

SMETS1 Consultation - Migration DUST Closure for MOC (Secure)

A SMETS1 consultation on proposals by DCC to end the provision of Migration DUST for the MOC (Secure) cohort (where GroupID = "DA").

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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 a detailed approach for migrating SMETS1 Installations into DCC's systems.

The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process. It also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the Smart Energy Code (SEC).

In May 2022, DCC concluded¹ on the closure of Migration DUST for the IOC and MOC (MDS) cohorts. In September 2022, DCC concluded² on closure of Migration DUST for the FOC (NP) cohort. At present Migration DUST is only provided for the MOC (Secure) and FOC (BG) cohorts. This consultation now proposes that the Migration DUST testing service is closed on 31 January 2023 solely for the MOC (Secure) cohort via a further amendment to Table 17.6 in the MTAD.

2. Closure of Migration DUST for MOC (Secure) (where GroupID = "DA")

The existing SMETS1 SVTAD, requires DCC to provide Migration DUST consistent with the details set out in the MTAD. Migration DUST is an element of the suite of Testing Services provided by DCC. Migration DUST allows a Testing Participant to test the interactions between their own solution and the systems and processes used by DCC to Migrate Active and Mixed SMETS1 Installations.

Migration DUST is a relatively expensive Testing Service with little routine utilisation as Migration is an activity that doesn't need additional testing by Test Participants where there is no new Migration product development envisaged that would affect how they interact with the DCC's Migration solution, unlike the broader Device and User System Testing (DUST). Migrations are now nearing completion for the MOC (Secure) cohort for most Responsible Suppliers, although consultation for closure of the relevant Requesting Party is not expected until later in 2023.

Migration DUST in relation to the MOC (Secure) cohort was last used by a Testing Participant in September 2022. This Testing Participant is an Energy Supplier who has a material number of SMETS1 Installations remaining to be Migrated. Prior to this usage, the last time Migration DUST was used for the MOC (Secure) cohort by another Testing Participants was May 2022. Prior to issuing this consultation, DCC has also reached out to Energy Suppliers and no other Energy Supplier indicated an expectation to use Migration DUST again for the MOC (Secure) cohort.

Generally, the number of Testing Participants wishing to perform Migration DUST has dropped significantly compared to when it was first introduced. DCC has discussed the closure of Migration DUST with the only Responsible Supplier operating Active Meters for MOC (Secure) that has a material number of SMETS1 Installations to Migrate who has confirmed that they have no further demand for Migration DUST for the MOC (Secure) cohort.

A limited number of additional entries on the EPCL are planned for this cohort ahead of Requesting Party closure (to allow for a limited number of additional Migrations) but DCC does

¹ <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-2/>

² <https://www.smartdcc.co.uk/consultations/smets1-conclusion-migration-dust-closure-for-foc-np/>

not consider that this is a factor that should delay closure of Migration DUST for this cohort given that these additional EPCL entries will not impact the Migration solution that Migration DUST allows Testing Participants to test against.

DCC has no further changes to the Migration solution planned as a result of any unblocking proposals for this cohort. Before the end of 2022 (as part of the planned Closure 2 Consultation), DCC is planning to consult on partial Migration for the MOC (Secure) cohort (based on dormant GSME de-registration). However, the implementation of this partial Migration is entirely pre-Migration within the SMETS1 SMSO system and will lead to Migration of an ESME only SMETS1 Installation using the existing Migration solution. As the Migration solution is unchanged, DCC does not consider that this will give rise to any additional requirement for testing via Migration DUST for the MOC (Secure) cohort. Given the ongoing expense involved in maintaining the Migration DUST service for the MOC (Secure) cohort, closing it appears economically efficient.

DCC is proposing to set the end date for Migration DUST for MOC (Secure) in the MTAD at Tuesday 31 January 2023 (captured in an amendment to Table 17.6 in the MTAD). DCC is presently taking steps to contract for the testing service up to 31 January 2023 and could extend the commercial arrangements further (on a monthly basis) if the outcome of this consultation is that Migration DUST should not be closed for the MOC (Secure) cohort.

