Department for Business, Energy & Industrial Strategy

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

www.gov.uk/beis

24 July 2020

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

Dear Colleague,

DIRECTION TO DESIGNATE UPDATED VERSIONS OF THE TRANSITION AND MIGRATION APPROACH DOCUMENT & SMETS1 SUPPORTING REQUIREMENTS TO SUPPORT THE DCC SMETS1 SERVICE

1. This letter constitutes the Government's response to three consultations undertaken by DCC on BEIS' behalf and directions on new versions of SEC Appendix AL: SMETS1 Transition and Migration Approach Document (TMAD) and SEC Appendix AM: SMETS1 Supporting Requirements (S1SR).

2. The TMAD sets out the detailed technical and procedural requirements relating to the migration of first generation (SMETS1) smart meter devices. It was first incorporated into the SEC as Annex AL by the Secretary of State on 14 February 2019. The latest version in legal effect is version 5.0 which was designated on 15 June 2020. The S1SR describes supplementary rules for how the DCC will process SMETS1 Service Requests / Service Reference Variants (SR / SRV) and includes the accommodation of behaviours that are specific to certain SMETS1 Device Models. It was first designated by the Secretary of State on 28 July 2019. The latest version in legal effect is version 3.0 which was designated on 6 May 2020.

<u>TMAD amendments</u>

3. Between 13 March 2020 and 3 April 2020, the DCC ran a consultation on a number of changes to the TMAD to support the enrolment of Secure SMETS1 meters[1]. On 30 June 2020 DCC submitted an amended TMAD to BEIS for re-designation together with its consultation conclusions and copies of the eight responses received from stakeholders.

4. We note that specific concerns had been raised on the DCC's proposed UTRN cutover arrangements where respondents requested that the 48-hour period be increased and that DCC has accordingly amended the drafting to increase the period to 336 hours.

[1] https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-tmad-for-secure/

5. We also note that respondents were supportive of the proposed re-designation date of 26 June (or, if necessary, as soon as reasonably practical within one month thereafter) and that DCC sought to provide clarification on wider issues raised in its consultation response. We note that prior to issuing its consultation response, DCC held a multilateral meeting with energy suppliers to help them understand the proposals and to respond to concerns.

Changes to the S1SR – Aclara

6. Having identified three issues relating to SMETS1 Aclara smart metering devices, DCC proposed amendments to the S1SR to make provisions for these device specific behaviours and ran a consultation between 8 June 2020 and 3 July 20202. On 17 July 2020, DCC submitted an amended S1SR for re-designation to BEIS together with its consultation conclusions and copies of the six responses received from stakeholders.

7. In relation to proposed amendments in respect of Auxiliary Load functionality, three respondents commented that they believed a viable workaround existed whilst one respondent objected to the proposed approach as they were concerned about impact on consumers and energy suppliers. DCC noted and addressed these comments in its response and proposed that dormant meters with Auxiliary Load circuits are not migrated until a root cause analysis indicates a reliable workaround.

8. In relation to proposed amendments in Section 18 relating to SRV4.4.2, respondents were generally supportive of the proposals. Respondents were also largely supportive of the proposed amendments to SMETS1 in Section 18 relating to profile data and did not consider this issue sufficient to delay the addition of these devices to the EPCL. One respondent indicated that they would undertake testing of the firmware fix for this issue when DCC test facilities were available. Regarding the proposed mappings of clauses in Section 18 of the S1SR to the relevant Device Models in the Device Models in Device Model Variations to Equivalent Steps Matrix (DMVES), three respondents agreed with the proposed change; three did not express an opinion. Finally, in response to the proposed re-designation date of 26 July 2020, four respondents agreed with the proposed changes; one did not express an opinion and one commented that information on a workaround to prevent the Auxiliary Load issue should be distributed to energy suppliers.

Changes to the S1SR - Secure

9. The DCC ran another S1SR consultation between 5 June 2020 and 3 July 2020 proposing amendments to the S1SR to describe device behaviors specific to MOC Secure devices and to map clauses in Section 18 of S1SR to the relevant Device Models in DMVES. On 17 July 2020, DCC submitted to BEIS an amended S1SR for re-designation together with its consultation conclusions and copies of the three responses received from stakeholders.

[2] https://www.smartdcc.co.uk/media/3942/smets1-supporting-requirements-consultation-aclara.pdf

10. In relation to the proposed amendments to the S1SR in Section 18, one respondent sought clarity on an issue to which the DCC responded in its response; one respondent provided comments that were incorporated by the DCC into the S1SR and one respondent made comments relating to the DCC's response in a prior S1SR consultation that the DCC has addressed in its response. Regarding the mapping of clauses in Section 18 of S1SR to the relevant Device Models in DMVES and the proposed re-designation date of 26 July, we note that two respondents agreed whilst one did not express an opinion.

Conclusion

11. As DCC has dealt with all issues that arose out of the consultations, either through its consultation responses or through making changes to legal drafting in line with stakeholder feedback, we conclude that it is appropriate for the new version of TMAD (v.6.0) and for the new version of the S1SR (V4.0) to be designated on 26 July 2020. V6.0 of the TMAD is included at Annex A. A marked-up version of the document showing changes relative to the version previously in legal effect is provided at Annex B. V4.0 of the S1SR (incorporating the changes from the two separate consultations referred to above) is included at Annex C. A marked-up version of the document showing changes relative to the version previously in legal effect is provided at Annex D. Annex E presents the updated DMVES.

12. We understand that DCC will be issuing a consultation on amendments to the S1SR to document further device specific behaviours relating to Secure SMETS1 meters, that have been identified primarily from user testing post Systems Integration Testing. Given the nature of these proposals, our ambition for all dormant SMETS1 meters to be enrolled as early as possible, and that DCC will be issuing an operational guidance note for energy suppliers wishing to operate enrolled Secure meters, we consider it reasonable to designate this version of S1SR now.

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 26 July 2020, the SMETS1 Transition and Migration Approach Document previously designated and incorporated into the SEC as Appendix AL is hereby re-designated and incorporated in the form set out at Annex A of this direction.

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 26

July 2020, the SMETS1 Supporting Requirements previously designated and incorporated in the SEC as Appendix AM is hereby re-designated and incorporated in the form set out at Annex C and Annex E 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.

Yours faithfully,

Duncan Stone

Deputy Director & 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 [separate documents]

Annex A: SEC Appendix AL - SMETS1 Transition and Migration Approach Document v6.0

Annex B: SEC Appendix AL - SMETS1 Transition and Migration Approach Document v6.0 marked up against v5.0

Annex C: SEC Appendix AM – SMETS1 Supporting Requirements v4.0

Annex D: SEC Appendix AM – SMETS1 Supporting Requirements v4.0 marked up against v3.0

Annex E: SEC Appendix AM – Annex A – Device Model Variations to Equivalent Steps Matrix