Department for Business, Energy & Industrial Strategy

Department for Business, Energy & Industrial Strategy
1 Victoria Street,
London SW1H 0ET

www.gov.uk/beis

17 September 2020

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

Dear Colleague,

SMART METERING IMPLEMENTATION PROGRAMME: DIRECTION TO RE-DESIGNATE SMETS1 TMAD AND TO DESIGNATE THE S1SPKM COMPLIANCE POLICY AND THE S1SPKI CERTIFICATE POLICY IN RESPECT OF THE SMETS1 SECURE COHORT

1. This letter constitutes the Government's response to two consultations undertaken by DCC on BEIS' behalf and a direction to re-designate SEC Appendix AL SMETS1 Transition and Migration Approach Document (SMETS1 TMAD) and designate the SMETS1 Service Provider Key Management (S1SPKM) Compliance Policy as SEC Appendix AO and the certificate policy for Secure (being a S1SPKI Certificate Policy) as SEC Appendix AP. The S1SPKI Certificate Policy contains the Registration Authority Policies and Procedures (RAPP) pertaining to the Public Key Infrastructure (PKI) and the RAPP is therefore not incorporated as a separate document.

2. The TMAD sets out the detailed technical and procedural requirements relating to the migration of first generation (SMETS1) smart metering devices. It was first incorporated into the SEC as Appendix AL by the Secretary of State on 14 February 2019. The latest version in legal effect is version 6.0 which was designated on 24 July 2020.

3. For devices that communicate via the Secure SMETS1 Service Provider (S1SP), DCC has proposed using a separate PKI to the existing version in the SEC. Both the S1SPKI Certificate Policy and the S1SPKM Compliance Policy have been reviewed and approved by the SMKI Policy Management Authority (PMA). Section L of the SEC sets out the arrangements that govern the Smart Metering Key Infrastructure (SMKI) and which underpin the security of smart-meter related communications. This document is being incorporated into Appendix AP of the SEC. It is expected that an additional S1SPKI Certificate Policy will be incorporated into this appendix in the future that relates to the SMETS1 L+G cohort. This second document is currently being developed by the DCC in conjunction with the SMKI PMA.

The re-designation of TMAD

4. Between 24 July and 21 August 2020, the DCC ran a consultation on a change to the TMAD[1] to enable the upgrading by DCC of firmware for a dormant SMETS1 Installation where the corresponding entry is planned to be (rather than is actually) on the EPCL, thereby expediting the migration of SMETS1 Installations containing Dormant Devices and supporting the benefits of enrolment. On 7 September 2020, DCC submitted an amended TMAD to BEIS for re-designation together with its consultation conclusions and copies of the four responses received from stakeholders.

5. Three respondents were wholly supportive of the proposal to amend the TMAD to enable early dormant meter firmware updates. We note the concern raised by one respondent of the priority assigned to the migration of SMETS1 Dormant Devices in the TMAD. As alluded to by DCC, BEIS continue to believe that the existing policy position, reflected in TMAD, is the right one. DCC should give priority to the Migration of SMETS1 Installations containing Dormant Devices to prioritise the restoration of smart services for consumers who are not currently enjoying them, as they stand to receive the greatest benefits.

6. We note that one respondent who was supportive of the change expressed concern that the proposal did not maximise the benefit that could be provided from an early firmware update and that the decision point for this should be solely between DCC and the SMETS1 SMSO. BEIS supports the approach proposed by DCC which is based on completion of testing of the actual DMC being proposed for entry, or of the DMC on which substantive equivalence is being placed for a proposed entry, so that confidence in the firmware is demonstrated to all stakeholders prior to upgrades taking place.

7. Three respondents supported the proposed date for the Secretary of State to re-designate the TMAD. One respondent initially objected to the proposal and by association the designation date. However, we note that they withdrew this opposition after further engagement from DCC on the precise scope of the amendments being sought.

