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

www.gov.uk/beis

20 July 2021

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

Dear Colleague,

SMART METERING IMPLEMENTATION PROGRAMME: GOVERNMENT DIRECTION TO RE-DESIGNATE ANNEXES TO THE SMART ENERGY CODE AND CONSEQUENTIAL MAIN BODY CHANGES TO SUPPORT THE DCC SMETS1 SERVICE

1. This letter constitutes the Government's response to five consultations undertaken by the Data Communications Company (DCC) and a direction to re-designate the SMETS1 Transition and Migration Approach Document (TMAD), the SMETS1 Supporting Requirements (S1SR) and the DCC User Interface Specification (DUIS). 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. The letter also constitutes a direction to re-designate SEC Appendix Z (CPL Requirements Document) to enable an expedited firmware addition onto the Central Products List (CPL) where necessary for specified purposes relating to a SMETS1 Device Model. This letter also directs changes to SEC Sections A and H that are consequential on this CPL re-designation.

Changes to the SMETS1 TMAD

2. Between 5 February 2021 and 26 February 2021, DCC issued a consultation on the TMAD to provide incremental improvements through changes to the regulatory documents and DCC's technical solution for SMETS1 in support of the SMETS1 FOC migration[1]. This is referred to as "Uplift 2.1". 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. DCC also concluded on changes relating to "Uplift 2.0" in its conclusions. The changes in support of Uplift 2.0 were designated on 26 March 2021.

3. In respect of changes specific to Uplift 2.1, the consultation on the TMAD proposed amendments to support the migration of "split supply" (where there are two Responsible Suppliers at the premises – one in respect of the electricity meter and one in respect of the gas meter). The consultation also proposed a change to disable the pushing of profile

[1] https://www.smartdcc.co.uk/customer-engagement/dcc-conclusion-on-foc-uplift-20-and-uplift-21-tmad-consultation/

data on the Communications Hub where previously enabled, together with the removal of the rules that prevent migration of communications hubs where such data pushing has previously been enabled to allow profile data to be provided to Users. All three respondents agreed to the proposed changes. One respondent noted a minor drafting error from DCC which DCC addressed when concluding.

4. Between 23 April 2021 and 10 May 2021, DCC consulted on a re-designation date of 20 July 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD updates relating to Uplift 2.1[2]. All three respondents supported the proposal. BEIS also recognises that DCC conducted broader outreach on its proposals via transitional governance fora, such as the Technical and Business Design Group (TBDG) and the Implementation Managers' Forum (IMF).

Changes to the S1SR and DUIS

5. Between 7 May 2021 and 4 June 2021, DCC sought respondents' views on changes to the S1SR to make provision for device specific behaviours in relation to Uplift 2.1 for FOC. DCC also proposed changes to DUIS (versions 3.0, 3.1 and 4.0)[3] to remove the FOC-specific exclusions relating to firmware upgrades for SMETS1 Prepayment Meter Interface Devices (PPMIDs) to allow for the upgrading of firmware on PPMIDs for FOC Device Model Combinations (DMCs).[4] DCC submitted its conclusions to the Secretary of State on the S1SR on 14 June 2021, along with the three responses it received.

6. In respect of DCC's proposed amendments to Section 18 of the S1SR (which describes device specific behaviours), all three respondents were supportive but suggested some changes to the drafting. DCC agreed and amended the drafting when concluding.

7. Two respondents agreed with DCC's proposed mappings of clauses in Section 18 of the S1SR to the relevant device models in the DMVES annex. One did not provide a response to the question.

8. DCC also sought views on the proposed amendments to DUIS to allow for the upgrading of firmware on PPMIDs for FOC DMCs. Two respondents agreed with DCC's proposals; one did not provide a response.

9. DCC consulted on a proposed re-designation date of 20 July 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the S1SR and DUIS updates related to Uplift 2.1. Three respondents provided a response to this question, all of whom agreed that this date was appropriate.

[2] https://www.smartdcc.co.uk/customer-engagement/smets1-conclusions-on-changes-to-the-re-designation-date-of-the-tmad-for-foc-uplift-21/

[3] The re-designated versions of DUIS 3.0, 3.1 and 4.0 will maintain the same version numbering and will be identifiable from previous versions through the re-designation dates. A modification has not been made to version numbering as no changes to the schema have been proposed.

[4] https://www.smartdcc.co.uk/customer-engagement/changes-to-the-smets1-supporting-requirements-document-and-dcc-user-interface-specification-for-the-uplift-21-foc/

10. On 14 June 2021, DCC consulted on further changes to the S1SR to make provision for device specific behaviours that it had identified through testing[5]. These were in support of the 2.1 FOC uplift and 1.3 MOC uplift which are both due to be brought into production on 21 July. DCC received two responses to its proposed amendments to Section 18. Both respondents requested clarity on the application of Time of Use tariffs. BEIS notes that DCC has addressed these queries in its response. No objections or questions were raised in response to DCC's proposed mappings of clauses in Section 18 of the S1SR to the DMVES annex.

