

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

Draft: 11 April 2025

L SMART METERING KEY INFRASTRUCTURE AND DCC KEY INFRASTRUCTURE

L1. SMKI POLICY MANAGEMENT AUTHORITY

Establishment of the SMKI PMA

- L1.1 The Panel shall establish a Sub-Committee in accordance with the requirements of this Section L1, to be known as the “**SMKI PMA**”.
- L1.2 Save as expressly set out in this Section L1, the SMKI PMA shall be subject to the provisions concerning Sub-Committees set out in Section C6 (Sub-Committees).

Membership of the SMKI PMA

- L1.3 The SMKI PMA shall be composed of the following persons (each an “**SMKI PMA Member**”):
- (a) the SMKI PMA Chair (as further described in Section L1.5);
 - (b) four SMKI PMA (Supplier) Members (as further described in Section L1.6);
 - (c) two SMKI PMA (Network) Member (as further described in Section L1.8); and
 - (d) one representative of the Security Sub-Committee and one representative of the Technical Architecture and Business Architecture Sub-Committee (in each case as further described in Section L1.10); and
 - (e) one SMKI Specialist (appointed as described in the definition of that expression in Section A1 (Definitions)).
- L1.4 Each SMKI PMA Member must be an individual (and cannot be a body corporate, association or partnership). No one person can hold more than one office as an SMKI PMA Member at the same time.
- L1.5 The “**SMKI PMA Chair**” shall be such person as is (from time to time) appointed to that role by the Panel in accordance with a process designed to ensure that:
- (a) the candidate selected is sufficiently independent of any particular Party or class of Parties;
 - (b) the SMKI PMA Chair is appointed for a three-year term (following which he or she can apply to be re-appointed);
 - (c) the SMKI PMA Chair is remunerated at a reasonable rate;
 - (d) the SMKI PMA Chair’s appointment is subject to Section C6.9 (Member Confirmation), and to terms equivalent to Section C4.6 (Removal of Elected Members);
 - (e) provision is made for the SMKI PMA Chair to continue in office for a reasonable period following the end of his or her term of office in the event of any delay in appointing his or her successor; and

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- (f) where the SMKI PMA Chair's appointment (and for the purposes of this Section and Section L1.5A all references to appointment shall encompass re-appointment) is to take effect on or after the date this Section L1.5(f) comes into force, the Panel shall:
- (i) notify the Secretary of State of the appointment it proposes to make;
 - (ii) not make the appointment unless and until the Secretary of State has confirmed in writing that they do not object to the appointment being made;
 - (iii) ensure that the terms of the appointment include terms which provide for the Panel to terminate the appointment where directed to do so by the Secretary of State pursuant to Section L1.5A and from such date or within such period as may be specified in the Secretary of State's direction; and
 - (iv) where the appointed person has not, at the date of the appointment, passed (as a minimum) a Security Check (or equivalent), ensure that the terms of the appointment include terms which:
 - (A) require the appointed person to apply for a Security Check (or equivalent) within one month of the date of the appointment;
 - (B) provide for the Panel to terminate the appointment if a Security Check (or equivalent) is not passed by the appointed person within 12 months of the date of the appointment (or such longer period as the Secretary of State may approve following a request from the Panel).
- L1.5A The Secretary of State may, in respect of any SMKI PMA Chair appointment which takes effect on or after the date Section L1.5(f) comes into force, direct the Panel to terminate the appointment of the SMKI PMA Chair where the Secretary of State considers it necessary to do for the purposes of preserving the integrity of, and in the interests of maintaining, the security of the End-to-End Smart Metering System (or any part of that system).
- L1.5B The Panel shall comply with any direction given to it by the Secretary of State pursuant to Section L1.5A.
- L1.6 Each of the four **"SMKI PMA (Supplier) Members"** shall (subject to any directions to the contrary made by the Secretary of State for the purpose of transition on the incorporation of this Section L1 into this Code):
- (a) be appointed in accordance with Section L1.7, subject to compliance by the appointed person with Section C6.9 (Member Confirmation);
 - (b) retire 2 years after his or her appointment (without prejudice to his or her ability to be nominated for a further term of office); and
 - (c) be capable of being removed from office in accordance with Sections C4.5 and C4.6 (Removal of Elected Members), for which purpose those Sections shall be read as if references to "Elected Member" were to "SMKI PMA (Supplier) Member", references to "Panel" were to "SMKI PMA", references to "Panel Chair" were to "SMKI PMA Chair", and references to "Panel Members" were to "SMKI PMA Members".
- L1.7 Each of the four SMKI PMA (Supplier) Members shall be appointed in accordance with a

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process:

- (a) by which three SMKI PMA (Supplier) Members will be elected by Large Supplier Parties, and one SMKI PMA (Supplier) Member will be elected by Small Supplier Parties;
- (b) by which any person (whether or not a Supplier Party) shall be entitled to nominate candidates to be elected as an SMKI PMA (Supplier) Member; and
- (c) that is otherwise the same as that by which Elected Members are elected under Sections C4.2 and C4.3 (as if references therein to “Panel” were to “SMKI PMA”, references to “Panel Chair” were to “SMKI PMA Chair”, references to “Panel Members” were to “SMKI PMA Members”, and references to provisions of Section C or D were to the corresponding provisions set out in or applied pursuant to this Section L1).

