

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

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15 December 2022

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

Dear Colleague,

Smart Metering Implementation Programme: decision on the addition of entries to the Eligible Product Combinations List for DCC SMETS1 services – EPCL Report 28

On 30 November 2022, DCC published EPCL Report 28 and sought approval for the addition of the associated active, dormant, and mixed entries to the Eligible Product Combination List (EPCL). This report presents a range of device model combinations (DMCs) and would enable enrolment of 2,190 smart metering systems to DCC's SMETS1 Service in the Initial Operating Capability (IOC), the Middle Operating Capacity (MOC Secure), and the Final Operating Capacity (FOC BG) cohorts. All the entries are proposed to be added as substantively equivalent to existing EPCL entries. The DMCs, which the proposed entries represent, had already been listed on the ECPL but needed new or updated entries to account for some of them requiring firmware upgrades, in part due to turning from active to dormant on customer churn since being added.

Approving the proposed entries will enable the migration of these smart metering systems in to the DCC and use of smart services by DCC Users. This includes allowing energy suppliers to restore smart services to consumers where necessary, and enable consumers to retain smart services when switching energy supplier.

In determining whether to approve adding the proposed entries, I have sought to gain sufficient confidence that DCC is able to support migration and subsequent operations for smart metering systems comprising these DMCs. I have received a range of evidence on these matters including:

- DCC EPCL Report 28 that assesses the proposed entries against the relevant Live Service Criteria and sets out the pacing strategy for migrating the dormant devices;
- An updated risk register documenting risks and mitigations linked to DCC's capability to successfully migrate and support operation of the additional devices that would be enabled by the proposed entries;
- Assurances from the DCC in respect of requisite current system stability;
- DCC confirmation of the SEC Security Sub-Committee's view that the proposed EPCL entries present no security risks; and
- Advice from my own team in BEIS including confirmation on regulatory readiness and that mitigating actions on residual risks are in place

Based on this evidence, I am assured that:

DCC understands, has assessed, and sufficiently mitigated, all relevant risks and concerns
that may impact its capabilities to migrate and support operation of the devices enabled by
the proposed entries;

- DCC has deployed a range of system improvements and fixes in the October, November, and December maintenance releases to benefit all cohorts, especially FOC, which respond to the migration impacting incidents seen in that period;
- the proposed EPCL entries present a relatively small volume of meters against which DCC has considerable available migration capacity; and
- No stakeholder concerns have been directly raised to BEIS in the 5-day standstill period allocated for this

I recognise that approving further devices to the EPCL at this late stage in the enrolment project, and so far after previous approvals, potentially sits at odds with bringing the project to a close. We want however to maximise enrolment where it is economically efficient to do so and note that the devices represented by this approval are very low in number and only a fraction of DCC's daily migration capacity. Any further approvals are expected to be of a similar nature, in terms of being by exception and having no overall bearing on migration timescales.

In summary, having considered the full range of evidence and recommendations available to me, I have decided to hereby approve the addition of the entries outlined Annex 2 of this letter to the EPCL, pursuant to clause 3.7 of the SMETS1 TMAD.

Thank you to all parties who have engaged with and supported this process.

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

Annex 1: EPCL Report 28

Annex 2: EPCL Report 28 - Annex A - EPCL Report Entries