

ENERGY
SMART METERS
DRAFT MODIFICATIONS TO THE STANDARD CONDITIONS OF GAS AND
ELECTRICITY SUPPLY LICENCES, THE SMART ENERGY CODE AND THE
CONDITIONS OF THE SMART METER COMMUNICATION LICENCES (SMART METERS
No. 2 of 2025)

Presented to Parliament pursuant to section 89 of the Energy Act 2008

Draft modifications to the Conditions of the Gas and Electricity Supply Licences, the Smart Energy Code and the Conditions of the Smart Meter Communication Licences laid before Parliament under section 89(3) of the Energy Act 2008; draft to lie for forty days pursuant to section 89(4) of that Act, during which period either House of Parliament may resolve that the modifications not be made.

ENERGY
SMART METERS
DRAFT MODIFICATIONS TO THE STANDARD CONDITIONS OF GAS AND
ELECTRICITY SUPPLY LICENCES, THE SMART ENERGY CODE AND THE
CONDITIONS OF THE SMART METER COMMUNICATION LICENCES (SMART
METERS No. 2 of 2025)

The Secretary of State makes the following licence modifications and modifications to the Smart Energy Code in exercise of the powers conferred by section 88(1) of the Energy Act 2008 ("the Act").

The Secretary of State has consulted the holders of any licence being modified, the Gas and Electricity Markets Authority and such other persons as the Secretary of State considered appropriate in accordance with section 89(1) of the Act.

A draft of these modifications has been laid before Parliament in accordance with section 89(3) of the Act. Neither House of Parliament resolved, within the 40-day period referred to in section 89(4) of the Act, that the Secretary of State should not make the modifications.

Interpretation

1 In these modifications –

- (a) "Smart Energy Code" means the document of that title required to be maintained and in force in accordance with condition 22 of the smart meter communication licences; and
- (b) "smart meter communication licences" means –
 - (i) the licence granted to Smart DCC Limited on 20 September 2013 under section 7AB(2) of the Gas Act 1986; and
 - (ii) the licence granted to Smart DCC Limited on 20 September 2013 under section 6(1A) of the Electricity Act 1989.

Modifications to the standard conditions of gas supply licences

- 2 The standard conditions of gas supply licences granted or treated as granted under section 7A(1) of the Gas Act 1986 are modified, in accordance with paragraphs 3 to 5 below, with effect from the day after the day on which this instrument is made.
- 3 In standard condition 1, in paragraph 1.2, insert in alphabetical order, the following new definitions –

"Virtual WAN Communications Hub	means a Communications Hub that has the capability to connect to a Virtual WAN Device.
Virtual WAN Device	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."
- 4 In standard condition 28 –
 - (a) in paragraph 28.1 –
 - (i) in sub-paragraph 28.1(bb), after "when this can be used by the Domestic Customer;", delete "and";
 - (ii) renumber existing sub-paragraph 28.1(d) as sub-paragraph 28.1(c);
 - (iii) in renumbered sub-paragraph 28.1(c), after "the timescale and any conditions for removing or resetting it", delete the full stop "." and insert "; and"; and
 - (iv) after renumbered sub-paragraph 28.1(c), insert new sub-paragraph 28.1(d) as follows –
" (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.";
 - (b) in paragraph 28.7 –
 - (i) in sub-paragraph 28.7(d), after "have been carried out;", delete "and";
 - (ii) in sub-paragraph 28.7(e), after "the Priority Services Register)", delete the full stop "." and insert "; and"; and
 - (iii) after sub-paragraph 28.7(e), insert new sub-paragraph 28.7(f) as follows –
" (f) the Prepayment Meter is not reliant on a Virtual WAN Device for communications with the DCC."; and
 - (c) in paragraph 28.22, insert in alphabetical order, the following new definition –
"“**Self-disconnection**” has the meaning given in standard condition 27A (Self-disconnection).".
- 5 In standard condition 43 –
 - (a) after paragraph 43.20, insert a new heading and new paragraphs 43.20A and 43.20B as follows –

"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); and

- (b) connect the Virtual WAN Device to the Virtual WAN Communications Hub.