L1.8 The two **“SMKI PMA (Network) Members”** shall (subject to any directions to the contrary made by the Secretary of State for the purpose of transition on the incorporation of this Section L1 into this Code):

- (a) be appointed in accordance with Section L1.9, subject to compliance by the appointed person with Section C6.9 (Member Confirmation);
- (b) retire 2 years after his or her appointment (without prejudice to his or her ability to be nominated for a further term of office); and
- (c) be capable of being removed from office in accordance with Sections C4.5 and C4.6 (Removal of Elected Members), for which purpose those Sections shall be read as if references to “Elected Member” were to “SMKI PMA (Network) Members”, references to “Panel” were to “SMKI PMA”, references to “Panel Chair” were to “SMKI PMA Chair”, and references to “Panel Members” were to “SMKI PMA Members”.

L1.9 The two SMKI PMA (Network) Member shall be appointed in accordance with a process:

- (a) by which one SMKI PMA (Network) Member will be elected by the Electricity Network Parties and one SMKI PMA (Network) Member will be elected by the Gas Network Parties; and
- (b) that is otherwise the same as that by which Elected Members are elected under Sections C4.2 and C4.3 (as if references therein to “Panel” were to “SMKI PMA”, to “Panel Chair” were to “PMA Chair”, to “Panel Members” were to “SMKI PMA Members”, and to provisions of Section C or D were to the corresponding provisions set out in or applied pursuant to this Section L1).

L1.10 The Security Sub-Committee and the Technical Architecture and Business Architecture Sub-Committee shall each nominate one of their members to be an SMKI PMA Member by notice to the Secretariat from time to time. The Security Sub-Committee or the Technical Architecture and Business Architecture Sub-Committee (as applicable) may each replace its nominee from time to time by prior notice to the Secretariat. Such nomination or replacement shall be subject to compliance by the relevant person with Section C6.9 (Member Confirmation). Until each such Sub-Committee exists, the Panel shall nominate a person to act as a representative of that Sub-Committee (and may from time to time replace such person).

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- L1.11 Each SMKI PMA Member must ensure that he or she reads the SMKI Document Set when first appointed, and subsequently from time to time, so that he or she is familiar with its content.

Proceedings of the SMKI PMA

- L1.12 Each SMKI PMA Member shall be entitled to appoint an Alternate in accordance with Section C5.19 (as it applies pursuant to Section L1.15). The SMKI PMA Chair must nominate another person to act as Alternate for the SMKI PMA Chair (which person may be the SMKI Specialist but may not be another SMKI PMA Member, and which person must be sufficiently independent of any particular Party or class of Parties).
- L1.13 No business shall be transacted at any meeting of the SMKI PMA unless a quorum is present at that meeting. The quorum for each such meeting shall be four of the SMKI PMA Members, at least one of whom must be the SMKI PMA Chair (or his or her Alternate).
- L1.14 Without prejudice to the generality of Section C5.13(c) (Attendance by Other Persons) as it applies pursuant to Section L1.15:
- (a) a representative of the DCC shall be invited to attend each and every SMKI PMA meeting (which representative shall be entitled to speak at SMKI PMA meetings without the permission of the SMKI PMA Chair); and
 - (b) other persons who may be invited to attend SMKI PMA meetings may include:
 - (i) the Independent SMKI Assurance Service Provider;
 - (ii) one or more representatives of Device Manufacturers; or
 - (iii) a specialist legal adviser.
- L1.15 Subject to Sections L1.12, L1.13 and L1.14, the provisions of Section C5 (Proceedings of the Panel) shall apply to the proceedings of the SMKI PMA, for which purpose that Section shall be read as if references to “Panel” were to “SMKI PMA”, references to “Panel Chair” were to “SMKI PMA Chair”, and references to “Panel Members” were to “SMKI PMA Members”.
- L1.16 Notwithstanding Section C3.12 (Protections for Panel Members and Others), that Section shall not apply to the SMKI Specialist in any circumstances and the SMKI Specialist shall have no rights under that Section.

