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# MP077
# ‘DCC Service Flagging’

## Modification Report

### Version 0.1

## About this document

This document is a draft 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 three annexes:

- **Annex A** contains the business requirements.
- **Annex B** contains the legal text to deliver the Proposed Solution.
- **Annex C** contains the DCC Preliminary Assessment.

## Contact

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# 1. Summary

This Proposal was raised by Paul Saker of EDF on 7 June 2019.

The industry needs a simple and reliable mechanism for identifying where smart devices are, or are not, present at a location. This information is necessary for Suppliers to establish whether there is a Smart Metering System (SMS) they can communicate with at that location, and for Distribution Network Operators (DNOs) to correctly handle alerts. Issues have been identified in the current process where the Data Communications Company (DCC) Service Flagging is incorrect. This hinders both the switching process for some consumers with smart meters (as Suppliers cannot offer an appropriate tariff) and Ofgem's Switching Programme in general.

The Proposed Solution is to amend the Smart Energy Code (SEC) Appendix X 'Registration Data Interface Specification' and any other references in the SEC to the DCC Service Flags. The 'W' and 'S' Flags will be removed, and instead an 'N' and an 'I' Flag will take their place. By doing this, the new DCC Service Flag states should align to what is written in the SEC and allow Users to tell the difference between Devices on an SMS that are Active, installed but not commissioned or decommissioned.

# 2. Issue

## What are the current arrangements?

The current approach, as recommended by DCC, is to use the DCC Service Flag held in the gas and electricity registration systems to understand the SMS at a property. This is created using the D350 data flow triggered from the DCC central systems. When the first meter in a smart metering system is commissioned the value of the Service Flag is set to 'A' for active. The other current Service Flag values available are 'S' for suspended and 'W' for withdrawn. These three DCC Service Flags are detailed in the SEC in Appendix X 'Registration Data Interface Specification'.

## What is the issue?

At the moment, multiple concerns that have been raised with the way the DCC Service Flags operate. These issues include:

- The DCC Service Flag is being set to 'A' where a smart metering system is installed but has not been commissioned, and therefore cannot be operated as 'smart'. It appears that this may be set to 'A' when the meter status is set to 'whitelisted' or 'installed not commissioned' which is not what would be expected based on the definition of 'Enrolment' within the SEC as found in SEC Section A 'Definitions and Interpretations' and H5 in SEC Section H 'DCC Services'.
- The DCC Service Flag will remain as 'A' indicating an SMS is still present even when a SMS is removed and not replaced or is replaced with a non-smart meter as there are no DCC Service Flags to reflect that removal.
- The DCC Service Flag may remain as NULL, where a valid Flag value hasn't been set. This may be the case even where a Smart Metering Equipment Technical Specifications (SMETS) 2 meter has been installed, if the meter has been installed without a WAN connection being made ('Install and Leave' process).
- Due to the removal of the "'non-domestic opt-out'[1], the 'W' DCC Service Flag is no longer required.
- The 'S' Flag is not currently used in DCC Systems.
- The DCC systems include a value of "N" for Not Active to address the situations where a meter is, or has been present but is not operating in smart mode, but this value is not currently used in the registration systems.

SEC Section E 'Registration Data' specifies an obligation on DCC to provide information to Gas and Electricity Registration Data Providers (RDPs) where an Enrolled SMS is associated with the relevant network. SEC Appendix X 'Registration Data Interface Specification' details the definition of a Service Flag and the relationship of the interfaces between the RDPs and DCC concerning data flows as defined in the Data Transfer Catalogue (DTC).

Any change to the DCC Service Flagging system, alterations that are made to the way that this process is carried out, states the flags are set to (Active, Suspended or Withdrawn), data flows or other contributing factors will need to be captured in the above SEC Sections and anywhere else that is identified as part of the Refinement process.

[1] The "non-domestic opt-out" was removed from the Energy Supply Licence conditions following a BEIS consultation.

## What is the impact this is having?

It is important that the issues raised are addressed as it is having a direct impact on and impeding the switching process for some consumers with smart meters. The reliability and accuracy of the switching process is something that Ofgem are focussing on currently through their Switching Programme.

The industry needs a simple and reliable mechanism for identifying where smart devices are, or are not, present at a location. This information is necessary for suppliers to establish whether there is an SMS they can communicate with at that location in order to accurately offer customers the correct tariff and service. It is also essential for distributors to correctly handle alerts.

It could also lead to Suppliers having to expend additional resources and effort to correct any issues and reducing confidence in the existing business process. Suppliers with Smart Metering stock may need to perform a site visit to attain information concerning SMS's such as the location and condition of individual devices, whether they are fully operational, in a 'dumb' state or have been removed and/or damaged.

If the issue is left unchecked, it may result in consumers not being offered a full choice of products or services as part of the Change of Supply process leading to reducing consumer confidence in the Smart Metering Programme.

# 3. Solution

## Proposed Solution

The Proposed Solution is to amend SEC Appendix X 'Registration Data Interface Specification' to describe the DCC Service Flag process. This will require removing the 'W' and 'S' Flags which are no longer in use, and instead replace them with the existing DCC 'N' Flag and a new 'I' (InstalledNotCommissioned) Flag which will need to be placed into the appropriate registration system.

These new DCC Service Flag states in addition to the 'A' Flag will enable Users to tell the difference between a Device on an SMS that is active, installed but not fully operational or decommissioned.

Originally, the business requirements included the 'N' Flag including the states of Suspended and Recovery/Recovered, but the solution in the Preliminary Assessment doesn't have these states accounted for. This was due to some of the proposed changes potentially resulting in large numbers of Meter Points needing to have their DCC Service Status flag changed at the same time. For example, the Meter Point Administration Number (MPANs) and Meter Point Reference Number (MPRNs) associated with every Smart Meter in some types of Smart Metering Key Infrastructure (SMKI) Recovery incident, or a corresponding Smart Meter's Firmware Version suspension or Recovery status. Additionally, changes to the Recovery status could have also affected the performance of the Recovery operation due to having to undertake additional functionality when the focus should be on recovering the Devices.

