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Stage 04: Modification Report

SECMCP0035: Updates to SEC Appendix B – Organisation ARL expiration date to be aligned to DCCKI ARL

This modification looks to ensure that the Smart Metering Key Infrastructure (SMKI) Organisation Authority Revocation List (ARL) is aligned to the Data Communications Company Key Infrastructure (DCCKI) ARL; amending the expiration date of the Organisation ARL from 12 months to 13 months, as per the DCCKI Certificate Policy (CP) and the DCCKI ARL.



At its meeting on 21st June 2017, the Change Board voted to approve this modification.



Impact on:

- Smart Energy Code Appendix B – Organisation Certificate Policy.

There are no impacts on SEC Parties or the DCC.

What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
04	Final Modification Report

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SECP0035

Final Modification Report

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About this document

This document is the Final Modification Report (FMR) for SECMP0035. The Smart Energy Code (SEC) Change Board considered this FMR at its meeting on 21st June 2017 and determined SECMP0035 should be approved.

This has two attachments:

- **Attachment A:** SECMP0035 Draft legal text; and
- **Attachment B:** responses to the SECMP0035 Modification Report Consultation.

1. Summary

This section provides an overview of [SECMP0035](#). For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this document are listed in the Glossary (Appendix A) of this document.

1.1 Why Change?

Currently, the Smart Energy Code (SEC) Appendix B – Organisation Certificate Policy, Section 4.9.7, requires each version of the ARL to be valid for 12 months after it is lodged in the SMKI Repository. However, the DCCKI CP reflects an expiration date of ‘up to 13 months’ rather than 12 months for the DCCKI ARL. This has caused the validity of the Organisation ARL to be inconsistent with the DCCKI ARL.

1.2 Solution

This modification proposes amendments to SEC Appendix B to change the expiration date for the Organisation ARL to reflect ‘up to 13 months’ rather than 12 months. Following review of the Modification Report Consultation responses, this modification proposes to also amend SEC Appendix S - DCCKI Certificate Policy to ensure that the wording in this Appendix is aligned with that which is proposed to change in Appendix B.

1.3 Impacts and Costs

This modification will impact the SEC only. There are no anticipated impacts on SEC Parties or central systems.

The costs to implement this change will be limited to the Code Administrator's time and effort to make the necessary amendments to the SEC and release a new version to SEC Parties as well as the publication of this new version on the SEC Website.

1.4 Implementation

As this Modification Proposal only involves changes to SEC, the implementation date of this Modification is proposed to be **5 Working Days (WD)** following the end of the 10 WD referral period, which commences following the Change Board vote.

1.5 Progression Path

This Modification is being progressed as a Path 3 ‘Self-Governance’ Modification.

2. Why Change?

2.1 Background

At the 21st February 2017 SMKI Policy Management Authority (PMA) meeting, the DCC requested the SMKI PMA to consider the expiration date of the Organisation ARL, as there was a misalignment with what is in the DCCKI ARL.

The DCC recommended that a Modification Proposal be raised by the SMKI PMA to address the inconsistency so that both the Organisation ARL and the DCCKI ARL both had an expiration date of 'up to 13 months'.

The SMKI PMA noted the DCC's views and agreed that the Organisation ARL window should be extended in this instance from 12 months to 'up to 13 months'. It also agreed that a Modification Proposal should be raised by the SMKI PMA on behalf of the DCC as per SEC Section L1.19, which enables the Sub-Committee to submit Modification Proposals to the SMKI Document Set. As the Organisation Certificate Policy is part of the SMKI Document Set, the SMKI PMA has raised this Modification Proposal to resolve this identified inconsistency.

2.2 What is the issue?

Currently, Smart Energy Code (SEC) Appendix B – Organisation Certificate Policy, Section 4.9.7, requires each version of the ARL to be valid for up to 12 months after it is lodged in the SMKI Repository. However, the DCCKI CP reflects an expiration date of up to 13 months rather than 12 months for the DCCKI ARL. This has caused the validity of the Organisation ARL to be inconsistent with the DCCKI ARL.

To provide clarity and remove the risk of there being issues related to inconsistent timescales, a change is required to SEC Appendix B to align the expiration dates for the Organisation ARL from 12 months to 'up to 13 months'.

