SMETS1 Supporting Requirements

Proposed amendments and configuration changes

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1. Executive Summary

1. This document consults on the behaviour of specific SMETS1 Devices and seeks parties' views on the management of those behaviours. We have attempted to describe the topics is plain English but the document is aimed at readers with some technical knowledge of the functioning of SMETS1 Devices.

2. We are consulting on proposals to describe certain Device behaviours in the SMETS1 Supporting Requirements (S1SR). We consider this will support the operation of those Devices. These proposals will not amend the behaviour of the Device.

3. In addition, we describe two issues identified in SMETS1 Devices in the FOC cohort related to the generation of unnecessary Alerts and the return of incorrect data for half hourly data requests. In these two cases we propose amendments to the S1SR which would require updates to the Device configuration to address both issues. We propose that DCC be required to complete configuration amendments on behalf of Supplier Parties.

4. We welcome feedback from Parties on the proposals set out in this consultation. In addition, we also ask for details and evidence of how these Device configurations are impacting suppliers and their customers both now and in the future if not addressed.

5. This consultation closes at 17:00 on 07/03/2025, and responses should be sent to consultations@smartdcc.co.uk.

2. Introduction

2.1. Background

6. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single secure, digital network. DCC supports the roll-out and operation of second-generation (SMETS2) smart meters, as well as the migration and operation of existing first-generation (SMETS1) meters onto our network.

7. In the initial stages of the smart meter roll-out across Great Britain, and before DCC was established, a number of energy suppliers installed first generation smart metering devices (known as SMETS1 Devices), in households and small/medium non-domestic premises. These SMETS1 Devices were initially operated through Suppliers' own systems and not connected to DCC Services. This meant that a SMETS1 Device could not always continue to provide smart functionality when operated by another supplier (for example following a change of Supplier event).

8. In 2018 and 2019, the Secretary of State at the time directed changes to the Energy Supplier and DCC Licences as well as the Smart Energy Code (SEC). This required DCC to provide services to enrol first-generation (SMETS1) meters on to DCC systems and for energy suppliers to enrol these in a timely way. This has enabled consumers to access the benefits of an interoperable smart metering market. There are more than 11 million SMETS1 meters, categorised into three main cohorts, now operating on DCC systems. Most energy suppliers have now completed enrolling their SMETS1 meters.

9. The SEC Appendix AM SMETS1 Supporting-Requirements[1] (S1SR) document provides supporting requirements, including communications, in relation to SMETS1 Devices, and in particular where this differs from SMETS2 equivalents.

2.2. Areas for consultation

2.2.1. SMETS1 Device behaviour

10. Section 2 of this consultation provides details on SMETS1 Device behaviour where DCC propose new additions to the S1SR to describe that behaviour.

11. The Great Britain Companion Specification[2] (GBCS) describes the detailed requirements for communications between Smart Metering Devices. In a number of cases the behaviour of the SMETS1 Device does not align to the detail within GBCS. To allow Parties to understand the behaviour of their SMETS1 Devices and operate them with efficiency the S1SR describes that unaligned SMETS1 Device behaviour.

12. There has been a number of iterations of the S1SR, as new SMETS1 Device behaviours, which are not aligned to GBCS, have been identified over time. This consultation proposes updates to the current version of S1SR where additional SMETS1 Device behaviour has been identified and is proposed for inclusion.

2.2.2. SMETS1 Device configuration

13. Section 3 of this consultation provides details of SMETS1 Final Operating Capacity (FOC) Electricity Smart Meter Equipment (ESME) Devices configuration issues, where DCC proposes amendments to the S1SR and technical solutions.

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[1] smartenergycodecompany.co.uk/documents/sec-subsidiary-documents/sec-appendix-am-smets1-supporting-requirements/
[2] SEC Schedule 8 – GB Companion Specification

14.   These configuration changes are expected to provide a solution for Device-specific issues regarding the generation of unnecessary Alerts and the return of incorrect data when half hourly consumption data is requested.