There are two other areas that this solution will have an impact on:

- The Ofgem Switching Programme, due to the Central Switching Solution (CSS) assuming the responsibility for providing RDP updates to Data Service Provider (DSP). This will positively impact the Switching Programme by helping to ensure that an SMS involved in a CoS event will be displaying the correct information for its DCC Service Flag.
- There will be changes to the Registration Data outgoing flows from the DSP for electricity and gas to add a Not Active status ('N'). However, this depends on revised the interface specifications being agreed with the industry as part of the Refinement Process.

The business requirements for the Proposed Solution can be found in Annex A.

# 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 Parties are impacted by this change to some capacity. All Users can use the DCC Service Flags to be given information on the status of an SMS. If these change, then any Party who uses these amended Service Flags will be impacted.

Supplier Parties will be additionally impacted by potentially not having to correct any issues arising from incorrect information being provided to a SMS they are responsible for. This will result in less time and money being used to mitigate these issues.

Consumers will also benefit from accurate information being given to Devices they own on an SMS and therefore being offered the correct tariff and not potentially incur any pass through of costs incurred by Suppliers.

## DCC System

In their Preliminary Assessment the DCC have stated that their DSP Systems are impacted by this change. However, they anticipate no change to Technical Specifications.

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Preliminary Assessment response in Annex C.

## SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix X 'Registration Data Interface Specification'

The full details of the legal text can be found in Annex B.

## Consumers

Consumers will be positively impacted by this change by their Suppliers being able to pass on reliable information about the state of a SMS their respective Devices. It will also help the provision of Smart Metering services available to a consumer by identifying which premises are able to run a full range of Smart Metering services and helping to ensure that a Change of Supplier event doesn't deprive a consumer of any Smart Metering services.

## Other industry Codes

This Modification Proposal will impact both the Master Registration Agreement (MRA) and XOSERVE. Both codes will be consulted upon during the Refinement period of the Modification Proposal.

## Greenhouse gas emissions

There are no impacts on greenhouse gas emissions.

# 5. Costs

## DCC costs

The estimated DCC implementation costs to implement this modification is £75,000. The breakdown of these costs are as follows:

| Breakdown of DCC implementation costs | |
|---|---|
| **Activity** | **Cost** |
| Design, Build and Pre-Integration Testing (PIT) | £75,000 |
| Systems Integration Testing (SIT) | TBC |
| User Integration Testing (UIT) | TBC |
| Implement to Live | TBC |

More information can be found in the DCC Preliminary Assessment response in Annex C.

## SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

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

# 6. Implementation approach

## Recommended implementation approach

SECAS is recommending an implementation date of:

- **24 June 2021** (June 2021 SEC Release) if a decision to approve is received on or before 24 June 2020.

According to the DCC's Preliminary Assessment, they have stated "As currently planned, the standard ongoing major release model will provide drops to the production environment in June 2021". This has been based on the estimate that of 3 million live smart meters, approximately 45,000 meter points are currently set to the status that is covered in the proposed N Flag state. Because this figure could be subject to change by the time the Impact Assessment is carried out, a review will be carried out as part of the Impact Assessment to ensure this number is accurate, or if it has changed. They have stated that this proposed implementation approach may be revised as part of the Impact Assessment. This implementation approach has been agreed in principle by the MRA, but this stance could be revised and will be reviewed ahead of being agreed by the Panel.

# 7. Assessment of the proposal

## Observations on the issue

Views raised by Sub-Committees included the Technical Architecture and Business Architecture Sub-Committee (TABASC) stating their interest in the modification. They questioned whether this would be classified as a defect; something the DCC needs to correct to be in line with what the SEC currently states. Smart Energy Code Administrator and Secretariat (SECAS) took note of this comment and responded saying that because the modification's solution could end up changing the DCC Flagging System outright, this would require a SEC modification rather than being a defect. No other Sub-Committee gave any views on the Modification Proposal during its Development Stage.

Comments from SEC Parties were unanimously supportive, expressing their support to address the issue raised and to prevent it becoming harder to manage. SSE noted, along with their support, that there would be a cross-code impact with the MRA and that any Impact Assessments would have to be coordinated with any developments with Ofgem's Switching Programme. SECAS had acknowledged the cross-code impact this modification would create with MRA and assured that communication would be sought between Ofgem and DCC over how any potential solution is created and delivered.

## Solution development

### Changes in the Solution from the Business Requirements

When the Proposed Solution was originally suggested in the first Working Group meeting, members believed that InstalledNotCommissioned, Suspended and Recovery/Recovered should be included in the new 'N' Flag. The business requirements were drafted to include these and were submitted to the DCC for a Preliminary Assessment. When the Preliminary Assessment was returned, SECAS noted that there were divergences from the business requirements which were raised at the next Working Group meeting. Specifically, the Proposed Solution no longer included the Suspended and Recovery/Recovered states. This was because if a popular Device model is removed from the Central Products List (CPL) this would cause a large number of DCC Service Flags on an SMS to change to Suspended. Previously the MRA stated they could only handle 20,000 updates per file, which is sent to the Network Parties, which means the approach for these updates would be staggered. Additionally, an 'I' Flag was introduced so that the 'N' and 'I' Flags could differentiate between meters that are decommissioned and installed, but not commissioned. With the removal of the 'W' and 'S' flags, this results in the Service Flags being changed to the following:

- A – Active
- N – Non-Active
- I – InstalledNotCommissioned

One Working Group member enquired into the restrictions on the existing D350 flows that the 'N' Flag would use. In particular, how many flows could be included a single file update and if there was a definitive content limit for this file. This was to confirm whether a single D350 file update could be sent from DCC through the MRA to Users could potentially affect hundreds of thousands of Devices. SECAS took this query to both DCC and the MRA to which both confirmed that there was no limit from a DCC or MRA perspective for what they could provide to Users. This means that a single D350

update could affect hundreds of thousands of Devices, including the above scenario where if a popular Device type is removed from the CPL, this will Suspend them.

## Support for Change

The Working Group members were happy with this new Proposed Solution in principle. The Working Group noted they were content to remove the 'Suspended' DCC Service Flag state as they agreed it was not necessary to know about the suspension. One member asked about the implementation date, and whether the other impacted codes would be notified about when this change will take place to prevent any breaches of code. SECAS took actions to confirm with the MRA and to XOSERVE when a suitable implementation date would be for the Modification Proposal. SECAS was also asked to confirm if the MRA's figure of 20,000 updates per file is for the data flow affected by the Modification Proposal, rather than a Change of Agent flow. When SECAS asked the MRA about this, the MRA confirmed that there was no cap on the number of updates in a file, as per the previous enquiry into restrictions on MRA data flows.

