



Department for
Business, Energy
& Industrial Strategy

Department for Business,
Energy & Industrial Strategy

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18 September 2020

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

Dear Colleague,

Smart Metering Implementation Programme: response to consultation on changes to Smart Energy Code Technical Specifications and Subsidiary Documents

This letter contains a response (and associated directions) to our consultation of 18 June 2020 on changes to Smart Energy Code (SEC) Technical Specifications and Subsidiary Documents to support previous changes to licences and SEC main body provisions. The changes consulted upon included the implementation of Device Level Technical Specifications, the introduction of XML signing Certificates, the implementation of proportional load control functionality as part of the November 2020 SEC Release and an update to the SMKI Recovery Procedures.

The proposed changes to SEC Technical Specifications and Subsidiary Documents were broadly supported by respondents. A summary of consultation responses and our response to the consultation can be found in **Annex A** to this letter. As a result, we are designating (as per the Direction in **Annex C**) the proposed changes to SEC Schedule 9 and SEC Schedule 11 with a designation date of 19 September 2020 to support the implementation of Device Level Technical Specifications. The direction also re-designates the SMKI Recovery Procedure (SEC Appendix L) on 19 September 2020 to extend it applies to the recovery of Organisation Certificates used in communications with SMETS1 Devices and modifies the processes that apply where the Contingency Private Key and Contingency Symmetric Key are used.

On 14 September 2020, a number of changes to energy licences and the SEC were signed after having been laid before Parliament in accordance with the requirements of Section 89 of the 2008 Energy Act. The majority of these will come into effect on 19 September 2020. As proposed in our June consultation, we are also today issuing a Direction under SEC Section X3.1 (provided in **Annex B**) to delay the coming into effect of elements of the changes relating to the introduction of XML signing Certificates such that these Certificates cannot at present be used. It is currently planned that they will be available for use from the date of the November 2020 SEC Release.

Ahead of the go-live date for the November 2020 SEC Release, we plan to issue a further direction letter to designate/re-designate further changes to SEC Subsidiary Documents to support the introduction of proportional load control functionality and the issuing and use of

XML signing Certificates, as well as to designate the date from which the delayed XML signing Certificate SEC provisions shall have effect.

Yours faithfully,



Duncan Stone

Deputy Director and Head of Delivery,
Smart Metering Implementation Programme

Annexes:

Annex A – Response to 18 June 2020 Consultation

Annex B – Direction to prevent a modification to section L of the SEC (Smart Metering Key Infrastructure and DCC Key Infrastructure) from having legal effect

Annex C [Separate Attachment] – Direction to designate device specific versions of SEC Schedule 9 – SMETS1 1 February 2018, SMETS2 1 February 2018, SMETS2 8 November 2018 and SMETS2 4 July 2019, SEC Schedule 11 – TSAT and SEC Appendix L – SMKI Recovery Procedure

Annex A – Response to Consultation

Overview of consultation responses

1. The consultation closed on 16 July 2020 and we received a total of 3 written responses from Scottish Power, E.ON and Square1 Energy. Following the close of the consultation we also contacted members of the Technical Business and Design Group, of whom three indicated that they had not responded to the consultation because they were content with the proposals within it.
2. The three respondents agreed with the majority of the consultation questions. One respondent made a comment not directly related to the consultation questions around the implementation of the 'Load Controller Known Remote Party'. One response suggested that additional information should be included in the Incompatibility Matrix. More details on these comments are given below.

Overview of Government response

3. From the consultation responses, BEIS noted broad agreement from respondents with the proposals set out in the June consultation. As a result, we are today issuing a Direction under SEC Section X3.1 to delay the coming into effect of the changes relating to XML signing Certificates. We are also designating the proposed changes to SEC Subsidiary Documents with a designation date of 19 September 2020 to support the implementation of Device Level Technical Specifications and to revise the SMKI Recovery Procedures.
4. Then, ahead of the go-live date for the November 2020 SEC Release, BEIS will issue a direction letter to designate/re-designate further changes to SEC Subsidiary Documents to support the introduction of APC functionality and to underpin the issuing and use of XML signing Certificates. We will also terminate the effect of our X3.1 Direction that delays the SEC changes relating to SML signing Certificates. It is noted that most of the Subsidiary Document changes that were consulted upon in this consultation are complementary to changes to licences and the main body sections of the SEC that have been laid before Parliament in accordance with the requirements of Section 89 of the 2008 Energy Act, which will come into legal effect on 19 September 2020.

