

Virtual WAN Arrangements
Amendments to the DCC Licence, Gas Supply Licences, Electricity Supply Licences and the Smart Energy Code

Draft 2: 22 April 2025

DCC Licence, LC 1 (Definitions)

"Enabling Services"

means services forming part of the Mandatory Business of the Licensee that fulfil an enabling role with respect to the provision of Core Communication Services and Elective Communication Services, and that consist of:

- (a) the Enrolment Service;
- (b) the Communications Hub Service; ~~and~~
- (c) the Interoperability Checker Service;
- (d) the Virtual WAN Provider Service; and
- ~~(ee)~~ Other Enabling Services.

"Mandatory Business Services"

means the services comprising the Mandatory Business of the Licensee, namely (i) the Core Communication Services, (ii) the Elective Communication Services, and (iii) the Enabling Services, ~~(iv) the Interoperability Checker Service;~~ (iv) Incorporation, delivery and provision of the Centralised Registration Service (Condition 15), in each case as operated or provided by the Licensee in accordance with the relevant provisions of Condition 17 (Requirements for provision of Services), or in respect to the Incorporation, delivery and provision of the Centralised Registration Service, these may also be services provided by the Licensee in accordance with a direction given by the Authority in accordance with Condition 15.

"Other Enabling Services"

means any Enabling Services forming part of the Mandatory Business of the Licensee ~~(other than the Communications Hub Service and the Enrolment Service)~~ that are specified and defined as such, whether in this Licence or the SEC, but excluding those services which are expressly referred to by name in the definition of Enabling Services.

"Virtual WAN Provider Service"

means the service that is operated by the Licensee pursuant to Part E1 of Condition 17 (Requirements for the provision of Services).

DCC Licence, LC 6 (Authorised Business of the Licensee)

6.6 The Enabling Services to which paragraph 6.5(c) refers are these:

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- (a) the Enrolment Service, being the service operated by the Licensee under an Agreement for Services in accordance with Part D of Condition 17;
- (b) the Communications Hub Service, being the service provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part E of Condition 17; ~~and~~
- (c) the Interoperability Checker Service being the service provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part D1 of Condition 17;
- (d) the Virtual WAN Provider Service being the service provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part E1 of Condition 17; and
- (~~ee~~) Other Enabling Services, being any Enabling Services that are specified and defined as such in this Licence or the SEC (other than those services referred to by name in this paragraph 6.6~~the Communications Hub Service and the Enrolment Service~~) and that are provided by the Licensee under or pursuant to an Agreement for Services in accordance with Part F of Condition 17.

DCC Licence, LC 17 (Requirements for the provision of Services)

17.19 Subject to paragraph 17.19A, nNothing in this Part D requires the Licensee to provide an Enrolment Service for the purposes of any Smart Metering System by means of which a Smart Meter Communication Service is proposed to be provided to any premises, or within any area containing premises, that falls within a category that is for the time being specified by the Licensee as a Service Exemption Category in any Statement of Service Exemptions in force under this condition.

17.19A Paragraph 17.19 is without prejudice to the requirement for the Licensee to provide an Enrolment Service for those Smart Metering Systems with which the Licensee is able to communicate via the Virtual WAN Provider Service.

Part E1: Terms for provision of the Virtual WAN Provider Service

17.22B The Licensee must provide to SEC Parties under or pursuant to an Agreement for Services on terms that are prescribed by, or are determined in accordance with, the provisions of the SEC, the Virtual WAN Provider Service; being a service whereby the Licensee makes available an interface via which Smart Metering Systems can securely connect to the Licensee's systems over the internet, including for the purposes of providing Enrolment Services, Core Communication Services and Elective Communication Services.

DCC Licence, LC 20 (Determination of disputes by the Authority)

20.3 This Part A applies if, after a period that to the Authority appears reasonable for the purpose, the Licensee has failed to enter into an Agreement for Services with any person ("the

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Requester”) who is entitled, or claims to be entitled, to have such an agreement with the Licensee pursuant to a request made to the Licensee under:

- (a) Part C of Condition 17 (with respect to the Licensee's provision of Elective Communication Services);
- (b) paragraph 16 of Condition 17 (with respect to the Licensee's provision of certain Enrolment Services);
- (c) [paragraph 22B of Condition 17 \(with respect to the Licensee's provision of the Virtual WAN Provider Service\)](#); or
- (de) paragraph 23 of Condition 17 in respect of those Other Enabling Services expressly identified in the SEC as being subject to the application of this paragraph 20.3(de).