## Views against the General SEC Objectives

### Proposer's views

The Proposer believes that the Modification Proposal better facilitates General SEC Objective (a)[2]. The reason for this was that by establishing a source of reliable information on the status of an SMS at a consumer's premise, this will help ensure the efficient operation of Smart Meters and associated Devices. It can also improve the provision of Smart Metering services by helping provide accurate information to Supplier Parties if a consumer is affected by a CoS event.

### Industry views

Views from industry participants on the SEC Objectives this Modification Proposal better facilitates will be sought as part of the Refinement Consultation.

[2] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

# Appendix 1: Progression timetable

Following the Working Group meeting on 5 February 2020, the next steps agreed were to issue the Refinement Consultation and return to the Working Group to follow up with actions requested from the meeting. Depending on the feedback from the Refinement Consultation and the next Working Group, plans would then be made for requesting the Impact Assessment at the next Change Board meeting once the business requirements were re-aligned to the Proposed Solution.

| Progression Timetable | |
|---|---|
| **Action** | **Date** |
| Issue Refinement Consultation | 24 Feb 2020 – 13 Mar 2020 |
| Return to Working Group | 1 Apr 2020 |

# 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** |
| CPL | Central Products List |
| CSS | Central Switching Service |
| DCC | Data Communications Company |
| DSP | Data Service Provider |
| DTC | Data Transfer Catalogue |
| MPAN | Meter Point Administration Number |
| MPRN | Meter Point Reference Number |
| MRA | Master Registration Agreement |
| RDP | Registration Data Provider |
| SEC | Smart Energy Code |
| SECAS | Smart Energy Code and Secretariat |
| SMKI | Smart Metering Key Infrastructure |
| SMS | Smart Metering System |
| TABASC | Technical Architecture and Business Architecture Sub-Committee |

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# MP077 'DCC Service Flagging'

# Business requirements – version 0.4

## About this document

This document contains the business requirements for this Modification Proposal. It provides detailed information on the business requirements for the Proposed Solution agreed by the Proposer, with input from the Data Communications Company (DCC) and Sub-Committees. It also provides the considerations and assumptions for each business requirement with respect to this Modification Proposal.

# 1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

| Business Requirements | |
|---|---|
| **Ref.** | **Requirement** |
| 1 | DCC to implement a method of understanding if there is a Device currently at a premise. |
| 2 | DCC to have a reliable source of information on the state of DCC Service Flags. |
| 3 | DCC to implement a new Service Flag state of “N” for Non-Active to inform where a Device has been installed but not commissioned/set to active. |

# 2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

## 2.1 General

The DCC Service Flag provides information regarding the state of a Smart Metering System (SMS) at the consumer's premise. The three current states of the DCC Service Flagging are:

- "A" for Active;
- "W" for Withdrawn; and
- "S" for Suspended.

The solution will look to address the issues of understanding what the correct DCC Service Flags are, whether those are displayed and ensuring that the correct information can be sent to users of the service.

SEC Section A 'Definitions and Interpretations' defines the Smart Metering Systems separately for electricity and gas. The DCC Service Flag is used equally for electricity and gas and is communicated to the Electricity Registration Data Provider (RDP) and Gas RDP. MP077 was raised by Network Parties and Suppliers for electricity; however, it makes sense to extend this to gas too, so both are accounted for in the same solution.

We anticipate this solution will have impacts on the Smart Energy Code (SEC), Master Registration Agreement (MRA), Retail Energy Code (REC), the UK Link Systems and potentially the Uniform Network Code (UNC). The UK Link Systems impact will require a change proposal to be raised and implemented by their Data Services Contract (DSC) Delivery Sub-Group.

## 2.2 Requirement 1: To implement a method of understanding if there is a Device currently at a premise.

This requirement obligates the DCC to implement a means of identifying whether there is at least one Device enrolled in a Smart Metering System at a premise.

Currently, the means of identifying Devices is done through identifying whether a SMS is active or not. An active SMS is identified by at least one Metering Device that has been commissioned on the SMS. For accurate information on the location of an individual smart meter, a combination of DCC Service Status, Meter Point Status and Device Status is required. Information supplied by DCC service flags alone does not suffice.

The current implementation of the SEC and DCC service does not account for Devices that may have been removed from the SMS or that don't deliver all of the smart functionality. If all Metering Devices have been removed from the SMS the status of the SMS remains incorrectly as active.

Therefore, a more granular approach is required. As part of the Modification Proposal's solution, it looks to allow for the situation where the SMS ceases to exist due to all Metering Devices being removed or not being available. As part of this assessment, we require the clarifications on the current DCC's use of the "A" for Active Flag and "S" for Suspended Flag states and whether that aligns to the SEC.

DCC will also provide summaries for the current “A” for Active and “S” for Suspended DCC Service Flag States so it can be accurately placed in the SEC. These are required to remove ambiguity from when Flag states are used and to prevent SEC Users being misinformed.

## 2.3 Requirement 2: To have a reliable source of information on the state of DCC Service Flags.

This requirement obligates the DCC to provide reliable and consistent updates on the state of Service Flags.

At the moment, Service Flags describing the state of the SMS are being set to inaccurate values. SEC Parties have noted that this inaccuracy has made the switching process of Smart Meters and other Devices harder to complete. It also may result in Suppliers mis-selling a service to consumers if the Service Flag misinforms the Supplier of which services they can provide to the consumer. With reliable information of DCC Service Flags being an integral part of Ofgem’s Switching Programme plans, this is required as part of the Modification Proposal’s solution.

This requires DCC to remove the “W” for Withdrawn Flag from the DCC Flagging System. With the “W” Flag requiring a Service Request which is not currently used in the DCC User Interface Specification (DUIS) and future versions, this Flag is obsolete and needs removing. The reason it currently isn’t in use in DUIS is due to the removal of the non-domestic opt-out.

## 2.4 Requirement 3: To implement a new Service Flag state of “N” for Non-Active to inform where a Device has been installed but not commissioned/set to active.