Duties of the SMKI PMA

- L1.17 The SMKI PMA shall undertake the following duties:
- (a) to approve the Device CPS, Organisation CPS ~~and~~, the IKI CPS [and the VWKI CPS](#), and any changes to those documents, in accordance with Sections L9;
 - (b) to propose variations to the SMKI SEC Documents, as further described in Section L1.19;
 - (c) to periodically review (including where directed to do so by the Panel) the effectiveness of the SMKI Document Set [and the VWKI Document Set](#) (including so as to evaluate

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whether the SMKI Document Set [and the VWKI Document Set](#) remains consistent with the SEC Objectives), and report to the Panel on the outcome of such review (such report to include any recommendations for action that the SMKI PMA considers appropriate);

- (d) as soon as reasonably practicable following the incorporation of each of the following documents into this Code, its re-incorporation, or its modification in accordance with section 88 of the Energy Act 2008, to review that document in accordance with paragraph (c) above:

- (i) the SMKI Compliance Policy;
- (ii) the SMKI RAPP;
- (iii) the Device Certificate Policy;
- (iv) the Organisation Certificate Policy;
- (v) the IKI Certificate Policy;
- (vi) the SMKI Recovery Procedure,

and (where the SMKI PMA considers it appropriate to do so) submit one or more Draft Proposals in respect of those documents;

- (e) to periodically review the effectiveness of the DCCKI Document Set [and/or the VWKI Document Set](#), and to:

- (i) notify DCC where it considers that changes should be made to the DCCKI Document Set [and/or the VWKI Document Set](#) in order to ensure that DCC meets its obligations under Section G (Security) (such notification to include any recommendation for action that the SMKI PMA considers appropriate); and
- (ii) copy any such notification to the Security Sub-Committee and, except to the extent that it is appropriate to redact information for security purposes, to other SEC Parties;

- (f) as soon as reasonably practicable following the incorporation of each of the following documents into this Code, its re-incorporation, or its modification in accordance with section 88 of the Energy Act 2008, to review that document in accordance with paragraph (e) above:

- (i) the DCCKI RAPP;
- (ii) the DCCKI Certificate Policy;

- (g) to review the DCCKI CPS, and any amendments proposed to be made to it by the DCC, in accordance with Section L13 (DCC Key Infrastructure);

- (h) as part of its review of the SMKI Compliance Policy pursuant to paragraph (d) above, to consider whether SMKI Participants which are subject to assurance assessments pursuant to the SMKI Compliance Policy should be liable to meet the costs (or a

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proportion of the costs) of undertaking such assessments, and (where the SMKI PMA considers it appropriate to do so) submit one or more Draft Proposals as referred to in paragraph (d) above;

- (i) in relation to any incident in which a Relevant Private Key is (or is suspected of being) Compromised, to decide, in accordance with the SMKI Recovery Key Guidance, whether or not to require the use of the Recovery Private Key or Contingency Private Key (including in the latter case the use of the Contingency Symmetric Key);
- (j) to exercise the functions allocated to it under the SMKI Recovery Procedure, and in particular to exercise any power to nominate Parties for such purposes (and in accordance with such procedures) as may be set out in the SMKI Recovery Procedure;
- (k) to provide the Panel, the Change Sub-Committee, the Change Board and Working Groups with support and advice in respect of Draft Proposals and Modification Proposals that provide for variations to the SMKI SEC Documents, the DCCKI SEC Documents, or the S1SPKM SEC Documents;
- (l) to provide assurance in accordance with Section L2 (SMKI Assurance);
- (m) to provide the Panel with support and advice in respect of Disputes for which the Panel is required to make a determination, insofar as such Disputes relate to the SMKI Document Set, the DCCKI Document Set ~~or~~, the S1SPKM Document Set or the VWKI Document Set;
- (n) to provide the Panel and Sub-Committees with general advice and support with respect to the SMKI Services, the SMKI Repository Service, the DCCKI Services, the DCCKI Repository Service, each S1SPKI ~~and~~, each SMETS1 Symmetric Key Arrangement and the VWKI Service;
- (o) to exercise such functions as are allocated to it under, and to comply with all the applicable requirements of, the SMKI Document Set in accordance with Section L9.1;
- (p) in respect of each S1SPKI CPS, to review, and either to approve or determine not to reject (subject to such amendments as it may direct), or to reject:
 - (i) a draft of that document, in accordance with Section L14.11;
 - (ii) any proposed amendment to that document, in accordance with Section L14.13;
- (q) to periodically review the effectiveness of the S1SPKM Document Set and to:
 - (i) notify DCC where it considers that changes should be made to the S1SPKM Document Set (such notification to include any recommendation for action that the SMKI PMA considers appropriate); and
 - (ii) copy any such notification to the Security Sub-Committee;
- (r) as soon as reasonably practicable following the incorporation of each of the following documents into this Code, its re-incorporation, or its modification in accordance with section 88 of the Energy Act 2008, to review that document in accordance with paragraph (q) above:

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- (i) each S1SPKI Certificate Policy;
- (ii) each S1SPKI RAPP;
- (iii) each SMETS1 Cryptographic Key Management Policy;
- (iv) the S1SPKM Compliance Policy; and
- (s) to perform any other duties expressly ascribed to the SMKI PMA elsewhere in this Code.

