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MP245 'SMKI Document Set Changes 2023'

Modification Report

Version 1.0

16 August 2023

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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.
- **Annex B** contains the responses to the Modification Report Consultation.

Contact

If you have any questions on this modification, please contact:

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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

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MP245 ‘2023 Review of the SMKI Document set’

Annex A

Legal text – version 1.0

About this document

This document contains the changes required to deliver the Proposed Solution.

SEC Appendix A – ‘Device Certificate Policy’

These changes have been redlined against Appendix A version A3.0.

Amend Section 4.1.3 as follows:

4.1.3 Enrolment Process for the Registration Authority and its Representatives

- (A) Provision is made in the SMKI RAPP section 6 in relation to the establishment of an enrolment process in respect of DCA Personnel and DCA Systems:
- (i) in order to Authenticate them and verify that they are authorised to act on behalf of the DCA in its capacity as the Registration Authority; and
 - (ii) including in particular, for that purpose, provision:
 - (a) for the face-to-face or video link Authentication of all SMKI Registration Authority Personnel by a SMKI Registration Authority Manager; and
 - (b) for all SMKI Registration Authority Personnel to have their identify and authorisation verified to the level pursuant to the SMKI PMA Guidance on “Verifying Individual Identity” published on the Website.

Appendix B – ‘Organisation Certificate Policy’

These changes have been redlined against Appendix B version 8.0.

Amend Section 4.1.3 as follows:

4.1.3 Enrolment Process for the Registration Authority and its Representatives

- (A) Provision is made in the SMKI RAPP section 6 in relation to the establishment of an enrolment process in respect of OCA Personnel and OCA Systems:
- (i) in order to Authenticate them and verify that they are authorised to act on behalf of the OCA in its capacity as the Registration Authority; and
 - (ii) including in particular, for that purpose, provision:
 - (a) for the face-to-face or video link Authentication of all SMKI Registration Authority Personnel by a SMKI Registration Authority Manager; and
 - (b) for all SMKI Registration Authority Personnel to have their identify and authorisation verified to the level pursuant to the SMKI PMA Guidance on “Verifying Individual Identity” published on the Website.

Appendix C – ‘SMKI Compliance Policy’

These changes have been redlined against Appendix C version 2.0.

Amend Section 2.2 as follows:

Quality Requirements

- 2.2 The quality requirements specified in this Part 2.2 are that the SMKI Independent Assurance Scheme must be a scheme:
- (a) which is recognised as an accreditation scheme for the purposes of [the eIDAS Regulation \(No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market\). Article 3\(2\) of Directive 1999/93/EC on a Community framework for electronic signatures](#);
 - (b) which is based on ISO 27001; and
 - (c) the provider of which:
 - (i) is used by the United Kingdom Government to provide assurance in relation to electronic trust services; and
 - (ii) requires all its scheme assessors to be UKAS certified.

Appendix D – ‘SMKI Registration Authority Policies and Procedures’

These changes have been redlined against Appendix D version 5.0.

Amend Section 4.1.2 as follows:

4.1.2 High level overview of SMKI Registration Authority procedures

Figure 1 as set out immediately below provides a high level view of the procedures required in order for a Party, RDP, SECCo or the DCC (in its role as DCC Service Provider) to:

- verify their organisational identity;
- become an SRO;
- become an ARO;
- gain credentials for accessing SMKI Services and/or the SMKI Repository Service;
- become an Authorised Subscriber for:
 - Organisation Certificates or Device Certificates, or both;
 - a File Signing Certificate (issued under the IKI Certificate Policy) for the purposes of verifying Digital Signatures of files in accordance with the Code;
- gain access to Organisation Certificates and/or Device Certificates and other material via the SMKI Repository; and
- gain access to File Signing Certificates, and their corresponding Private Keys to be used for the purposes of Digitally Signing files.