DCC Licence, LC 22 (The Smart Energy Code)

22.21 The SEC must include or make appropriate provision for or in connection with the following matters:

- (a) ~~of~~ all of the Mandatory Business Services (clearly distinguishing between Core Communication Services, Elective Communication Services, [each Enabling Service](#)~~the Enrolment Service, the Communications Hub Service, Other Enabling Services~~, and, as appropriate, the Incorporation, delivery and provision of the Centralised Registration Service) that are to be provided by the Licensee under or pursuant to the SEC; ...

DCC Licence, LC 30 (Requirements for the Regulatory Accounts)

30.17 ...

Authorised Business Activities means each of the following activities carried on within the Authorised Business of the Licensee:

- (a) as part of the Mandatory Business:
 - (i) the procurement and provision of Core Communication Services,
 - (ii) the procurement and provision of Elective Communication Services,
 - ~~(iii) the operation of the Enrolment Service,~~
 - ~~(iv) the procurement and provision of the Communications Hub Service,~~
 - (vi) the procurement and provision of [the Other](#) Enabling Services; and
 - (vii) the preparation, delivery and provision for the Centralised Registration Service;
[and](#)

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- (b) as part of the Permitted Business:
 - (i) the procurement and provision of Value Added Services,
 - (ii) the procurement and provision of Minimal Services; ~~and~~.

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Gas Supply Licences, SLC 1 (Definitions for standard conditions)

<u>Virtual WAN Communications Hub</u>	<u>means a Communications Hub that has the capability to connect to a Virtual WAN Device.</u>
<u>Virtual WAN Device</u>	<u>means a device which can connect to a Customer's internet connection, and which can use that internet connection to convey messages between a Virtual WAN Communications Hub and the DCC, as further described in the Smart Energy Code.</u>

Gas Supply Licences, SLC 28 (Prepayment Meters)**Information about Prepayment Meters**

- 28.1 If the licensee offers to enable a Domestic Customer to pay or a Domestic Customer asks to pay Charges for the Supply of Gas through a Prepayment Meter, the licensee must provide, prior to or upon the installation of that meter, appropriate information to that customer about:
- (a) the advantages and disadvantages of a Prepayment Meter;
 - (aa) information relating to the operation of the Prepayment Meter, including information about the process for, and methods by which, the Domestic Customer can pay in advance through the Prepayment Meter;
 - (b) where they may obtain information or assistance if:
 - (i) the Prepayment Meter is not operating effectively; or
 - (ii) any device used to allow the Charges for the Supply of Gas to be paid through the Prepayment Meter is not operating effectively;
 - (bb) the licensee's Emergency Credit, Friendly-hours Credit, Additional Support Credit and Involuntary Prepayment Meter Credit facilities as defined in SLC 27A including what this is and when this can be used by the Domestic Customer; ~~and~~
 - (d) the procedures that the licensee will follow when removing or resetting the Prepayment Meter, including the timescale and any conditions for removing or resetting it; ~~and~~
 - (e) if the Prepayment Meter will rely upon a Virtual WAN Device for communications with the DCC, the consequences of Self-disconnection and the steps required to top-up following Self-disconnection.

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Involuntary Prepayment Meters

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28.7 A licensee must not install an Involuntary Prepayment Meter, unless, in accordance with the guidance issued under SLC 28.4, each of the following requirements are satisfied:

- (a) the Debt Trigger has been met;
- (b) the licensee has made multiple attempts to engage with a customer;
- (c) the licensee has complied with its obligations to customers in payment difficulty (including but not limited to under SLCs 27, 27A and 28);
- (d) appropriate Site Welfare Visits have been carried out; ~~and~~
- (e) the licensee has determined that an Involuntary Prepayment Meter would be safe and reasonably practicable in all the circumstances of the case (including but not limited to the Precautionary Principle, and having carried out checks of all information relating to the Priority Services Register); ~~and~~
- (f) the Prepayment Meter is not reliant on a Virtual WAN Device for communications with the DCC.

...

28.22 For the purposes of this condition:

...

"Self-disconnection" has the meaning given in standard condition 27A (Self-disconnection).

...

Gas Supply Licences, SLC 43: Smart Metering Systems and In-Home Displays – Operational Requirements

...

Virtual WAN Devices

43.20A Where the licensee provides a Virtual WAN Device to a Customer at a relevant premises, the licensee must (and must do so Free of Charge):

- (a) install a Virtual WAN Communications Hub for the relevant premises (if one is not already installed);
- (b) connect the Virtual WAN Device to the Virtual WAN Communications Hub; and
- (c) take all reasonable steps to maintain the connection between the Virtual WAN Device and the Virtual WAN Communications Hub, and not do anything that compromises the connection between the Virtual WAN Communications Hub and the DCC (while the Customer consents to its internet being used for the purpose of such connection).

Part B: In-Home Displays

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Part C: Definitions**Definitions and Interpretation**

43.26 In this Condition:

...