Chapter 1. Summary of relevant existing BEIS policy positions as context for the current consultation

Q1	Do you agree with our proposed use of SEC Section X3.1 to delay the coming into effect of the changes relating to XML signing Certificates?
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Summary of responses

5. All respondents agreed with the proposal to use SEC Section X3.1 to delay the coming into effect of the changes relating to XML signing Certificates.

BEIS' response and decision

6. Considering overall agreement with the proposal, BEIS will use SEC Section X3.1 to delay the coming into force of the changes relating to XML signing Certificates.

Q2	Do you agree with the proposed drafting of SEC Section X3.1 Direction for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

7. All respondents agreed with the proposed drafting of SEC Section X3.1 Direction.

BEIS' response and decision

8. Considering overall agreement with the proposed drafting of SEC Section X3.1 Direction, BEIS will use this Direction to delay the coming into effect of the changes related to XML signing Certificates.

Chapter 2. Proposed changes to SEC Technical Specifications and Subsidiary Documents for implementation in September 2020

Q3	Do you agree with the proposed drafting of SEC Schedule 9 – SMETS1 1 February 2018, SMETS2 1 February 2018, SMETS2 8 November 2018 and SMETS2 4 July 2019 to support DLV (please refer to Annex C)?
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Summary of responses

9. All respondents agreed with the proposed drafting of SEC Schedule 9 – SMETS1 1 February 2018, SMETS2 1 February 2018, SMETS2 8 November 2018 and SMETS2 4 July 2019 to support DLV.

BEIS' response and decision

10. Considering overall agreement with the proposed drafting of SEC Schedule 9 – SMETS1 1 February 2018, SMETS2 1 February 2018, SMETS2 8 November 2018 and SMETS2 4 July 2019 to support DLV, BEIS will designate those technical specifications as part of the September 2020 designations/re-designations in order to replace the existing SMETS documents in SEC Schedule 9.

Q4	Do you agree with the proposed changes to SEC Schedule 11 – TSAT to support DLV (please refer to Annex C)?
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Summary of responses

11. All respondents agreed with the proposed drafting of SEC Schedule 11 – TSAT to support DLV.

BEIS' response and decision

12. Considering overall agreement with the proposed drafting of SEC Schedule 11 – TSAT to support DLV, BEIS will re-designate this document as part of the September 2020 designations/re-designations.

Q5	Do you have any comments on the proposed Incompatibility Matrix (please refer to Annex C)?
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Summary of responses

13. One respondent mentioned that the aim of the Incompatibility Matrix is to provide support where parties find combinations of Devices that do not work correctly. Therefore, the detail in the Incompatibility Matrix needs to be sufficient to determine the particulars of what will not work and why. However, the respondent felt that the proposed Incompatibility Matrix did not provide the required level of detail for the following reasons:
- The note of SMETS1 devices not necessarily being compatible with each other does not provide enough information to be useful. The devices where incompatibility is known should be listed;
 - It would be worthwhile referencing any guidance notes to support incompatibilities (for example Guidance Point 22 in the DCC guidance Use of DUIS document for CHTS1.0/GSME3.1+ incompatibilities); and
 - 'Clarifications provided in later specifications' – the exact specifications should be noted.

BEIS' response and decision

14. As per revised SEC F2.11, the Incompatibility Matrix is intended to reflect deliberate incompatibilities between different versions of the SMETS2 specifications and not tested incompatibilities between devices. SMETS1 does not have sufficient versions (and neither does it have an equivalent to GBCS in regulation) for there to be any deliberate incompatibilities between SMETS1 versions. BEIS presented and sought views on the Incompatibility Matrix prior to the consultation addressing the level of detail applied. On the basis of this work, BEIS concludes that in the first instance, the Matrix as shared is appropriate, as a starting point, to provide to the SEC Panel who can subsequently consider whether they want to add any more detail before publication.

Q6	Do you agree with the proposed changes to SEC Appendix L – SMKI Recovery Procedure for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

15. All respondents agreed with the proposed changes to SEC Appendix L – SMKI Recovery Procedure for the purpose set out in the consultation.

BEIS' response and decision

16. Considering overall agreement with the proposed drafting of SEC Appendix L – SMKI Recovery Procedure, BEIS will re-designate this document as part of the September designations/re-designations.