43.20B In respect of any relevant premises at which there is a Virtual WAN Device which is connected to a Virtual WAN Communications Hub (whether or not that Virtual WAN Device was provided by the licensee), the licensee must take all reasonable steps to maintain the connection between that Virtual WAN Device and the Virtual WAN Communications Hub, and must 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)."; and

- (b) in paragraph 43.26, insert in alphabetical order, the following new definition –

"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 its 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).".

Modifications to the standard conditions of electricity supply licences

6 The standard conditions of electricity supply licences granted or treated as granted under section 6(1)(d) of the Electricity Act 1989 are modified, in accordance with paragraphs 7 to 9 below, with effect from the day after the day on which this instrument is made.

7 In standard condition 1, in paragraph 1.3, insert in alphabetical order, the following new definitions –

"Virtual WAN Communications Hub means a Communications Hub that has the capability to connect to a Virtual WAN Device.

Virtual WAN Device 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.".

8 In standard condition 28 –

- (a) in paragraph 28.1 –

- (i) in sub-paragraph 28.1(bb), after "when this can be used by the Domestic Customer;", delete "and";
- (ii) in sub-paragraph 28.1(c), after "the timescale and any conditions for removing or resetting it", delete the full stop "." and insert "; and"; and
- (iii) after sub-paragraph 28.1(c), insert new sub-paragraph 28.1(d) as follows –

- "(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.";
 - (b) in paragraph 28.7 –
 - (i) in sub-paragraph 28.7(d), after "have been carried out;", delete "and";
 - (ii) in sub-paragraph 28.7(e), after "the Priority Services Register)", delete the full stop "." and insert "; and"; and
 - (iii) after sub-paragraph 28.7(e), insert new sub-paragraph 28.7(f) as follows –
 - "(f) the Prepayment Meter is not reliant on a Virtual WAN Device for communications with the DCC."; and
 - (c) in paragraph 28.22, insert in alphabetical order, the following new definition –

"**Self-disconnection**" has the meaning given in standard condition 27A (Self-disconnection).".
- 9 In standard condition 49 –
 - (a) after paragraph 49.20, insert a new heading and new paragraphs 49.20A and 49.20B as follows –

"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); and
 - (b) connect the Virtual WAN Device to the Virtual WAN Communications Hub.

49.20B In respect of any relevant premises at which there is a Virtual WAN Device which is connected to a Virtual WAN Communications Hub (whether or not that Virtual WAN Device was provided by the licensee), the licensee must take all reasonable steps to maintain the connection between that Virtual WAN Device and the Virtual WAN Communications Hub, and must 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)."; and
 - (b) in paragraph 49.26, insert in alphabetical order, the following new definition –

"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 its 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)."

Modifications to the Smart Energy Code

10 The Smart Energy Code is modified, in accordance with paragraphs 11 to 14 below, with effect from the day after the day on which this instrument is made.

11 In Section A, in Section A1, in Section A1.1 –

- (a) in the title of the definition of "4G Central/South", before "Central/South" insert "North/";
- (b) in the (renamed) definition of "4G North/Central/South", after "the Geographical Regions covering", insert "the north of Great Britain,";
- (c) in the definition of "Code Performance Measure" –
 - (i) after "Section H13.1 (Code Performance Measures)", delete "or" and insert a comma ","; and
 - (ii) after "Section L8.6 (Code Performance Measures)", insert "or Section L18.47 (VWKI Performance Standards)";
- (d) in the definition of "Compromised" –
 - (i) in sub-paragraph (g), after "the root certificate for that S1SPKI;", delete "and";
 - (ii) after sub-paragraph (g), insert new sub-paragraph (h) as follows –