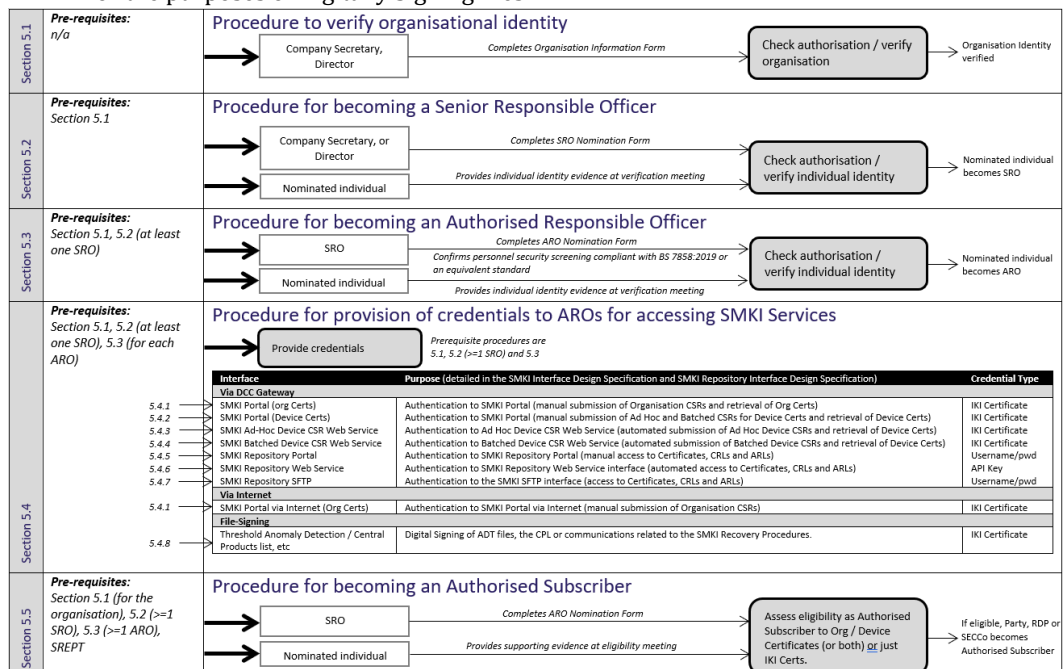


Figure 1: Overview of SMKI access registration processes

- SMKI RAPP Section 5.1 sets out the procedure and detailed processes for confirming the role of the nominating individual and verifying the organisational identity of the Party,

RDP, SECCo or DCC Service Provider, which shall be conducted where its identity has not previously been established.

- SMKI RAPP Section 5.2 sets out the procedure and detailed processes for verifying the identity of an individual nominated to become an SRO. The DCC shall ensure that an individual cannot become an SRO until the organisational identity of the applicant has been verified.
- SMKI RAPP Section 5.3 sets out the procedure and detailed processes for verifying the identity of an individual nominated to become an ARO. The DCC shall ensure that an individual cannot become an ARO until the organisation has at least one SRO and the organisational identity of the applicant has been verified.
- Once an individual has become an ARO, SMKI RAPP Section 5.4 sets out the procedure and detailed processes by which the appropriate credentials used to access SMKI Services and/or the SMKI Repository Service are provided to AROs.
- Where an applicant wishes to be an Authorised Subscriber for Organisation Certificates or Device Certificates or both, Section 5.5 of the SMKI RAPP sets out the procedure and detailed processes by which the DCC determines if the applicant is eligible to become an Authorised Subscriber for such Organisation Certificates or Device Certificates or both.

In respect of the procedures and detailed processes set out in SMKI RAPP Sections 5.1 to 5.5, the DCC shall place no restriction on the number of forms that can be submitted by an individual Party, RDP, SECCo or the DCC. Where reasonably practicable, the DCC shall conduct the procedures as set out in SMKI RAPP Sections 5.1 to 5.5 such that where multiple forms are submitted at the same time, multiple procedures can be conducted [within a single visit to the DCC's offices via a video link](#) by the applicant's nominated individuals.

Amend Section 6.2 as follows:

6.2 Procedure for becoming a SMKI Registration Authority Manager

The procedure for becoming a SMKI Registration Authority Manager as detailed immediately below shall be conducted by DCC's Chief Information Security Officer (CISO), [or an individual that they have authorised to act on their behalf in this capacity](#), on behalf of the DCC, in order to nominate, authorise and verify a SMKI Registration Authority Manager.

Step	When	Obligation	Responsibility	Next Step
6.2.1	As required	Nominate an individual to become a SMKI Registration Authority Manager, who shall be an employee of the DCC or be contracted to the DCC, and advise the nominated individual of the evidence to be provided in order to verify their identity.	DCC Chief Information Security Officer, on behalf of the DCC	6.2.2
6.2.2	As soon as reasonably practicable following 6.2.1	Confirm verification meeting date/time with nominated individual.	DCC Chief Information Security Officer, on behalf of the DCC	6.2.3
6.2.3	In verification meeting	The CISO shall, in accordance with the provisions of Sections G4.4 to G4.8:	DCC Chief Information Security Officer, on behalf of the DCC	If verified, 6.2.5. If not

		a. check proof of identity provided against the information provided by the nominated individual; and b. verify the identity of the nominated individual to the level pursuant to the SMKI PMA Guidance on "Verifying Individual Identity" published on the Website.		verified, 6.2.4
6.2.4	In verification meeting	If the identity of the nominated individual is not successfully verified, provide reasons for the failure to the individual and notify the individual that a further verification meeting is required to remedy the unsuccessful elements of the verification.	DCC Chief Information Security Officer, on behalf of the DCC	6.2.5
6.2.5	In verification meeting	If the identity of the nominated individual is successfully verified, notify the individual verbally and subsequently in writing that they have become a SMKI Registration Authority Manager and notify the SMKI PMA that the nominated individual has become a SMKI Registration Authority Manager.	DCC Chief Information Security Officer, on behalf of the DCC	6.2.6
6.2.6	As soon as reasonably practicable following 6.2.5	Record the details of the individual that has become a SMKI Registration Authority Manager, in a manner which is auditable.	SMKI Registration Authority	Procedure as set out in SMKI RAPP Section 6.4

Appendix Q 'IKI Certificate Policy'

These changes have been redlined against Appendix Q version 5.0.