3. Solution

3.1 What's the solution?

This modification proposes to amend SEC Appendix B 4.9.7(B) as detailed below:

4.9.7 CRL Issuance Frequency (if applicable)

- (A) The OCA shall ensure that an up to date version of the Organisation ARL is lodged in the SMKI Repository:
 - (i) at least once in every period of twelve months; and
 - (ii) promptly on the revocation of an OCA Certificate.
- (B) Each version of the Organisation ARL shall be valid until the date which is up to 123 months after the date on which that version of the Organisation ARL is lodged in the SMKI Repository.

Following review of the responses received to the Modification Report Consultation responses, SECMP0035 now proposes to also amend SEC Appendix S to ensure that the wording in this appendix is aligned with that which is proposed to change in Appendix B.

These additional changes to SEC Appendix S 4.9.7(b) are as follows:

4.9.7 CRL Issuance Frequency

- (a) The DCCKICA shall ensure that an up to date version of any DCCKI ARL is lodged in the DCCKI Repository:
 - (i) at least once in every period of twelve months; and
 - (ii) promptly on the revocation of a EII DCCKICA Certificate or UI DCCKICA Certificate.
- (b) Each version of the DCCKI ARL shall be valid until the date which is up to 13 months after the date on which that version is lodged in the DCCKI Repository or until it is subsequently replaced with an updated version.

3.2 Propsoed draft legal text

The proposed legal drafting to deliver the proposed solution is provided in **Attachment A**.

3.3 Proposed implementation approach

As this modification only seeks to align the SEC Organisation ARL and the DCCKI ARL, the SMKI PMA and SECAS recommend an implementation date of:

- **5 Working Days (WDs)** following the end of the 10 WD Self-Governance referral window.

This implementation approach is subject to SECMP0035 being progressed as a Path 3 'Self Governance' Modification Proposal. Further information on proposed progression can be found in section 5 below.

4. Impacts and Costs

4.1 Impacts

The following section sets out the assessment of the likely impacts arising from SECMP0035.

Potential Impacts of SECMP0019	
Smart Energy Code Parties	
Suppliers	There are no Party impacts anticipated due to the implementation of this modification.
Networks	
DCC	
Other	
Systems	
DCC Systems	There are no impacts on central systems anticipated due to the implementation of this modification.
User Systems	
Smart Metering Systems	
Other	
SEC and Subsidiary Documents	
SEC Sections	No SEC Sections or Schedules are impacted by this modification.
Subsidiary Documents	Appendix B - Organisation Certificate Policy Appendix S - DCCKI Certificate Policy
Other Industry Codes and Documents	
There are no impacts on other industry codes and documents.	
Greenhouse gas emissions	
There are no impacts on greenhouse gas emissions.	
Impact on Consumers	
No impacts have been identified on Consumers.	

4.2 Costs

The costs to implement this change will be limited to the Code Administrator's time and effort for:

- making the necessary amendments to the SEC;
- releasing a new version of the SEC to SEC Parties; and
- publication of the Modification Proposal on the SEC Website.

Implementation activities, cost and effort		
Implementation activities	Effort	Cost
• Application of approved changes to the SEC • Publication of a new version of the SEC on the SEC Website and issuance to SEC Parties • Review and update any impacted SEC guidance materials	Two Man Days maximum	£1,200 ¹

