



ECoS Migrations Consultation on the ECoS Migration Reporting Regime

Your chance to shape the changes to the EMRR

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Respond by: 28 June 2024

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1. Introduction and Context

1. 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 of second-generation (SMETS2) Smart Meters, as well as the migration of existing first-generation (SMETS1) Smart Meters onto our network.

1.1. Background

2. The Enduring Change of Supplier (ECoS) arrangements is the process that DCC follows when a consumer changes Supplier and the new Supplier seeks to take over control of the Smart Meter and other Devices in the consumer premises.
3. When a gas or electricity consumer with a Smart Meter switches Supplier, the security information held on the Smart Meter needs to be changed so that it relates to the new Supplier and not the previous Supplier. The processes that were initially in place for managing the change of security information held on Smart Meters are referred to as the Transitional Change of Supplier (TCoS) processes and they are administered by part of the DCC Systems known as the “Change of Supplier Party” (CoS Party).
4. In order to facilitate ECoS, DCC has, since 5 July 2023, been carrying out ECoS Migrations for all eligible TCoS Devices. Devices are only eligible for ECoS Migration where they have been Commissioned (or in the case of a Gas Proxy Function has been installed as part of a Communications Hub Function that has been Commissioned) and have not subsequently been Decommissioned. This has resulted in over 30m completed migrations.
5. In accordance with SEC Appendix AS ‘ECoS Transition and Migration Approach Document’ clause 4.1, the DCC provides the Panel, all Parties and (on request) the Department for Energy Security and Net Zero (DESNZ) with the ECoS Migration Reporting Regime (EMRR). This document includes a list of reports that the DCC provides to Supplier Parties in respect of ECoS Migrations and provides an overview of the frequency, content of and recipients of those reports.

At present, the reports the DCC provides under the EMRR are:

Ref	Name	Distribution	Frequency
ECOSMIG-001	Detail Report: ECoS Migrations Completed Successfully	Responsible Supplier	Daily
ECOSMIG-002	Detail Report: ECoS Migrations Completed Unsuccessfully	Responsible Supplier	Daily
ECOSMIG-003	Detail Report: Gaining Supplier Devices History	Responsible Supplier	Monthly
ECOSMIG-004	Summary Report: Device Count by Non-Migratable Device Model	Responsible Supplier	Weekly

ECOSMIG-005	Summary Report: ECoS Migration Activity for the Previous Week	Responsible Supplier	Weekly
ECOSMIG-006	Detailed Report: Newly Installed ECoS Devices	Responsible Supplier	Monthly
ECOSMIG-007	Summary Report: ECoS Total Counts	Responsible Supplier	Monthly

6. With over 30m Devices now migrated, DCC advises that ECoS Migrations will cease on 19 July 2024, ahead of Private Key Transfer (PKT) go-live, which is targeted for 30 July 2024. This will allow time to prepare for shutdown and handover of services and reporting to the ECoS Party. Following PKT, the ECoS Party will have the capability to swap the Certificates on Devices from being those that related to the old TCoS Private Key to new ones that relate to keys generated by the ECoS Party.
7. The final reports will be generated on 1 August 2024. this allows for any migrations that are in the 7-day retry process as of 19 July 2024 to be updated before the monthly reporting is generated.
8. The ECoS Transition and Migration Approach Document (ETMAD) clauses 4.2 to 4.5 (inclusive) set out the approach to amending the EMRR. This includes publishing an initial draft of the revised EMRR for consultation with Supplier Parties and such other persons as are likely to be interested.

1.2. Purpose of the consultation

9. DCC advises industry that it will cease ECoS Migrations from 19 July 2024. As such, DCC seeks to amend the EMRR to state this date and advise that reporting will also cease after 19 July 2024, with the final report being made available on 1 August 2024. All existing text in the EMRR shall be deleted. The rationale behind ceasing the reporting is that there will be no further migrations to be reported on.
10. This consultation is expected to impact the following the following Parties:
 - Large Suppliers;
 - Small Suppliers; and
 - Other SEC Parties.

If you believe a Party category is impacted which isn't listed above, please let us know.
11. The following documents will be impacted:
 - ECoS Migration Reporting Regime.

Please note that this is not a SEC document, therefore the proposed changes will not result in an uplift to the SEC.
12. The closing date for this consultation is 28 June 2024.

2. Proposed changes and questions

2.1. DCC to cease ECoS Migration reporting in line with PKT go-live

13. DCC informs industry that it will cease ECoS Migrations on 19 July 2024, ahead of PKT go-live (30 July 2024). This has been discussed and agreed with DESNZ. As such, DCC proposes to stop producing the reports captured in the EMRR, with the final reports being made available on 1 August 2024.

Q1

Do you agree with DCC ceasing EMRR reporting on 19 July 2024? Please provide your rationale.

2.2. EMRR amendments

14. To facilitate DCC's proposal, amendments have been drafted to the EMRR (Attachment 1).

Q2

Do you agree the amendments to EMRR and that it delivers DCC's intent? Please provide your rationale.

3. Next Steps

15. Following the closure of this consultation, in accordance with ETMAD clauses 4.2 to 4.5 (inclusive), DCC will consider respondents' views, and submit to DESNZ the updated EMRR that it considers suitable for approval; copies of the consultation responses received; and any areas of disagreement that arose during the consultation process that have not been resolved.
16. Following DESNZ approval, the updated EMRR will become effective from 19 July 2024.

Q3

Do you agree with the proposed publication date (19 July 2024) for the updates to the EMRR using the draft version at Attachment 1? Please provide your rationale.

4. How to Respond

17. Please provide responses by 5pm on 28 June 2024 to DCC at consultations@smartdcc.co.uk.
18. 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 for Energy Security and Net Zero (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.

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

5. Attachments

- Attachment 1: ECoS Migration Reporting Regime v3.0 (mark-up)
- Attachment 2: Response template