"(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); and"; and
 - (iii) renumber existing sub-paragraph (h) as sub-paragraph (i);
- (e) in the definition of "DCC Interfaces" –
 - (i) in sub-paragraph (e), after "the Self-Service Interface;", delete "and";
 - (ii) in sub-paragraph (f), after "via DCC Gateway Connections", delete the full stop "." and insert "; and"; and
 - (iii) after sub-paragraph (f), insert new sub-paragraph (g) as follows –

"(g) the Virtual WAN Interface.";

- (f) in the definition of "DCC Total System", after "including the DCC User Interface,", insert "the Virtual WAN Provider Service,";
- (g) in the definition of "Elective Communication Services", after "in a manner that involves communication", delete "via the SM WAN" and insert "between the DCC and one or more Smart Metering Systems";
- (h) in the definition of "Enabling Services", after "the Communications Hub Service,", insert "the Interoperability Checker Service, the Virtual WAN Provider Service,";
- (i) in the definition of "Issue" –
 - (i) in sub-paragraph (d), after "that expression in the DCCKI Certificate Policy", delete the full stop "." and insert a semi-colon ";"; and
 - (ii) after sub-paragraph (d), insert new sub-paragraph (e) as follows –
 - "(e) a VWKI Certificate, has the meaning given to that expression in the VWKI Certificate Policy.";
- (j) in the definition of "Minimum Service Level" –
 - (i) in sub-paragraph (c), after "Reported List of Service Provider Performance Measures;", delete "or";
 - (ii) in sub-paragraph (d), after "(Code Performance Measures)", delete the full stop "." and insert "; or"; and
 - (iii) after sub-paragraph (d), insert new sub-paragraph (e) as follows –
 - "(e) Section L18.47 (VWKI Performance Standards).";
- (k) amend the title of the definition "North" to read "LRR North";
- (l) in the (renamed) definition of "LRR North", after "in that Geographical Region", insert "(and where the term North is used in Appendix AD (DCC User Interface Specification) it shall be read as referring to LRR North)";
- (m) in the definition of "Other Enabling Services", after "the Communications Hub Services", insert ", the Interoperability Checker Service, the Virtual WAN Provider Service";
- (n) in the definition of "Performance Measurement Period" –
 - (i) in sub-paragraph (c), after "Reported List of Service Provider Performance Measures;", delete "or";
 - (ii) in sub-paragraph (d), after "(Code Performance Measures)", delete the full stop "." and insert "; or"; and
 - (iii) after sub-paragraph (d), insert new sub-paragraph (e) as follows –
 - "(e) Section L18.47 (VWKI Performance Standards).";
- (o) in the definition of "Region" –
 - (i) in sub-paragraph (a), before "North", insert "LRR"; and
 - (ii) in sub-paragraph (d), before "Central/South" insert "North";
- (p) in the definition of "SMETS2+ SM WAN", after "SMETS2+ Communications Hub Functions", insert ", but excluding communications via the Virtual WAN Interface";
- (q) in the definition of "Service Level Requirements", in sub-paragraph (a) –
 - (i) after "Section H13.1 (Code Performance Measures)", delete "or" and insert a comma ","; and

- (ii) after "Section L8.6 (Code Performance Measures)", insert "or Section L18.47 (VWKI Performance Standards)";
- (r) in the definition of "Target Response Time", after "(SMKI Performance Standards and Demand Management)", insert "or L18.44 (VWKI Performance Standards)";
- (s) in the definition of "Target Service Level" –
 - (i) in sub-paragraph (c), after "Reported List of Service Provider Performance Measures;", delete "or";
 - (ii) in sub-paragraph (d), after "(Code Performance Measures)", delete the full stop "." and insert "; or"; and
 - (iii) after sub-paragraph (d), insert new sub-paragraph (e) as follows –
 - "(e) Section L18.47 (VWKI Performance Standards)."; and
- (t) insert, in alphabetical order, the following new definitions –