2.3. Consultation closure

15.   We welcome feedback from Parties on the proposed S1SR changes and implementation of technical solutions. We also seek details of the impact of Device specific issues to help inform appropriate next steps. This consultation closes at 17:00 on 07/03/2025, and responses should be sent to consultations@smartdcc.co.uk.

3. SMETS1 Device Behaviour

16. The S1SR contains clauses that explains SMETS1 Device behaviour where that behaviour does not align to GBCS. The behaviours and their description relate to specific SMETS1 Devices. Annex A[1] of the S1SR is the Device Model Variations to Equivalent Steps Matrix (DMVESM) which identifies the specific SMETS1 Device (or Devices) that each S1SR clause relates to. The proposed changes in this consultation cover both amendments to S1SR clauses and amendments to the DMVESM.

17. The S1SR references Electricity Smart Metering Equipment as ESME, Gas Smart Metering Equipment as GSME, and the Communications Hub Function as CHF.

18. Below we propose changes to the S1SR and DMVESM, these changes relate to three key areas:

    a. Correction of a formatting error within the S1SR

    b. The addition of new issues into the S1SR identified through DCC's Device Issues Recommendation Forum[2] and in support of Half Hourly settlement

    c. Meter configuration changes that can result in incidents or incorrect response

3.1. Formatting error

19. DCC has identified a formatting error at clause 18.5 of the S1SR, which we believe was implemented during the change from version 11 to version 12. The error occurred at clause 18.5p where the sub-clauses related to it were assigned their own clause reference (18.5q, 18.5r, etc). These sub-clauses should have been referenced i, ii, and so on.

20. This formatting error resulted in subsequent clauses being assigned incorrect references, which in turn resulted in a disconnect between the S1SR clauses and the DMVESM. This disconnect has not been reported by Users and we are not aware that this has caused any negative impact. Correcting the error is considered necessary to ensure that the disconnect does not cause any issues or confusion in the future.

21. We have reviewed the S1SR for similar formatting errors and disconnection with the DMVESM. We have not identified any further errors or disconnects between the S1SR and the DMVESM that require resolving.

22. We propose that the clause references are corrected to those in S1SR version 11 to ensure that they align to the DMVESM. The proposed changes are highlighted as track-changed within the accompanying red-lined S1SR draft.

Question One

Do you agree with the proposal to correct the formatting error in the S1SR, including amendments to the following clauses which restores overall alignment of the S1SR clauses to the DMVESM? Please give a rationale for your response.

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[1] https://smartenergycodecompany.co.uk/documents/sec-subsidiary-documents/sec-appendix-am-annex-a-device-model-variations-to-equivalent-steps-matrix-v12-2/

[2] The Device Issues Forum is a Department and DCC forum that considers SMETS1 Device behaviour raised by Parties and considers how best to manage those behaviours.

3.2. Device Issues Recommendation Forum recommended amendments

23.   The Device Issues Recommendation Forum (DIRF) is technical group attended by DCC and SEC Parties that considers SMETS1 Devices specific issues, including whether they are suitable for inclusion in the S1SR.

24.   Through that engagement the following meter behaviour has been highlighted that does not align to GBCS and is not yet described in the S1SR.

25.   This behaviour is considered suitable for inclusion into the S1SR by DIRF and we propose to add this device behaviour to the S1SR. We consider that the addition will allow Parties to understand the behaviour of their devices better and manage them more effectively.

26.   In this section we consider the issue to be that some SMETS1 Device behaviour, which is not aligned to GBCS, is not described in the S1SR. This section therefore focuses on the description of the SMETS1 Device behaviour where an addition to the S1SR is proposed.

27.   A tracked changes version of the S1SR has been published with this consultation in which the proposed wording for amendments can be viewed.

3.2.1. Honeywell ESME SRV 1.1.1 (Update Import Tariff) – specify the day and month

28.   For Honeywell ESME Devices the SRV 1.1.1 must specify an absolute value for the month and day of month of the season start date to be successfully processed. Where those values are not provided a failure response will be returned.