Free of Charge

means that the licensee does not seek to recover costs from a Customer in relation to the provision, installation, operation or maintenance of either or both of a Virtual WAN Communications Hub or Virtual WAN Device; provided that the licensee may:

- (a) recover such costs from is Customers generally as an incremental charge for electricity or gas supplied to them; and
- (b) charge for a Virtual WAN Device with enhanced functionality if a Customer opts to take this enhanced version in preference to the basic version (having been given the choice).

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Electricity Supply Licences, SLC 1 (Definitions for standard conditions)

<u>Virtual WAN Communications Hub</u>	<u>means a Communications Hub that has the capability to connect to a Virtual WAN Device.</u>
<u>Virtual WAN Device</u>	<u>means a device which can connect to a Customer's internet connection, and which can use that internet connection to convey messages between a Virtual WAN Communications Hub and the DCC, as further described in the Smart Energy Code.</u>

Electricity Supply Licences, SLC 28 (Prepayment Meters)**Information about Prepayment Meters**

- 28.1 If the licensee offers to enable a Domestic Customer to pay or a Domestic Customer asks to pay Charges through a Prepayment Meter, the licensee must provide, prior to or upon the installation of that meter, appropriate information to that customer about:
- (a) the advantages and disadvantages of a Prepayment Meter;
 - (aa) information relating to the operation of the Prepayment Meter, including information about the process for, and methods by which, the Domestic Customer can pay in advance through the Prepayment Meter;
 - (b) where they may obtain information or assistance if:
 - (i) the Prepayment Meter is not operating effectively; or
 - (ii) any device used to allow the Charges to be paid through the Prepayment Meter is not operating effectively;
 - (bb) the licensee's Emergency Credit, Friendly-hours Credit, Additional Support Credit and Involuntary Prepayment Meter Credit facilities as defined in SLC 27A including what this is and when this can be used by the Domestic Customer; ~~and~~
 - (c) the procedures that the licensee will follow when removing or resetting the Prepayment Meter, including the timescale and any conditions for removing or resetting it; ~~and~~
 - (d) if the Prepayment Meter will rely upon a Virtual WAN Device for communications with the DCC, the consequences of Self-disconnection and the steps required to top-up following Self-disconnection.

...

Involuntary Prepayment Meters

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28.7 A licensee must not install an Involuntary Prepayment Meter, unless, in accordance with the guidance issued under SLC 28.4, each of the following requirements are satisfied:

- (a) the Debt Trigger has been met;
- (b) the licensee has made multiple attempts to engage with a customer;
- (c) the licensee has complied with its obligations to customers in payment difficulty (including but not limited to under SLCs 27, 27A and 28);
- (d) appropriate Site Welfare Visits have been carried out; ~~and~~
- (e) the licensee has determined that an Involuntary Prepayment Meter would be safe and reasonably practicable in all the circumstances of the case (including but not limited to the Precautionary Principle, and having carried out checks of all information relating to the Priority Services Register); ~~and~~
- (f) the Prepayment Meter is not reliant on a Virtual WAN Device for communications with the DCC.

...

28.22 For the purposes of this condition:

...

"Self-disconnection" has the meaning given in standard condition 27A (Self-disconnection).

...

Electricity Supply Licences, SLC 49: Smart Metering Systems and In-Home Displays – Operational Requirements

...

Virtual WAN Devices

49.20A Where the licensee provides a Virtual WAN Device to a Customer at a relevant premises, the licensee must (and must do so Free of Charge):

- (a) install a Virtual WAN Communications Hub for the relevant premises (if one is not already installed);
- (b) connect the Virtual WAN Device to the Virtual WAN Communications Hub; and
- (c) take all reasonable steps to maintain the connection between the Virtual WAN Device and the Virtual WAN Communications Hub, and not do anything that compromises the connection between the Virtual WAN Communications Hub and the DCC (while the Customer consents to its internet being used for the purpose of such connection).

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Part B: In-Home Displays

...

Part C: Definitions**Definitions and Interpretation**

49.26 In this Condition:

...

Free of Charge

means that the licensee does not seek to recover costs from a Customer in relation to the provision, installation, operation or maintenance of either or both of a Virtual WAN Communications Hub or Virtual WAN Device; provided that the licensee may:

(a) recover such costs from is Customers generally as an incremental charge for electricity or gas supplied to them; and

(b) charge for a Virtual WAN Device with enhanced functionality if a Customer opts to take this enhanced version in preference to the basic version (having been given the choice).

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SEC, Section A

Code Performance Measure

means a performance measure set out in Section D11.3 (Code Performance Measures), Section H13.1 (Code Performance Measures), ~~Section L8.6 (Code Performance Measures)~~ or Section L18.47 (VWKL Performance Standards).