This requirement obligates the DCC to create a new DCC Service Flag state of “N” to indicate a Non-Active SMS. The “N” flag will be added as a new state to the existing D0350 Data Flow.

SEC Parties have identified that after a SMS is fully operational, the flag is set to “A”. However, this flag state did not change on these systems, despite having had all Devices removed from the SMS at a later time.

The proposed “N” flag will be used to identify a SMS with installed Devices where the Devices are not fully operational or have not been commissioned. Until the SMS can deliver the full range of functionality, the DCC Service Flag associated with the SMS will be set to “N”;

Upon successful commissioning of the Device the DCC Service Flag will be then set to “A”.

The “N” Flag is to be used when the following circumstances occur:

- One or multiple Metering Devices have been installed at a premise and the DCC is informed by the Responsible Supplier that the Devices are in the state “InstalledNotCommissioned”;
- All Metering Devices on the SMS have been set to the states “InstalledNotCommissioned”, “Decommissioned”, “Recovery” or ”Recovered”.

Any time the “N” Flag is used, the DCC will issue the D0350 Data Flow and provide the relevant information to the Meter Point Administration Service (MPAS) Provider.

With the InstalledNotCommissioned being included in the “N” Flag, the responsible party (or parties) for installation(s) will be obligated to provide the correct information to the Smart Metering Inventory (SMI). This is crucial to ensure no miscommunications occur with setting the correct DCC Service Flags.

Discussions took place as to whether more Device States should be included in the “N” Flag’s scope or whether it should be providing information at a Device, rather than SMS level. These points were considered by the Proposer from the Working Group and the Technical Architecture and Business Architecture Sub-Committee (TABASC). The Proposer elected to choose this limited scope due to the information at an individual Device level already being available through the SMI. It was acknowledged that although possible to replicate the data in the SMI to deliver information through the Service Flags, this wouldn’t be feasible. This was due to concerns that it would come at unjustifiable expense to industry and that the lead time required to implement the solution would be too long for any improvement before Ofgem’s Switching Programme takes effect.

## 3. Glossary

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

| Glossary | |
|---|---|
| **Acronym** | **Full term** |
| DCC | Data Communications Company |
| DSC | Data Services Contract |
| DUIS | DCC User Interface Specification |
| MPAS | Meter Point Administration Service |
| MRA | Master Registration Agreement |
| RDP | Registration Data Provider |
| REC | Retail Energy Code |
| SEC | Smart Energy Code |
| SMI | Smart Metering Inventory |
| SMS | Smart Metering System |
| TABASC | Technical Architecture and Business Architecture Sub-Committee |

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# MP077 'DCC Service Flagging'

# Legal text – version 0.1

## About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

These changes have been drafted against SEC Version 6.25.

This document contains the changes required to deliver the Proposed Solution.

# Appendix X 'Registration Data Interface Specification'

## Amend Section 3.28 (b) (i) as follows:

(i) The format of an E46 record is as follows:

| Field Name | Optionality | Type | Length | Description |
|---|---|---|---|---|
| Transaction Type | Mandatory | Text | 3 | Value: E46 |
| Outcome Code | Mandatory | Text | 2 | Details whether the request has been accepted or rejected.<br>AC – Accepted<br>RJ – Rejected. |
| Meter Point Reference | Mandatory | Number | 10 | |
| DCC Service Flag | Mandatory | Text | 1 | Service flag provided by the DCC. The allowable values are:<br>A – Active<br>~~S~~N – ~~Suspended~~Non-Active<br>~~W~~I – ~~Withdrawn~~ InstalledNotCommissioned |
| DCC Service Effective From Date | Mandatory | Date | 8 | The date the DCC Service Flag (provided above) is effective from. Format : YYYYMMDD |

## Amend Section 3.29 (a) as follows:

(a) DCC Status File

To notify each Gas Registration Data Provider of DCC Service Flag updates the DCC shall send a single DCC Status File (Ref DXI) that shall consist of a single data record per update (Ref. E45). The format of an E45 record is as follows:

| Field Name | Optionality | Type | Length | Description | SEC reference |
|---|---|---|---|---|---|
| Transaction Type | Mandatory | Text | 3 | Value: E45 | Not applicable |
| Meter Point Reference | Mandatory | Number | 10 | | Section E2.4 (b) |
| DCC Service Flag | Mandatory | Text | 1 | Service flag provided by the DCC.<br>The allowable values are:<br><br>A – Active<br>~~S~~N – ~~Suspended~~Non-Active<br>~~W~~I – ~~Withdrawn~~InstalledNotCommissioned | Section E2.4 (b) |
| DCC Service Effective From Date | Mandatory | Date | 8 | The date the DCC Service Flag (provided above) is effective from.<br>Format : YYYYMMDD | Section E2.4 (b) |

# SEC Modification Proposal, SECMP0077, DCC CR1249

## DCC Service Flags

## Preliminary Impact Assessment (PIA)

| | |
|---|---|
| **Version:** | **0.26** |
| **Date:** | **30th December, 2019** |
| **Author:** | **DCC** |
| **Classification:** | **DCC PUBLIC** |

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# 1 Document History

## 1.1 Revision History

| Revision Date | Revision | Summary of Changes |
|---|---|---|
| 30/12/2019 | 0.26 | Initial version, internal DCC review |
| | | |
| | | |

## 1.2 Associated Documents

This document is associated with the following documents:

| Ref | Title and Originator's Reference | Source | Issue Date |
|---|---|---|---|
| 1 | MP077-Business-Requirements-v0.1 | SECAS | 27/11/2019 |

References are shown in this format, [1].

## 1.3 Document Information

The Proposer for this Modification is Paul Saker of EDF Energy. The original proposal was submitted in June 2019.

The Preliminary Impact Assessment was requested of DCC on 9th November 2019.

The SECAS provided text following combines references to "Device Status" and "DCC Service Flag". For consistency the term "DCC Service Status" has been used for the solution definition instead of "DCC Service Flag" for consistency with Smart Metering Inventory (SMI) terminology. However the Modification title and requirements have been left with the term DCC Service Flag.

# 2 Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated.

The SEC Definitions, issue statement, and requirements following have been provided by SECAS and the Proposer.

## 2.1 SEC Definitions of Service Flags

The following definitions are specified in the Smart Energy Code (SEC).