29.   It is proposed that a new clause 18.1 (ee) is added to the S1SR to describe this behaviour and detailed in DMVESM for Honeywell ESME Devices.

3.2.2. Secure ESME GSME SRV 2.1 (Update Prepayment Configuration) – prepayment part-penny updates

30.   For Secure meters, both ESME and Gas Smart Meter Equipment (GSME), the Devices will not accept part penny updates for the following parameters:

   a.   EmergencyCreditLimit

   b.   EmergencyCreditThreshold

   c.   LowCreditThreshold

   d.   MaxMeterBalance

   e.   MaxCreditThreshold

31.   Any update to these values not in full pence values will not be rejected, but the SMETS1 Service Provider (S1SP) will round down the value to the nearest full pence. The value defined on the Device may be slightly lower (by less than one penny) than the User intended but no notification of the difference will be provided.

32.   For clarity these values are not related to the actual credit held on a meter and there is no financial impact on the consumer.

33.   It is proposed that a new clause 18.5 (jj) is added to the S1SR to describe this behaviour and detailed in DMVESM for Secure ESME and GSME Devices.

3.2.3. Itron ESME SRV 6.8 (Update Device Configuration (Billing Calendar)) – incorrect billing period on PPMID

34. Where Itron ESME Device BillingPeriodStart is updated with a date in the future, the correct billing period will be applied to the ESME but the associated SMETS1 PPMID will not reflect the ESME update and associated data.

35. DCC proposes that new clause 18.42 h is added to the S1SR to describe this behaviour and detailed in DMVESM for Itron ESME Devices.

3.2.4. Secure ESME SRV 6.12 (Update Device Configuration (Instantaneous Power Threshold)) – power thresholds

36. For Secure ESME the LowMediumPowerThreshold must be greater than 1W and lower than the MediumHighPowerThreshold or the S1SP will reject the request. The LowMediumPowerThreshold must be equal to or less than 29899W or the Device will reject the request. The MediumHighPowerThreshold must be greater than the LowMediumPowerThreshold and less than or equal to 29900W or the device will reject the request.

37. DCC proposes that new clauses 18.44 b and c are added to the S1SR describe this behaviour and detailed in DMVESM for Secure ESME Devices.

3.2.5. Secure CHF SRV 11.1 (Update Firmware) – firmware updates to CHF

38. Clause 18.63a already exists in the S1SR to describe where a SRV 11.1 (Update Firmware) request will be rejected while SRV 11.3 (Activate Firmware) is being progressed. The clause is true for Secure CHF but is not currently applied to it in DMVESM.

39. It is therefore proposed that clause 18.63a is applied to Secure CHF in DMVESM.

3.2.6. Secure ESME SRV 4.2 (Read Instantaneous Export Registers) – half hourly data

40. In preparation for Market-wide Half Hourly Settlement there are planned changes to SRV4.2. These changes will be implemented once updates in the S1SR have been designated.

41. For Secure ESME the Scheduled 4.2 will return meter read data taken at 00:00:00 of the calendar day in which the SRV processed, rather than being processed as an instantaneous read.

42. DCC proposes that new clause at 18.15a is added to the S1SR to describe this behaviour and detailed in DMVESM for Secure ESME.

Question Two

Do you agree with the proposed amendments to the S1SR as set out above, which describe, as yet undocumented, behaviour of SMETS1 Devices highlighted through DIRF and that behaviour which will be implemented to support Market-wide Half Hourly Settlement? Please give a rationale for your response. If you agree with some, but not all the proposed amendments please provide details.

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4. SMETS1 Device Configuration

4.1. L&G FOC Meter Configuration Proposals

43. The proposals described in this section relate to L&G ESME Devices in the FOC cohort where the functioning or configuration of the Device causes service impacts. To remove those impacts a change to the functioning of the Devices is required.

44. In this section we first consider how to categorise the L&G ESME Devices in the S1SR. This categorisation is required to allow other proposed changes to be applied to this specific group of Devices only.

