Smart Energy Code

SEC Smart Energy Code

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Stage 01: Modification Proposal

What stage is this document in the process?

- 01 Modification Proposal
- 02 Initial Modification Report
- 03 Draft Modification Report
- 04 Final Modification Report

SECMP0035:

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.

The Proposer recommends that this Modification Proposal should be:

- Path 3: Self-Governance

This Modification Proposal should:

- proceed to Modification Report Consultation

Impact on:

- Smart Energy Code

Gemserv

Administered by Gemserv

8 Fenchurch Place, London EC3M 4AJ

1. Proposer's Contact Details

Details of Proposer

		Representative as Point of Contact
Name:	Gordon Hextall	Gordon Hextall
Organisation:	SMKI PMA Chair, on behalf of the SMKI PMA	SMKI PMA Chair, on behalf of the SMKI PMA
Contact Number:		
Email Address:	gordon.hextall@seccoltd.com	gordon.hextall@seccoltd.com

Details of Representative's Alternate

Name:	n/a
Organisation:	n/a
Contact Number:	n/a
Email Address:	n/a

2. Modification Proposal Details

Mod Submission Date:	3 May 2017
Title of Mod Proposal:	Updates to SEC Appendix B – Organisation ARL expiration date to be aligned to DCCKI ARL

Description in Detail of the Proposed Modification:

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 12 months after it is lodged in the SMKI Repository. However, the DCCKI CP reflects an expiration date of 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 13 months.

What is the Proposed Solution?

At the 21 February 2017 SMKI PMA meeting, the DCC requested the SMKI PMA consider the expiration date of the Organisation ARL, as there was a misalignment to the DCCKI ARL. The SMKI PMA agreed that the DCC could publish the Organisation ARL in February 2017 and set the expiration date accordingly.

The DCC recommended that a Modification Proposal be submitted by the SMK PMA to address the inconsistency so that both the Organisation ARL and the DCCKI ARL both had an expiration date of 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 13. 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 to raise a Modification Proposal to resolve this issue.

Therefore, this modification seeks to amend SEC Appendix B, section 4.9.7(B) as follows:

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 1~~2~~3 months after the date on which that version of the Organisation ARL is lodged in the SMKI Repository.

3. Path Type and Urgency Recommendation

Proposer's recommendations on Path Type (delete as appropriate)	Path 3

Statement for recommended Path Type:

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.

Statement of whether Proposal is intended to be Fast-Track Modification (only Panel may raise this type of modification):

n/a

Is the Proposal Urgent? (delete as appropriate)	No

Statement of whether Proposal should be treated as an Urgent Proposal:

n/a

4. Modification Impact Assessment

4.1 SEC Objectives

Facilitation of SEC Objectives	Tick
General SEC Objectives (C1.1)	
(a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain;	☐
(b) the second General SEC Objective is to enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence;	☐
(c) the third General SEC Objective is to facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems;	☐
(d) the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy;	☐
(e) the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy;	☐
(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code;	☐
(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.	☒
Transition Objective (X1.2)	
X1.2 The objective to be achieved pursuant to Section X: Transition is the efficient, economical, co-ordinated, timely, and secure process of transition to the Completion of Implementation.	☐
Charging Objectives (C1.3) (in respect of the Charging Methodology)	
C1.4 The First Relevant Policy Objective: (a) applies in relation to Smart Metering Systems installed (or to be installed) at Domestic Premises; and (b) requires the Charging Methodology to ensure that Charges (other than Charges for Elective Communication Services) in respect of such Smart Metering Systems do not distinguish (whether directly or indirectly) between Energy Consumers at Domestic Premises in different parts of Great Britain.	☐