Expedited CPL Entries

11. Between 25 May 2021 and 22 June 2021, DCC consulted on a process and associated changes to SEC Appendix Z (CPL Requirements Document) as well as on associated consequential changes to SEC Sections A (Definitions and Interpretation) and H (DCC Services) to enable an expedited firmware addition onto the Central Products List (CPL) where necessary for specified purposes for a SMETS1 Device Model[6]. If a security vulnerability is discovered in a device that is already on the EPCL, it may be necessary to deploy a firmware upgrade to that device. However, doing so would mean the device would not appear on the Eligible Products Combination List (EPCL) and DCC would not have an obligation to provide Services in relation to these devices. DCC therefore proposed a temporary process to permit a new SMETS1 Device Model to be added to the CPL prior to the time that the SMETS1 Device Model is included in a DMC on the EPCL while a relevant DMC is being progressed through Pending Product Combinations Test (PPCT). This is the relevant test route for when suppliers wish to upgrade firmware for their SMETS1 installations and, therefore, add new DMCs to the EPCL in preparation for migration readiness.

12. DCC received two responses to its proposed process and regulatory changes. One respondent sought clarification on the details of the process, which DCC explained in its consultation response. There were no objections from respondents in respect of the proposals or regulatory drafting. BEIS understands that DCC also engaged the SEC Panel's Security Sub Committee (SSC), which supported the changes proposed.

13. DCC also consulted on a re-designation date of 20 July 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for these amendments and the proposed making of consequential changes to SEC Sections A and H using Section X5 of the SEC (Incorporation of Certain Documents into this Code). One respondent agreed to the proposed date and one respondent did not provide an answer to this question.

Conclusion

14. In light of the responses to the DCC consultations, the Government believes that it is appropriate to make the document re-designations and consequential amendments as proposed.

[5] https://www.smartdcc.co.uk/customer-engagement/conclusions-on-dcc-s-further-consultation-on-changes-to-the-smets1-supporting-requirements/
[6] https://www.smartdcc.co.uk/customer-engagement/emergency-cpl-smets1-entries/

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 20 July 2021 the SMETS1 Transition and 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 20 July 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.

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 20 July 2021 the DCC User Interface Specification (DUIS) versions 3.0, 3.1 and 4.0, previously designated and incorporated into the SEC as Appendix AD, are hereby re-designated and incorporated in the form set out at Annexes E, G and I respectively of this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC (Incorporation of Certain Documents into this Code), the Secretary of State directs that with effect from 20 July 2021 the CPL Requirements Document previously designated and incorporated into the SEC as Appendix Z, is hereby re-designated and incorporated in the form set out at Annex O of this direction. In addition, the Secretary of State directs that with effect from 20 July 2021 consequential changes to Sections A and H set out in Annexes K and M respectively shall also be made.

For the avoidance of doubt, any re-designation of the SMETS1 TMAD, S1SR, DUIS and the CPL Requirements Document shall be without prejudice to anything done under the DCC Licence or SEC on or after these documents first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

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 Migration Approach Document (TMAD) v15.0 clean

Annex B: SEC Appendix AL – SMETS1 Transition Migration Approach Document (TMAD) v15.0 – marked up against v14.0

Annex C: SEC Appendix AM – SMETS1 Supporting Requirements (S1SR) v9.0 clean

Annex D: SEC Appendix AM – SMETS1 Supporting Requirements (S1SR) v9.0 – marked up against v8.0

Annex E: SEC Appendix AD – DCC User Interface Specification (DUIS) v3.0 (20 July 2021) - clean

Annex F: SEC Appendix AD – DCC User Interface Specification (DUIS) v3.0 (20 July 2021) – marked up

Annex G: SEC Appendix AD – DCC User Interface Specification (DUIS) v3.1 (20 July 2021) - clean

Annex H: SEC Appendix AD – DCC User Interface Specification (DUIS) v3.1 (20 July 2021) – marked up

Annex I: SEC Appendix AD – DCC User Interface Specification (DUIS) v4.0 (20 July 2021) – clean

Annex J: SEC Appendix AD – DCC User Interface Specification (DUIS) v4.0 (20 July 2021) – marked up

Annex K: SEC Section A – Definitions and Interpretations v16.0 - clean

Annex L: SEC Section A – Definitions and Interpretations v16.0 - marked up against v15.0

Annex M: SEC Section H – DCC Services v12.0 clean

Annex N: SEC Section H – DCC Services v12.0 marked up against v11.0

Annex O – SEC Appendix Z - CPL Requirements Document v3.0 - clean

Annex P – SEC Appendix Z - CPL Requirements Document v3.0 - marked up against v2.0