45. We then explain the two issues that these Devices cause, which are:

    a. HAN Alerts and Alert storms related to changes between BST and GMT (4.1.2), and

    b. Incorrect reporting of Half Hourly data (4.1.3)

46. Amendments to how these meters operate or are configured are proposed, which will resolve the issues identified.

47. Finaly, we consider how best to implement the changes in configuration and present two different approaches.

48. It should be noted that SMETS1 Devices, and their functioning, are the responsibility of Supplier Parties. However, DCC recognises that we can offer a service to resolve those issues, where that resolution route might be more effectively delivered through a single delivery method provided by a single Party rather than multiple Supplier Parties, which would additionally need to factor in consumer switching.

4.1.1. Categorisation of L&G FOC Devices

49. The issues described in this section, and their proposed resolution, relate only to L&G Devices in the FOC cohort. The issues are described below, where we also propose configuration requirements to resolve those issues.

50. In order to require those configuration requirements to be applied to, and relevant to, only those L&G ESME FOC Devices, a new S1SR definition is required to group these Devices into their own category.

51. We therefore propose the addition of a new category of Device to distinguish L&G ESME Devices in the FOC cohort from other SMETS1 Devices. This new device category will then be used to apply meter configuration requirements, as described in the following proposals.

52. DCC has proposed a new definition for L&G Devices in the definition section of the S1SR under "Category 3 Device" in definitions.

Question Three

Do you agree that the proposed amendments the S1SR definitions will group L&G Devices in the FOC cohort into their own separate category?

4.1.2. HAN Alerts and alert storms related to changes between BST and GMT

53. There are ~2.3 million FOC ESME Devices currently operating on DCC systems.

54. During the British Summer Time (BST) to Greenwich Mean Time (GMT) clock change in October 2023 the volume of unnecessary Alerts generated resulted in a Category 1 incident (INC000001103865). The Incident impacted all ESME and GSME Devices across the FOC and Initial Operating Capacity (IOC) estate due to shared Service Providers. The Incident impact lasted for 19 hours during which time FOC On-Demand success performance reduced to 9% and IOC On-Demand success reduced to 11%. This reduced performance impacted all traffic across the network which could have resulted in failed top-ups and increased customer contacts to Supplier Parties. It is difficult for DCC to put a cost value on the overall impact since the impact is borne by Supplier Parties

55.   Investigations showed that unnecessary Alerts are generated during every change from BST to GMT and vice versa. During each change between BST and GMT each FOC ESME Device generates two alerts. We can therefore expect each change between BST and GMT to result in the generation of at least ~4.6 million Alerts (plus a large volume of retries where they fail due to system demand) over a short time period.

56.   The Alerts generated are non-mandated GBCS Alerts. They are not sent to any DCC User or utilised by the S1SP. Their generation and transmission across the network utilise network capacity but return no benefit to DCC Users.

57.   As the volume of FOC ESME Devices operated on DCC systems increased as migrations in FOC continued to completion (November 2024), the volume of unnecessary Alerts traversing DCC systems, but not utilised by any DCC User or the S1SP, also experienced a corresponding increase. These alerts are not required for the successful and efficient functioning or management of the Devices from which they are generated.

58.   These Alerts generated during changes between BST and GMT result in a significant increase in Demand over a short time-period, but where that demand is not driven by true or useful network traffic.

59.   The FOC ESME Devices configuration determines which Alerts are generated and they are as they were set when they were operated by the Smart Meter System Operator (SMSO) before migration to DCC systems. Changes between BST and GMT were not specifically included in pre-migration testing and so the issue of the large volume of Alert generation during such periods was not identified for resolution prior to meter migration.

60.   To manage the incident and in attempts to improve service levels, Scheduled Reads were paused and one DCC User voluntarily accepted a temporary suspension of Services.