Compromised

means:

- (a) in relation to any System, that the intended purpose or effective operation of that System is compromised by the occurrence of any event which has an adverse effect on the confidentiality, integrity or availability of the System or of any Data that are stored on or communicated by means of it;
- (b) in relation to any Device, that the intended purpose or effective operation of that Device is compromised by the occurrence of any event which has an adverse effect on the confidentiality, integrity or availability of the Device or of any Data that are stored on or communicated by means of it;
- (c) in relation to any Data, that the confidentiality, integrity or availability of that Data is adversely affected by the occurrence of any event;
- (d) in relation to any Secret Key Material, that that Secret Key Material (or any part of it), or any Cryptographic Module within which it is stored, is accessed by, or has become accessible to, a person not authorised to access it;
- (e) in relation to any Certificate, that any of the following Private Keys is Compromised: (i) the Private Key associated with the Public Key that is contained within that Certificate; (ii) the Private Key used by the relevant Certification Authority to Digitally Sign the Certificate; or (iii) where relevant, the Private Key used by the relevant Certification Authority to Digitally Sign the Certification Authority Certificate associated with the Private Key referred to in (ii);
- (f) in relation to any DCCKI Certificate, that any of the following Private Keys is Compromised: (i) the Private Key associated with the Public Key that is contained within that DCCKI Certificate; (ii) the Private Key used by the DCCKICA to Digitally Sign the DCCKI Certificate; or (iii) where relevant, the Private Key used by the DCCKICA to Digitally Sign

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the DCCKICA Certificate associated with the Private Key referred to in (ii);

- (g) in relation to any certificate issued under an S1SPKI (the 'end certificate'), that any of the following Private Keys is Compromised: (i) the Private Key associated with the Public Key that is contained within that end certificate; (ii) any other Private Key that has been used to Digitally Sign any certificate that may be used to link the end certificate to the root certificate for that S1SPKI; ~~and~~

- (h) in relation to any VWKI Certificate, that any of the following Private Keys is Compromised: (i) the Private Key associated with the Public Key that is contained within that VWKI Certificate; (ii) the Private Key used by the VWICA to Digitally Sign the VWKI Certificate; or (iii) where relevant, the Private Key used by the VWKICA to Digitally Sign the VWKICA Certificate associated with the Private Key referred to in (ii);

- ~~(ih)~~ in relation to any process or to the functionality of any hardware, firmware or software, that the intended purpose or effective operation of that process or functionality is compromised by the occurrence of any event which has an adverse effect on its confidentiality, integrity or availability,

and “**Compromise**” and “**Compromising**” are to be interpreted accordingly.

DCC Interfaces

means each and every one of the following interfaces:

- (a) the DCC User Interface;
- (b) the Registration Data Interface;
- (c) the SMKI Repository Interface;
- (d) the SMKI Services Interface;
- (e) the Self-Service Interface; ~~and~~
- (f) the communications interfaces used for the purposes of accessing those Testing Services designed to be accessed via DCC Gateway Connections; ~~and~~

- (g) the Virtual WAN Interface.

DCC Total System

means the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code, including the DCC User Interface, the Virtual WAN Provider Service, the SMETS1 SM WAN, the SMETS2+ SM

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WAN and Communications Hubs except for those Communications Hubs which are:

- (a) SMETS1 CHs;
- (b) neither installed nor in the possession of the DCC; and/or
- (c) installed, but are not Commissioned.

Elective Communication Services means the provision of communication services that are (or are to be) defined in a Bilateral Agreement (rather than the DCC User Interface Services Schedule) in a manner that involves communication [between the DCC and one or more Smart Metering Systems via the SM WAN](#) (provided that such services must relate solely to the Supply of Energy or its use).

Enabling Services means one or more of the Enrolment Service, the Communications Hub Service, [the Interoperability Checker Service](#), [the Virtual WAN Provider Service](#), and the Other Enabling Services.

Issue in relation to:

- (a) a Device Certificate or DCA Certificate, has the meaning given to that expression in Annex A of the Device Certificate Policy;
- (b) an Organisation Certificate or OCA Certificate, has the meaning given to that expression in Annex A of the Organisation Certificate Policy;
- (c) an IKI Certificate or ICA Certificate has the meaning given to that expression in the IKI Certificate Policy;
- (d) a DCCKI Certificate (including any DCCKICA Certificate) has the meaning given to that expression in the DCCKI Certificate Policy;

[\(e\) a VWKI Certificate, has the meaning given to that expression in the DCCKI Certificate Policy.](#)

Minimum Service Level means, in respect of each Performance Measure, the number or percentage intended to represent the minimum level of performance for the activity which is the subject of the Performance Measure, as set out in:

- (a) Section D11.3 (Code Performance Measures);
- (b) Section H13.1 (Code Performance Measures);
- (c) the Reported List of Service Provider Performance Measures; ~~or~~

