



Department
of Energy &
Climate Change

**Department of Energy &
Climate Change**
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www.gov.uk/decc

8 March 2016

To: The Authority (Ofgem), SEC Parties, the SEC Panel and other interested parties

DIRECTION TO:

- **BRING SMKI SECTIONS L3, L5, L11 AND L12 OF THE SMART ENERGY CODE (SEC) INTO LEGAL EFFECT;**
- **DESIGNATE AND INCORPORATE THE SMKI INTERFACE DESIGN SPECIFICATION, THE SMKI CODE OF CONNECTION, THE SMKI REPOSITORY INTERFACE DESIGN SPECIFICATION, THE SMKI REPOSITORY CODE OF CONNECTION, AND THE IKI CERTIFICATE POLICY INTO THE SEC;**
- **AMEND THE DEVICE CERTIFICATE POLICY AND SMKI COMPLIANCE POLICY; AND**
- **TEMPORARILY RELIEVE THE DATA COMMUNICATIONS COMPANY (DCC) OF ITS OBLIGATION TO REPORT AGAINST THE CODE PERFORMANCE MEASURE RELATING TO THE DELIVERY OF CERTIFICATES FROM THE SMKI REPOSITORY.**

Dear Colleague,

SMKI Live Certificates Available - Response to consultation of 11 February 2016 (SMKI elements only)

Introduction

1. My letter of 11 February 2016 sought views on bringing into legal effect a number of SEC provisions and associated Subsidiary Documents relating to the provision by the DCC of Smart Metering Key Infrastructure (SMKI) services on the date of the “SMKI Live Certificates Available” milestone (**9 March 2016** in the DCC Plan)¹ – SMKI being the public key infrastructure established by the DCC to provide

¹ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

secure communications between Devices and Users. My letter also sought views on some other SEC activations which are detailed in a separate letter of today's date. Four consultation responses were received on bringing these provisions into legal effect, all of which were broadly supportive, albeit with some reservations or requests for clarification which are addressed below.

2. Additionally DECC has set out the criteria which will be taken into account to determine whether to activate the regulatory framework to support the milestone "SMKI Live Certificates Available" on 9th March 2016 (Appendix 1 refers). This requires the DCC to confirm that: it is appropriate to proceed, including confirming operational readiness and that all relevant key ceremonies have been completed; there is no impact on plans towards 'DCC Live'; and that it does not believe there are any material SEC party/other stakeholder concerns.
3. The details of this activation and relevant conclusions to the consultation points are detailed below.

Section L3 (The SMKI Services)

4. With regard to bringing Section L3 (The SMKI Services) into legal effect, one respondent raised a concern about the transitional variation (applicable until Release 1.3) relaxing the obligation on the DCC to check the Smart Metering Inventory (SMI) Status of Devices when determining whether or not a Party is an Eligible Subscriber for a Device Certificate. For clarification, the relaxation on SMI Status checks does not mean that DCC will not be applying SMI Status checks when processing Service Requests at DCC Live. Instead, it means that DCC will not be checking the SMI Status of Devices when processing Certificate Signing Requests (CSRs) for Device Certificates. In our assessment, any security issues raised by the inability of DCC to check SMI Status when issuing Device Certificates were not sufficiently material to warrant the delays that would have otherwise been required to rectify this situation prior to activating the 'SMKI Live Certificates Available' milestone.

SMKI Interface Design Specification

5. With regard to incorporating the SMKI Interface Design Specification into the SEC, one respondent queried the interpretation of the term "Receipt", preferring the performance measure clock to start ticking as soon as a batched CSR is received by the DCC rather than when it is verified and validated by the DCC (Section 1.2). We note that no objections were raised in TPMAG to this definition when the document was re-baselined. We recognise that ideally the time associated with the verification checks could be included within the target times; however, the drafting reflects the measures that DCC is capable of implementing without further

changes to systems. We acknowledge that this is an area that Parties may wish to re-visit post DCC Live via the SEC modifications process.