A Smart Metering System (SMS) is defined as a Communication Hub (CH) with one Commissioned meter and any available PPMID or IHD devices. One CH and Electricity Smart Metering Equipment (ESME) for electricity or one CH and Gas Smart Metering Equipment GSME for gas are the minimum configurations. Note that the SEC explicitly distinguishes between a SMS for electricity and gas.

The DCC Service Flag and the current state associated with the SMS is communicated to the appropriate Meter Point Administration Service (MPAS) for electricity meters and XOSERVE for gas meters.

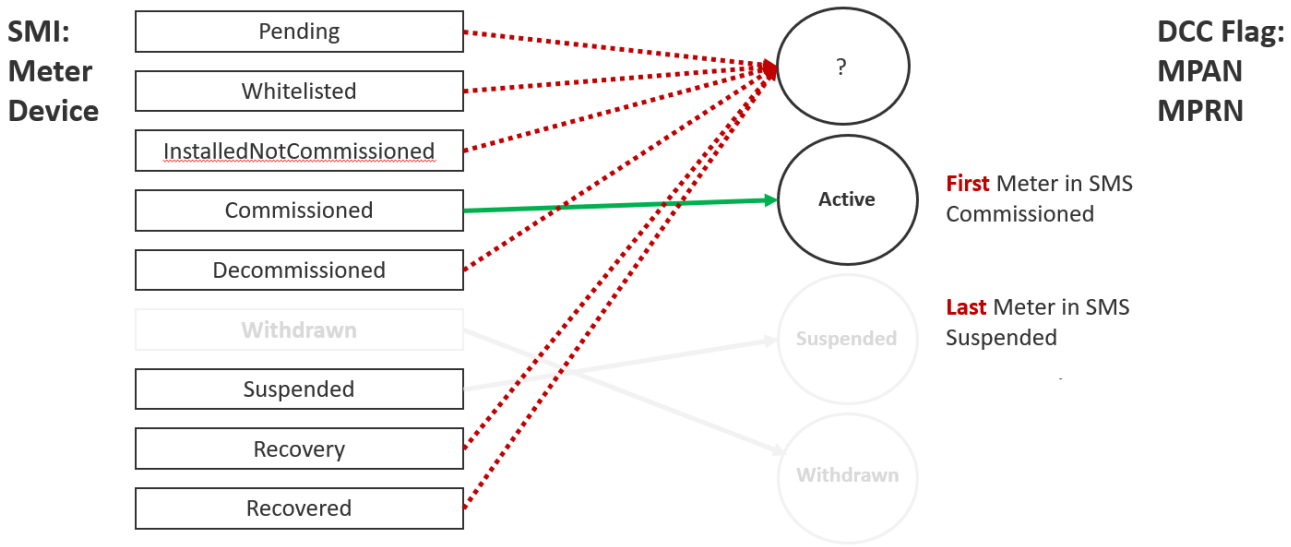
There are three possible status flags; Active (A), Suspended (S), and Withdrawn (W). Once the ESME (or GSME) is Commissioned the SMS has the status of “Active”.

The SEC does not indicate what happens if the LAST meter of a SMS is removed (in the sense of removed from the Certified Products List (CPL), it may still be physically at the premises). In analogy to the creation of the SMS, the SMS ceases to exist. In such a case the SMS state should be set to “Suspended”.

## 2.2 Current State

The "Active" state is applicable when a SMS is commissioned. According to Suppliers and DNOs, the “Active” state is retained even when all meters are physically removed from the premises; this is perceived as being an issue when it comes to assess whether a Smart Metering Services are possible. In the sense of the SEC there is no longer a functional SMS at the premises.

SMI Device States can be mapped to the Service Flag states as shown following.




Most of the SMI states do not map to the DCC Service Flag, which makes it difficult for the DNOs and Suppliers to track status.

## 2.3 What is the Issue?

The industry needs a simple and reliable mechanism for identifying cases where smart devices are, or are not, present at a location. This information is necessary for suppliers to establish whether there is a smart metering system they can communicate with at that location, and for distributors to correctly handle alerts. Issues have been identified in the current process where the Service Flagging is incomplete which could hinder the switching process for some consumers with smart meters.

## 2.4 Business Requirements for this Modification

This section contains the considerations and assumptions for each business requirement as provided by the Proposer and SECAS.

| Req. | Requirement |
|---|---|
| 1 | DCC to implement a method of understanding if there is a Device currently at a premises. |
| 2 | DCC to have a reliable source of information on the state of DCC Service Flags. |
| 3 | DCC to implement a new Service Flag state of “N” for Non-Active to inform where a Device has been installed but not commissioned or set to Active. |

*Table 1: Business Requirements for SECMP0077, CR1249*

### 2.4.1 Requirement 1: Implement a method of understanding if there is a Device currently at a premises

This requirement obligates the DCC to implement a means of identifying Devices at premises. Currently, the means of identifying Devices is through noting whether a Smart Metering System (SMS) is active or not. This doesn’t account for Devices that may have been removed from the SMS or that don’t deliver all of the smart functionality. Therefore, a more granular approach is required as part of the Modification Proposal’s solution.

Note that SECAS have separately provided the following supporting information for this requirement:

*A clarification on how the DCC Service Flag state “Suspended” currently works is required.*

*According to DNOs and Suppliers the DDC Service Flag state “Suspended” has not been observed in the live system. This may be because the conditions for this state haven’t been met in the live system.*

*When the last meter on the SMS has been Suspended in SMI, then the state of the DCC Service Flag must be set to “Suspended”. This state will require all meters to be in the Suspended state.*

### 2.4.2 Requirement 2: To have a reliable source of information on the state of DCC Service Flags

This requirement obligates the DCC to provide reliable and consistent updates on the state of Service Flags. At the moment, there are Service Flags that have been set to SMS that are inaccurate. SEC Parties have noted that this inaccuracy has made the switching process of Smart Meters and other Devices harder to complete. It also may result in

Suppliers mis-selling a service to consumers if the Service Flag misinforms the Supplier of which services they can provide to the consumer. With reliable information of DCC Service Flags being an integral part of Ofgem's Switching Programme plans, this is required as part of the Modification Proposal's solution.