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	(d) Section L8.6 (Code Performance Measures); or- (e) Section L18.47 (VWKI Performance Standards) .
Other Enabling Services	means the Services other than the Enrolment Services, the Communications Hub Services, the Interoperability Checker Service , the Virtual WAN Provider Service and the Communication Services.
Performance Measurement Period	means, in respect of each Performance Measure, the applicable period over which the Service Level for that Performance Measure is to be measured, as set out in: (a) Section D11.3 (Code Performance Measures); (b) Section H13.1 (Code Performance Measures); (c) the Reported List of Service Provider Performance Measures; or (d) Section L8.6 (Code Performance Measures); or- (e) Section L18.47 (VWKI Performance Standards).
SMETS2+ SM WAN	means the means by which the DCC sends, receives and conveys communications to and from SMETS2+ Communications Hub Functions (which may differ from Region to Region), but excluding communications via the Virtual WAN Interface .
Service Level Requirements	means: (a) in respect of each Code Performance Measure, the Target Response Time, Target Resolution Time or Target Availability Time (applicable in accordance with the table at Section D11.3 (Code Performance Measures), at Section H13.1 (Code Performance Measures) or at Section L8.6 (Code Performance Measures) or Section L18.47 (VWKI Performance Standards)); or (b) in respect of each Service Provider Performance Measure, the standard to which the relevant DCC Service Provider is obliged by its DCC Service Provider Contract to perform the activity that is the subject of the Service Provider Performance Measure.
Target Response Time	has the meaning given to that expression in Section H3.14 (Target Response Times) or L8 (SMKI Performance Standards and Demand Management) or L18.44 (VWKI Performance Standards) .

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Target Service Level	means, in respect of each Performance Measure, the number or percentage intended to represent a reasonable level of performance for the activity which is the subject of the Performance Measure, as set out in: (a) Section D11.1 (Code Performance Measures); (b) Section H13.1 (Code Performance Measures); (c) the Reported List of Service Provider Performance Measures; or (d) Section L8.6 (Code Performance Measures); or (e) Section L18.47 (VWKI Performance Standards).
<u>Virtual WAN Communications Hub</u>	means a SMETS2+ Communications Hub that has the capability to connect to a Virtual WAN Device.
<u>Virtual WAN Device</u>	means a Device which can connect to an Energy Consumer's internet connection, and which can use that internet connection to convey messages between a Virtual WAN Communications Hub and the Virtual WAN Interface.
<u>Virtual WAN Device Model</u>	means a Device Model of a Virtual WAN Device.
<u>Virtual WAN Interface</u>	means the interface made available by the DCC pursuant to the Virtual WAN Provider Service via which messages can be conveyed to and from Virtual WAN Smart Metering Systems over the internet, using an Energy Consumer's internet connection and a Virtual WAN Device.
<u>Virtual WAN Interface Specification</u>	means the SEC Subsidiary Document of that name to be developed pursuant to Section H18 (Virtual WAN Provider Service).
<u>Virtual WAN Interface Tests</u>	means the tests described in Section H14.59 (Virtual WAN Interface Tests).
<u>Virtual WAN Key Infrastructure (or VWKI)</u>	means the public key infrastructure established by the DCC to provide, amongst other things, transport layer security across the Virtual WAN Interface.
<u>Virtual WAN Provider Service</u>	means the Service described in Section H18 (Virtual WAN Provider Service).
<u>Virtual WAN Reliant Premises</u>	means a Domestic Premises or Relevant Premises with a Smart Metering System with which the DCC can only consistently communicate via a Virtual WAN Device.
<u>Virtual WAN Smart Metering System</u>	means a Smart Metering System that includes a Virtual WAN Communications Hub and is capable of communicating with the DCC via a Virtual WAN Device.