Device Certificate Policy and SMKI Compliance Policy

6. With regard to making a minor amendment to the Device Certificate Policy (the inclusion of a 'subjectAltName' file extension in a DCA certificate), one respondent disagreed with making changes to these documents at all due to their view that policy should drive the technical solution as opposed to technical solution driving the policy. We agree with the principle., However, here we are simply aligning the requirements to the solution and this is the only change since this document was incorporated into the SEC in August 2014. Moreover, there is no impact on Device Certificates themselves.
7. In terms of the SMKI Compliance Policy, another respondent sought clarification on the rationale for enabling increased flexibility in the timings of Stage 1 and Stage 2 Assurance Reports in the SMKI Compliance Policy, and felt uncomfortable that these reports could be published on such date as the SMKI PMA may determine. For clarification, the original SMKI Compliance Policy was incorporated into the SEC as Appendix C in August 2014. Since then, there have been changes to the DCC Plan culminating in the DCC request to use contingency in December 2015 which has led to consequential changes in the SMKI delivery timetable which no longer aligns with those 2014 timings of assurance plans. To provide flexibility to manage such changes to currently scheduled timetables, we believe the formal SMKI governance processes are best equipped to specify when assurance reports should be provided. It is expected that the SMKI PMA will provide details to the SEC Panel and the Implementation Managers Forum (IMF) to ensure co-ordination with wider programme timetables and plans.
8. With regard to temporarily relieving DCC of its obligation to report against the Code Performance Measure relating to the delivery of certificates from the SMKI Repository, one respondent disagreed that there was any need to amend the dates. For clarification, DCC will not be capable of reporting on these obligations until the implementation of the Change Request that provides it with the necessary reporting information to do so (CR110 Part 2). The deferral of this capability to Release 1.3 was approved by on behalf of the Secretary of State in the contingency response letter as part of the DCC replan (see Appendix 2 of that letter), in which it was necessary to strike a balance between delays to DCC Live and DCC functionality. Another respondent sought assurance that the reporting capability would be fully implemented at Release 1.3. This is indeed the case and the legal drafting in the direction below facilitates that requirement.

Inventory, Enrolment and Withdrawal Procedures (IEWP)

9. In our open letter consultation of 11th January 2016², DECC proposed to include within the IEWP an additional obligation on suppliers to configure data items on devices that are relevant to Network Operators to those settings published by the relevant network party, and to switch on this obligation at the 'SMKI Live Certificates Available' milestone. Further to the responses to this consultation and discussions in the End to End Design Issues Sub Group, we no longer propose to make this change at this time. Instead, we will be bringing forward additional proposals on this matter in due course and in the meantime invite suppliers to endeavour to adopt the relevant settings that have been published by the Energy Networks Association.

Activating the regularoty framework to provide SMKI services ('SMKI Live Certificates Available')

10. We consider it appropriate to activate the SEC provisions that support the JIP milestone 'SMKI Live Certificates Available' on 9 March 2016 and consequently has dediced to make the direction and designations necessary to do so. In reaching this view, we have taken into account the ongoing need for timely implementation of the Smart Metering Programme and the following relevant factors:

- i) that the SMKI PMA has recommended, and the SEC Panel has approved the exit from SRT (1a, 1b & 2b) in accordance with the SRT Approach Document;
- ii) that the DCC has confirmed that:
 - a. it believes that it is appropriate to proceed, including confirming operational readiness and that all relevant key ceremonies have been completed;
 - b. there is no impact on plans towards 'DCC Live'; and
 - c. it does not believe there are any material SEC party/other stakeholder concerns; and
- iii) DECC is not aware of any material SEC party/other stakeholder reasons not to proceed.

² <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/sos-consultations/11-january-2016-decc-consultation-on-key-custodians-and-comms-hubs.zip?sfvrsn=2>

Direction and Designation

This direction is made for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "**DCC Licence**") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "**SEC**").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Designation of SEC Subsidiary Documents

Pursuant to Condition 22.27 of the DCC Licence and Section X5 of the SEC, the Secretary of State directs that:

- a) The document set out at Annex A in this direction is hereby designated as the **SMKI Interface Design Specification**, and shall be incorporated into the SEC as Appendix M with effect from **9 March 2016**;
- b) The document set out at Annex B in this direction is hereby designated as the **SMKI Code of Connection**, and shall be incorporated into the SEC as Appendix N with effect from **9 March 2016**;
- c) The document set out at Annex C in this direction is hereby designated as the **SMKI Repository Interface Design Specification**, and shall be incorporated into the SEC as Appendix O with effect from **9 March 2016**;
- d) The document set out at Annex D in this direction is hereby designated as the **SMKI Repository Code of Connection**, and shall be incorporated into the SEC as Appendix P with effect from **9 March 2016**;
- e) The document set out at Annex E in this direction is hereby designated as the **IKI Certificate Policy**, and shall be incorporated into the SEC as Appendix Q with effect from **9 March 2016**; and

Supplemental Provisions on Designation of SEC Subsidiary Documents

In accordance with Condition 22.29 of the DCC Licence and Section X5.6 of the SEC:

- a) Section A1 of the SEC is hereby amended by replacing the words "Appendix [TBC]" in the definition of SMKI Interface Design Specification with the words "Appendix M";
- b) Section A1 of the SEC is hereby amended by replacing the words "Appendix [TBC]" in the definition of SMKI Code of Connection with the words "Appendix N";
- c) Section A1 of the SEC is hereby amended by replacing the words "Appendix [TBC]" in the definition of SMKI Repository Interface Design Specification with the words "Appendix O";
- d) Section A1 of the SEC is hereby amended by replacing the words "Appendix [TBC]" in the definition of SMKI Repository Code of Connection with the words "Appendix P";
- e) Section A1 of the SEC is hereby amended by replacing the words "Appendix [TBC]" in the definition of IKI Certificate Policy with the words "Appendix Q";
- f) Some or all of the SEC Subsidiary Documents designated by the Secretary of State in this direction contain a number of references (whether directly or indirectly via defined expressions) to documents that are intended in the future to be incorporated into the SEC as SEC Subsidiary Documents. Such

references shall, until the document in question has been incorporated into the SEC, be read as references to the versions of those documents from time to time identified by the Secretary of State pursuant to Section T2.3 and T3.3 of the SEC (known as the Testing Baseline Requirements Document).

Effective Dates and Section X Variations

Pursuant to Section X3.1 (b) of the SEC, the Secretary of State hereby designates **9 March 2016** as the date from which the following provisions of the SEC will have legal effect:

- a) Sections L3 (The SMKI Services), L5 (The SMKI Repository Services), L11 (The Subscriber Obligations), and L12 (Relying Party Obligations);
- b) the SMKI Interface Design Specification, SMKI Code of Connection, SMKI Repository Interface Design Specification, SMKI Repository Code of Connection, and the IKI Certificate Policy;

Pursuant to Section X3.6 of the SEC, the Secretary of State directs that the following variations shall apply:

- a) In respect of **Section L3 (The SMKI Services)**, the following variation shall apply. The variation is that, in respect of the obligation on the DCC under Section L3.4 to provide any SMKI Services that may be requested by an Authorised Subscriber in accordance with the applicable requirements of the SMKI SEC Documents, the DCC shall, for the purposes of ascertaining whether the request is made in accordance with those requirements, disregard any references in Section L3.16 to the SMI Status of a Device.
- b) in respect of **the SMKI Code of Connection**, notwithstanding section 3.1.1 of the SMKI Code of Connection or any other provision of the SEC, the following variation shall apply until the date on which the DCC is first obliged to provide Communication Services under the SEC. The variation is that the DCC's obligation to respond to Batched Certificate Signing Requests by 08:00 on the following day, shall only apply to Batched Certificate Signing Requests received between 8am and 6pm on a Working Day.

Other Section X Directions

Sections L8.1 (SMKI Services: Target Response Times) to L8.6 (Code Performance Measures) of the SEC are currently subject to a variation in accordance with Section X3.5 (Variations in respect of Section L) of the SEC. Section X3.5 provides for that variation to apply until the Stage 2 Assurance Report has been published (or such later date as the Secretary of State may designate for the purposes of Section X3.5). For the purposes of Section X3.5, the Secretary of State hereby designates the following dates:

- a) for the purposes of Sections L8.1 to L8.3, the later of the date of publication of the Stage 2 Assurance Report or the date on which the DCC is first obliged to provide Communication Services under the SEC; and
- b) for the purposes of Code Performance Measure 8, the date of Service Release 1.3 (being, in respect of the variations that are to be made by the Secretary of State on the DCC User Interface Services Schedule first being effective so that there are Services listed in the schedule for which there is no Eligible User Role, the date on which one or more of those variations are

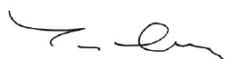
cancelled such that there is one or more Eligible User Roles for one or more of those Services).

Pursuant to Section X6 of the SEC, the Secretary of State hereby directs that the following variations shall apply with effect from **9 March 2016** until the date of Service Release 1.3 (having the meaning set out in sub-paragraph (b) above, or such earlier date as the Secretary of State designates for the purposes of Section X6.3:

- a) The **Device Certificate Policy** set out in Appendix A of the SEC is hereby amended so that it conforms with the version of that document set out in Annex F in this direction; and
- b) The **SMKI Compliance Policy** set out in Appendix C of the SEC is hereby amended so that it conforms with the version of that document set out in Annex G in this direction.

This direction is also being notified to the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SEC website in due course.³

Yours faithfully



T J Guy

DECC Delivery

DECC Smart Metering Implementation Programme (SMIP)

(an official of the Department of Energy & Climate Change authorised to act on behalf of the Secretary of State)

Annexes:

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| Annex A | SMKI Interface Design Specification; |
| Annex B | SMKI Code of Connection; |
| Annex C | SMKI Repository Interface Design Specification; |
| Annex D | SMKI Repository Code of Connection; |
| Annex E | IKI Certificate Policy; |
| Annex F | Device Certificate Policy; |
| Annex G | SMKI Compliance Policy; |

³ <https://www.smartenergycodecompany.co.uk/sec/sec-and-guidance-documents>

Appendix:

1. DECC letter with criteria for SMKI Live activation.