

SMETS1 Conclusions Closure 2 – Part C

A SMETS1 conclusion on proposals by DCC to end Migrations for the FOC (NP) cohort.

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1. Introduction and Context

A number of Energy Suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 Services involves an approach for migrating SMETS1 Installations into DCC's systems.

The detailed technical and procedural requirements of the Migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The TMAD is Appendix AL of the Smart Energy Code¹ (SEC). This document sets out DCC's conclusion on the proposal to cease Migrations for the FOC (NP) cohort in accordance with the TMAD.

The Closure 2 Consultation² was issued on 16 December 2022 with responses due by noon on 10 February 2023. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD. DCC is concluding on the Closure 2 matters in four parts:

- the Closure 2 Part A Conclusion³ covering the TMAD amendment for partial Migration was published on 15 February 2023 and the TMAD was re-designated⁴ by the Secretary of State on 21 February 2023;
- the Closure 2 Part B Conclusion⁵ covering the remaining TMAD changes was published on 15 March 2023 and the TMAD is expected to be re-designated by the Secretary of State no later than 21 March 2023;
- this Closure 2 Part C Conclusion covers the Requesting Party closure for the FOC (NP) cohort; and
- finally, there will be a separate Closure 2 Part D Conclusion covering the Requesting Party closure for the IOC cohort that will be published later in March 2023.

2. Stakeholder Engagement

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

2.1. Questions

The consultation set out eleven questions across a range of topics. This Part C Conclusion only provides a response to Closure 2 Q10, covering closure of the FOC (NP) cohort. The other questions are covered by the separate conclusions. Table 1 below details this question as presented in the public consultation.

¹ The current version of the SEC is available from <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>

² <https://www.smartdcc.co.uk/consultations/smets1-consultation-closure-2/>

³ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-a/>

⁴ <https://smartenergycodecompany.co.uk/latest-news/sec-v68-0-implemented-to-support-the-dcc-smets1-service/>

⁵ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-b/>

Number	Question
Closure 2 Q10	For the FOC (NP) cohort, do you agree with DCC's draft RP Decommissioning Timetable document that sets out the proposed date for the Requesting Party for the FOC (NP) cohort to be decommissioned to be Sunday 26 March 2023 (or any following Sunday up to and including Sunday 28 May 2023)? For the FOC (NP) cohort, do you have any detailed comments on the draft RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.

Table 1 – Consultation Questions – Closure 2 – Part C Conclusion

2.2. Responses

Stakeholders were invited to respond to the consultation by noon on Friday 10 February 2023 using the response template⁶ that was provided.

DCC received a written response from eight respondents regarding this consultation. Six respondents were an Energy Supplier and two respondents were a Meter Asset Provider (MAP).

One respondent only provided a few comments and did not provide an explicit response to any of the questions. This respondent expressed broad support for the proposals outlined in the consultation document.

2.3. Analysis of Responses

DCC subject matter experts have reviewed each response and analysed the respondents' feedback to the consultation. The following section provides an analysis of responses for Closure 2 Q10, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement.

3. Ending Migrations in the FOC (NP) Cohort (Closure 2 Q10)

Consistent with Clause 7 of the TMAD, DCC sought views on a proposal to close the Requesting Party service for the FOC (NP) cohort from 26 March 2023. These changes were covered by the following question: *“For the FOC (NP) cohort, do you agree with DCC's draft RP Decommissioning Timetable document that sets out the proposed date for the Requesting Party for the FOC (NP) cohort to be decommissioned to be Sunday 26 March 2023 (or any following Sunday up to and including Sunday 28 May 2023)? For the FOC (NP) cohort, do you have any detailed comments on the draft RP Decommissioning Timetable document and supporting evidence presented in this consultation document? Please provide a rationale for your views.”*

3.1. Respondents' Comments / DCC Analysis / Clarifications

Seven respondents provided a response to this question with five expressing broad support.

Three respondents expressed support without further comment.

One respondent stated that they had no opinion on this matter.

⁶ <https://www.smartdcc.co.uk/media/Oldfs5ok/smets1-consultation-closure-2-response-template-v2.docx>

One respondent expressed caveated support; stressing the importance that all actions have been taken by DCC to validate data and exhaust attempts to Migrate or else exclude. This respondent also noted the importance of DCC informing impacted Energy Suppliers of the final SMETS1 Installations which cannot be enrolled. DCC accepts these points.