8. The consultation process gave rise to one minor typographical change to Clause 4.26 of the TMAD.

The designation of the S1SPKM Compliance Policy and S1SPKI Certificate Policy

9. Between 17 July and 14 August 2020, DCC consulted on the content of the PKI for the SMETS1 Secure cohort (this document being one of the S1SPKI Certificate Policies and one that also incorporates its associated RAPP)[2]. In the consultation, DCC sought views on a proposed S1SPKM Compliance Policy and S1SPKI Certification Policy in respect of the Secure Cohort.

10. With regards to the proposed S1SPKM Compliance Policy, one respondent requested confirmation from DCC that it will assure and provide evidence to a level equivalent to the requirements specified in SEC Section G2.23 and G2.24. We note that DCC confirmed it has procured Independent Assurance Services for the assessment of the S1SPKI

[1] https://www.smartdcc.co.uk/media/4077/early_firmware_consultation_issued.pdf
[2] https://www.smartdcc.co.uk/media/4205/pki-for-secure-consultation-response.pdf

Services which satisfies the suitability and independence requirements specified in Section 3 of the S1SPKM Compliance Policy and SEC Section G.

11. BEIS notes that none of the four respondents had additional comments on the S1SPKI Certificate Policy for Secure and that all four respondents agreed with the proposed designation date of 11 September (or, if necessary, as soon as reasonably practical within one month thereafter) for both the S1SPKM Compliance Policy and S1SPKI Certificate Policy.

Conclusion

12. As DCC has considered and dealt with all issues that arose out of the consultations, we conclude that it is appropriate for the new version of TMAD (v.7.0), the S1SPKM Compliance Policy, and the S1SPKI Certificate Policy to be (re)designated on 17 September 2020. Version 7.0 of the TMAD is included at Annex A. A marked-up version of the document showing changes relative to the version previously in legal effect is provided at Annex B. The S1SPKM Compliance Policy and S1SPKI Certificate Policy are included at Annexes C and D of this letter, respectively.

Direction

This direction is made for the purposes of the smart meter communication licences granted to Smart DCC Ltd 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.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that with effect from 17 September 2020 the SMETS1 Transition and Migration Approach Document, previously designated and incorporated into the SEC as Appendix AL, is hereby re-designated and incorporated in the form set out at Annex A of this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 17 September 2020, the documents set out at Annexes C and D in this direction are hereby designated for incorporation as the S1SKM Compliance Policy and S1SPKI Certificate Policy and shall be incorporated into the SEC as Appendixes AO and AP respectively in the forms set out at Annexes C and D respectively of this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5.6 of the SEC, the Secretary of State considers it necessary and expedient for the purposes, and in consequence, of giving full and timely effect to the incorporation of the S1SPKM Compliance Policy and the S1SPKI Certificate Policy into the SEC, to amend the definitions of “S1SPKI Certificate Policy”, “S1SPKM Compliance Policy”, and “S1SPKI Registration Authority Policies and Procedures

(or S1SPKI RAPP)" in Section A1.1 (Definitions) of the SEC by replacing the words "Appendix [TBC]" for the S1SPKI Certificate Policy with "Appendix AP"; by replacing the words "Appendix [TBC]" for S1SPKM Compliance Policy with "Appendix AO"; and by adding "or the section of the associated S1SPKI Certificate Policy identified as being the S1SPKI RAPP for that S1SPKI Certificate Policy" to the "S1SPKI Registration Authority Policies and Procedures (or S1SPKI RAPP)" definition. The Secretary of State hereby designates 17 September 2020 as the date from which the amendment is to have effect in the SEC.

For the avoidance of doubt, any re-designation of the TMAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

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.

Yours faithfully,

Duncan Stone

Deputy Director & Head of Delivery,
Smart Metering Implementation Programme

(An official of the Department for Business, Energy & Industrial Strategy authorised to act on behalf of the Secretary of State)

ANNEXES (separate documents)

Annex A: SEC Appendix AL - SMETS1 Transition and Migration Approach Document v7.0

Annex B: SEC Appendix AL - SMETS1 Transition and Migration Approach Document v7.0 marked up against v6.0

Annex C: SEC Appendix AO – S1SPKM Compliance Policy

Annex D: SEC Appendix AP – S1SPKI Certificate Policy