Amend Section 4.1.3 as follows:

4.1.3 Enrolment Process for the Registration Authority and its Representatives

- (A) Provision is made in the SMKI RAPP section 6 in relation to the establishment of an enrolment process in respect of ICA Personnel and ICA Systems:
- (i) in order to Authenticate them and verify that they are authorised to act on behalf of the ICA in its capacity as the Registration Authority; and
 - (ii) including in particular, for that purpose, provision:
 - (a) for the face-to-face or video link Authentication of all Registration Authority Personnel by a Registration Authority Manager; and
 - (b) for all Registration Authority Personnel to have their identify and authorisation verified to the level pursuant to the SMKI PMA Guidance on 'Verifying Individual Identity' published on the Website.

Appendix W ‘DCCKI Registration Authority Policies and Procedures’

These changes have been redlined against Appendix W version 3.0.

Amend Section 3.2 as follows:

3. PARTY AND REGISTRATION DATA PROVIDER ENROLMENT

General enrolment obligations

Party and Registration Data Provider obligations

- 3.1 Each Party or RDP that wishes to use the DCCKI Services is required to become a DCCKI Authorised Subscriber.
- 3.2 In order to become a DCCKI Authorised Subscriber, a Party or RDP must:
- (a) be an Authorised Subscriber under the Organisation Certificate Policy;
 - (b) submit a DCCKI Authorised Subscriber application in accordance with this DCCKI RAPP via the means set out on the DCC Website and the guidance on DCC SharePoint;
 - (c) have at least one individual who is a DCCKI SRO for that Party or RDP; and
 - (d) have at least one individual who is a DCCKI ARO for that Party or RDP.

Amend Section 3.4 as follows:

- 3.4 Where the information provided to the DCCKI Registration Authority in relation to:
- (a) the Party or RDP being a DCCKI Authorised Subscriber;
 - (b) individuals who are acting in the role of DCCKI SRO for that Party or RDP; or
 - (c) individuals who are acting in the role of DCCKI ARO for that Party or RDP;
- changes, that Party or RDP shall:
- (d) advise the Service Centre, via email, ~~Desk~~ of such change; and
 - (e) ensure that the procedures as set out in section 3.27 of this DCCKI RAPP are undertaken in respect of providing revised information to the DCCKI Registration Authority, as soon as reasonably practicable thereafter.

Amend Section 3.10 as follows:

Submission of application

- 3.10 ~~Where a Party or RDP wishes to nominate an individual to become a DCCKI SRO, a Director, Company Secretary or existing DCCKI SRO of that Party or RDP shall ensure that:~~ Nomination of an individual to become a DCCKI Senior Responsible Officer shall be made by a Director, Company Secretary or existing DCCKI SRO on behalf of the Party or RDP or to the level pursuant to the SMKI PMA Guidance on 'Verifying Organisation Identity'. Nomination of an individual to become a DCCKI Authorised Responsible Officer shall be made by a DCCKI Senior Responsible Officer on behalf of the Party or RDP.
- (a) a DCCKI SRO Nomination Form is completed in accordance with this DCCKI RAPP and any instructions, help or advice provided by the DCCKI Registration Authority from time to time, including via the DCC Website;
 - (b) the information provided is complete and accurate;
 - (c) the DCCKI SRO Nomination Form is authorised by a Director, or Company Secretary of that Party or RDP; and
 - (d) the completed DCCKI SRO Nomination Form is submitted to the DCCKI Registration Authority via the means set out on the DCC Website.

Amend Section 3.16 as follows:

Procedure for becoming a DCCKI Authorised Subscriber

Submission of request

- 3.16 Where a Party or RDP wishes to become a DCCKI Authorised Subscriber, a Director, Company Secretary or DCCKI SRO of that Party or RDP shall ensure that:
- (a) a DCCKI Authorised Subscriber Application is submitted in accordance with this DCCKI RAPP and any instructions, help or advice provided by the DCCKI Registration Authority from time to time, including via the DCC Website, and including the provision of such information as is set out in the form contained in Annex A (A~~34~~) to this DCCKI RAPP;
 - (b) the information provided is complete and accurate;
 - (c) the DCCKI Authorised Subscriber Application is authorised by a Director or Company Secretary of that Party or RDP, or DCCKI SRO; and
 - (d) the DCCKI Authorised Subscriber Application is submitted to the DCCKI Registration Authority via the means set out on the DCC Website.