"Virtual WAN Communications Hub	means a SMETS2+ Communications Hub that has the capability to connect to a Virtual WAN Device.
Virtual WAN Device	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.
Virtual WAN Device Model	means a Device Model of a Virtual WAN Device.
Virtual WAN Interface	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.
Virtual WAN Interface Specification	means the SEC Subsidiary Document of that name to be developed pursuant to Section H18 (Virtual WAN Provider Service).
Virtual WAN Interface Tests	means the tests described in Section H14.59 (Virtual WAN Interface Tests).
Virtual WAN Key Infrastructure (or VWKI)	means the public key infrastructure established by the DCC to provide, amongst other things, transport layer security across the Virtual WAN Interface.
Virtual WAN Provider Service	means the Service described in Section H18 (Virtual WAN Provider Service).
Virtual WAN Reliant Premises	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.
Virtual WAN Smart Metering System	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.
Virtual WAN Transition Document	means the SEC Subsidiary Document of that name to be developed pursuant to Section H19 (Virtual WAN Transition Document).
VWAN Provider Certificates	has the meaning given to that expression in the VWKI Certificate Policy.
VWD Manufacturer	means a Party which is the Manufacturer of a Virtual WAN Device.
VWKI Authorised Subscriber	means either the DCC or 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.
VWKI Authority Revocation List (or VWKI ARL)	has the meaning given to that expression in the VWKI Certificate Policy.
VWKI Certificate	has the meaning given to that expression in the VWKI Certificate Policy.
VWKI Certificate Policy	means the SEC Subsidiary Document of that name set out in Appendix [TBC].
VWKI Certificate Revocation List (or VWKI CRL)	has the meaning given to that expression in the VWKI Certificate Policy.
VWKI Certificate Signing Request	means a request for a VWKI Certificate submitted by a VWKI Eligible Subscriber in accordance with the VWKI Certificate Policy and the VWKI RAPP.
VWKI Certification Authority (or VWKICA)	has the meaning given to that expression in the VWKI Certificate Policy.
VWKI Certification Practice Statement (or VWKI CPS)	has the meaning given to that expression in Section L18.29 (the VWKI Certification Practice Statement).
VWKI Code of Connection	means the SEC Subsidiary Document of that name set out in Appendix [TBC].
VWKI Device Certificate	has the meaning given to that expression in the VWKI Certificate Policy.
VWKI Document Set	has the meaning given in Section L18.27 (VWKI Document Set).
VWKI Eligible Subscriber	has the meaning given to that expression in Section L18.6(a) (VWKI Eligible Subscribers).
VWKI Interface Design Specification	means the SEC Subsidiary Document of that name to be developed pursuant to Section L18.11 (VWKI Interface Design Specification).
VWKI Participant	means the DCC (acting in its capacity as the provider of the VWKI Services), all VWKI Subscribers and all VWKI Relying Parties.

VWKI Registration Authority Policies and Procedures (or VWKI RAPP)	means the SEC Subsidiary Document of that name set out in Appendix [TBC].
VWKI Relying Party	means a person who, pursuant to the Code, receives and relies upon a VWKI Certificate or a VWKICA Certificate.
VWKI Repository	has the meaning given to that expression in Section L18.13 (the VWKI Repository).
VWKI Repository Code of Connection	means the SEC Subsidiary Document of that name set out in Appendix [TBC].
VWKI Repository Interface	has the meaning given to that expression in Section L18.22 (the VWKI Repository Interface).
VWKI Repository Interface Design Specification	has the meaning given to that expression in Section L18.23 (the VWKI Repository Interface Design Specification).
VWKI Repository Service	has the meaning given to that expression in Section L18.14 (the VWKI Repository Service).
VWKI SEC Documents	has the meaning given to that expression in Section L18.28 (the VWKI SEC Documents).
VWKI Service Interface	has the meaning given to that expression in Section L18.10 (VWKI Service Interface).
VWKI Services	has the meaning given to that expression in Section L18.1 (Virtual WAN Key Infrastructure).
VWKI Subscriber	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.
VWKICA Certificates	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).
WAN Selection Arrangements	means the document of that name established and maintained pursuant to one or more Versions of the Communications Hub Technical Specifications."