Note that SECAS have separately provided the following supporting information for this requirement:

*The Withdrawal of devices has been removed from the SEC; in DUIS the corresponding Service Request 8.5 has been modified so that no DCC user is entitled to use this Service Request. As a consequence it is not possible for devices to enter the SMI status of "Withdrawn". The DCC Service Flag "Withdrawn" is not possible since it would require that all meters are set to the SMI state "Withdrawn".*

*The DCC Service Flag state "Withdrawn" must be removed.*

### 2.4.3 Requirement 3: To implement a new Service Flag state of "N" for Non-Active to inform where a Device has been installed but not commissioned/set to Active

This requirement obligates the DCC to create a new DCC Service Flag state of "N" for Non-Active. The three current states of the DCC Service Flagging are the following:

• "A" for Active;

• "W" for Withdrawn; and

• "S" for Suspended.

SEC Parties have identified that after a SMS is fully operational, the flag is set to A. However, the flag state has not changed on these systems, despite having had Devices removed from the system – meaning these should have been changed to either W or S. The proposed N flag would be used to distinguish between Devices that were installed in a premises, but not fully operational. Until it can deliver the full range of functionality and then set to A, the Device will be set to N.

Note that SECAS have separately provided the following supporting information for this requirement:

*The SEC doesn't currently specify what state the DCC Service Flag should be set to for most of the SMI states which haven't been covered in the previous slides.*

*The suggestion is to add a new state to the DCC Service Flag called "Non-Active" abbreviated as "N". This state will be used to indicate whether all meters on the SMS are in one of the following SMI states:*

- *InstalledNotCommissioned*
- *Decommissioned*
- *Recovery*
- *Recovered*

*Note that meters on the SMS can have different SMI states; they don't need to be in the same state for the DCC Service Flag "Non-Active" to apply.*

# 3 Description of Solution

The solution requested by SECAS is to provide clarity in SEC Appendix X 'Registration Data Interface Specification' to describe the DCC Service Flag process. As part of this, the "W" for Withdrawn DCC Flag will be removed from the SEC and an "N" for Non-Active Flag will be introduced. The "N" Flag will cover the state for devices in a Smart Metering System (SMS) which are installed but yet to be commissioned, decommissioned or in a state of recovery. The Modification also requests clarification of the DCC Service Flag states.

## 3.1 Requirements Review

The DCC and Service Providers have reviewed the requirements and noted the following.

### 3.1.1 Terminology and Definitions

The SEC Modification request and requirements in the above sections combines references to "Device Status" and "DCC Service Flag". Instead of the latter, the term "DCC Service Status" will be used in this Preliminary Impact Assessment for technical consistency with Smart Metering Inventory (SMI) terminology.

For clarity, these are two different statuses with different purposes:

1. **Device Status** refers to an individual Device, which may be a Smart Meter or other Device Type. Examples of Device Status include Pending, Commissioned, Decommissioned, Suspended and Recovery.

2. **DCC Service Status** refers to a Meter Point (sometimes referred to as a MPxN), which may be a Meter Point Administration Number (MPAN) or Meter Point Registration Number (MPRN).

    - Within DSP, the DCC Service Status is changed to Active when it is first associated with a Commissioned Smart Meter. At that point the change in status is communicated to the relevant Registration Data Provider (RDP) via an outgoing data flow (D0350 for electricity and the DXI equivalent for gas).

    - There is an additional status Withdrawn that was intended for use when the Service Opt-Out Service Requests were used.[1] Since those Service Requests are no longer available via DUIS the "Withdrawn" status is not valid. In the current implementation, the DCC will never inform the RDPs of a change in DCC Service Status after changing it to Active.

    - The flows to the RDPs also support a DCC Service Status of Suspended, but as it is not possible to suspend a MPxN (only a device) this status is also never used currently.

The statuses are communicated in different ways:

1. Device Status is made available to DCC Service Users via the functions in Self Service Interface (SSI) screens and the DUIS Service Request 8.2 Read Inventory.

[1] The status "Withdrawn" applies if the last meter of a SMS has been opted out of the DCC Smart services. The Service Request (SR) 8.5 is currently set such that it cannot be used by any DCC User. In this sense, Withdrawn would be used to indicate if a Supplier is no longer Smart; however, BEIS have officially stated that Withdrawn is not a valid state.

2. DCC Service Status is not made available to DCC Service Users by the DCC directly, e.g. it is not included in SSI screens or DUIS Service Requests. The status is available via industry Registration Data processes D350 and DXI.

Note that DSP has already implemented an additional DCC Service Status N meaning “Not Active”, which is maintained within DSP SMI, but as this is not currently a valid value in Registration Data flows and therefore cannot be exported.

A SMS is said to be "Decommissioned" if it is removed from the wall. This is a relatively frequent occurrence.

The Device Statuses of "Recovery" and "Recovered" relate to putting a new certificate on a device. The update from this action is not sent to the DNOs but is a separate DCC Status Update.

In the case of an Install and Leave scenario, where a supplier does not complete the installation, then a SMS can be set to state of “Suspended”.

### 3.1.2 DCC Service Status Rules

Existing DSP rules for changing a DCC Service Status from Active to Not Active are based on the decommissioning of Smart Meters and take into account circumstances of the same Meter Point (MPxN) being allocated to more than one Smart Meter. Hence, in a case where one Smart Meter is being decommissioned while another Smart Meter with the same MPxN remains Commissioned, the DCC Service Status would not be set to Not Active. Checks are also made for cases where a Meter Point association was made in error and is corrected using SRV 8.4 Update Inventory. The current rules are:

1. The starting position in DSP for Meter Points which have never had a Smart Meter operated via DCC is that DCC Service Status is null.
2. The DCC Service Status becomes A (Active) when:
   - a Smart Meter has been associated with a Meter Point (SRV 8.11 Update HAN Device Log) and the Smart Meter’s Device Status becomes Commissioned (SRV 8.1.1 Commission Device).
   - when a Meter Point (that is not A already) is linked to a Commissioned Smart Meter (by SRV 8.4 Update Inventory).
3. The DCC Service Status becomes N (Not Active) when:
   - a Smart Meter associated with the Meter Point is decommissioned (SRV 8.3 Decommission Device), except where the Meter Point is still associated with another Smart Meter;
   - a Smart Meter associated with the Meter Point is unlinked from a commissioned device (SRV 8.4 Update Inventory), except where the Meter Point is still associated with another Smart Meter.

