



Department for
Energy Security
& Net Zero

**Department for Energy
Security & Net Zero**
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The Authority (Ofgem), the SEC Panel, SEC Parties
and other interested parties

18 August 2025

Dear Colleague,

CONSULTATION ON THE SECOND VERSION OF THE VIRTUAL WAN TRANSITION DOCUMENT, THE VIRTUAL WAN INTERFACE SPECIFICATION AND DOCUMENTATION NEEDED TO SUPPORT THE VIRTUAL WAN KEY INFRASTRUCTURE (VWKI) AND ON THE DATE OF THEIR INCORPORATION INTO THE SEC

On 28 July 2025, the Department published a consultation¹ on the initial version of the Virtual WAN Transition Document which was designed to do two things:

- switch off a number of SEC provisions² relating to Virtual WAN in advance of Soft Launch (planned for January 2026); and
- put in place arrangements whereby Energy Suppliers can order Virtual WAN Communications Hubs (VWCHs) for delivery in December 2025 in advance of Sort Launch.

We are now consulting on the second version of the Virtual WAN Transition Document and upon the documentation needed to support go-live of the VWKI Services.

The purpose of the second version of the Virtual WAN Transition Document is to make changes that allow Virtual WAN Device (VWD) Manufacturers to become subscribers for VWD Certificates and to allow them to access the necessary server side and issuing authority certificates.

To support these arrangements, we are consulting on a suite of SEC subsidiary documents that are needed for the switch-on of the Virtual WAN Key Infrastructure (VWKI) Services and to allow VWD manufacturers to qualify to become subscribers for VWD Certificates. This includes the Virtual WAN Interface Specification, the VWKI Certificate Policy and other VWKI Documents.

Finally, we are consulting on the proposed date for incorporation of all of these documents into the SEC, which we are proposing will be 10 October 2025 (or as soon as reasonably practicable within one month thereafter).

Responses to the questions set out in the consultation (and associated reasons) should be submitted to smartmetering@energysecurity.gov.uk by 17:00 on 26 September 2025.

¹ <https://smartenergycodecompany.co.uk/desnz-consultation-on-first-version-of-the-virtual-wan-transition-document-and-wan-selection-arrangements/>

² The SEC provisions referred to have not yet actually been introduced in the SEC as they are currently in Parliament. They are due to be introduced in early September this year, and the first version of the VWAN Transition Document would switch most of the active obligations off, including the obligation on DCC to provide the Virtual WAN Provider Service and the VWKI service. A copy of the changes can be found [here](#).

Yours faithfully,



James Cosgrove

Deputy Director
Smart Metering Implementation Programme

(An official of the Department for Energy Security & Net Zero authorised to act on behalf of the Secretary of State).

Annex 1: Consultation on the second version of the Virtual WAN Transition Document, the Virtual WAN Interface Specification and documentation needed to support Virtual WAN Key Infrastructure and the date of their incorporation into the SEC.

Annex 2: VWAN Transition Document v2.0 (draft)

Annex 3 VWAN Interface Specification v1.0 (draft)

Annex 4 VWKI Certificate Policy v1.0 (draft)

Annex 5 VWKI Registration Authority Policies and Procedures v1.0 (draft)

Annex 6 VWKI and VWKI Repository Code of Connection v1.0 (draft)

Annex 7 VWKI Interface Design Specification v1.0 (draft)

Annex 8 VWKI Repository Interface Design Specification v1.0 (draft)

Annex 1: CONSULTATION ON THE SECOND VERSION OF THE VIRTUAL WAN TRANSITION DOCUMENT, THE VIRTUAL WAN INTERFACE SPECIFICATION AND DOCUMENTATION NEEDED TO SUPPORT THE VIRTUAL WAN KEY INFRASTRUCTURE AND ON THE DATE OF THEIR INCORPORATION INTO THE SEC