Q7	Do you agree with our proposal to designate/re-designate the documents referred to in the above questions 3 – 6 on 19 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter)?
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Summary of responses

17. All respondents agreed with the proposal to designate/re-designate the documents referred to in questions 3 – 6 on 19 September 2020 or, if necessary, within one month thereafter.

BEIS' response and decision

18. Considering overall agreement with the proposal set out in question 7, BEIS is re-designating the documents referred to in questions 3 – 6 on 19 September 2020.

Chapter 3. Proposed changes to SEC Technical Specifications and Subsidiary Documents for implementation in November 2020

Q8	Do you agree with BEIS' proposal to designate additional documents for inclusion in SEC Schedules 8, 9 and 10 and to re-designate the document in Schedule 11 as well as SEC Appendices E, AB and AC as part of the November 2020 SEC Release in order to provide access to SAPC functionality?
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Summary of responses

19. All respondents agreed with the proposal to designate additional documents for inclusion in SEC Schedules 8, 9 and 10 and to re-designate the document in Schedule 11 as well as SEC Appendices E, AB and AC as part of the November 2020 SEC Release in order to provide access to SAPC functionality.

BEIS' response and decision

20. Considering overall agreement with the proposal set out in question 8, BEIS will proceed with the designation/re-designation of those documents as part of the November 2020 SEC Release.

Q9	Do you agree with BEIS' proposal to re-designate SEC Appendices B, D and M as part of the November 2020 SEC Release in order to introduce XML signing Certificates?
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Summary of responses

21. All respondents agreed with the proposal to re-designate SEC Appendices B, D and M as part of the November 2020 SEC Release in order to introduce XML signing Certificates.

BEIS' response and decision

22. Considering overall agreement with the proposal set out in question 9, BEIS will proceed with the re-designation of those documents as part of the November 2020 SEC Release.

Q10	Do you agree with the proposed drafting of SEC Schedule 9 – SMETS2 29 November 2020 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

23. All respondents agreed with the proposed drafting to accommodate DLV changes for the November 2020 SEC Release.

BEIS' response and decision

24. Considering overall agreement with the proposed drafting of SMETS2 29 November 2020, BEIS will re-baseline this document as SMETS2 29 November 2020 – Draft 4 to replace the currently baselined version of SMETS2 v5.0 Draft 3 and for use as the basis for the additional version of SMETS that will be designated in November 2020.

Q11	Do you agree with the proposed changes to SEC Appendix B – Organisation Certificate Policy v1.2 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

25. All respondents agreed with the proposed changes to SEC Appendix B – Organisation Certificate Policy to support the introduction of XML signing Certificates.

BEIS' response and decision

26. Considering overall agreement with the proposed changes to Organisation Certificate Policy, BEIS will re-designate this document as part of the November 2020 SEC Release.

Q12	Do you agree with the proposed changes to SEC Appendix D – SMKI Registration Authority Policies and Procedures v2.1 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

27. All respondents agreed with the proposed changes to SEC Appendix D – SMKI Registration Authority Policies and Procedures to support the introduction of XML signing Certificates.

BEIS' response and decision

28. Considering overall agreement with the proposed changes to SMKI Registration Authority Policies and Procedures, BEIS will re-designate this document as part of the November 2020 SEC Release.

Q13	Do you agree with the proposed changes to SEC Appendix E – UISS v4.0 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

29. All respondents agreed with the proposed changes to SEC Appendix E – UISS to include additional Service Requests that are required to operate SAPCs.

BEIS' response and decision

30. Considering overall agreement with the proposed changes to UISS, BEIS will re-designate this document as part of the November 2020 SEC Release.

Q14	Do you agree with the proposed changes to SEC Appendix M – SMKI Interface Design Specification v1.4 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

31. All respondents agreed with the proposed changes to SEC Appendix M – SMKI Interface Design Specification to support the introduction of XML signing Certificates.
32. One respondent highlighted that the table in Annex A under the heading 'Meaning of XML schema codes' of SEC Appendix O – SMKI Repository Interface Design Specification also needs to be updated to reflect the addition of the new Remote Party Role Code relating to XML signing Certificates as well as to reflect the other non-GBCS specified Remote Party Role Codes set out in Annex A to Section L of the SEC. We agree that this housekeeping change should additionally be made and we will include it in a version of SEC Appendix O – SMKI Repository Interface Design Specification that will be re-designated for the November 2020 Release.