## 3.2 DSP Solution Overview

As requested, the proposed DSP solution would implement changes to outgoing Registration Data flows for electricity and gas to add a Not Active status (‘N’). This depends on revised interface specifications being agreed with the industry.

However the DCC and DSP propose that the DSP’s current rules for using the Not Active DCC Service Status should continue to be used, rather than adding the additional status changes proposed in the Modification. This is for several reasons:

- The Modification requirements suggest some changes to Device Status that should be temporary rather than irrevocable, e.g. Recovery (which can be mitigated by updating SMKI Organisation Certificates on the Device).

- Some of the proposed changes could result in large numbers of Meter Points needing to have their DCC Service Status flag changed at the same time (e.g. the MPANs and MPRNs associated with every Smart Meter in some types of SMKI Recovery incident, or a corresponding Smart Meter's Firmware Version suspension or Recovery status). Changes to the Recovery status could also affect the performance of the Recovery operation due to having to undertake additional functionality when the focus should be on recovering the Devices.

- Continuing to use the current rules would be quicker and cheaper than changing them.

It should be noted that the existing rules differ from the Modification requirements stated above, notably that the setting in Smart Meters of Device Statuses "InstalledNotCommissioned", "Recovery" and "Recovered" do not contribute to the changing of DCC Service Status in related Meter Points.

DSP's current implementation for supplying outgoing data to RDPs for DCC Service Status has a database query which returns flags that have changed to status A but for which the status change has not yet been notified to the RDP. The current implementation includes recording that a change has been notified to the RDP.

This approach would be extended in the proposed DSP solution for this Modification to cover status changes to N. Note that Meter Points for which the DCC has never supported Smart Metering service will be recorded with null DCC Service Status, so would not be picked up by this query, i.e. only Meter Points which have been Active previously and then become Not Active would be identified.

Two DSP feature switches will be introduced to enable the new functionality, one for Gas and one for Electricity at the appropriate point for each. It is assumed that the new functionality will be enabled only when all RDPs for a given fuel type are in a position to receive the new DCC Service Status, i.e. there will be no need for DSP to enable the new feature for electricity on a per RDP basis, since with more than 20 electricity RDPs that would make the solution more complex.

In ESI reports, Meter Point Registration Extract and Meter Point Extract only include those with DCC Service Status "A", and it is assumed that will continue to be the case, so this change does not impact those data extracts.

### 3.2.1 Rationale for DSP Solution

As noted above, the DSP proposed solution does not match exactly the changes described in the Modification requirements. The commercial benefit of proceeding with the DSP proposed solution rather than the approach described in the CR is that the DSP solution will achieve the aim of the Modification via a far more efficient route, as it is a relatively small enhancement of existing functionality. As the scale of change in the DSP solution is low, the implementation and integration impact is small, resulting in a lower forecast price and duration.

## 3.3 Other Solution Impacts

Two other areas of the overall smart metering system solution are likely to be impacted.

- The Ofgem Switching Programme, as Central Switching Solution (CSS) will assume the responsibility for providing RDP updates to DSP.

- Changes to the Registration Data outgoing flows from the DSP for electricity and gas to add a Not Active status ('N'). This depends on revised interface specifications being agreed with the industry.

These impacts will be fully assessed as part of the Full Impacted Assessment (FIA), if the revised approach is approved and the FIA requested.

# 4 Impact on DCC Systems, Processes and People

This section describes the impact of SECMP0077 on DCC Services and Interfaces that impact Users and/or Parties.

## 4.1 System Components

The following DSP system components are affected by this change:

- Data Management
- Registration Data interfaces outgoing from DSP to RDPs, both electricity and gas
- Reference data to define the two new feature switches

## 4.2 Security Impact

The implementation will be security assured during the implementation phase. This includes reviewing designs, test artefacts and providing consultancy to the implementation and test teams.

A more detailed security impact will be carried out as part of the Full Impact Assessment.

At this stage, a penetration test and updates to protective monitoring are not thought to be required.

## 4.3 Technical Specifications

No changes to DUIS, GBCS, or any other Technical Specification is expected.

Changes to industry flows as detailed above are anticipated.

## 4.4 Integration Impact

An appropriate level of Systems Integration and User Integration Testing (SIT and UIT) will be carried out prior to progressing the release of this change to the Production environment.

Testing of the changes to the Registration Data interfaces between the DSP and RDPs will be required.

## 4.5 Infrastructure Impact

There will be no change to the infrastructure design as a result of this change.

The change does not impact the DSP resilience or Disaster Recovery implementation.

## 4.6 Application Support

No changes to Application Support are expected.

## 4.7 Service Impact

No material impact is expected for the DSP Operations team and no changes to SLAs are expected.

## 4.8 Safety Impact

No impact is expected, but a full Safety Impact Assessment will be carried out as part of the production of the Full Impact Assessment (FIA).

## 4.9 Contract Schedules

No changes to contracts are expected, this will be evaluated for the FIA.

# 5 Implementation Timescales and Approach

Notwithstanding in which release this change is implemented, based on the currently stated requirements, the elapsed time for DSP implementation will be between 1 and 3 months from project initiation through to PIT complete.

The release lifecycle duration will be confirmed as part of the FIA. As currently planned, the standard ongoing major release model will provide drops to the production environment in June 2021.

## 5.1 Implementation Approach

Implementation of this change is assumed to follow a waterfall methodology. The release lifecycle duration will be confirmed as part of the FIA.

When the proposed new functionality goes live, all Meter Points with DCC Service Status of N in the DSP Inventory will be identified by the first run. This performance risk has been considered; research on Production data shows that at the time of this PIA (November 2019), there are approximately 45,000 Meter Points with DCC Service Status N spread across all the RDPs out of approximately three million live Smart Meters. It is assumed that these numbers are not large enough to justify introducing a batching approach for the initial catch-up, and that it should be possible for them all to be notified to RDPs using the same approach as the subsequent incremental changes. However, this should be reviewed nearer the time of implementation in case the position changes substantially.

## 5.2 Testing and Acceptance

It is assumed that the change will be implemented and tested as part of a major release, and will include release based regression testing in SIT and UIT. Changes to the RDPs will be tested during UIT.

# 6 Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal.

The scope of supply under this PIA includes design, development (build), system testing, and performance testing within the PIT environments.

The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the functional requirements as assumed now. The price is not an offer open to acceptance. It should be noted that the change has not been subject to the same level of analysis that would be performed as part of a Full Impact Assessment and as such there may be elements missing from the solution or the solution may be subject to a material change during discussions with the DCC. As a result the final offer price may result in a variation.

## 6.1 Design, Build, and Testing Cost Impact

The table below details the cost of delivering the changes and Services required to implement this Modification. For a PIA, only the Design, Build and PIT indicative costs are supplied.

| £ | Design, Build and PIT | SIT | UIT | TTO | App. Support | SP Total |
|---|---|---|---|---|---|---|
| Phase ROM | 75,000 | n/a | n/a | n/a | n/a | 75,000 |

| | |
|---|---|
| Design | The production of detailed System and Service designs to deliver all new requirements. |
| Build | The development of the designed Systems and Services to create a solution (e.g. code, systems, or products) that can be tested and implemented. It includes Unit Testing (also referred to as System Testing), Performance Testing and Factory Acceptance Testing by the Service Provider or supplier. |
| Pre-Integration Testing (PIT) | Each Service Provider tests its own solution to agreed standards in isolation of other Service Providers. This is assured by DCC. This phase also includes regression testing across all Comms Hub products |
| Systems Integration Testing (SIT) | All the Service Providers PIT-complete solutions are brought together and tested as an integrated solution, ensuring all SP solutions align and operate as an end-to-end solution. The System Integrator is responsible for leading this phase with the Service Providers offering testing support services. |
| User Integration Testing (UIT) | Users are provided with an opportunity to run a range of pre-specified tests in relation to the relevant change. The DCC is responsible for leading this phase with the Service Providers offering testing support services. |

| | |
|---|---|
| Implementation to Live (TTO) | The solution is implemented into production environments and ready for use by Users as part of a live service. The Transition to Operations (TTO) service is subject to implementation costs. |
| Application Support | Any costs associated with supporting the new functionality. |

Based on the existing requirements, the fixed price cost for a Full Impact Assessment is **£9,358** and would be expected to be completed in 30 days.

# 7 Risks, Assumptions, Issues, and Dependencies

In the following sections, Risks, Assumptions, Issues, and Dependencies have been identified.

It is possible that further RAID will be established as part of the Working Group reviews and the FIA.

## 7.1 Risks

None at this time.

## 7.2 Assumptions

| Ref. | Area | Description | Accept |
|---|---|---|---|
| MP77-AD01 | Volume | When the new functionality goes live, all Meter Points where the DCC Service Status is N in the DSP Inventory will be picked by the first run. It is assumed that these numbers are not large enough to justify introducing a batching approach for the initial catch-up, and that it should be possible for them all to be notified to RDPs using the same approach as the subsequent incremental changes. However, this should be reviewed nearer the time of implementation in case the position changes substantially. | |
| MP77-AD02 | SEC Change | The Modification requirements include requesting SEC changes to clarify some status meanings and it is assumed that SECAS will be responsible for making appropriate changes, though DSP can advise on definitions to support changes considered. | |
| MP77-AD03 | Requirement | This solution proposes the use of DSP's existing implementation of DCC Service Status N, which has the consequence that the Modification's requirements that DCC Service Status N should be used in association with Meter Points where a corresponding Smart Meter has Device Status "InstalledNotCommissioned", "Recovery" or "Recovered" will not be met. It is assumed that SECAS will accept this prior to progressing to FIA. | |
| MP77-AD04 | RDP | Assume the new feature will be enabled only when all RDPs for a given fuel type are in a position to receive the new DCC Service Status, i.e. there will be no need for DSP to enable the new feature on a per RDP basis | |
| MP77-AD05 | Data Flow Change | DCC will coordinate changes to electricity and gas data flows with the industry | |
| MP77-AD06 | Reports | Assume it will continue to be the case that ESI data extract reports Meter Point Registration Extract and Meter Point Extract will only include DCC Service Status "A", i.e. those with DCC Service Status "N" are not included | |
| MP77-AD07 | Switching | Integration with CSS is not in the scope of this Modification. If that position changes then a Change Request governing DSP's CSS adaptation will need to be raised or amended. | |

## 7.3 Issues

None at this time.

## 7.4 Dependencies

| Ref. | Area | Dependency | Impact |
|---|---|---|---|
| MP77-DD01 | Reg Data Flows | Implement changes to outgoing Registration Data flows for electricity and gas to add a Not Active status ('N'). This will depend on revised interface specifications being agreed with the industry. | Med |

# Appendix A: Glossary

The table below provides definitions of the terms used in this document.

| .Acronym | Definition |
|---|---|
| CH | Communication Hub |
| CPL | Certified Products List |
| CR | DCC Change Request |
| CSP | Communication Service Provider |
| DCC | Data Communications Company |
| DNO | Distribution Network Operators |
| DSP | Data Service Provider |
| DUIS | DCC User Interface Specification |
| ESME | Electricity Smart Metering Equipment |
| FIA | Full Impact Assessment |
| GBCS | Great Britain Companion Specification |
| GSME | Gas Smart Metering Equipment |
| IHD | In Home Display |
| MPAN | Meter Point Administration Number |
| MPAS | Meter Point Administration Service |
| MPRN | Meter Point Registration Number |
| MPxN | Generic term for Meter Point (Number) |
| PIA | Preliminary Impact Assessment |
| PIT | Pre-Integration Testing |
| PPMID | PrePayment Meter user Interface Device |
| RDP | Registration Data Provider |
| ROM | Rough Order of Magnitude (cost) |
| SEC | Smart Energy Code |
| SECAS | Smart Energy Code Administrator and Secretariat |
| SIT | Systems Integration Testing |
| SMETS | Smart Metering Equipment Technical Specification |
| SMI | Smart Metering Inventory |
| SMKI | Smart Meter Key Infrastructure |
| SMS | Smart Metering System |
| SP | Service Provider |
| SR | Service Request |
| SRV | Service Request Variant |
| SSI | Self Service Interface |
| TTO | Transition to Operations |
| UIT | User Integration Testing |