61.   DCC has worked with Service Providers to mitigate the impacts to service levels caused by the unnecessary Alerts generated during changes between BST and GMT to reduce the likelihood of further Incidents. DCC increased capacity of the system, delivered for a one-off cost, to manage the increase in demand and continue to pause Scheduled activity during changes between BST and GMT.

62.   This mitigation has not stopped the Alerts being generated but has helped to manage the network during their generation. As a result, no further Incidents have occurred during more recent changes between BST and GMT. While this mitigation has reduced the likelihood of future Incidents, it does not solve the root cause of the issue which is considered to be the generation of unnecessary Alerts at significant volume.

63.   While the unnecessary Alerts continue to be generated, DCC will continue to experience a peak in demand during changes between BST and GMT, and so there remains a risk that disruption could occur again in the future. This risk will be greater during times where additional demand is placed on the network during a change between BST and GMT. There are currently ~7.6 million IOC and FOC Devices operating through DCC systems that would be impacted by a repeat of the October 2023 Incident.

64.   DCC consider that the best option to fully mitigate the ongoing risk of future incidents related to changes between BST and GMT, and to help reduce regular day-to-day traffic on the network, is to target a solution on the root cause of the issue. DCC propose that the Alert configuration of FOC ESME Devices be amended so that those Alerts that are not described in GBCS or utilised by the S1SPs are prevented from being sent across the communication network. This change would significantly reduce the network demand seen during changes between BST and GMT by removing the generation of ~4.6 million unused Alerts. It would therefore remove the cause of the Category 1 Incidents seen in the past and the cause of service disruption.

65.	We consider that this change would also reduce demand on the network and improve resilience at other times since these Alerts will not be sent across the network at any point. In addition, the increased capacity delivered to manage the unnecessary HAN Alerts will be retained and improve resilience further. The change will not impact how Parties operate or interact with their FOC Devices since these Alerts are not currently used.

66.	This change would allow DCC to cease the mitigating actions required to manage the network demand currently seen during changes between BST and GMT.

67.	To require such a configuration change we are proposing two S1SR amendments which set the Alert configuration, these include:

a.	A new definition for *SMETS1 HAN Alert* which are those device specific Alerts not described in GBCS

b.	The addition of a new Annex G where point (i) requires the configuration change so that SMETS1 HAN Alerts are not sent across the WAN

68.	There are different options for the implementation of this configuration which are considered in section 4.1.4.

Question Four
What were the impacts on your organisation and your customers during the October 2023 Incident or what could be the impacts on your organisation if a similar incident were to occur?

Question Five
Do you agree with the proposal to amend FOC ESME configuration to stop HAN Alerts not mapped to GBCS or utilised by the S1SP being sent across the Network? Do you consider that the proposed S1SR amendments sufficiently define the Alerts which should be removed from network traffic and require the appropriate configuration? Please give a rationale for your response.

### 4.1.3.	Incorrect reporting of Half Hourly data

69.	Following an incident raised by an Energy Supplier in January 2024, it has now been established that all ~2.3 million L&G SMETS1 ESME Devices in the FOC cohort, operated on the DCC network, are not configured in alignment to DUIS requirements, specifically related to half hourly data. This configuration results in incorrect half hourly data being provided from FOC ESME Devices following the issue of SRV 4.8.1 (Read Active Import Profile), 4.8.2 (Read Reactive Import Profile) and 4.8.3 (Read Export Profile). These SRVs return the maximum demand equivalents for half hourly period rather than total import or export values which would be required for half hourly billing and settlement.

70.	The Devices are configured as they were prior to migration to DCC when they were operated through SMSO. Meter configuration was not a requirement of the testing prior to migration. This topic has been discussed at the July 2024 Technical and Business Design Group (TBDG) where an action was taken for DCC to develop and consult on the proposals presented here.

71.	DCC investigations suggest that all FOC ESME Devices return incorrect data for SRV 4.8.2 and 4.8.3 due to incorrect load profiles on the Devices. For SRV 4.8.1 our investigations show that a subset of FOC ESME Devices provide incorrect data due to incorrect load profiles on the Devices. DCC is unable to identify the individual Devices that this applies to and cannot determine the precise number of Devices impacted.

