

Citizens Advice Response to DCC's consultation on the Transition and Migration Approach Document (TMAD)

June 2018



About Citizens Advice

The Citizens Advice service provides free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It values diversity, promotes equality and challenges discrimination.

On 1 April 2014, the Citizens Advice service took on the powers of Consumer Futures to become the statutory representative for energy consumers across Great Britain. The service aims:

- to provide the advice people need for the problems they face
- to improve the policies and practices that affect people's lives.

The Citizens Advice service is a network of nearly 300 independent advice centres that provide free, impartial advice from more than 2,900 locations in England and Wales, including GPs' surgeries, hospitals, community centres, county courts and magistrates courts, and mobile services both in rural areas and to serve particular dispersed groups.

In 2017, Citizens Advice Service helped fix 163,000 energy problems through our local network and 61,000 through our Consumer Service Helpline. Our Extra Help Unit specialist case handling unit resolved 8,367 cases on behalf of consumers in vulnerable circumstances, and their Ask the Adviser telephone service handled 2,593 calls from other advice providers in need of specialist energy advice.

Since April 2012 we have also operated the Citizens Advice Consumer Service, formerly run as Consumer Direct by the Office for Fair Trading (OFT). This telephone helpline covers Great Britain and provides free, confidential and impartial advice on all consumer issues.

Response

Question 1: Do you agree with the principles DCC proposes to apply in agreeing the initial schedules for migration with suppliers? Please provide a rationale for your views

In general, we agree with the principles that the DCC has proposed for managing initial schedules for migration.

Question 2: Do you consider that a notification period of 21 days to notify the responsible supplier of when the migration of an active meter will occur is appropriate?

We expect suppliers will be best placed to comment on this question, however the time frame must be sufficient to ensure appropriate customer communication can be established.

Question 3: Do you agree with the proposal that the DCC shall take reasonable steps to notify the responsible supplier prior to migrating dormant meters.

We expect all suppliers will need to inform their customers of their new circumstances, once enrolment has been completed. There needs to be some mechanism for the DCC to let the authority know when they have been unable to successfully contact a supplier and for that matter to be escalated, if necessary.

Question 4: Do you consider that a notification period of at least 21 days to notify Suppliers of when the configuration of Dormant Meters will occur is appropriate? Please provide a rationale for your views.

We do not have any opinion on this particular matter.

Question 5: Do you consider that a notification period of at least 21 days to notify Suppliers of when the migration of Dormant Meters will occur is appropriate? Please provide a rationale for your views.

We expect suppliers will be best placed to comment on this question, however the timeframe must be sufficient to ensure appropriate customer communication can be established.

Question 6: Do you agree with the proposal that in respect of Dormant Meters, the TMAD deems that the Responsible Supplier has consented to DCC (via the SMETS1 SMSO) undertaking the steps that are necessary to ensure that a device is configured in such way that it complies with the SMETS1 Supporting Requirements, including upgrading the firmware on that Device to appropriately configure it (i.e. the TMAD giving DCC the authority to undertake the steps)? Please provide your rationale.

Yes, we agree that the DCC should undertake steps to ensure that the SMETS1 device is configured in such a way that it complies with SMETS1 supporting services. In the unlikely event consumers will be impacted by any such configuration, the DCC should immediately notify the supplier and undergo mitigating actions.

Question 7: Do you agree with the proposed principle of deemed consent for Dormant Meters i.e. the TMAD giving DCC the authority to take the steps that are required for Migration? Please provide your rationale.

Yes, we agree with the proposed principle of deemed consent for simplicity. However, we would expect the responsible supplier to be notified during the process and informed should there be any difficulties that emerge. Fundamentally, the supplier should be engaged in the customer communication process.

Question 8: Do you agree with the proposal that the Installing Suppliers shall provide support and assistance as reasonably requested by DCC (including firmware where available) to support configuration of Dormant Meters by DCC? Please provide your rationale.

On principle, we agree that Installing Suppliers would be best place to provide support and assistance as reasonably required by the DCC. However, we note that many small suppliers have used similar meter types and SMSOs. We would advocate for an efficient approach to be taken, where possible to minimise cost during this programme.

Question 9: Do you agree with the proposal to extend the scope of section L to provide for additional Remote Party Roles (and Codes) to allow DCC to act in the capacity as either the Requesting Party or the Commissioning Party, and to the Issuing of an additional Certificate type for use by the S1SP in the migration processes? Please provide a rationale for your views.

Yes, for a time limited period.

Question 10: Do you agree that DCC should not be liable where it is found that data upon which it has relied relating to a SMETS1 Installation that has been provided by a SMETS1 SMSO has been found to be inaccurate? Please provide a rationale for your views.

We would agree that the liability should be on the SMETS1 SMSO to provide accurate information but both parties should take appropriate steps to ensure data is interrogated and checks are in place to minimise risks.

Question 11: Do you agree with the approach that is being proposed by DCC to request Panel approval for a variation to the Planned Maintenance regime?

Yes, the DCC should request approval from the Panel for a variation to the Planned Maintenance regime. However, there should be other incentives for the DCC to

maintain their regime and consequences should the variations cause harmful disruption to the programme.

Question 12: Do you have any comments on the proposed drafting of section 'Transitional Variations to SEC Sections'? Please provide a rationale for your views

Not at this time.

Question 13: Do you have any comments on the proposed drafting of section 'Pre-migration Rights and Obligations'? Please provide a rationale for your views

In the case of dormant meters, we agree that the relevant SMETS1 SMSO should initiate remote communications with the SMETS1 CHF, provided these communications do not breach any data/privacy protections. The TMAD alludes to the possibility a SMETS1 SMSO may not be able to communicate with the meter. We would encourage further elaboration on what would happen in these circumstances for the purpose of transparency and clarity.

Question 14: Do you have any comments on the proposed drafting of the section 'Migration Process'? Please provide a rationale for your views.

Not at this time.

Question 15: Do you have any comments on the proposed drafting of the section 'Commissioning Requirements? Please provide a rationale for your views.

Not at this time.

Question 16: Do you have any comments on the proposed drafting of the section 'Decommissioning of a Requesting Party or the Commissioning Party'? Please provide a rationale for your views.

Not at this time.

Question 17: Do you have any comments on the proposed drafting of the Section 'Commissioning Requests'? Please provide your rationale.

Not at this time.

Question 18: Do you have any comments on the proposed drafting of the Section 'Requirement specific to GroupID = "AA"? Please provide your rationale.

Not at this time.

Question 19: Do you have any comments on the proposed drafting of the Section 'SMETS1 Migration Interface'? Please provide your rationale.

Not at this time.

Question 20: Do you have any comments on the proposed drafting of the Section 'SMETS1 Migration Schema'? Please provide your rationale.

Not at this time.

Question 21: Do you have any comments on the proposed drafting of the Section 'File Content Encryption and Decryption'? Please provide your rationale.

Not at this time.

Do you have any general comments on the proposed drafting of the Section 'Device installation – requirements specific to GroupID = "AA"? Do you agree with the view that the provisions within this Section are equally relevant to the enduring DCC service, and are therefore being proposed to be added to the SMETS1 Supporting Requirements document?

Not at this time.