One respondent expressed support stating that the FOC (NP) cohort should be closed as soon as possible.

One respondent objected in principle stating any delay in shutting down the FOC (NP) Requesting Party Service results in unacceptable costs to the industry and ultimately to the end consumer i.e. implying the FOC (NP) cohort should be closed earlier. DCC understands these concerns raised by the respondent. However, given the regulatory process in Clause 7 of the TMAD (as described in the consultation document), DCC observes that it is not possible for DCC to submit an earlier orderly closure date (i.e. sooner than the schedule proposed in the consultation) for the FOC (NP) cohort to the Secretary of State for approval.

3.2. Areas of Unresolved Disagreement

n/a

3.3. Summary

DCC concludes it is appropriate to close the FOC (NP) cohort within the schedule set out in the consultation document i.e. a Sunday between Sunday 26 March 2023 and Sunday 28 May 2023).

DCC plans to recommend closure of the FOC (NP) cohort to the Secretary of State. DCC will make a formal proposal on the RP Decommissioning Timetable for the FOC (NP) cohort to the Secretary of State as set out in Section 6 below.

4. Withdraw of the Requesting Party service for the FOC (NP) Cohort

The SMETS1 SMSO for the FOC (NP) cohort wrote to Ofgem and BEIS on 18 January 2023 to advise that they planned to withdraw their Requesting Party service from the end of January 2023 and securely decommission the underpinning data servers by the end of February 2023 prior to the data centre closure.

Since 18 January 2023, DCC has engaged with the SMETS1 SMSO for the FOC (NP) cohort. In these discussions, DCC sought to retain the Requesting Party services for the FOC (NP) cohort to allow for an orderly closure, however, these engagements were unsuccessful.

On 9 February 2023, the Requesting Party service for the FOC (NP) cohort was ceased by the relevant SMETS1 SMSO. From this date onwards, DCC has had no ability to commence Migrations for any remaining SMETS1 Installations containing Dormant Meters within the FOC (NP) cohort.

At the point the service ceased, there were a number of SMETS1 Installations remaining for the FOC (NP) cohort, which breaks down (based on DCC's analysis) as follows:

- 14,635 SMETS1 Installations containing solely Dormant Meters; and
- 122 SMETS1 Installations that are mixed (i.e. containing an Active Meter and a Dormant Meter).

From these remaining SMETS1 Installations containing solely Dormant Meters, DCC considers that 14,124 SMETS1 Installations fall into an Excluded Category (some of which are only applicable from when the Part B TMAD is re-designated⁷). Given the Requesting Party service had ceased for the FOC (NP) cohort, there are 511 SMETS1 Installations that can't be attempted for Migration but otherwise would have been progressed by DCC to either successful Migration or included within an Excluded Category. The majority of these 511 SMETS1 Installations have been processed to allow a Migration attempt at least once. 433 of the 511 SMETS1 Installations have been included in at least one deemed Migration Authorisation whilst they contained solely Dormant Meters whereas 78 of these 511 SMETS1 Installations were never included in a deemed Migration Authorisation whilst they contained solely Dormant Meters.

DCC is undertaking post closure audit activity (to the extent possible given the early cessation of the service) to protect against security risks. These audit activities are consistent with the requirements within Clause 7 of the TMAD.

5. Conclusions

DCC intends to submit a draft RP Decommissioning Timetable for the FOC (NP) cohort to the Secretary of State as proposed in this consultation given the responses received and the early withdrawal of services by the relevant SMETS1 SMSO. The purpose of this timetable is to provide for a regulatory closure of the Requesting Party given the operational circumstances thereby providing clarity of the situation to all stakeholders. The alternative approach would be to consult on changes to Clause 7 of the TMAD to account for the situation of early cessation of the Requesting Party for a cohort, however this would be a less efficient option without any fundamental impact on the situation.

In summary, DCC considers that the draft RP Decommissioning Timetable for the FOC (NP) cohort is appropriate.

6. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document. DCC will publish its conclusions report on the DCC Website and notify SEC Parties.

DCC plans to formally submit the RP Decommissioning Timetable for the FOC (NP) cohort to the Secretary of State one week after the publication of this conclusion document.

The envisaged date for decommissioning is Sunday 9 April 2023.

⁷ The TMAD changes arising from Closure 2 Part B Conclusion are expected to be re-designated by the Secretary of State no later than 21 March 2023.