12 In Section F –

- (a) in Section F2, after existing Section F2.38, insert new Sections F2.39-F2.45 as set out in Schedule 1 of this instrument; and
- (b) in Section F9 –
 - (i) in Section F9.17 –
 - (A) before "North, 2G/3G Central and 2G/3G South", insert "LRR";

- (B) after "2G/3G South (but not 4G", delete "Central/South" and insert "North/Central/South"; and
- (C) after "Section F9.18A potentially applies to 4G", delete "Central/South" and insert "North/Central/South"; and
- (ii) in Section F9.21 –
 - (A) in Section F9.21(a), before "North, 2G/3G Central and 2G/3G South", insert "LRR"; and
 - (B) in Section F9.21(b), after "for 4G", delete "Central/South" and insert "North/Central/South".

13 In Section H –

- (a) in Section H5, in Section H5.4 –
 - (i) after "the DCC is not obliged to Commission", delete "Communications Hub Functions (or therefore to Enrol Smart Metering Systems) where it" and insert "a Communications Hub Function (or therefore to Enrol the corresponding Smart Metering System) where the DCC"; and
 - (ii) after "Statement of Service Exemptions", insert "; save where the DCC is able to Commission the Communications Hub Function via the Virtual WAN Provider Service";
- (b) in Section H8, in Section H8.16 –
 - (i) in Section H8.16(g), after "which shall be available to all Users;", delete "and";
 - (ii) after Section H8.16(g), insert new Section H8.16(h) as follows –
 - "(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"; and
 - (iii) renumber existing Section H8.16(h) as Section H8.16(i);
- (c) in Section H14 –
 - (i) in Section H14.1 –
 - (A) in Section H14.1(k), after "Wired Instrumented Test Communications Hubs;", delete "and";
 - (B) in Section H14.1(l), after "DCC Boxed", delete the full stop "." and insert "; and "; and
 - (C) after Section H14.1(l), insert new Section H14.1(m) as follows –
 - "(m) Virtual WAN Interface Tests."; and
 - (ii) after existing Section H14.59, insert a new heading and new Section H14.60 as follows –
 - "Virtual WAN Interface Tests**
 - H14.60 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."; and
- (d) after existing Section H17, insert new Sections H18 and H19 as set out in Schedule 2 of this instrument.

14 In Section L –

- (a) in Section L1 –
 - (i) in Section L1.17 –
 - (A) in Section L1.17(a) –
 - 1) after "Organisation CPS", delete "and" and insert a comma ","; and
 - 2) after "the IKI CPS", insert "and the VWKI CPS";
 - (B) in Section L1.17(c) –
 - 1) after "the effectiveness of the SMKI Document Set", insert "and the VWKI Document Set"; and
 - 2) after "to evaluate whether the SMKI Document Set", delete "remains" and insert "and the VWKI Document Set remain";
 - (C) in Section L1.17(e) –
 - 1) after "the effectiveness of the DCCKI Document Set", insert "and/or the VWKI Document Set,"; and
 - 2) in Section L1.17(e)(i), after "changes should be made to the DCCKI Document Set", insert "and/or the VWKI Document Set,";
 - (D) in Section L1.17(m) –
 - 1) after "the DCCKI Document Set", delete "or" and insert a comma ","; and
 - 2) after "the S1SPKM Document Set", insert "or the VWKI Document Set"; and
 - (E) in Section L1.17(n) –
 - 1) after "each S1SPKI", delete "and" and insert a comma ","; and
 - 2) after "each SMETS1 Symmetric Key Arrangement", insert "and the VWKI Service";
 - (ii) in the heading of Section L1.19, after "the SMKI SEC Documents" delete "and S1SPKM" and insert ", the S1SPKM SEC Documents and the VWKI";
 - (iii) in Section L1.19 –

