



Department for
Business, Energy
& Industrial Strategy

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

8 October 2021

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

Dear Colleague,

**SMART METERING IMPLEMENTATION PROGRAMME: DIRECTION TO RE-DESIGNATE
THE SMART ENERGY CODE (SEC) S1SR, THE CPL REQUIREMENTS DOCUMENT AND
CONSEQUENTIAL SEC CHANGES TO SUPPORT THE DCC SMETS1 SERVICE**

1. The letter constitutes the Government response to a consultation undertaken by the Data Communications Company (DCC) on BEIS' behalf and a direction to re-designate the SMETS1 Supporting Requirements (S1SR) and the CPL Requirements Document. This letter also directs changes to Section A of the SEC that is consequential to the re-designation of the CPL Requirements Document. This is to support the enrolment of first-generation smart meter devices (SMETS1) in the national smart meter communications network managed by the Data and Communications Company (the DCC).

Bilingual Prepayment Interface Devices

2. DCC has identified that some models of Prepayment Interface Devices (PPMIDs) can operate as part of either a SMETS1 or SMETS2+ installation. DCC's consultation explained that the current regulations do not permit devices to be both SMETS1 and SMETS2+ and DCC systems are unable to process commands to such device types.
3. Between 27 July 2021 and 20 August 2021, DCC consulted on a tactical solution to enable energy suppliers to use one of these bilingual PPMID device types as part of either a SMETS1 or SMETS2+ installation. This involves Energy Suppliers creating a distinct entry in the Central Products List (CPL) for the SMETS1 entry and SMETS2+ entry. DCC also consulted on energy suppliers' appetite for an enduring solution to be developed by DCC to address the issue. This would involve changes to the SEC and DCC Systems to enable the devices in question to be commissioned to either a SMETS1 or SMETS2+ Installation.
4. DCC received seven responses from stakeholders to its proposed tactical solution. Six respondents supported the tactical solution with two being explicit that the tactical solution should be implemented as soon as possible; others indicated the need for a solution as soon as possible but that there would be complications for Manufacturers because of the proposal. The seventh respondent queried why DCC was not able to make a judgement on

the tactical solution and indicated that Manufacturers are best placed to load CPL details. In its consultation response, DCC sought to address concerns raised and separately engaged parties on these concerns. DCC concluded that the benefits of the tactical approach outweighed any complications and DCC proposed to introduce it given the broad support amongst respondents for a solution to bilingual devices as soon as possible.

5. Furthermore, DCC has, following support from stakeholders, decided to raise a SEC Mod in support of introducing an enduring solution to address the bilingual PPMID issue that will replace the tactical solution in the future.
6. DCC proposed regulatory drafting for the tactical solution (which includes changes to the S1SR, CPL Requirements Document and consequential changes to Section A of the SEC) and sought respondents' views. DCC received seven responses from stakeholders. Three of whom agreed with DCC's proposals. The majority did not disagree with making drafting changes but challenged the nature of the proposed changes e.g. through the identification of typographical errors. In its conclusions, DCC addressed the typographical errors identified by respondents and recommended proceeding with its proposed changes

Size Limitation for Firmware

7. DCC also consulted on a change to the S1SR to make provision for the possibility that firmware upgrades may fail. This is because all devices have limits on the amount of storage that is available for a firmware image due to no value being defined by the SMETS1 specification. Seven respondents provide a written response to DCC. One respondent agreed with the proposed changes to the S1SR, others did not have material objections but identified drafting issues and asked DCC to work with Manufacturers to ensure firmware upgrades continue to be possible. In its conclusions, DCC confirmed it is working with Manufacturers on the size limitation of firmware upgrades and made drafting changes in accordance with respondents' feedback.

Secure Third-Party PPMIDs

8. DCC also sought respondents' views on whether DCC should develop a solution to allow for the upgrade of third-party PPMIDs that are attached to Secure Installations as the DCC's Secure S1SP solution does not support this. DCC will not be taking this change forward due to the lack of support from respondents. However, DCC recommended capturing these device specific issues in the S1Sr in its conclusions, noting that no respondents objected.

Meta Data Issue

9. When a hash value (a numeric figure used to identify data) is generated for a firmware image, the firmware image is locked to a specific Communications Hub manufacturer meaning the firmware image is unable to be used for Communications Hubs provided by other manufacturers. Therefore, a firmware upgrade of a PPMID will only succeed for Communications Hubs from a single manufacturer. DCC therefore proposed changes to allow for the upgrading of PPMID firmware on PPMIDs irrespective of the device-set to which it is attached. Only two respondents out of seven supported DCC's proposal. As a result of the lack of support, DCC concluded that it would not be progressing this change.

10. As a result of the “meta data issue”, DCC also consulted on making changes to the S1SR to reflect the inability to upgrade firmware on all PPMIDs. Although only two respondents agreed with the proposed changes, DCC concluded it intends to make the proposed changes to the S1SR as they are required to reflect current device specific behaviours.

Unsupported PPMIDs

11. DCC also proposed making changes to the S1SR in recognition of PPMIDs that are no longer supported by manufacturers (and therefore cannot receive firmware updates). Seven respondents provided responses to the question. Six of whom did not object to the proposed change; one respondent supported it.

Designation

12. DCC sought views on a proposed re-designation date of 10 September 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter). Seven respondents responded to the question; six of whom agreed with the proposed designation date while another did not object.

Conclusion

13. We conclude that it is appropriate for new versions of S1SR (v10.0) and the CPL Requirements Document (v4.0) to be re-designated on 8 October 2021 and for the consequential changes to Section A of the SEC to be made. Version 10.0 of the S1SR 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. Version 4.0 of the CPL Requirements Document 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. Version 20.0 of Section A is included at Annex E. A marked-up version of the document showing the changes relative to the version previously in legal effect is provided at Annex F.

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 8 October 2021, the SMETS1 Supporting Requirements (S1SR) previously designated and incorporated into the SEC as Appendix AM of the SEC is hereby re-designated and incorporated in the form set out in 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 8 October 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 C of this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC, the Secretary of State directs that in consequence of the designation of the CPL Requirements Document, with effect from 8 October 2021, Section A (Definitions and Interpretation) of the SEC is amended to be of the form set out at Annex E of this direction.

For the avoidance of doubt, any re-designation of the S1SR and the CPL Requirements Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after the S1SR or CPL Requirements Document being previously designated or re-designated, or to the continuing effectiveness of anything done under the S1SR or CPL Requirements Document prior to their re-designations (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 AM – SMETS1 Supporting Requirements Document (S1SR) v10.0 – clean

Annex B: SEC Appendix AM - SMETS1 Supporting Requirements Document (S1SR) v10.0 – marked up against v9.0

Annex C: SEC Appendix Z – CPL Requirements Document v4.0 - clean

Annex D: SEC Appendix Z – CPL Requirements Document v4.0 - marked up against v3.0

Annex E: Section A – Definitions and Interpretation v20.0 – clean

Annex F: Section A – Definitions and Interpretations v20.0 – marked up against v19.0