¹ Based on a blended rate of £600 per day

5. Views on SECMP0035

5.1 Proposer's Views against SEC Objectives

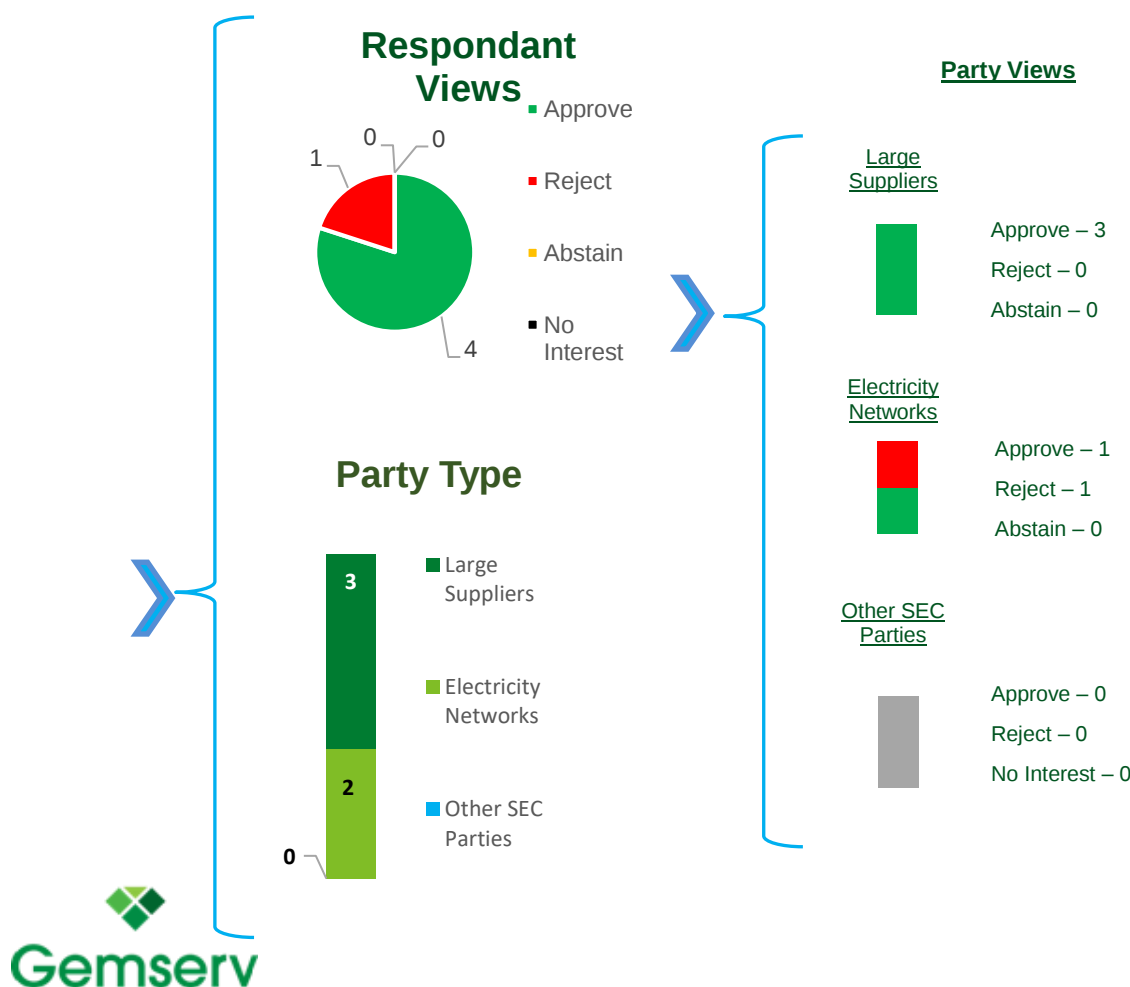
The Proposer's view on how this modification will better facilitate the achievement of the SEC objectives are set out below.

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
g) to facilitate the efficient and transparent administration and implementation of this Code.	Updating the SEC Appendix B to reflect that the Organisation ARL has the same expiration date as the DCCKI ARL as stated in the DCCKI CP promotes efficiency in the implementation of the arrangements. This is because making such a change provides clarity and removes the risk of issues or unintended confusion related to inconsistent timescales.

6. Modification Report Consultation Responses

This section summarises the responses received to the Modification Report Consultation. Eleven respondents, representing a total of 5 SEC Parties, replied to the Modification Report Consultation. The full list of represented SEC Parties and the responses are provided in Attachment B.

6.1 Summary of Responses



6.2 Summary of Modification Report Consultation respondent's views against the SEC Objectives

Summary of Large Suppliers' views for and against SECMP0035		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (g)	Respondents who agreed that SECMP0035 does better facilitate Objective (g) stated that: - will align the timescales for the Organisation ARL and DCCKI ARL which will improve efficiency and prevent confusion - removes potential inconsistency and provides clarity in the implementation of this Code	One respondent did not agree that SECMP0035 would better facilitate Objective (g) as (at the time of the consultations) the Modification only looked to amend SEC Appendix B. which would introduce a new inconsistency (but within the code itself) as a further clarification change is needed to SEC Appendix S.

7. Change Board Decisions

7.1 Deferral?

The Change Board unanimously agreed that SECMP0004 should not be sent back to the SEC Panel for further clarification or analysis.

7.2 Approve SECMP0004

The Change Board voted unanimously to approve SECMP0035.



The Change Board believes that this modification does better facilitates SEC Objective (g) as the modification:

- aligns the SEC requirements with the requirements set out in the DCCKI ARL;
- improves consistency and transparency; and
- removes ambiguity.

8. Appendix A – Glossary and References

Glossary	
Acronym	Term
SMKI	Smart Metering Key Infrastructure
ARL	Authority Revocation List
DCCKI	Data Communications Company Key Infrastructure
CP	Certificate Policy
PMA	Policy Management Authority