BEIS' response and decision

33. Considering overall agreement with the proposed changes to SEC Appendix M – SMKI Interface Design Specification, BEIS will re-designate this document as part of the November 2020 SEC Release, additionally incorporating the update to the table described above in SEC Appendix O – SMKI Repository Interface Design Specification.

Q15	Do you agree with the proposed changes to SEC Appendix AB – SRPD v4.0 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

34. All respondents agreed with the proposed changes to SEC Appendix AB to include SAPCs in the SRPD.

BEIS' response and decision

35. Considering overall agreement with the proposed changes to SEC Appendix AB, BEIS will re-designate this document as part of the November 2020 SEC Release.

Q16	Do you agree with the proposed changes to SEC Appendix AC – IEDP v2.1 for the purpose set out in this consultation (please refer to Annex C)?
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Summary of responses

36. All respondents agreed with the proposed changes to SEC Appendix AC to include SAPCs in the IEDP.

BEIS' response and decision

37. Considering overall agreement with the proposed changes to SEC Appendix AC, BEIS will re-designate this document as part of the November 2020 SEC Release.

Specific points made not directly addressing the consultation questions

38. One respondent expressed concerns relating to the introduction of the 'Load Controller Known Remote Party' role and requested a clarification around the scope of this role and who will be responsible for the maintenance and update of the Security Credentials in the Load Controller slots on the Devices. This respondent also added that once the role and responsibilities are clarified, it is very likely that further SEC changes will be required in order to give them effect.

BEIS' response

39. In our response to the consultation on Smart Metering System Proportional Load Control (published in October 2019), BEIS concluded that the 'limit' functionality should be included in the specification as a future proofing measure, but remain dormant until industry, Ofgem and/or Government determines it should be implemented in the live environment following further consultation. Appropriate governance requirements would need to be in place and further DCC changes would need to be made before the 'limit' functionality could be enabled. Consistent with this position, we have specified 'limit' functionality in both SMETS and GBCS, but access to this functionality is not currently possible because we have prevented the SMKI Certificate with the relevant Remote Party Role Code from being capable of being issued. Hence the trust anchor cells on any ESME with APC / SAPC cannot be populated with the relevant Device Security Credentials to permit load controller operation.

Next steps

40. Next steps will include:
- In October 2020, we will designate the versions of CTSD and ETAD consulted upon by DCC in July 2020.

- We will consult on the timing of the November 2020 Release designations/re-designations prior to the November 2020 Release and this consultation may also invite views on minor additional changes to some of the documentation;
- We will then issue a direction letter ahead of the go-live date for the November 2020 SEC Release in order to designate/re-designate the following documents so these changes take effect at the same time as the November 2020 SEC Release¹:
 - SMETS2 29 November 2020;
 - SEC Schedule 8 – GBCS v4.0 and SEC Schedule 10 – CHTS v1.4 which include changes related to APC functionality based on the versions consulted upon in October 2019;
 - SEC Appendix AC – IEDP v2.1, Appendix AB – SRPD v4.0, Appendix E – UISS v4.0 and SEC Schedule 11 – TSAT as per the versions proposed in our consultation of 18 June 2020 on changes to SEC Technical Specifications and Subsidiary Documents (except for the TSAT which was not included and will be consulted upon as part of our future consultation on the timing of the November 2020 Release designations/re-designations);
 - DUIS v4.0 and MMC v4.0 as per the versions consulted upon by DCC in May 2020;
 - SEC Appendix B (Organisation Certificate Policy v1.2), SEC Appendix D (SMKI Registration Authority Policies and Procedures v2.1), SEC Appendix M (SMKI Interface Design Specification v1.4) and SEC Appendix O (SMKI Repository Interface Design Specification v2.1) in order to introduce XML signing Certificates and as per the versions proposed in our consultation of 18 June 2020 on changes to SEC Technical Specifications and Subsidiary Documents;
- Finally, we will repeal the Direction under X3.1 as XML signing becomes functional.

¹ Please note that there are two sets of legal changes to SEC subsidiary documents that feed into the November 2020 release. These are (i) BEIS led changes which are primarily, but not exclusively, related to the introduction of SAPCs and XML signing Certificates; and (ii) changes from a package of SEC modifications that will also form part of the November 2020 release. Legally these changes are being made via separate routes. The BEIS-led changes will be made using powers under condition 22 of the DCC licence and X5 of the SEC. The non-BEIS related changes will be made using the SEC Modification process. In practice, what this means is that once the package of subsidiary document changes for the November 2020 Release is made by BEIS, a number of those documents will be further modified by the SEC Modification changes. It is planned that the SECAS website that shows the latest versions of the SEC will show only the consolidated versions of the relevant documents, i.e. incorporating the changes from both these two routes.