L1.18 The SMKI PMA shall establish a process whereby the Code Administrator monitors Draft Proposals and Modification Proposals with a view to identifying (and bringing to the SMKI PMA's attention) those proposals that are likely to affect the SMKI SEC Documents. The Code Administrator shall comply with such process.

Modification of the SMKI SEC Documents ~~and, the~~ S1SPKM SEC Documents and the VWKI SEC Documents by the SMKI PMA

L1.19 Notwithstanding Section D1.3 (Persons Entitled to Submit Draft Proposals):

- (a) the SMKI PMA shall be entitled to submit Draft Proposals in respect of any of the SMKI SEC Documents, the VWKI SEC Documents or S1SPKM SEC Documents where the SMKI PMA considers it appropriate to do so; and
- (b) any SMKI PMA Member shall be entitled to submit Draft Proposals in respect of any of the SMKI SEC Documents ~~or,~~ S1SPKM SEC Documents or VWKI SEC Documents where he or she considers it appropriate to do so (where the SMKI PMA has voted not to do so).

Updated or Replacement Standards, Procedures and Guidelines

L1.20 In respect of the SMKI Document Set, the SMKI Services, the DCCKI Document Set, the DCCKI Services, the VWKI Document Set, the VWKI Services and Sections L2 to L13 shall be interpreted in accordance with the following provisions of this Section L1.

L1.21 As a consequence of its duties under Section L1.17, the SMKI PMA shall determine any updates that are required to standards, procedures and guidelines that apply to the operation of the SMKI Services ~~and,~~ the DCCKI Services and the VWKI Services (and shall publish the latest versions on the Website).

Transitional Period for Updated or Replacement Standards, Procedures and Guidelines

L1.22 Section L1.23 applies where:

- (a) the DCC or any User is required, in accordance with any provision of the SMKI SEC Documents or VWKI SEC Documents, to ensure that it, or that any of its policies, procedures, systems or processes, complies with:
 - (i) any standard, procedure or guideline issued by a third party; and

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- (ii) any equivalent to that standard, procedure or guideline which updates or replaces it from time to time; and
 - (b) the relevant third party issues an equivalent to that standard, procedure or guideline which updates or replaces it.
- L1.23 Where this Section L1.23 applies, the obligation on the DCC or User (as the case may be):
- (a) shall be read as an obligation to comply with the updated or replaced standard, procedure or guideline from such date as is determined by the SMKI PMA in respect of that document; and
 - (b) prior to that date shall be read as an obligation to comply (at its discretion) with either:
 - (i) the previous version of the standard, procedure or guideline; or
 - (ii) the updated or replaced standard, procedure or guideline.
- L1.24 Any date determined by the SMKI PMA in accordance with Section L1.23 may be the subject of an appeal by the DCC or any User to the Panel (whose decision shall be final and binding for the purposes of this Code).

L2. SMKI ASSURANCE

L2.1 SMKI Compliance Policy

The SMKI PMA shall exercise the functions allocated to it by the SMKI Compliance Policy.

- L2.2 The DCC shall procure all such services as are required for the purposes of complying with its obligations under the SMKI Compliance Policy.

SMKI Participants: Duty to Cooperate in Assessment

- L2.3 Each SMKI Participant shall do all such things as may be reasonably requested by the SMKI PMA, or by any person acting on behalf of or at the request of the SMKI PMA (including in particular the Independent SMKI Assurance Service Provider), for the purposes of facilitating an assessment of that SMKI Participant's compliance with any applicable requirements of the SMKI Document Set.
- L2.4 For the purposes of Section L2.3, an SMKI Participant shall provide the SMKI PMA (or the relevant person acting on its behalf or at its request) with:
- (a) all such Data as may reasonably be requested, within such times and in such format as may reasonably be specified; and
 - (b) all such other forms of cooperation as may reasonably be requested, including in particular access at all reasonable times to:
 - (i) such parts of the premises of that SMKI Participant as are used for; and
 - (ii) such persons engaged by that SMKI Participant as carry out, or are authorised

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to carry out,

any activities related to its compliance with the applicable requirements of the SMKI Document Set.

