



Department for
Business, Energy
& Industrial Strategy

Department for Business,
Energy & Industrial Strategy
1 Victoria Street,
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www.gov.uk/beis

26 March 2021

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

Dear Colleague,

**SMART METERING IMPLEMENTATION PROGRAMME: GOVERNMENT DIRECTION TO
RE-DESIGNATE THE TRANSITION AND MIGRATION APPROACH DOCUMENT AND THE
SMETS1 SUPPORTING REQUIREMENTS WITHIN THE SMART ENERGY CODE TO
SUPPORT DCC'S SMETS1 SERVICE**

1. This letter constitutes the Government's response to two consultations undertaken by the Data Communications Company (DCC) on our behalf and a resulting direction to re-designate the SMETS1 Transition and Migration Approach Document (TMAD) and the SMETS1 Supporting Requirements (S1SR). This is to support the introduction of further changes to the DCC solution to better support the enrolment and subsequent operation of first generation smart meter devices on the DCC network.
2. The detailed technical and procedural requirements of the migration approach for SMETS1 are set out in the TMAD. It was first incorporated into the Smart Energy Code (SEC) as Appendix AL by the Secretary of State on 14 February 2019. The latest version in legal effect is version 11.0 which was designated on 28 February 2021.
3. The S1SR describes supplementary rules for how DCC will process SMETS1 Service Requests and Service Reference Variants and includes the accommodation of behaviours that are specific to certain SMETS1 Device Models. It was first incorporated into the SEC as Appendix AM by the Secretary of State on 28 July 2019. The latest version in legal effect is version 7.0 which was designated on 28 February 2021.

Changes to the SMETS1 TMAD

4. Between 5 February and 26 February 2021, DCC issued a consultation on the TMAD¹ to provide incremental improvements through changes to the regulatory documents and DCC technical solution for SMETS1 in support of the SMETS1 FOC migration. This is referred to as "Uplift 2.0". It is DCC's decision to implement the 2.0 Uplift on the basis of satisfying itself that any testing requirements have been met. DCC submitted its consultation conclusions on the TMAD to the Secretary of State on 9 March 2021, along with copies of the three responses it received from stakeholders.

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/changes-to-the-smets1-supporting-requirements-document-for-the-uplift-20-foc/>

5. In respect of Uplift 2.0, the consultation on the TMAD proposed an automated technical solution to bring file sequencing behaviour for FOC in line with IOC, MOC MDS and MOC Secure. This would enable files within the FOC migration solution to be processed in circumstances where they are delivered out of sequence (table 5.9)².
6. The consultation also proposed amendments to Clause 4.9 of the TMAD in relation to Daily Migration Demand for all SMETS1 meters. As it stands, Clause 4.8 of the TMAD requires each energy supplier to provide DCC a value for its Daily Migration Demand for that Migration Week. Where no value is provided, the existing Clause 4.9 allows for a default value to be assumed by the DCC in line with the energy supplier's previous migration submission. An amendment to Clause 4.9 was proposed by DCC in its consultation to set the default value to zero where no submission is provided to enable more efficient use of capacity.
7. In addition, the consultation proposed two changes to the TMAD in support of Uplift 2.1³. These are out of scope of this direction letter and amendments relating to Uplift 2.1 are expected to be designated into the SEC later this year. DCC is due to submit a Joint Implementation Plan Change Request (JIP CR) shortly for consultation and BEIS expects further consultation from DCC regarding the Uplift 2.1 designation date.
8. None of the three respondents disagreed with DCC's proposals in support of Uplift 2.0. DCC sought views on a redesignation date of 23 March 2021 (or within a month thereafter) for the TMAD. All three respondents supported this timing.

Changes to the S1SR

9. DCC has identified changes that are required to the S1SR specifically for the FOC cohort that have arisen out of testing or that reflect system changes that are due to be implemented as part of Uplift 2.0. Between 17 February and 5 March 2021, DCC ran a consultation on changes to the S1SR⁴ as part of Uplift 2.0. DCC submitted its conclusions on the S1SR on 15 March 2021, along with the five responses it received.
10. In respect of DCC's proposed amendments to Section 18 of the S1SR (which describes device specific behaviours), DCC received five responses. One respondent was concerned that including the management of price scalars and debt recovery rates in the S1SR meant the acceptance of undesirable behaviours. Two others noted concerns that the price scalar issue constrained supplier charging options. Respondents also sought clarification on specific aspects of the drafting and identified a minor typographical error. BEIS notes DCC's position that the purpose of drafting these behaviours is to provide visibility of them to Users and that DCC intends, in the case of the scalar issue, to bring forward, in a future release, proposals to mitigate impacts of the device behaviour. BEIS recognises that DCC has amended the drafting in several instances to provide further clarity or to correct previous drafting.
11. Five respondents commented on DCC's proposed mappings of clauses in Section 18 of the S1SR to the relevant device models in the Device Model Variations to Equivalent Steps (DMVES) annex. Four respondents agreed with the proposed mappings; another stated they could not comment on the link between the device model and the requirement but they agreed with mappings in DMVES. With regard to DCC's proposed designation date of 23 March 2021 (or within a month thereafter), five respondents agreed with the proposed

² P47,48 Transition Migration and Approach Document (TMAD v12.0)

³ Uplift 2.1 as defined in the DCC consultation document, paragraphs 2.3 and 2.4

(<https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-tmad-changes-for-foc-uplift-20-and-uplift-21/>)

⁴ <https://www.smartdcc.co.uk/customer-hub/consultations/changes-to-the-smets1-supporting-requirements-document-for-the-uplift-20-foc>

date with one indicating that their agreement was contingent on the resolution of the issues they raised being addressed, which BEIS notes is now the case.

Conclusion

12. BEIS concludes that it is appropriate for the new versions of TMAD and S1SR to be designated as they appear in Annexes A and C respectively. Marked-up versions of the documents showing changes relative to the versions previously in legal effect are also provided at Annexes B and D.

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 30 March 2021 the Transition Migration Approach Document (TMAD), 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 30 March 2021 the SMETS1 Supporting Requirements (S1SR), previously designated and incorporated into the SEC as Appendix AM, is hereby re-designated and incorporated in the form set out at Annex C of this direction.

For the avoidance of doubt, any re-designation of the TMAD or S1SR 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 – Transition Migration Approach Document (TMAD) v12.0

Annex B: SEC Appendix AL – Transition Migration Approach Document (TMAD) v12.0 – marked up against v11.0

Annex C: SEC Appendix AM – SMETS1 Supporting Requirements (S1SR) v8.0

Annex D: SEC Appendix AM – SMETS1 Supporting Requirements (S1SR) v8.0 – marked up against v7.0