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<u>Virtual WAN Transition Document</u>	<u>means the SEC Subsidiary Document of that name to be developed pursuant to Section H19 (Virtual WAN Transition Document).</u>
<u>VWAN Provider Certificates</u>	<u>has the meaning given to that expression in the VWKI Certificate Policy.</u>
<u>VWD Manufacturer</u>	<u>means a Party which is the Manufacturer of a Virtual WAN Device.</u>
<u>VWKI Authorised Subscriber</u>	<u>means a VWD Manufacturer which is a VWKI Authorised Subscriber for the purposes of (and in accordance with the meaning given to that expression in) the VWKI Certificate Policy.</u>
<u>VWKI Authority Revocation List (or VWKI ARL)</u>	<u>has the meaning given to that expression in the VWKI Certificate Policy.</u>
<u>VWKI Certificate</u>	<u>has the meaning given to that expression in the VWKI Certificate Policy.</u>
<u>VWKI Certificate Policy</u>	<u>means the SEC Subsidiary Document of that name set out in Appendix [TBC].</u>
<u>VWKI Certificate Revocation List (or VWKI CRL)</u>	<u>has the meaning given to that expression in the VWKI Certificate Policy.</u>
<u>VWKI Certificate Signing Request</u>	<u>means a request for a VWKI Certificate submitted by a VWKI Eligible Subscriber in accordance with the VWKI Certificate Policy and the VWKI RAPP.</u>
<u>VWKI Certification Authority (or VWKICA)</u>	<u>has the meaning given to that expression in the VWKI Certificate Policy.</u>
<u>VWKI Certification Practice Statement (or VWKI CPS)</u>	<u>has the meaning given to that expression in Section L18.29 (the VWKI Certification Practice Statement).</u>
<u>VWKI Code of Connection</u>	<u>means the SEC Subsidiary Document of that name set out in Appendix [TBC].</u>
<u>VWKI Device Certificate</u>	<u>has the meaning given to that expression in the VWKI Certificate Policy.</u>
<u>VWKI Document Set</u>	<u>has the meaning given in Section L18.27 (VWKI Document Set).</u>
<u>VWKI Eligible Subscriber</u>	<u>has the meaning given to that expression in Section L18.6 (VWKI Eligible Subscribers).</u>
<u>VWKI Interface Design Specification</u>	<u>means the SEC Subsidiary Document of that name to be developed pursuant to Sections L18.11 (VWKI Interface Design Specification).</u>

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<u>VWKI Participant</u>	<u>means the DCC (acting in its capacity as the provider of the VWKI Services), all VWKI Subscribers and all VWKI Relying Parties.</u>
<u>VWKI Registration Authority Policies and Procedures (or VWKI RAPP)</u>	<u>means the SEC Subsidiary Document of that name set out in Appendix [TBC].</u>
<u>VWKI Relying Party</u>	<u>means a person who, pursuant to the Code, receives and relies upon a VWKI Certificate or a VWKICA Certificate.</u>
<u>VWKI Repository</u>	<u>has the meaning given to that expression in Section L18.13 (the VWKI Repository).</u>
<u>VWKI Repository Code of Connection</u>	<u>means the SEC Subsidiary Document of that name set out in Appendix [TBC].</u>
<u>VWKI Repository Interface</u>	<u>has the meaning given to that expression in Section L18.22 (the VWKI Repository Interface).</u>
<u>VWKI Repository Interface Design Specification</u>	<u>has the meaning given to that expression in Section L18.23 (the VWKI Repository Interface Design Specification).</u>
<u>VWKI Repository Service</u>	<u>has the meaning given to that expression in Section L18.14 (the VWKI Repository Service).</u>
<u>VWKI SEC Documents</u>	<u>has the meaning given to that expression in Section L18.28 (the VWKI SEC Documents).</u>
<u>VWKI Service Interface</u>	<u>has the meaning given to that expression in Section L18.10 (VWKI Service Interface).</u>
<u>VWKI Services</u>	<u>has the meaning given to that expression in Section L18 (Virtual WAN Key Infrastructure).</u>
<u>VWKI Subscriber</u>	<u>means, in relation to any VWKI Certificate, a VWD Manufacturer which has been Issued with and accepted that VWKI Certificate, acting in its capacity as the holder of the VWKI Certificate.</u>
<u>VWKICA Certificates</u>	<u>means the VWKI Root Certificate, the VWAN Provider Issuing Authority Certificate, and the VWAN Device Issuing Authority Certificate (as each such expression is defined in the VWKI Certificate Policy).</u>
<u>WAN Selection Arrangements</u>	<u>means the document of that name established and maintained pursuant to one or more Versions of the Communications Hub Technical Specifications.</u>

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SEC, Section F2 (Central Products List), add new sections as follows:

Virtual WAN Devices

- F2.39 Virtual WAN Devices are Type 2 Devices, so they are not identified in the Central Products List and have no SMI Status.
- F2.40 The Security Sub-Committee shall maintain and make available to Parties a list of Virtual WAN Device Models which qualify to be issued with a VWKI Device Certificate, as further described in Sections F2.41 to F2.43 (inclusive).
- F2.41 In order to be added to such list, the VWD Manufacturer of the Virtual WAN Device Model must provide a statement to Security Sub-Committee stating that:
- (a) the Device Model meets the interface requirements of a Virtual WAN Device as set out in the Virtual WAN Provider Interface Specification;
 - (b) the Device Model meets the principles of ETSI 303 645 (or is capable of being upgraded to meet such principles within such time period as the Security Sub-Committee specifies); and
 - (c) the virtual WAN functionality of the Device Model will (i) continue to operate following a change of Responsible Supplier; (ii) is not dependent on any post-installation charges; and (iii) will not be adversely affected by any actions of the VWD Manufacturer.
- F2.42 Each VWD Manufacturer shall notify the Security Sub-Committee if the VWD Manufacturer becomes aware that one of its Virtual WAN Device Models does not meet the requirements of Section F2.41.
- F2.43 The Security Sub-Committee:
- (a) may remove a Virtual WAN Device Model from its list of Virtual WAN Device Models if the Security Sub-Committee determines that the Virtual WAN Device Model does not meet the security requirements of Section F2.41; and
 - (b) shall remove a Virtual WAN Device Model from its list if the Panel determines that it is appropriate to do so in circumstances where the Virtual WAN Device Model does not meet the requirements of Section F2.41 (other than the security requirements).
- F2.44 The DCC shall:
- (a) only issue VWKI Device Certificates in respect of Device Models listed on the Security Sub-Committee's list of Virtual WAN Device Models;
 - (b) only communicate with Virtual WAN Devices which have VWKI Device Certificates;
 - (c) revoke VWKI Device Certificates for Device Models if instructed to do so by the Security Sub-Committee or the Panel; and
 - (d) suspend communications with Virtual WAN Devices of particular Device Models if instructed to so by the Security Sub-Committee or the Panel (even though they have VWKI Device Certificates).

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F2.45 Where a Supplier Party provides (or arranges for the provision of) a Virtual WAN Device in order to meet the requirements of its Energy Licence, the Supplier Party must provide a Virtual WAN Device of a Virtual WAN Device Model which is listed on the Security Sub-Committee's list at the time it is provided.

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SEC, Section H5.4 (Statement of Service Exemptions)

H5.4 In accordance with Condition 17 of the DCC Licence (and notwithstanding any other provision of this Section H5), the DCC is not obliged to Commission [a Communications Hub Function](#)s (or therefore to Enrol [the corresponding Smart Metering Systems](#)) where [the DCC#](#) is exempted from the requirement to do so in accordance with a Statement of Service Exemptions; [save where the DCC is able to Commission the Communications Hub Function via the Virtual WAN Provider Service](#).

SEC, Section H8.16 (Self-Service Interface)

H8.16 The Self-Service Interface must (as a minimum) allow the following categories of User to access the following:

...

(g) additional information made available by the DCC to assist with the use of the Services and diagnosis of problems, such as service status (including information in respect of Planned Maintenance and Unplanned Maintenance) and frequently asked questions (and the responses to such questions), which shall be available to all Users; ~~and~~

[\(h\) where a User's Smart Metering Inventory search results in the provision of information relating to a Communications Hub Function, the following information shall be made available to the User: \(i\) whether or not there is a Virtual WAN Device connected to the Communications Hub Function; and \(ii\) if so, whether the Communications Hub Function is using the SM WAN or the Virtual WAN Interface to communicate with the DCC; and](#)

~~(i)~~ anything else expressly required by a provision of this Code.

SEC, Section H14 (Testing Services)

H14.1 The DCC shall provide the following testing services (the “**Testing Services**”):

- (a) User Entry Process Tests;
- (b) SMKI and Repository Entry Process Tests;
- (c) Device and User System Tests;
- (d) Modification Proposal implementation testing (as described in Section H14.34);
- (e) DCC Internal Systems change testing (as described in Section H14.36);
- (f) RDP Entry Process Tests;
- (g) SMETS1 Pending Product Combinations Tests;
- (h) RF Noise Testing;

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- (i) Interoperability and Innovation Events;
- (j) GFI Testing;
- (k) Wired Instrumented Test Communications Hubs; ~~and~~
- (l) DCC Boxed; ~~and~~
- (m) Virtual WAN Interface Tests.

...

Virtual WAN Interface Tests

H14.59 The DCC shall provide a Testing Service (known as the Virtual WAN Interface Tests) as follows:

- (a) the Testing Service will enable Testing Participants to test communications between a Smart Metering System and the DCC via a Virtual WAN Device and the Virtual WAN Interface, as further described in the Enduring Testing Approach Document (and which may include simulations of the same);
- (b) each User shall be a Testing Participant, subject to any limitations set out in the Enduring Testing Approach Document; and
- (c) the DCC and the relevant Testing Participant shall each comply with any and all additional obligations concerning the Virtual WAN Interface Tests set out in the Enduring Testing Approach Document.

SEC, new Section H18 (Virtual WAN Provider Service)**H18. Virtual WAN Provider Service****Obligation of the DCC to maintain the Virtual WAN Interface**

H18.1 The DCC shall establish and maintain the Virtual WAN Interface.

