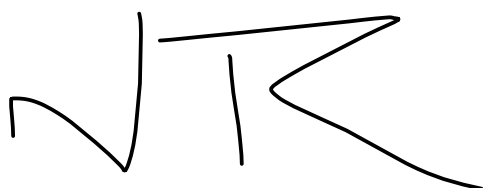
9. Comments on this proposal should be submitted by **17.00 Friday 6 March 2020** to: smartmetering@beis.gov.uk or addressed to: Smart Metering Implementation Programme – Regulation, Department for Business, Energy & Industrial Strategy, 1 Victoria Street, London SW1H 0ET.
10. Information provided in response to this consultation, including personal data, may be subject to publication or release to other parties, or to disclosure in accordance

⁴ Available on DCC sharepoint to users

with the access to information regimes (these are primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

11. Individual responses to this consultation may be published and you should therefore let us know if you are not content for your response or any part of it to be published. If you indicate that you do not want your response published, we will not publish it automatically but it could still be subject to information requests as detailed above. If you do not want your individual response to be published, or to otherwise be treated as confidential, please say so clearly in writing when you send your response to the consultation. For the purposes of considering access to information requests, it would also be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'N T R' with a stylized flourish.

Nick Taylor

Head of SMETS1 Enrolment, 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: Draft Designation Direction

Annex B: SEC Appendix AL – SMETS1 Transition and Migration Approach Document (TMAD) for MOC MDS draft v1.4 – marked up against version 1.3 in legal effect

ANNEX A: DRAFT DESIGNATION DIRECTION

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.

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 [13 March 2020], 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 [X] 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 also being notified to the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SEC website in due course.