Events of Default

- L2.5 In relation to an Event of Default which consists of a material breach by an SMKI Participant of any applicable requirements of the SMKI Document Set, the provisions of Sections M8.2 (Notification of an Event of Default) to M8.4 (Consequences of an Event of Default) shall apply subject to the provisions of Sections L2.6 to L2.13.
- L2.6 For the purposes of Sections M8.2 to M8.4 as they apply pursuant to Section L2.5, an Event of Default shall (notwithstanding the ordinary definition thereof) be deemed to have occurred in respect of the DCC where it is in material breach of any applicable requirements of the SMKI Document Set (provided that Sections M8.4(e), (f) and (g) shall never apply to the DCC).
- L2.7 Where in accordance with Section M8.2 the Panel receives notification that an SMKI Participant is in material breach of any applicable requirements of the SMKI Document Set, it shall refer the matter to the SMKI PMA. On any such referral, the SMKI PMA may investigate the matter in accordance with Section M8.3 as if the references in that Section to the “Panel” were to the “SMKI PMA”.
- L2.8 Where the SMKI PMA has:
- (a) carried out an investigation in accordance with Section M8.3; or
 - (b) received a report from the Independent SMKI Assurance Service Provider, following an assessment by it of the compliance of any SMKI Participant with the applicable requirements of the SMKI Document Set, concluding that the SMKI Participant has not complied with those requirements,
- the SMKI PMA shall consider the information available to it and shall determine whether any non-compliance with the SMKI Document Set has occurred and, if so, whether that non-compliance constitutes an Event of Default.
- L2.9 Where the SMKI PMA determines that an Event of Default has occurred, it shall:
- (a) notify the relevant SMKI Participant and any other Party it considers may have been affected by the Event of Default; and
 - (b) refer the matter to the Panel for the Panel to determine the appropriate steps to take in accordance with Section M8.4.
- L2.10 Where the Panel is considering what steps to take in accordance with Section M8.4, it shall request and consider the advice of the SMKI PMA.
- L2.11 Where the Panel determines that an SMKI Participant is required to give effect to a remedial action plan in accordance with Section M8.4(d) that plan must be approved by the SMKI PMA.
- L2.12 Where, in accordance with Section L2.11, the SMKI PMA has approved a remedial action plan in relation to the provision by the DCC of the SMKI Services, the Panel shall ensure that

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the approved plan (being redacted only in so far as necessary for the purposes of security) is made available to all Parties.

L2.13 Where, in accordance with Section L2.11, the SMKI PMA has approved a remedial action plan in relation to:

- (a) the DCC acting in a capacity other than as the provider of the SMKI Services, the Panel may arrange for a version of the approved plan (or parts of that plan) to be made available to all the Parties; or
- (b) any other SMKI Participant, the Panel may arrange for an anonymised version of the approved plan (or parts of that plan) to be made available to all the Parties,

but (in each case) only where the Panel considers that such dissemination is necessary for the purposes of security.

Emergency Suspension of SMKI Services or VWKI Services

L2.14 Where the SMKI PMA has reason to believe that there is any immediate threat of the DCC Total System, any User Systems, any Smart Metering Systems or any RDP Systems being Compromised to a material extent by the occurrence of an event arising in relation to the SMKI Services or the VWKI Services, it may instruct the DCC immediately to suspend:

- (a) the provision (in whole or in part) of the SMKI Services and/or the VWKI Services and/or any other Services which rely on the use of Certificates and/or VWKI Certificates;
- (b) the rights of any SMKI Participant or VWKI Participant to receive (in whole or in part) the SMKI Services and/or the VWKI Services and/or any other Services which rely on the use of Certificates and/or VWKI Certificates,

and thereafter to retain that suspension in effect until such time as the SMKI PMA instructs the DCC to reinstate the provision of the relevant Services or the rights of the SMKI Participant or VWKI Participant (as the case may be).

L2.15 Where the SMKI PMA takes any steps under Section L2.14, it:

- (a) shall immediately thereafter notify the Authority;
- (b) shall comply with any direction given to it by the Authority in relation to such steps; and
- (c) may notify all the Parties of some or all of such steps (without identifying the SMKI Participant or VWKI Participant), but only where the Panel considers that such notification is necessary for the purposes of security.

L2.16 Any Party which is affected by the SMKI PMA taking any steps under Section L2.14 may appeal the decision to do so to the Authority, and the DCC shall comply with any decision of the Authority in respect of the matter (which shall be final and binding for the purposes of this Code).

L3. THE SMKI SERVICES

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L4. THE SMKI SERVICE INTERFACE

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L5. THE SMKI REPOSITORY SERVICE

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L6. THE SMKI REPOSITORY INTERFACE

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L7. SMKI AND REPOSITORY ENTRY PROCESS TESTS

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L8. SMKI PERFORMANCE STANDARDS AND DEMAND MANAGEMENT

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L9. THE SMKI DOCUMENT SET

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L10. THE SMKI RECOVERY PROCEDURE

...

L11. THE SUBSCRIBER OBLIGATIONS

...

L12. RELYING PARTY OBLIGATIONS

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L13. DCC KEY INFRASTRUCTURE

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L14. THE S1SPKM DOCUMENT SET

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L15. S1SPKM ASSURANCE

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L16. SUPPLIER OF LAST RESORT

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L17. INTERACTIONS WITH CSS

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L18. VIRTUAL WAN KEY INFRASTRUCTURE

The VWKI Services

L18.1 The "VWKI Services" means all of the activities undertaken by the DCC in its capacity as the VWKI Certification Authority in accordance with the applicable requirements of the Code.

VWKI Authorised Subscribers

L18.2 Each VWD Manufacturer may apply to become a VWKI Authorised Subscriber in accordance with, and by following the relevant procedures set out in, the VWKI Certificate Policy and the VWKI RAPP.