- (A) in Section L1.19(a), after "any of the SMKI SEC Documents", insert ", the VWKI SEC Documents"; and
 - (B) in Section L1.19(b) –
 - 1) after "any of the SMKI SEC Documents", delete "or" and insert a comma ","; and
 - 2) after "S1SPKM SEC Documents", insert "or VWKI SEC Documents";
 - (iv) in Section L1.20, after "the DCCKI Services", insert ", the VWKI Document Set, the VWKI Services";
 - (v) in Section L1.21 –
 - (A) after "the operation of the SMKI Services", delete "and" and insert a comma ",";
 - (B) after "the DCCKI Services", delete "and" and insert "and the VWKI Services (and"; and
 - (C) after "the latest versions on the", delete "Website" and insert "Website)"; and
 - (vi) in Section L1.22, in Section L1.22(a), after "any provision of the SMKI SEC Documents", insert "or VWKI SEC Documents";
- (b) in Section L2 –
 - (i) in the heading before Section L2.14, after "SMKI Services", insert "or VWKI Services";
 - (ii) in Section L2.14 –
 - (A) in the first paragraph of Section L2.14 after "an event arising in relation to the SMKI Services", insert "or the VWKI Services";
 - (B) in Section L2.14(a) –
 - 1) after "the provision (in whole or in part) of the SMKI Services and/or", insert "the VWKI Services and/or"; and
 - 2) after "any other Services which rely on the use of Certificates", insert "and/or VWKI Certificates";
 - (C) in Section L2.14(b) –
 - 1) after "the rights of any SMKI Participant", insert "or VWKI Participant";
 - 2) after "to receive (in whole or in part) the SMKI Services", insert "and/or the VWKI Services"; and
 - 3) after "any other Services which rely on the use of Certificates", insert "and/or VWKI Certificates"; and
 - (D) in the final paragraph of Section L2.14 , after "or the rights of the SMKI Participant", insert "or VWKI Participant"; and
 - (iii) in Section L2.15, in Section L2.15(c), after "(without identifying the SMKI Participant", insert "or VWKI Participant"; and
- (c) after existing Section L17, insert new Section L18 as set out in Schedule 3 of this instrument.

Modifications to the Smart Meter Communication Licences

- 15 The conditions of the smart meter communication licences are modified, in accordance with paragraphs 16 to 21 below, with effect from the day after the day on which this instrument is made.
- 16 In condition 1, in paragraph 1.4 –
- (a) in the definition of "Enabling Services" –
 - (i) in sub-paragraph (b), after "the Communications Hub Service;", delete "and";
 - (ii) after sub-paragraph (b), insert new sub-paragraphs (c) and (d) as follows –
 - "(c) the Interoperability Checker Service;
 - (d) the Virtual WAN Provider Service; and"; and
 - (iii) renumber existing sub-paragraph (c) as sub-paragraph (e);
 - (b) in the definition of "Mandatory Business Services" –
 - (i) after "(iii) the Enabling Services, (iv)", delete "the Interoperability Checker Service, (v)"; and
 - (ii) after "Incorporation, delivery and provision of the Centralised Registration Service (Condition 15)", insert ",";
 - (c) in the definition of "Other Enabling Services" –
 - (i) after "forming part of the Mandatory Business of the Licensee", delete "(other than the Communications Hub Service and the Enrolment Service)"; and
 - (ii) after "whether in this Licence or the SEC", insert ", but excluding those services which are expressly referred to by name in the definition of Enabling Services"; and
 - (d) insert, in alphabetical order, the following new definition –
 - "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).".
- 17 In condition 6, in paragraph 6.6 –
- (a) in sub-paragraph 6.6(b), after "an Agreement for Services in accordance with Part E of Condition 17;", delete "and";
 - (b) after sub-paragraph 6.6(b), insert new sub-paragraphs 6.6(c) and 6.6(d) as follows –
 - "(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";
 - (c) renumber existing sub-paragraph 6.6(c) as sub-paragraph 6.6(e); and
 - (d) in renumbered sub-paragraph 6.6(e), after "defined as such in this Licence or the SEC (other than", delete "the Communications Hub Service and the Enrolment Service" and insert "those services referred to by name in this paragraph 6.6".
- 18 In condition 17 –
- (a) in paragraph 17.19, before "in this Part D requires the Licensee", delete "Nothing" and insert "Subject to paragraph 17.19A, nothing";
 - (b) after paragraph 17.19, insert new paragraph 17.19A as follows –

