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What stage is this document in the process?

Stage 01: Initial Modification Report

SECMP0035: Updates to SEC Appendix B – Organisation ARL expiration date to be aligned to DCCKI ARL

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

Modification raised by:

SMKI PMA

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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.

Any Questions?

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The recommendation is that this Modification Proposal should:

- follow Path 3: Self Governance; and
- proceed to Modification Report Consultation.



Impact on:

- Smart Energy Code Appendix B – Organisation Certification Policy.

There are no impacts on SEC Parties or the DCC.

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About this document

This document is an Initial Modification Report (IMR). It enables the SEC Panel to carry out its initial consideration on how this Modification Proposal should be progressed through the Modification Process.

The Panel will consider this IMR at its meeting on 12th May 2017.

This IMR has four attachments:

- **Attachment A:** SECMP0035 Modification Proposal Form;
- **Attachment B:** SECMP0035 Draft legal text;
- **Attachment C:** SECMP0035 – draft Modification Report; and
- **Attachment D:** SECMP0035 – draft Modification Report Consultation response form.

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.

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 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 the SEC, the implementation date of this modification is proposed to be **Five Working Days (WD)** following the end of the 10 WD referral period, which commences following the Change Board vote (subject to the modification being progressed as a Path 3 ‘Self Governance’ Modification Proposal).

1.5 Proposed progression

The Proposer and SECAS recommend that SECMP0035 is progressed as a Path 3 ‘Self-Governance’ Modification, and that as the changes are fully defined and do not require refinement, that SECMP0035 proceeds to Modification Report Consultation.

2. Why Change?

2.1 Background

At the 21st February 2017 Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) meeting, the DCC requested the SMKI PMA 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, 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 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.

There are no other changes associated with this Modification Proposal.

3.2 Proposed draft legal text

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

3.3 Proposed implementation approach

As this modification only seeks to align the SEC Organisation ARL and the DCCKI AR, 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.

3.4 Views against SEC Objectives

The table below highlights the Proposer's view on how this modification will better facilitate the achievement of the SEC Objectives.

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

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
	provides clarity and removes the risk of there being issues or unintended confusion related to inconsistent timescales.

4. Potential Impacts and Costs

4.1 Impacts

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

Potential Impacts of SECMP0035	
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.
SEC Subsidiary Documents	Appendix B - Organisation Certificate Policy
Other Industry Codes and Documents	
There are no impacts on other industry codes and documents anticipated.	
Greenhouse gas emissions	
There are no impacts on greenhouse gas emissions anticipated.	
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 time and effort for:

- making the necessary amendments to the SEC;
- releasing a new version of the SEC to SEC Parties; and
- publication of it 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

5. Proposed Progression

5.1 Modification Path

This modification is not expected to have a material impact as it only seeks to align the Organisation ARL expiration date timescales in SEC Appendix B with the timescales of the DCCKI ARL expiration date in the DCCKI CP.

5.2 Indicative Progression Plan

The following is a high level indicative progression plan. The detail in this plan is subject to change. Changes to the overall timetable, however, are subject to a Panel review.

Modification Timetable		
Stage	Start	Finish
Modification Proposal raised	3 rd May 17	N/A
IMR considered by Panel	5 th May 2017	12 th May 17

¹ Based on a blended rate of £600 per day

Modification Timetable		
Stage	Start	Finish
Refinement Process	N/A	N/A
Modification Report Consultation	17 th May 2017	8 th June 2017
Change Board vote	21 st June 2017	
Implementation	5WDs following the end of the 10 WD Self-Governance referral period.	

6. SEC Panel Decisions

The Panel:

- **AGREED** for SECMP0035 to progress as a Path 3 – Self Governance modification;
- **AGREED** to submit SECMP0035 for Modification Report Consultation; and
- **AGREED** that SECMP0035 should be progressed per the timetable in section 5.2 of this IMR.

7. Further Information

More Information is available in:

- **Attachment A:** SECMP0035 - Modification Proposal Form; and
- **Attachment B:** SECMP0035 - draft legal text;
- **Attachment C:** SECMP0035 – draft Modification Report;
- **Attachment D:** SECMP0035 – draft Modification Report Consultation response form

For further information please see the Modification register page of the SEC website or contact SECAS at: secas@gemserv.com

Appendix A – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
	Fast-Track Modifications	Means Modification Proposals (Path 4 Modifications) to correct typographical or other minor errors or inconsistencies to the Code (Section D2.8, SEC Stage 3.0).
	General SEC Objectives	Has the meaning given to that expression in Section C1 (SEC Objectives) (Section C1, SEC Stage 3.0). The SEC Objectives are those objectives that the SEC has been designed to achieve.
	Greenhouse Gas Emission	Means emissions of Greenhouse Gases, as defined in section 92 of the Climate Change Act 2008 (Section A1, SEC Stage 3.0).
	Path Type	Means the Modification Path to be followed in respect of a Modification Proposal. The type of Path will depend upon the nature of the variation proposed in the Modification Proposal (D2.1, SEC Stage 3.0). The four Modification Paths under the SEC are: • Path 1 Modifications: Authority-led (Section D2.4/D2.5, SEC Stage 3.0) • Path 2 Modifications: Authority Determination (Section D2.6, SEC Stage 3.0) • Path 3 Modifications: Self-Governance (Section D2.7, SEC Stage 3.0) • Path 4 Modifications: Fast-Track Modifications (Section D2.8, SEC Stage 3.0)
	Party Category	Means one of the following categories: (a) the Large Supplier Parties collectively; (b) the Small Supplier Parties collectively; (c) the Electricity Network Parties collectively; (d) the Gas Network Parties collectively; or (e) the Other Sec Parties collectively. (Section A1, SEC Stage 3.0).
	Urgent Proposal	Means a Modification Proposal deemed an Urgent Proposal where the Authority directs the Panel to treat the Modification Proposal as an urgent Proposal (whether following a referral by the Panel pursuant to Section D4.5, or at the Authority's own initiation) (Section D4.5/D4.6, SEC Stage 3.0).
	User Systems	Means, in respect of each User (DCC User), the Systems of that User (including, where relevant, those of its Supplier Nominated Agent) used in relation to the Services and/or Smart Metering Systems (Section A1, SEC Stage 3.0). The Proposer may wish to consider Suppliers; Network Operators; Registration Data Providers; Other DCC Users (e.g. Authorised Third Parties / Switching Sites); Supplier Nominated Agents.