L18.3 The DCC shall authorise itself and each VWD Manufacturer to submit a VWKI Certificate Signing Request to become a VWKI Subscriber, where such VWD Manufacturer has successfully completed the relevant procedures and satisfied the criteria set out in the VWKI Certificate Policy and the VWKI RAPP.

L18.4 The DCC shall provide any VWKI Services that may be requested by a VWKI Authorised Subscriber where the request is made by that VWKI Authorised Subscriber in accordance with the applicable requirements of the VWKI SEC Documents.

L18.5 The DCC shall ensure that in the provision of VWKI Services it acts in accordance with Good Industry Practice.

VWKI Eligible Subscribers

L18.6 A VWKI Authorised Subscriber:

(a) shall be known as a "VWKI Eligible Subscriber" in respect of a VWKI Certificate if it is entitled to become a VWKI Subscriber for that VWKI Certificate; and

(b) will be entitled to become a VWKI Subscriber for a VWKI Certificate only if it is identified as a VWKI Eligible Subscriber in respect of that VWKI Certificate in accordance with the provisions of the VWKI Certificate Policy and the VWKI RAPP.

VWKI Subscribers

L18.7 The DCC and each VWD Manufacturer shall be entitled to become a VWKI Subscriber in accordance with, and by following the relevant procedures set out in, the VWKI Certificate Policy and the VWKI RAPP.

The VWKI Service Interface

DCC: Obligation to Maintain the VWKI Service Interface

L18.8 The DCC shall maintain the VWKI Service Interface in accordance with the VWKI Interface Design Specification, and make it available to VWKI Authorised Subscribers for sending and

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receiving communications in accordance with the VWKI Code of Connection.

L18.9 The DCC shall ensure that the VWKI Service Interface is available at all times (subject to Planned Maintenance undertaken in accordance with Section H8.3).

The VWKI Service Interface

L18.10 The “**VWKI Service Interface**” means a communications interface designed to allow communications to be sent between a VWKI Authorised Subscriber and the DCC for the purposes of the VWKI Services.

VWKI Interface Design Specification

L18.11 The “**VWKI Interface Design Specification**” shall be a SEC Subsidiary Document of that name which:

- (a) shall specify the technical details of the VWKI Service Interface;
- (b) shall include the protocols and technical standards that apply to the VWKI Service Interface;
- (c) shall base those technical standards on PKIX/IETF/PKCS open standards, where:
 - (i) PKIX is the Public Key Infrastructure for X.509 Certificates, being an IETF set of standards for certificate and certificate revocation list profiles as specified in IETF RFC 5280;
 - (ii) the IETF is the Internet Engineering Task Force; and
 - (iii) PKCS is the Public Key Cryptography Standard; and
- (d) may set out the procedure by which a VWKI Authorised Subscriber and the DCC may communicate over the VWKI Service Interface, and may in particular specify any requirements on:
 - (i) a VWKI Authorised Subscriber which accesses, or is seeking to access, the VWKI Service Interface;
 - (ii) the DCC in relation to the provision of means of access to the VWKI Service Interface and/or any steps which must be taken by it in relation to communications made by a VWKI Authorised Subscriber and received by it over the VWKI Service Interface.

VWKI Code of Connection

L18.12 The “**VWKI Code of Connection**” shall be a SEC Subsidiary Document of that name which:

- (a) shall set out the way in which VWKI Authorised Subscribers may access the VWKI Service Interface;
- (b) shall specify the procedure by which VWKI Authorised Subscribers and the DCC may communicate over the VWKI Service Interface;

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(c) shall include a description of the way in which the mutual authentication and protection of communications taking place over the VWKI Service Interface will operate; and

(d) may specify any requirements on a VWKI Authorised Subscriber which accesses, or is seeking to access, the VWKI Service.

The VWKI Repository Service

The VWKI Repository

L18.13 The “**VWKI Repository**” means a System for storing and (subject to the provisions of this Section L18) making available copies of the following:

(a) all VWKI Certificates and VWKICA Certificates;

(b) all versions of the VWKI Certificate Policy;

(c) the latest version of the VWKI RAPP;

(d) the latest version of the VWKI CRL;

(e) the latest version of the VWCKI ARL; and

(f) such other documents or information as the DCC, in its capacity as the provider of the VWKI Services, may from time to time consider appropriate.

The VWKI Repository Service

L18.14 The DCC shall establish, operate, maintain and make available the VWKI Repository in accordance with the provisions of this Section L18 (the “**VWKI Repository Service**”).

L18.15 The DCC shall ensure that the documents and information described in Section L18.13 may be lodged in the VWKI Repository by itself for the purpose of providing the VWKI Services or complying with any other requirements placed on it under this Code.

L18.16 The DCC shall ensure that no person may lodge documents or information in the VWKI Repository other than in accordance with Section L18.15.

L18.17 The DCC shall ensure that the VWKI Repository may be accessed for the purpose of viewing and/or obtaining a copy of any document or information stored on it by any Party which reasonably requires such access in accordance, or for any purpose associated, with the Code.