There is a very unlikely edge case whereby there is a need for further Migration DUST testing for MOC (Secure) after the closing of the testing service. This requirement could only arise from Responsible Suppliers operating Active Meters for MOC (Secure), being the Testing Participants who use this service. As outlined earlier, DCC has engaged with the Responsible Supplier with a material number of SMETS1 Installations remaining to Migrate who has already confirmed they have no demand for such testing service. Nevertheless, for Migration DUST to be re-started for the MOC (Secure) cohort, the following elements would be required:

- a further amendment to the MTAD would be required to remove the end date for Migration DUST for the cohort (i.e. further consultation to reverse the amendment to Table 17.6 in the MTAD that is proposed within the scope of this consultation and which would be expected to take up to three months to progress the MTAD amendment); and
- DCC would need to undergo a purchasing exercise to procure additional provision of the service from the existing service provider (which would be expected to have a minimum lead time of six weeks under the existing commercial arrangements).

Testing Participants should note that once the Migration DUST service for a cohort has ended, DCC's ability to enrol (Migrate) new test devices in respect of that cohort for other Testing Services in User Interface Testing (UIT) environments such as Device and User System Testing (DUST) and User Entry Process Testing (UEPT) would cease. This is because the ability to enrol new SMETS1 devices into the UIT environment is linked commercially to the provision of the Migration DUST service for each cohort. Ceasing to have a mechanism to migrate new device sets into the UIT environments could limit DCC's ability to support other Testing services as described in Section H14 of the SEC. Consistent with the approach for IOC, MOC (MDS), and FOC (NP), to mitigate this, DCC is currently migrating all of DCC's remaining SMETS1 test stock for MOC (Secure) into DCC's UIT environments to ensure the maximum number of usable devices for Testing Participants is maintained post closure of Migration DUST. DCC envisages a similar activity will take place for the remaining cohort (FOC (BG) where GroupID = "EA") in due course.

MDUST Close MOC (Secure) Q1

Do you agree with DCC's proposals to close Migration DUST for MOC (Secure) from Tuesday 31 January 2023 (or within one month thereafter) as captured by the proposed changes to the MTAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

3. Next Steps

The SMETS1 SVTAD allows DCC to modify the MTAD directly following stakeholder consultation / provision of a conclusion report to the Secretary of State. DCC can then amend the MTAD so long as the Secretary of State does not direct DCC otherwise. DCC is proposing to modify the MTAD to enable the partial closure of Migration DUST for MOC (Secure) using the procedure set out in Clause 4.2 of the SMETS1 SVTAD.

Following this consultation, DCC will provide the Department for Business, Energy, and Industrial Strategy (BEIS) with a summary of responses received and detail on how DCC has addressed any concerns raised. DCC will then ensure it builds in sufficient time for BEIS to take a view on the merit of the proposed changes to the MTAD.

DCC expects to issue its conclusion to this consultation, along with any necessary amendments to the MTAD on or before 20 January 2023. Unless the Secretary of State directs otherwise, DCC proposes to modify the MTAD through the draft direction at Attachment 1, on 27 January 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter).

MDUST Close
MOC (Secure)
Q2

Do you agree with the proposed modification date of 27 January 2023 (or within one month thereafter) for the changes to the MTAD?

4. How to Respond

Please provide responses in the attached template by 16:00 on 13 January 2023 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

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 BEIS and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS and/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 BEIS 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.

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

5. Attachments

Attachment / Title
1. Draft Modification Text on MTAD
2. Response Template - Migration DUST Closure for MOC (Secure)
3. MTAD 4.MOCS Draft Redlined

Table 1 – Attachments

Attachment 1

This attachment contains the text that DCC plans to use for direction of changes to the MTAD.

MTAD Draft Modification Text

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Clause 4.2 of Appendix AK of the SEC (the SEC Variation Testing Approach Document for SMETS1 Services), DCC directs that, with effect from [DD MM YYYY], the Migration Test Approach Document is hereby modified in the form set out in Annex [TBC] of this direction.

For the avoidance of doubt such modification of the Migration Test Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this first being established, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).

This direction is also being notified to the SEC Administrator.