H18.2 The DCC shall, subject to and in accordance with the Virtual WAN Interface Specification, make the Virtual WAN Interface available to enable communications between the DCC and Virtual WAN Smart Metering Systems (as an alternative to communications via the SM WAN) for the purposes of the DCC sending and receiving Commands, Service Responses and Alerts to and from Smart Metering Systems over the internet, including for the purposes of Enrolling Smart Metering Systems and/or providing Communication Services in respect of Smart Metering Systems.

H18.3 The DCC shall ensure that the Virtual WAN Interface is available at all times (subject to Planned Maintenance undertaken in accordance with Section H8.3).

H18.4 The DCC shall comply with the WAN Selection Arrangements.

Development of the Virtual WAN Interface Specification

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H18.5 The first version of the Virtual WAN Interface Specification is to be designated by the Secretary of State and incorporated into this Code pursuant to Part G of Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code).

H18.6 The Virtual WAN Interface Specification shall include:

- (a) the specification of the interface between Virtual WAN Devices and the DCC Systems (being the Virtual WAN Interface); and
- (b) the specification of the interface between Virtual WAN Communications Hubs and Virtual WAN Devices.

Obligations of Users in respect of the Virtual WAN Provider Service

H18.7 Each User shall ensure that it shall not (and that no-one acting on its behalf shall) connect a Virtual WAN Device to an Energy Consumer's internet without that Energy Consumer's consent, and without explaining that the Energy Consumer's internet will be used for the purposes of conveying messages to and from the Smart Metering System.

H18.8 Each Responsible Supplier for a Virtual WAN Smart Metering System at a Virtual WAN Reliant Premises shall periodically notify the Energy Consumer that there is a Virtual WAN Device connected to the Energy Consumer's internet, and that the Energy Consumer has consented to their internet being used for the purposes of conveying messages to and from the Smart Metering System.

H18.9 If the relevant Energy Consumer notifies a Responsible Supplier for a Smart Metering System that is connected to the Virtual WAN Interface that the Energy Consumer does not consent to the Virtual WAN Device being connected to or using the Energy Consumer's internet, then the Responsible Supplier shall:

- (a) inform the Energy Consumer of the consequences of disconnecting the Virtual WAN Device; and
- (b) if the Energy Consumer nevertheless wishes to disconnect the Virtual WAN Device, inform the Energy Consumer how to do so.

SEC, new Section H19 (Virtual WAN Transition Document)

H19. Virtual WAN Transition Document

Overview

H19.1 The Virtual WAN Transition Document is to be developed by the DCC pursuant to this Section H19, and incorporated into this Code pursuant to Part G of Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code).

Purpose

H19.2 The purpose of the Virtual WAN Transition Document is to:

- (a) provide that some or all of the modifications made to this Code for the purposes of setting out the Virtual WAN Arrangements shall not initially apply;

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- (b) provide for the phased introduction of the Virtual WAN Arrangements;
- (c) provide for additional and/or varied provisions to apply for a transitional period prior to the full establishment of the Virtual WAN Arrangements;
- (d) establish arrangements by which Users can order Virtual WAN Communications Hubs for use in the live trialling of Virtual WAN Devices;
- (e) establish arrangements by which Manufacturers can access the VWKI Services for the purposes of the live trialling of Virtual WAN Devices; and
- (e) facilitate live trialling of Virtual WAN Devices.

H19.3 For clarity, initial versions of the Virtual WAN Transition Document may only deal with some of these listed purposes.

Content of the Virtual WAN Transition Document

H19.4 The Virtual WAN Transition Document may include, without limitation, some or all of the following:

- (a) rights and/or obligations of the DCC and other Parties designed to facilitate or achieve the purposes of the Virtual WAN Transition Document which are either additional to or vary other rights and/or obligations set out in this Code;
- (b) the processes by which changes to DCC Systems are to be made to enable the DCC to begin communicating with Virtual WAN Smart Metering Systems via the Virtual WAN Interface;
- (c) pre-conditions to apply in relation to use of the Virtual WAN Interface or the making available of Virtual WAN Communications Hubs;
- (d) transitional arrangements for accessing the VWKI Service and VWKI Repository Service;
- (e) DCC reporting obligations regarding the Virtual WAN Arrangements;
- (f) limitations and/or variations to the Services and/or the rights and/or obligations of the Parties to apply for a transitional period prior to the full establishment of the Virtual WAN Arrangements, which may include limitations and/or variations to Services in light of other proposed changes to this Code; and
- (g) provision for the referral and determination of disputes in respect of the Virtual WAN Transition Document, which may include interim or final determinations by the Secretary of State, the Authority, the Panel or any other person specified by the Secretary of State.

Definitions

H19.5 In this Section H19, the "Virtual WAN Arrangements" means the arrangements for or connected with the provision of the Virtual WAN Provider Services, including in relation to Virtual WAN Devices, Virtual WAN Communications Hubs, the Virtual WAN Interface and the VWKI Services.