1. Introduction

- 1.1. On 28 July 2025, the Department published a consultation¹ on the initial version of the Virtual WAN (VWAN) Transition Document which was designed to do two things:
 - switch off a number of SEC provisions² relating to Virtual WAN in advance of Soft Launch (planned for January 2026); and
 - put in place arrangements whereby Energy Suppliers can order Virtual WAN Communications Hubs (VWCHs) for delivery in December 2025, again in advance of Sort Launch.
- 1.2. These changes are due to take effect in early September 2025.
- 1.3. This document is a consultation on the second version of the VWAN Transition Document which is primarily focussed on changes to switch on³ the Virtual WAN Key Infrastructure (VWKI) Service. It is also a consultation on the VWAN Interface Specification (VWIS) and the suite of documents that are needed to support the operation of the VWKI Service.

2. VWAN Transition Document version 2.0 and VWIS v1.0

- 2.1. The principal effect of the second version of the VWAN Transition Document^{4&5} is to:
 - i) discontinue the switch off of the requirement for DCC to provide the VWKI Service and the VWKI Repository Service that was included in the first version of the VWAN Transition Document; and
 - ii) discontinue the switch off of the provisions in SEC Sections F2.39-F2.45 that set out how VWD Device manufacturers can add VWD Device Models to the list of Virtual WAN Device Models which qualify to be issued with a VWKI Device Certificate.
- 2.2. We are also consulting on the Virtual WAN Interface Specification (VWIS) which is included as Annex 3 to the covering letter. The reason that we are consulting on this document is that VWD Manufacturers will, amongst other things, be required to confirm to the Security Sub-Committee that their Virtual WAN Device Models comply with the relevant requirements of VWIS in order to qualify for VWKI Device Certificates to be issued in relation to those Virtual WAN Device Models.
- 2.3. The principal purpose of the VWIS is to specify the interface between the DCC's Virtual WAN Provider Service and Virtual WAN Devices. It is relevant therefore both to the DCC and to Virtual WAN Device Manufacturers.

³ In practice, the switch on is effected by removing the provisions in the first version of the transition document that switch off the obligation to provide the VWKI Service.

⁴ This document is a consultation on the second Stage of documents described in Table 1 below in the run up to Soft Launch.

⁵ Please note that in version 1.0 (draft) of the VWAN Transition Document that was issued for consultation in July, Clause 4.1(b) was included erroneously and is not included in this version 2.0 (draft) of the document. Additionally, we will not include the erroneous drafting in the document that is designated.

Table 1.

Stage	Description	Date of consultation	Date phase goes live	Documents Affected	Comments
1	Principal obligations on DCC to provide VWAN-related Services switched off. Arrangements for ordering VWAN CHs put in place.	28 July 2025	Around 5th September 2025	VWAN Transition Document v1.0 WAN Selection Arrangements v0.4 CHTSv1.5 GBCSv4.1 CRP666 version 0_2	CHTSv1.5 and GBCSv4.1 are already incorporated into the SEC. CRP666 is maintained outside the SEC. The WAN Selection Arrangements will be published on the DCC website. CRP666 version 0_2 has been shared and discussed with TBDG and its subgroups, and is subject to the usual process for technical approval, expected in September 2025.
2	Switch on of the VWKI Services to allow VWD Manufacturers to subscriber for VWAN Device Certificates and to access copies of: - The Root VWKICA Certificate; - Issuing VWP CA Certificates; and - VWP Certificates.	18 August 2025	Around 10 October 2025	VWAN Transition Document v2.0 Virtual WAN Interface Specification v1.0 VWKI Certificate Policy v1.0 VWKI Registration Authority Policies and Procedures v1.0 VWKI Interface Specification v1.0 VWKI Code of Connection v1.0 ⁶ VWKI Repository Interface Specification v1.0 VWKI Repository Code of Connection v1.0 ⁶ VWKI Certification Practice Statement v1.0	The Certification Practice Statement will be shared with SMKI PMA in advance of switching on the VWKI Service, but is not a public document.

6 Please note that it is planned that the VWKI Code of Connection and the VWKI Repository Code of Connection will be combined into a single document for Soft Launch.

