

SMETS1 Conclusions on TMAD – 31 December 2021 Expiry

DCC Conclusions and Report to Secretary of State on
changes to the SMETS1 Transition and Migration
Approach Document (TMAD) related to the expiry date.

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1. Introduction and Context

The detailed technical and procedural requirements of the migration approach for SMETS1 are set out in the SMETS1 Transition and Migration Approach Document (TMAD). This document is included in the Smart Energy Code¹ (SEC) as Appendix AL and the latest version (8.0) was included in the SEC on 12 November 2020.

DCC issued a consultation regarding the TMAD related to FOC on 16 October 2020 (<https://www.smartdcc.co.uk/customer-hub/consultations/dcc-response-to-the-consultation-of-25-august-2020-and-further-consultation-on-tmad-for-foc/>) which included a proposal to extend the expiry date of the TMAD to 31 December 2021 alongside the proposed changes for FOC.

This document provides a response to that consultation consistent with the regulatory requirements for revising the TMAD. This conclusions document is focused solely on the TMAD expiry date. Given the delay in go live for the FOC primary release, DCC will be concluding separately on the matters related to FOC in due course.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed revisions to the TMAD.

On 16 October 2020, DCC published the consultation document titled '[SMETS1 Conclusion and Additional Consultation - TMAD for FOC](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

The scope of the consultation covered the following matters:

- [SMETS1 Transition and Migration Approach Document AL 7.1 delta](#); and
- draft text and proposed timescale for the Secretary of State's direction for the re-designation of the TMAD.

Stakeholders were invited to respond to the consultation issued on 16 October 2020 by 16:00 on Friday 6 November 2020 using the separate response template that was provided.

3. Consultation Questions & Responses

The consultation provided this template for respondents - [SMETS1 Conclusion and Additional Consultation - TMAD for FOC - Response Template](#) which presented the following consultation questions as set out in Table 1.

Consultation	Number	Question
16 October 2020	FOCa TMAD Q1	Do you agree with the proposed additional changes to the TMAD for FOC? Please provide a rationale for your views.

¹ <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

Consultation	Number	Question
16 October 2020	FOCa TMAD Q2	Do you agree with the proposed change to the date from 31 December 2020 to 31 December 2021 that TMAD will cease to apply? Please provide a rationale for your views.
16 October 2020	FOCa TMAD Q3	Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?
16 October 2020	FOCa TMAD Q4	Do you agree with the proposed re-designation date of 13 December 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?

Table 1 – Consultation Questions

DCC received a written response from three respondents to the 16 October 2020 consultation on the TMAD.

DCC provided all written responses to the Secretary of State once the consultations had closed.

4. Analysis of Responses

The analysis of responses in this conclusion document is only related to questions **FOCa TMAD Q2** and **FOCa TMAD Q4**. DCC will be responding separately regarding the other questions.

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response. Where appropriate, DCC has engaged with respondents to discuss major areas of disagreement to understand if an agreement may be reached.

DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:

- an overview of the responses on the topic; and
- areas where DCC disagrees with the view presented by respondents, as the regulation requirements require DCC to report on this.

4.1. Extending TMAD End Date (FOCa TMAD Q2)

DCC sought views on proposals to adjust the sunset provision such that the TMAD ceases to apply from 31 December 2021 asking ***“Do you agree with the proposed change to the date from 31 December 2020 to 31 December 2021 that TMAD will cease to apply? Please provide a rationale for your views.”***

4.1.1. Respondent View

Three respondents provided a response to this question.

Two respondents expressed explicit support for change to the sunset provision. One of these respondents noted this was a desirable change given previous delays in the SMETS1 programme and the other respondent noted this change aligns to the Standard Licence Conditions that apply to Energy Suppliers.

One respondent objected to the proposal for a revised end date. This respondent suggested an alternative formulation for Clause 1.3 of the TMAD to align to the “no earlier than 12 months following the final entry on the EPCL” as this better reflects the Standard Licence Conditions that apply to Energy Suppliers. DCC notes the respondent’s concern, however, DCC considers that the ability of the Secretary of State to amend the date as set out in the current and proposed drafting provides sufficient flexibility to address any concern that the TMAD would be prematurely disapplied.

4.1.2. Areas of Disagreement

Within the scope of the consultation, DCC disagrees with the proposal to restructure the formulation of Clause 1.3 of the TMAD as set out above.

4.2. TMAD Regulatory Change Date (FOCa TMAD Q4)

DCC sought views on the planned date for the Secretary of State re-designating the TMAD asking ***“Do you agree with the proposed re-designation date of 13 December 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?”***.

4.2.1. Respondent View

Three respondents provided a response to this question.

Three respondents expressed explicit support for the proposed schedule for amending the TMAD.

4.2.2. Areas of Disagreement

There were no areas of disagreement.

5. Summary of Drafting Changes

The consultation process gave rise to no drafting changes. However, DCC has transposed the proposed change to Clause 1.3 into v8.0 of the TMAD.

There are also minor drafting changes within the legal drafting to amend typographical errors.

6. Conclusions

DCC is confident that the version of the TMAD submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has had appropriate consultation with industry regarding these changes to the TMAD.

DCC has, where necessary, addressed the comments that have been received from industry and where appropriate has sought additional feedback from respondents. DCC does not believe that

the views expressed result in fundamental amendments to the TMAD and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations.

The TMAD revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised TMAD is defined to a sufficient level of detail for re-designation into the SEC;
- the revised TMAD provides an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- the revised TMAD is materially complete, and the content is technically accurate.

In summary, DCC considers that the revised TMAD is are fit for purpose.

7. Next Steps

DCC submitted this conclusions report to the Secretary of State on 10 December 2020.

Following the submission of TMAD to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD into the regulatory framework. Given this consultation process DCC notes the earliest date that these changes could be re-designated is 13 December 2020 and the latest date is 13 January 2021 without requiring a further consultation on the designation date.

8. Attachments

Attachment	Title
1.	TMAD AL9.0 draft – clean
2.	TMAD AL9.0 draft - delta against current version AL8.0

Table 2 - Attachments