L18.18 The DCC shall make available a copy of any document stored on the VWKI Repository to the Panel or the SMKI PMA (or the Code Administrator acting on their behalf) following receipt of a reasonable request to do so.

Parties: Duties in relation to the VWKI Repository

L18.19 No Party may access the VWKI Repository for the purpose of viewing and/or obtaining a copy of any document or information stored on it except to the extent that it reasonably requires such access in accordance, or for any purpose associated, with this Code.

The VWKI Repository Interface

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DCC: Obligation to Maintain the VWKI Repository Interface

L18.20 The DCC shall maintain the VWKI Repository Interface in accordance with the VWKI Repository Interface Design Specification and make it available to the Parties to send and receive communications in accordance with the VWKI Repository Code of Connection and (where applicable) for the purpose of Entry Process Testing.

L18.21 The DCC shall ensure that the VWKI Repository Interface is available at all times (subject to Planned Maintenance undertaken in accordance with Section H8.3).

The VWKI Repository Interface

L18.22 The “VWKI Repository Interface” means a communications interface designed to allow communications to be sent from and received by the VWKI Repository for the purposes of the VWKI Repository Service.

VWKI Repository Interface Design Specification

L18.23 The “VWKI Repository Interface Design Specification” shall be a SEC Subsidiary Document of that name which:

- (a) specifies the technical details of the VWKI Repository Interface; and
- (b) includes the protocols and technical standards that apply to the VWKI Repository Interface.

VWKI Repository Code of Connection

L18.24 The “VWKI Repository Code of Connection” shall be a SEC Subsidiary Document of that name which sets out the way in which the Parties may access the VWKI Repository Interface.

The VWKI Document Set

Obligations on the SMKI PMA

L18.25 The SMKI PMA shall exercise the functions that are allocated to it under and (in so far as they apply to it) comply with the requirements of the VWKI Document Set.

Obligations on VWKI Participants

L18.26 Each VWKI Participant shall (in so far as they apply to it) comply with the requirements of the VWKI SEC Documents.

The VWKI Document Set

L18.27 The “VWKI Document Set” means:

- (a) the VWKI SEC Documents; and
- (b) the VWKI CPS.

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The VWKI SEC Documents

L18.28 For the purposes of this Section L18, the “VWKI SEC Documents” means the provisions of the Code comprising:

(a) the following SEC Subsidiary Documents:

(i) the VWKI Certificate Policy;

(ii) the VWKI RAPP;

(iii) the VWKI Interface Design Specification;

(iv) the VWKI Code of Connection;

(v) the VWKI Repository Interface Design Specification; and

(vi) the VWKI Repository Code of Connection;

(b) the provisions of this Section L18; and

(c) every other provision of the Code which relates to the provision or the use of the VWKI Services or to any matters directly arising from or affecting the provision or the use of those Services.

The VWKI Certification Practice Statement

L18.29 The “VWKI CPS” shall originally be approved by the SMKI PMA, and shall thereafter be maintained by the DCC (as further described in Sections L18.30, L18.31 and L18.32).

L18.30 The VWKI CPS shall be a document which:

(a) sets out the policies and procedures of the DCC designed to ensure that it will comply with the requirements of the VWKI Certificate Policy;

(b) incorporates the detailed operating procedures to be used by the DCC for the purposes of its compliance with the requirements of that Policy;

(c) incorporates such other provisions as may be required by or in accordance with that Policy or any other part of the Code;

(d) is reviewed by the SMKI PMA to assess whether it is appropriate for these purposes; and

(e) is approved by the individual(s) carrying out the VWKI PMA Functions as being appropriate for these purposes.

L18.31 The DCC shall keep the VWKI CPS under review, and shall in particular carry out a review of the VWKI CPS:

(a) whenever (and to the extent to which) it may be required to so by the SMKI PMA or the individual(s) carrying out the VWKI PMA Functions; and

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(b) following receipt of a notification from the SMKI PMA in accordance with Section L1.17(e) (Duties of the SMKI PMA).

L18.32 Following:

(a) any review of the VWKI CPS, the DCC may propose amendments to it, which it shall submit to:

(i) the SMKI PMA for its review; and

(ii) the individual(s) carrying out the VWKI PMA Functions for their approval;

(b) a review carried out in accordance with Section L18.21(b), the DCC shall report to the SMKI PMA any remedial steps taken or proposed to be taken in order for it to continue to meet its obligations under Section G (Security).

Enquiries in relation to the VWKI Document Set

L18.33 The DCC shall respond within a reasonable time to any reasonable request for information made by a Party in relation to the VWKI Services, the VWKI Repository Service or the VWKI Document Set but excluding any request for a copy of any document or information which can be accessed through the VWKI Repository.