72. The incorrect load profile results in Parties being provided with maximum demand data for the half hourly period rather than half hourly consumption data when issuing these SRVs. The impact of the issue will be different depending on the use of that data.

73. Parties should consider how they use this data, particularly for billing purposes or half hourly tariffs and may wish to review consumer billing where they have concern that incorrect half hourly data has been used. In addition, if the data from these meters is used for half hourly settlement those calculations will be incorrect and have potentially negative consequences for Supplier Parties.

74. We have engaged with the Elexon Market Half Hourly programme to ensure they are aware of the issue and that below we propose the implementation of a DCC led technical solution, which will help support the realisation of the Programs benefits.

75. If a technical solution is not provided, and where Supplier Parties wished to directly resolve the issue, a potential alternative option might be to replace the SMETS1 installation with SMETS2 Devices. In this scenario we consider that both ESME and GSME would require replacement, with there being ~2.3 million installations the costs of replacing all of them may be considerable[1].

76. DCC believe that we can deliver a more cost-efficient solution for parties and consumers through a configuration change implemented via the S1SP.

77. DCC has therefore proposed an amendment to the S1SR with the addition of a configuration table detailed in Annex G ii. Where meters are configured in this manner correct data will be returned following the issue of SRV 4.8.1. 4.8.2 and 4.8.3.

Question Six

With reference to each SRV (4.8.1, 4.8.2 and 4.8.3) has your organisation identified this issue and how wide ranging do you understand the issue to be? Has this issue caused any negative impact to you or your customers and what has that impact been? Do you consider that the issue will present any additional problems in the future, particularly when considering half hour settlement? Without resolution could your organisation manage the data issue and what would the impacts of that be on consumers?

Question Seven

Do you agree with the proposed amendment to the S1SR to describe the required Device configuration for FOC ESME Devices that would remove the error related to half hour data? Please give a rationale for your response.

4.1.4. Implementation and costs of configuration changes

78. Firmware updates can be used to update the Device configuration to resolve the issues, but this is not seen as a viable since Supplier Parties don't have commercial arrangements with the S1SP and where resource constraints exist in the development of that new Firmware.

79. Through discussions at TBDG two options for amending the configuration to resolve the error which returns incorrect data have been identified and the same options can be considered for the non-mandated Alert issue. These are:

   a. Responsible Supplier Parties complete the configuration change for the meters they operate through the use of an SRV to be developed and made available by DCC

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[1] Smart Metering Implementation Programme - Cost-Benefit Analysis 2019 estimated meter asset costs

      b.   DCC completes the configuration change on behalf of Parties via the S1SP, through a tested and controlled rollout across the FOC estate

80.   Discussions at TBDG provided support for a S1SR amendments to require the configuration change and for DCC to implement those changes on behalf of Parties.

81.   A Supplier Party led deployment through a new SRV would require a GBCS and DUIS update which would come at additional cost for Parties, and which may also require alignment to other DUIS updates which could delay deployment. Supplier Parties would need to manage the deployment across the ~2.3 million FOC ESME Devices which may come with additional costs. In addition, Parties would need to consider the complications resulting from customer switches and how best to ensure those Devices are captured, presenting a risk of some Devices not being updated.

82.   We consider that an implementation led by DCC via the S1SP will allow for a managed rollout where Supplier Parties will not need to manage their own deployment, and the complications highlighted above. This approach would not require a DUIS update and so avoids some additional cost, complexity and the need to align deployment to a DUIS update. DCC can complete deployment in a controlled, gradual implementation which will not be complicated by customer switches, reducing the risk that some devices aren't captured by the update.

83.   The configuration update would be triggered by the S1SP with a controlled rollout across the FOC ESME population. Since it is not possible for DCC to establish which specific L&G FOC Devices are incorrectly configured for recording and reporting half hourly data for SRV 4.8.1, DCC would need to issue the configuration update to all FOC ESME Devices.

