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DP303

‘Aligning DCC Certificate processes with SMKI standards’

Modification Report

Version 0.1

9 September 2025

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by David Walsh from the Data Communications Company (DCC).

The DCC are required when validating Device Certificates to align with Smart Metering Key Infrastructure (SMKI) standards that are outlined within various Smart Energy Code (SEC) documents.

The DCC, in conjunction with the SMKI PMA (Policy Management Authority) have identified three issues within current SEC Documents relating to the processing of Device Certificates and SMKI standards causing a misalignment with the SEC.

The impact of this not resolving this issue will mean the DCC appear to be non-compliant with various SEC Appendices despite following the correct and agreed industry processes. The proposed changes by the DCC include that of making text-only amendments to four SEC Appendices to ensure the process of validating of Device Certificates going forward is aligned with the SEC.

This modification will be progressed as a Self-Governance modification, and any potential costs or impacts to SEC Parties are yet to be determined.

2. Issue

What are the current arrangements?

The DCC are required when validating Device Certificates to align with SMKI standards, of which these are outlined within various SEC documents. This ensures Device Certificates are accurate and validated by the Trusted Service Provider (TSP) in accordance with the SEC. The Certificate profiles within SEC Appendices A 'Device Certificate Policy' & B 'Organisation Certificate Policy' specify how the subject and issuer fields should be encoded, and SEC Appendix T 'DCCKI Interface Design Specification' defines how a Certificate Signing Request (CSR) should be submitted.

What is the issue?

The DCC have identified three issues relating to the misalignment of four SEC Documents, existing Device Certificate validation processes and SMKI standards. The issues identified are outlined below:

1. Device Certificate Authority (DCA) Certificate Signing Request (CSR) validation within DCC Systems is not aligned with SEC Appendix M 'SMKI Interface Design Specification' as it does not enforce checking the criticality of the extensions present in the CSR. In addition, there is an inconsistency within SEC Appendix A in how it defines the criticality of the 'subjectAltName' extension.

2. The DCA and Organisation Certificate Authority (OCA) produce Certificates with the subject and issuer fields encoded differently with respect to the certificate profiles in SEC Appendix A and SEC Appendix B. In addition, there is an inconsistency between SEC Appendix A and Request for Comments (RFC) 5280 in how the subject field should be encoded for a Device Certificate.

3. An RFC referenced in SEC Appendix T is not relevant to context and should instead reference the correct RFC number.

What is the impact this is having?

The impact of this not resolving this issue will lead to a continued misalignment between the SEC and existing Device Certificate validation processes undertaken by the DCC. This means that the Certificates signed by SMKI and the validation of the Device CSRs would essentially be non-compliant with the SEC despite the correct process being followed by the DCC. In addition, the inconsistencies identified above will remain in the SEC, causing ambiguities and could further impact future re-procurements.

Impact on consumers

There is no impact on consumers as a result of this modification.

3. Assessment of the proposal

Areas for assessment

SECAS will assess whether the proposed changes to various SEC Appendices will have any wider impacts to industry. In addition, the Smart Energy Code Administrator & Secretariat (SECAS) will engage with the SMKI Policy Management Authority (PMA) to ensure the proposed changes are fit for purpose and there are no unforeseen consequences.

Sub-Committee input

SECAS will engage the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Privacy Sub-Committee (PSC), the Performance Assurance Board (PAB) and the SMKI PMA to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	No input required.
PAB	No input required.
PSC	No input required.
SMKI PMA	Understand whether proposed changes are fit for purpose and assess the possibility of any potential unforeseen consequences of proposed changes.
SSC	No input required.
TABASC	No input required.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	9 Sep 2025
<i>Presented to CSC for initial comment</i>	<i>16 Sep 2025</i>
<i>Modification discussed at SMKI PMA</i>	<i>8 Oct 2025</i>
<i>Modification discussed at Working Group</i>	<i>5 Nov 2025</i>
<i>Presented to CSC for progression to Report Phase</i>	<i>18 Nov 2025</i>
<i>Modification Report Consultation</i>	<i>19 Nov 2025 – 9 Dec 2025</i>
<i>Change Board Vote</i>	<i>17 Dec 2025</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CSR	Certificate Signing Request
DCC	Data Communications Company
GBCS	Great Britain Companion Specification
OCA	Organisation Certificate Authority
OPSG	Operations Group
RFC	Request for Comment
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator & Secretariat
SMKI	Smart Metering Key Infrastructure
SMKI PMA	SMKI Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSP	Trusted Service Provider