Annex B – Direction to prevent a modification to Section L of the SEC (Smart Metering Key Infrastructure and DCC Key Infrastructure) from having legal effect

Background

1. In January 2020, BEIS consulted upon a modification to the table in Section L3.18 of the SEC to add a new type of Organisation Certificate with a Remote Party Role of “xmlSign”. The Government response to the consultation was published on 26 March 2020². The legal text to make the modification was laid before Parliament on 18 June 2020 in accordance with the requirements of Section 89 of the Energy Act 2008 in conjunction with a number of other changes to energy licences and the SEC.
2. The Secretary of State has consulted the Authority, the SEC Panel and the SEC Parties on a draft of a direction to delay the effect of the modification in accordance with Section X3.2 of the SEC (as preserved and renumbered by X1.5(iii) of the SEC).

Direction

3. Pursuant to Section X3.1 (Effective Dates) of the SEC, the Secretary of State today directs that the modification referred to in paragraph 1 above (and highlighted in the Appendix to this direction below) is not to have effect.

This direction is being notified to the SEC Administrator.

Duncan Stone

Deputy Director and 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)

18 September 2020

² <https://smartenergycodecompany.co.uk/latest-news/beis-government-response-to-consultation-on-code-and-licence-changes/>

Appendix to X3.1 Direction: SEC Section L3.18 (Organisation Certificates) marked up

Organisation Certificates

L3.18 Where the DCC, a Network Party or another Party which is (or is to become) a User, or any RDP, is an Authorised Subscriber in accordance with the Organisation Certificate Policy, that person will be an Eligible Subscriber in respect of an Organisation Certificate only where:

- (a) if the Subject of that Certificate is:
 - (i) either the DCC (acting pursuant to its powers or duties under the Code) or a DCC Service Provider, that person is the DCC; or
 - (ii) not the DCC, that person is the Subject of the Certificate; and
- (b) if the value of the X520OrganizationalUnitName field in that Certificate is a Remote Party Role corresponding to that listed in the table immediately below, either:
 - (i) that person is the DCC, and it is identified with that Remote Party Role in the second column of that table and the Certificate Signing Request originates from the individual System referred in the paragraph of the definition of DCC Live Systems identified in the fourth column of that table; or
 - (ii) that person is identified with that Remote Party Role in the second column of that table, and the value of the subjectUniqueID field in the Certificate is a User ID or RDP ID associated with any such User Role or with an RDP as may be identified in the third column of that table.

<u>Remote Party Role</u>	<u>Party</u>	<u>User Role or RDP</u>	<u>DCC Live Systems definition paragraph</u>
root	The DCC	[Not applicable]	(d)
recovery	The DCC	[Not applicable]	(f)
transitionalCoS	The DCC	[Not applicable]	(c)

wanProvider	The DCC	[Not applicable]	(a)
accessControlBroker	The DCC	[Not applicable]	(b)
issuingAuthority	The DCC	[Not applicable]	(a)
networkOperator	A Network Party	Either: (a) Electricity Distributor; or (b) Gas Transporter.	[Not applicable]
supplier	A Supplier Party	Either: (a) Import Supplier; or (b) Gas Supplier.	[Not applicable]
other	An RDP or any Party other than the DCC	Either: Other User; Registered Supplier Agent; Registration Data Provider; or Export Supplier.	[Not applicable]
pPPXmlSign	The DCC	[Not Applicable]	(g)
pPRDPFileSign	The DCC	[Not Applicable]	(g)
s1SPxmlSigning	The DCC	[Not Applicable]	(g)
xmlSign	An RDP or any Party	Either: Import Supplier; Gas Supplier; Electricity Distributor;	(a) or (c)

		Gas Transporter. Other User; Registered Supplier Agent; Registration Data Provider; or Export Supplier.	
loadController	None	None	[Not applicable]
commissioningPartyFileSigning	The DCC	[Not Applicable]	[Only relevant during SMETS1 Migration]
requestingPartyFileSigning	The DCC	[Not Applicable]	[Only relevant during SMETS1 Migration]
sISPMigrationSigning	The DCC	[Not Applicable]	[Only relevant during SMETS1 Migration]
commissioningPartyXmlSigning	The DCC	[Not Applicable]	[Only relevant during SMETS1 Migration]