84.   It should be noted that where the Device configuration is updated, historic half hourly data will be deleted, but that the data removed is not considered suitable for use. Daily data will not be impacted and remain accessible for billing. Where configuration updates are sent to the Device but are not required because the configuration is already correct, the update will be applied, but historic data will remain available. Supplier Parties would not need to take any action prior to the update.

85.   DCC would attempt to update all FOC ESME Devices to correct the half hourly data error and will monitor and report on progress towards completion.

86.   For the Alert issue we consider that ~50% of FOC ESME Devices will need to be successfully reconfigured to sufficiently mitigate the risk of service disruption and reasonable efforts to update all FOC ESME Devices would be made. DCC intends to monitor the progress of configuration updates to ensure minimum acceptable levels of updates are attained to mitigate the risk of future incidents occurring during changes between BST and GMT.

87.   For both issues DCC would make best efforts to update all FOC ESME Devices, but it should be noted that there may be some instances where an update cannot be made, such as to non-communicating Devices.

88.   Considering the benefits of a DCC managed implementation versus the complexities of a Supplier manage implementation, and TBDGs support for a DCC led implementation for half hourly data correction, we propose amendments at clause 13.3 that would require DCC to implement the FOC ESME Device configuration changes.

89.   DCC will consider Parties feedback to this consultation, and that already provided by TBDG, to evaluate support for the implementing the two configuration changes. Where the proposals, or one of them, is sufficiently supported and scheduled for incorporation into the S1SR, we will begin detailed planning, which will include development timelines and appropriate testing steps before completing a controlled rollout across the FOC population.

90.   Our initial investigation suggests that an eight-month period is required to design, build, test and deploy the solutions. Once more detailed timelines are understood DCC will share those details through the SEC Operations Sub-Committee and ensure they are kept informed on progress and implementation.

91. The one-off cost estimations for DCC to develop and implement the solutions to reconfigure FOC ESME Devices are provided below, these will be confirmed through a full impact assessment:

- To remove HAN Alerts not mapped in GBCS which are causing incidents during changes between BST and GMT (4.1.2), is estimated to be ~£307K

- To correct the data returned for half hourly data (4.1.3), is estimated to be ~£455K

Question Eight

For each proposed change (HAN Alerts and half hourly data errors), do you agree with the proposal that would require DCC to update FOC meter configuration for these proposed changes? Do you consider the proposed wording of clause 13.3 sufficient to require the configuration change? Please give a rationale for your response.

5. Next Steps

92. Following the closure of this consultation, DCC will take into account respondents' views. DCC will amend the S1SR as appropriate and will submit an amended version of the S1SR to the Department of Energy Security and Net Zero (the Department) for consideration and recommendation as to whether it is suitable for re-designation into the SEC by the Secretary of State.

93. DCC is aiming to provide a report to The Department by no later than 31st March 2025. This report will contain DCC's consideration of the consultation responses as well as a version of the S1SR that DCC considers is appropriate to designate into the SEC.

94. DCC has discussed the proposed re-designation of the S1SR with The Department. On that basis, DCC proposes that, subject to timely receipt of DCC's report and copies of relevant stakeholder responses to this consultation, for the Department to re-designate the S1SR on 4th April 2025 (or as soon as reasonably practicable within one month thereafter).

95. Where responses agree with DCC's proposed changes to the S1SR and with DCC's proposed approach to implementing the proposed changes to the FOC meter configuration, DCC will ensure that the responsible supplier Parties are kept informed on the progress of the meter configuration change and provide reporting to SEC operations Sub-Committee on the development and testing of the solution and its implementation.

Question Nine

Do you agree with the proposed re designation date of 4th April 2025 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR?

6. How to Respond

96. Please provide responses by 1700 on 7th March 2025 to DCC at consultations@smartdcc.co.uk.

97. Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to The Department and the Gas and Electricity Markets Authority (the Authority). Information provided to The Department or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to

information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If The Department or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

98.   If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.