C1.5 The Second Relevant Policy Objective is that, subject to compliance with the First Relevant Policy Objective, the Charging Methodology must result in Charges that: (c) facilitate effective competition in the Supply of Energy (or its use) under the Electricity Act and the Gas Act; (d) do not restrict, distort, or prevent competition in Commercial Activities that are connected with the Supply of Energy under the Electricity Act and the Gas Act; (e) do not deter the full and timely installation by Energy Suppliers of Smart Metering Systems at Energy Consumers' premises in accordance with their obligations under the Energy Supply Licence; and (f) do not unduly discriminate in their application and are reflective of the costs incurred by the DCC, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology.	☐
C1.6 The Third Relevant Policy Objective is that, subject to the Compliance with the First and Second Relevant Policy Objectives, the Charging Methodology must result in Charges that: a) facilitate effective competition in the Supply of Energy (or its use) under the Electricity Act and the Gas Act; b) do not restrict, distort, or prevent competition in Commercial Activities that are connected with the Supply of Energy under the Electricity Act and the Gas Act; c) do not deter the full and timely installation by Energy Suppliers of Smart Metering Systems at Energy Consumers' premises in accordance with their obligations under the Energy Supply Licence; and d) (d) do not unduly discriminate in their application and are reflective of the costs incurred by the DCC, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology.	☐

Statement of how the proposed variation would better facilitate the achievement of the SEC Objectives:
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 there being issues or unintended confusion related to inconsistent timescales.

4.2 Impacts

Statement of impact on Greenhouse Gas Emission:
n/a

Statement of impact on which parts of the SEC would need amending (e.g. proposed legal drafting):
An amendment to SEC Appendix B, section 4.9.7(b) is required to implement this modification. Details of the required amendment can be found in Section 2 of this document, and is also provided in Attachment A.

Statement of impact on likely changes to other Energy Codes:
There are no impacts on other Energy Codes anticipated.

Statement of impact on likely Party Categories:			
Large Supplier Parties	☐	Small Supplier Parties	☐
Electricity Network Parties	☐	Gas Network Parties	☐
Other SEC Parties	☐		
There are no Party impacts anticipated due to the implementation of this modification.			

Statement of impact on Consumers:
There are no Consumer impacts anticipated due to the implementation of this modification.

Statement of impact on Central Systems:			
DCC Systems	☐	User Systems	☐
Smart Metering Systems and/or Communications Hubs	☐	Other (i.e. on Smart Metering Key Infrastructure, or security)	☐
There are no impacts on Central Systems anticipated due to the implementation of this modification.			

5. Testing

Proposed Testing Requirements
It is expected that this modification does not require any testing.

6. Proposed Timetable

Proposed Timetable for Modification Proposal:

Stage	Start	Finnish
Stage 1 – Modification Proposal Raised	Apr 17	
Stage 2 – Panel reviews IMR	8 May 17	12 May 17
Stage 4 - Modification Report stage	May 17	June 17
Stage 5 – Change Board Vote	July 17	
Implementation (if approved)	5 WDs following the end of the Self-Governance referral window if it proceeds as a Path 3 Modification Proposal.	

7. Additional Information

Additional information:
None.

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8 Fenchurch Place, London EC3M 4AJ

APPENDIX 1: Glossary of Terms

The table below illustrates useful definitions of the terms used in this form. If you require any further information please contact the SECAS Helpdesk.

Term	Acronym	Definition
Organisational Authority Revocation List	ARL	Means a list, produced by the OCA, of all OCA Certificates that have been revoked in accordance with this Policy.
Data Communications Company Key Infrastructure	DCCKI	Means the document relating to the DCC Key Infrastructure which represents the policy applicable to the DCCKI.
DCC Systems	-	Means the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code (Section A1, SEC Stage 3.0). The Proposer may wish to consider anticipated impacts on the DCC Licensee's enterprise systems (e.g. billing) or the Data Service Provider or Communications Service Providers.
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.
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 (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)
Smart Metering Key Infrastructure	SMKI	Means the public key infrastructure established by DCC for the purpose, among other things, of providing secure communications between Devices and Users.

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