Stage	Description	Date of consultation	Date phase goes live	Documents Affected	Comments
3	Changes to coincide with the 6 November SEC Release	September 2025	6 Nov 2025	GBCS v4.4 CHTS v1.7 DUIS v5.4 MMC v5.4 TSAT (version to be confirmed)	The changes to these documents needed to support VWAN are being made to coincide with the 6 November SEC release to reduce costs of implementation.
4	Soft Launch	November 2026	30 January 2026	VWAN Transition Document v3.0 The list of other affected documents is still being finalised, but may include SEC Appendices: E, H, I, J, R, AB, AC, AD, AG and AI.	

- 2.4. It is intended that the VWIS will be kept under review whilst the VWAN solution is tested (including using VWPs) and that the document may be updated (and re-designated) in light of such testing, including to potentially add additional parameters into the specification.

3. VWKI Documents

- 3.1. The VWKI documents that we are proposing to designate for incorporation into the SEC on 10 October 2025 to support the switch-on of the VWKI Service and the VWKI Repository Service are:
- **The VWKI Certificate Policy** which is the principal document setting out how the PKI operates, i.e. what sorts of certificates can be issued and to whom, how certificates are governed etc.;
 - **The VWKI Registration Authority Policies and Procedures (RAPP)** which sets out the procedures by which organisations and their personnel need to follow to become VWKI Authorised Subscribers and to qualify to be able to submit certificate signing requests for VWKI Certificates;
 - **The Code of Connection for the VWKI Service and the VWKI Repository Service** (a single document); which sets out the technical arrangements for connecting to the VWKI Service and the VWKI Repository Service;
 - **The VWKI Interface Design Specification** which sets out the arrangements for interfacing with the VWKI Service; and
 - **The VWKI Repository Interface Design Specification** which sets out the arrangements for interfacing with the VWKI Repository Service.
- 3.2. These documents were discussed by the SMKI PMA⁷ on 13 August 2025 and, subject to the incorporation of comments, it was agreed that they should form the basis of this consultation. It is planned that the documents will also be reviewed further by the SMKI PMA as part of the consultation process, and formal approval of the documents by them will be sought before they are incorporated into the SEC.

4. Consequential Changes

- 4.1. When the original SEC drafting to support VWAN was developed, it was understood that VWKI Certificates would be capable of being revoked. However, discussions at the SMKI PMA have concluded that this functionality is unnecessary as there are no circumstances in which it was considered revocation would be warranted. As a consequence, it is planned to make an associated change to Section F2.44(c) to replace the existing text with the text “not used”.
- 4.2. We are also proposing to make a few minor amendments to align the nomenclature and associated acronyms in Section A (and elsewhere) to match the vernacular used in the Certificate Policy.

5. Consultation Questions

- Q1: Do you have any comments on the drafting of the VWAN Transition Document v2.0 (draft) in Annex 2 to the covering letter?
- Q2: Do you have any comments on the VWIS in Annex 3 to the covering letter?

⁷ The Smart Metering Key Infrastructure Policy Management Authority. A Sub-Committee of the SEC Pane

- Q3: Do you have any comments on any of the VWKI documents in Annexes 4-8 to the covering letter?
- Q4: Do you have any comments on the proposal to (re)designate the suite of documents above for incorporation into the SEC on 10 October 2025 (or as soon as practicable within one month thereafter)?

6. Next Steps

- 6.1. Responses to the questions set out in the consultation (and associated reasons) should be submitted to smartmetering@energysecurity.gov.uk by 17:00 on 26 September 2025.
- 6.2. This consultation will be followed shortly (in September) by a further consultation on Stage 3, and separately (and subject to any consultation comments received) the designation of the documents from Stage 1 (as per Table 1 above).

Annex 2: VWAN Transition Document v2.0 (draft)

Published separately.

Annex 3: VWAN Interface Specification v1.0 (draft)

Published separately.

Annex 4: VWKI Certificate Policy v1.0 (draft)

Published separately.

Annex 5: VWKI Registration Authority Policies and Procedures v1.0 (draft)

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