"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."; and

- (c) after paragraph 17.22, insert a new heading and new paragraph 17.22A as follows –

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

17.22A 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."

- 19 In condition 20, in paragraph 20.3 –

- (a) in sub-paragraph 20.3(b), after "(with respect to the Licensee's provision of certain Enrolment Services);", delete "or";
- (b) after sub-paragraph 20.3(b), insert new sub-paragraph 20.3(c) as follows –
 - "(c) paragraph 22B of Condition 17 (with respect to the Licensee's provision of the Virtual WAN Provider Service); or";
- (c) renumber existing sub-paragraph 20.3(c) as sub-paragraph 20.3(d); and
- (d) in renumbered sub-paragraph 20.3(d), after "as being subject to the application of this paragraph", delete "20.3(c)" and insert "20.3(d)".

- 20 In condition 22, in paragraph 22.21, in sub-paragraph 22.21(a) –

- (a) before "all of the Mandatory Business Services", delete "of"; and
- (b) after "(clearly distinguishing between Core Communication Services, Elective Communication Services,", delete "the Enrolment Service, the Communications Hub Service, Other Enabling Services" and insert "each Enabling Service".

- 21 In condition 30, in paragraph 30.17, in the definition "Authorised Business Activities" –

- (a) in sub-paragraph (a) –
 - (i) delete, in their entirety, existing sub-paragraphs (a)(iii) and (a)(iv) and renumber existing sub-paragraphs (a)(v) and (a)(vi) as (a)(iii) and (a)(iv) respectively;
 - (ii) in renumbered sub-paragraph (a)(iii), after "the procurement and provision of", delete "Other" and insert "the"; and
 - (iii) in renumbered sub-paragraph (a)(iv), after "the preparation, delivery and provision for the Centralised Registration Service", delete the full stop "." and insert "; and"; and
- (b) in sub-paragraph (b), in sub-paragraph (b)(ii), delete "; and" and insert a full stop ".".

Name

Parliamentary Under Secretary of State

Department for Energy Security and Net Zero

Date

SCHEDULE 1

NEW SECTIONS F2.39-F2.45 TO BE INCLUDED IN THE SMART ENERGY CODE (AFTER EXISTING SECTION F2.38)

"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 do so by the Security Sub-Committee or the Panel (even though they have VWKI Device Certificates).
- 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."

SCHEDULE 2

NEW SECTIONS H18 AND H19 TO BE INCLUDED IN THE SMART ENERGY CODE (AFTER EXISTING SECTION H17)

"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

- 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.

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;
- (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."

SCHEDULE 3

NEW SECTION L18 TO BE INCLUDED IN THE SMART ENERGY CODE (AFTER EXISTING SECTION L17)

"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 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;
- (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

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.

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 SMKI PMA 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; and
- (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 the SMKI PMA for its 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.

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

L18.44 The DCC shall in response to a Batched VWKI Device Certificate Signing Request, sending to an Eligible Subscriber the number of VWKI Certificates that were requested:

- (a) 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
- (b) 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) the time period specified in each of Section L18.44(a) and Section L18.44(b) within which the DCC shall undertake the activity shall be the "**Target Response Time**" for that activity;
- (b) 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; and
- (c) the concepts of 'sending' and 'receipt' are to be interpreted in accordance with the explanation of those concepts in the VWKI Interface Design Specification.

L18.46 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):

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