The VWKI Subscriber Obligations

VWKI Certificate Signing Requests

L18.34 Each VWKI Eligible Subscriber shall ensure that all of the information contained in each VWKI Certificate Signing Request made by it is true and accurate.

L18.35 No VWKI Eligible Subscriber may make a VWKI Certificate Signing Request which contains:

(a) any information that constitutes a trade mark, unless it is the holder of the Intellectual Property Rights in relation to that trade mark; or

(b) any confidential information which would be contained in a VWKI Certificate Issued in response to that VWKI Certificate Signing Request.

Subscribing for or Rejecting VWKI Certificates

L18.36 Where any VWKI Certificate is Issued to a VWKI Eligible Subscriber in response to a VWKI Certificate Signing Request, that VWKI Eligible Subscriber shall:

(a) establish whether the information contained in that VWKI Certificate is consistent with information that was contained in the VWKI Certificate Signing Request;

(b) if it identifies that the VWKI Certificate contains any information which is untrue or inaccurate immediately inform the DCC that it rejects the VWKI Certificate and give to the DCC its reasons for doing so; and

(c) in the absence of any such rejection, become a VWKI Subscriber for that VWKI Certificate.

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Use of VWKI Certificates

L18.37 Each VWKI Subscriber shall ensure that it does not use any VWKI Certificate held by it other than for the purposes of creating, sending, receiving and processing communications sent to and from the DCC pursuant to this Code.

VWKI Certificates: Protection of Private Keys

L18.38 Each VWKI Subscriber shall (in addition, if it is the DCC to its obligations under Section G (Security)) take reasonable steps to ensure that no Compromise occurs to any:

- (a) Private Key which is associated with a Public Key contained in a VWKI Certificate for which it is the VWKI Subscriber; or
- (b) Secret Key Material associated with that Private Key.

The VWKI Relying Party Obligations

L18.39 The DCC shall:

- (a) before relying on any VWKI Certificate:
 - (i) Check Cryptographic Protection in respect of the VWKI Certificate Revocation List and check the VWKI Certificate Revocation List; and
 - (ii) where that VWKI Certificate is shown on the VWKI Certificate Revocation List as having been revoked, not rely on the VWKI Certificate; and
- (b) before relying on any VWKICA Certificate:
 - (i) Check Cryptographic Protection in respect of the VWKI ARL on the VWKI Repository, in accordance with IETF RFC 5280; and
 - (ii) where that VWKICA Certificate is shown on the VWKI ARL as having been revoked, not rely on the VWKICA Certificate.

L18.40 The DCC shall not rely on a VWKI Certificate where the Validity Period of that VWKI Certificate has expired.

L18.41 The DCC shall not rely on a VWKI Certificate or VWKICA Certificate where it suspects that the VWKI Certificate or VWKICA Certificate has been Compromised.

L18.42 The DCC shall take reasonable steps, by means of appropriate Systems, to verify Digital Signatures, Check Cryptographic Protection, Confirm Validity and perform other appropriate cryptographic operations before relying on any VWKI Certificate or VWKICA Certificate.

L18.43 Each VWKI Relying Party other than the DCC shall take reasonable steps, by means of appropriate Systems, to verify Digital Signatures, Check Cryptographic Protection, Confirm Validity and perform other appropriate cryptographic operations before relying on any VWKI Certificate or VWKICA Certificate.

VWKI Performance Standards

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L18.44 The DCC shall undertake the following activities within the following time periods (each such time period being, in respect of each such activity, the “**Target Response Time**” for that activity):

(a) in response to a Batched VWKI Device Certificate Signing Request, sending to an Eligible Subscriber the number of VWKI Certificates that were requested:

(i) where the receipt of the Batched VWKI Device Certificate Signing Request from that Eligible Subscriber over the VWKI Service Interface occurred between the hours of 08:00 and 20:00 on any day, by no later than 08:00 on the following day;
or

(ii) where the receipt of the Batched VWKI Device Certificate Signing Request from that Eligible Subscriber over the VWKI Service Interface did not occur between the hours of 08:00 and 20:00, within 24 hours of the time of that receipt.

L18.45 For the purposes of Section L18.44, a “**Batched VWKI Device Certificate Signing Request**” is a single communication containing Certificate Signing Requests for the Issue of more than one but no more than 50,000 VWKI Device Certificates.

L18.46 For the purposes of Section L18.44, the concepts of ‘sending’ and ‘receipt’ are to be interpreted in accordance with the explanation of those concepts in the VWKI Interface Design Specification.

L18.47 Each of the following performance measures constitute a Code Performance Measure (to which the following Target Service Level and Minimum Service Level will apply, measured over the following Performance Measurement Period):

<u>No.</u>	<u>Code Performance Measure</u>	<u>Performance Measurement Period</u>	<u>Target Service Level</u>	<u>Minimum Service Level</u>
<u>7A</u>	<u>Percentage of VWKI Device Certificates delivered within the applicable Target Response Time.</u>	<u>monthly</u>	<u>99%</u>	<u>96%</u>