Amend Section 5.12 as follows:

- 5.12 In the event of a DCCKI Certificate Signing Request being rejected, the DCCKI Registration Authority shall:
- (a) create a record of the rejection on the DCCKI Certificate Signing Request Rejection Form, which shall contain the information and be substantively as set out in Annex A (A~~46~~) to this DCCKI RAPP;

- (b) notify a DCCKI ARO of the organisation via the Service Desk that submitted the DCCKI Certificate Signing Request of its rejection, this may be via telephone or in writing, using the contact details established as part of enrolment for the DCCKI Services; and
- (c) provide a copy of the DCCKI Certificate Signing Request Rejection Form via secured electronic means as set out on the DCC Website.

Amend Annex A as follows:

ANNEX A – FORM TEMPLATES

The Form Templates listed in Appendix A are available from the DCC Website or via SharePoint as provided by the DCC.

The DCC may, subject to the approval of the SMKI PMA, modify the form templates from time to time.

A1. DCCKI SRO NOMINATION FORM

A2. DCCKI ARO NOMINATION FORM

A3. DCCKI AUTHORISED SUBSCRIBER APPLICATION FORM

A4. DCCKI CERTIFICATE SIGNING REQUEST REJECTION FORM

A5. ADMINISTRATION USER CREDENTIALS REQUEST FORM

A6. DCCKI CERTIFICATE REVOCATION REQUEST FORM

A7. NOMINEE DETAILS FORM

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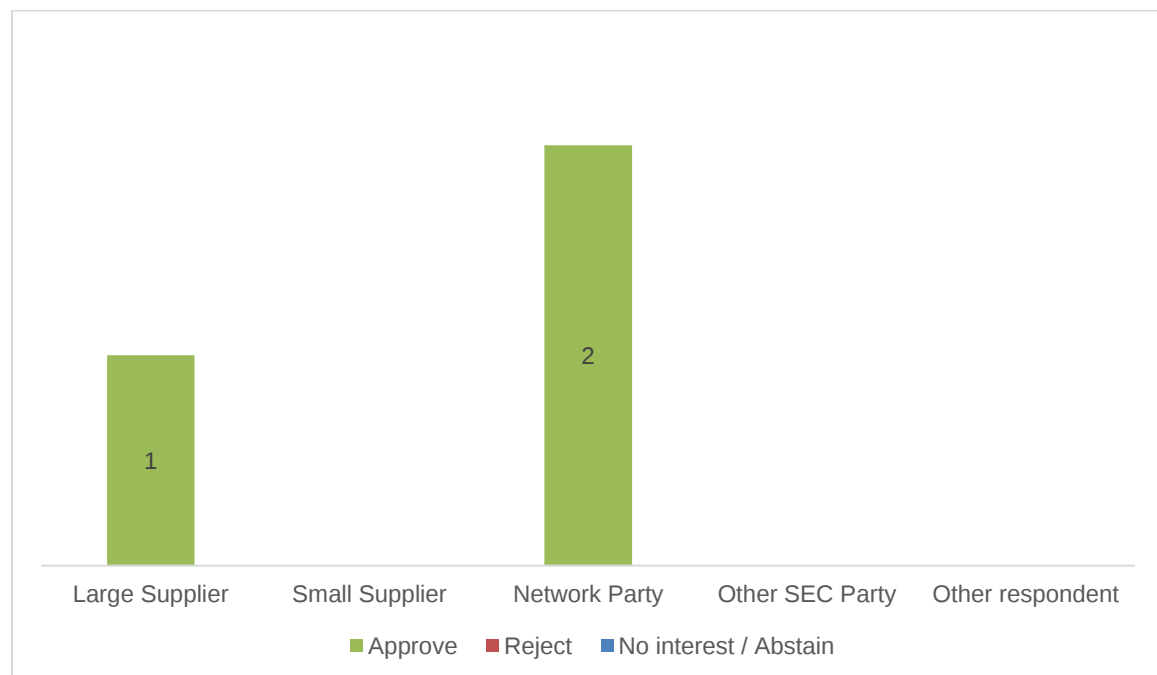
Annex B

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP245 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP245 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
E ON Next	Large Supplier	Approved	Alignment of information shown in SMKI Document Set	-
Scottish and Southern Electricity Networks	Network Party	Approved	We believe all parties will indirectly benefit from MP245 as there should be greater clarity and transparency that will bring the documents in line with the current procedures	-
National Grid Electricity Distribution	Network Party	Approved	-	-

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
E ON Next	Large Supplier	-
Scottish and Southern Electricity Networks	Network Party	-
National Grid Electricity Distribution	Network Party	-