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MP245 ‘SMKI Document Set Changes 2023’

Modification Report

Version 1.0

16 August 2023



Managed by



About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA).

The SMKI PMA is required to periodically review the SMKI and Data Communications Company (DCC) Key Infrastructure (DCCKI) Document Sets as stated in SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' paragraph 1.17.

A previous review in 2021 led to [MP173 'SMKI & DCCKI Document Set reviews'](#) and [MP198 'Further Changes from the Review of the SMKI and DCCKI Document Set'](#) being raised to implement the recommendations made by the review.

The SMKI PMA has had a further review completed in 2023 which has identified some further minor inconsistencies or suggested revisions that are required to align the documents with the current processes.

The Proposed Solution will address the concluding observations and recommendations of the SMKI Document Set review.

The costs of this proposal are limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort to implement the changes. This modification will indirectly impact all SEC Parties by giving greater clarity and transparency to the SMKI and DCCKI Document Sets, and minor process changes.

This modification is targeted for the November 2023 SEC Release. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

Review of the SMKI and DCCKI Document Sets

The SMKI PMA has an obligation in SEC Section L1.17 to periodically review the effectiveness of the SMKI Document Set (which is defined in SEC Section L9.3) and the DCCKI Document Set (which is defined in SEC Section L13.31). The most recent review was undertaken in early 2021 and [MP173 'SMKI & DCCKI Document Set reviews'](#) and [MP198 'Further Changes from the Review of the SMKI and DCCKI Document Set'](#) were raised to implement the recommendations made by the review.

The SMKI PMA has conducted a further review on the document sets and identified minor inconsistencies or improvements to be made.

What is the issue?

The findings from the 2023 review are identified in the table below.

Summary of issue	Sections affected	Proposed change
Verification meetings must take place face to face	Appendix A 'Device Certificate Policy' Appendix B 'Organisation Certificate Policy' Appendix D 'SMKI Registration Authority Policies and Procedures' Appendix Q 'IKI Certificate Policy'	Include clarification that these meetings can take place via video link
Submission of application requirements not aligned with current process	Appendix W 'DCCKI Registration Authority Policies and Procedures'	Replace existing clauses with new paragraph to detail reference to SMKI PMA Guidance. Update certain references to include detail on how to submit changes.
Misalignment of references to forms	Appendix W 'DCCKI Registration Authority Policies and Procedures'	Update references
Misalignment of processes	Appendix D 'SMKI Registration Authority Policies and Procedures'	Align the process in Appendix D to that in Appendix W
Reference to repealed EU Directive	Appendix C 'SMKI Compliance Policy'	Update reference to new Regulation

What is the impact this is having?

If this issue is not resolved, the SMKI and DCCKI Document Sets will contain some inconsistencies. These vary in nature but include minor typographical, cosmetic and alignment inconsistencies, as well as apparent inconsistencies and omissions between different SEC documents.

If these continue to remain, it could make it harder for Parties to comply with these documents and make the documents in question harder to maintain, increasing the chance of further inconsistencies occurring in the future.

Impact on consumers

The issues outlined in this proposal do not impact consumers.

3. Solution

The Proposed Solution is to implement the changes identified from the SMKI and DCCKI Document Set review. These changes have been identified by the SMKI Specialist and reviewed and recommended by the SMKI PMA Working Group.

The legal text to implement these changes can be found in Annex A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators		Gas Network Operators
	Other SEC Parties	✓	DCC

All Parties will indirectly benefit from this modification as the SMKI and DCCKI Document Sets will have greater clarity and transparency and align with current processes.

DCC System

There will be no impacts on the DCC System from this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix A 'Device Certificate Policy'
- Appendix B 'Organisation Certificate Policy'
- Appendix C 'SMKI Compliance Policy'
- Appendix D 'SMKI Registration Authority Policies and Procedures'
- Appendix Q 'IKI Certificate Policy'
- Appendix W 'DCCKI Registration Authority Policies and Procedures'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Devices

The issues outlined in this proposal do not impact Devices.

Consumers

The issues outlined in this proposal do not impact consumers.

Other industry Codes

The issues outlined in this proposal do not impact other industry codes.

Greenhouse gas emissions

The issues outlined in this proposal do not impact greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs associated with this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There will be no other costs for SEC Parties from this modification.

6. Implementation approach

Agreed implementation approach

The Change Sub-Committee (CSC) has agreed an implementation date of:

- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received on or before 19 October 2023; or
- **29 February 2024** (February 2024 SEC Release) if a decision to approve is received after 19 October 2023 but on or before 15 February 2024.

As this is a text-only change, the modification can be implemented ten Working Days following decision.

7. Assessment of the proposal

Sub-Committee input

Sub-Committee input	
Sub-Committee	Input sought
OPSG	No input required
SMKI PMA	The SMKI PMA have requested this modification be implemented.
SSC	No input required
TABASC	No input required

Observations on the issue

The changes in this modification report have been identified by the DCC and the SMKI Specialist. Both the SMKI PMA and some members of the Security Sub-Committee (SSC) provided input into the SMKI and DCCKI Document Set reviews and agreed the observations and recommendations should be addressed.

8. Case for change

Business case

The purpose of the proposed revisions to the SMKI and DCCKI Document Set is to bring the documents in line with current procedures and incorporate minor updates that have been identified. There is minimal cost to implement these changes.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (g)¹ by aligning inconsistencies and incorrect references.

¹ To facilitate the efficient and transparent administration and implementation of this Code.

Industry views

The SMKI PMA has agreed with the DCC that the minor changes identified require to be addressed.

Views against the consumer areas

Improved safety and reliability

This change is neutral in this area.

Lower bills than would otherwise be the case

This change is neutral in this area.

Reduced environmental damage

This change is neutral in this area.

Improved quality of service

This change is neutral in this area.

Benefits for society as a whole

This change is neutral in this area.

Final conclusions

The SMKI PMA and SMKI Specialist recommend that this modification be implemented.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	1 Aug 2023
CSC converts Draft Proposal to Modification Proposal	15 Aug 2023
Modification Report approved by CSC	15 Aug 2023
Modification Report Consultation	16 Aug – 7 Sep 2023
Change Board Vote	20 Sep 2023

Italics denote planned events that could be subject to change

Appendix 2: Glossary

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

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
DCC	Data Communications Company
DCCKI	Data Communication Company Key Infrastructure
EU	European Union
IKI	Infrastructure Key Infrastructure
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee