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

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

3 June 2016

**DIRECTION TO:**
- **BRING SECTIONS H1, H2 AND H3.22 OF THE SMART ENERGY CODE INTO LEGAL EFFECT**
- **DESIGNATE AND INCORPORATE THE DCC KEY INFRASTRUCTURE (DCCKI) REGISTRATION AUTHORITY POLICIES AND PROCEDURES AND DCCKI CERTIFICATE POLICY**
- **DESIGNATE A VARIATION TO THE DEFINITION OF USER SYSTEMS AND A TRANSITIONAL VARIATION TO SECTION H1.5-6**
- **DESIGNATE A TRANSITIONAL VARIATION TO SECTION H3.22**
- **RE-DESIGNATE THE COMMON TEST SCENARIOS DOCUMENT**

Dear Colleague,

**Introduction**

1. Our letter of 16 May sought views on bringing into legal effect a number of SEC provisions and Subsidiary Documents relating to the remaining elements of the User Entry Process (H1), Registered Supplier Agents (H2), Managing Demand for DCC User Interface Services (H3.22), the DCC Key Infrastructure Registration Authority Policies and Procedures (DCCKI RAPP) and the DCCKI Certificate Policy (DCCKI CP). The proposed date for these provisions to take legal effect was **6 June 2016**. We also proposed to re-designate the Common Test Scenarios Document (CTSD) on **6 June 2016** to correct minor errors. Lastly, we proposed **13 June 2016** as the date to bring Section L13 (DCCKI) and the remaining DCCKI Subsidiary Documents into legal effect. We deal with each of these areas in turn below.

**Sections H1, H2 and H3.22 and associated transitional variations**

2. All six respondents were generally supportive of our proposal to bring these sections into legal effect on 6 June 2016, . One large supplier respondent

noted that given the DCC's contingency request consultation, it assumed that the designation date for these Sections would now move to 4 July when User Entry Process Testing will commence. These Sections do not require the provision of User Entry Process Testing (UEPT) by the DCC, rather they place operational obligations on the DCC and SECAS to support the User Entry Process (UEP) more generally. Their activation is not, therefore, linked to the commencement of UEPT[1]. We are therefore of the view that 6 June 2016 remains the relevant activation date..

3. In terms of the transitional variation proposed to Section H1.5-6 (restricting the number of User IDs to one per User Role), all but one respondent agreed with the proposed change. The large supplier respondent who disagreed with this proposal stated its concern that the transitional variation would have a negative impact upon its rollout plans, and that it would be necessary for it to make system changes as a consequence of this proposal. This issue has previously been discussed as part of the Technical and Business Design Group (TBDG) on 16 December 2016. Subsequently, we published on 26 January[2] an open letter containing our proposal to implement this transitional variation, stating that we did not expect the transitional variation to be lifted until the next major release <u>after</u> Release 1.3 (i.e. Release 2), scheduled for June 2017. The respondent also stated that should this transitional variation be implemented, then the legal drafting should explicitly capture Release 1.3 as the end date for this transitional variation. However, in our letter of 16 May 2016 we incorrectly stated that Release 1.3 was the date where this functionality would be provided. The DCC remains unable to provide this functionality until after Release 1.3 but has not yet confirmed when this functionality will be available (i.e. Release 2 or subsequent releases) . As such, we will implement the transitional variation now and continue to engage with DCC, the SEC Panel and industry to confirm the precise date at which we will cancel it.

4. In terms of the transitional variation proposed to Section H3.22 and the revised definition of "User Systems", all respondents were in general agreement.

5. In our letter of 16 May, we also set out the criteria we would take into account

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[1] The provisions that activate the regulatory framework to support User Entry Process Testing are already in legal effect. The relevant provisions are T3 and X3.2(i) (iii) (A) of the SEC coupled with the designated Common Test Scenarios Document and the SEC Panel approved Interface Testing Approach Document.

[2] https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/developing-sec/information-letter-on-sec-arrangements-for-1-2-live-tbrd.pdf?sfvrsn=2

when determining whether to activate these Sections. This involved confirmation from SECAS and the DCC of their readiness given the obligations imposed upon them once these provisions are activated. Both have confirmed readiness in relation to H1, H2, and H3.22 in accordance with the criteria we set out.

**Common Test Scenarios Document**

6. All respondents agreed to our proposed re-designation date of 6 June 2016 for the Common Test Scenarios Document.

7. Some respondents have raised a number of points of detail regarding the drafting that is contained within the designated document rather than the changes that were the subject of the consultation:
    i.  Section 6.1.5: Two respondents pointed out that the second paragraph of the designated document requires deletion to rectify a referencing error. The one line reference to a non-existent clause in the document has therefore been deleted.The document that was the subject of the faulty reference is correctly referenced in Chapter 9 of the CTSD, which identifies the document as being available online.
    ii. Section 8.2.3: One respondent pointed out that the count of Service Requests in the table in the designated document should be 16, not 20. This is a correct observation and the total figure has been amended accordingly.
    iii. Section 8.2.8: One respondent pointed out that the Section in the designated document still has old Device Alert Codes based on DUIS 0.8.1.  This is a correct observation and the event / alert codes have been updated accordingly.
    iv. Section 8.2.9.1-5: In respect of the consultation on the proposed deletion of the mandatory test for N12 alerts, one respondent questioned why the link between DSP and CSP would need to be broken to generate DCC Aerts, rather than triggering DCC Alerts in real-world scenarios.  This is because the DCC has no mechanism to trigger an alert of this nature other than creating a real world scenario of a broken link between DSP and CSP which would disrupt the testing for other Test Participants if it was left as a mandatory test.
    v.  Section 8.2.11: One respondent made the assumption that this section in the designated document relating to Self-Service Interface Personnel Authentication Certificates would need to be deleted  because DCCKI certificates would not be available until DCC Live.  Although the date from which DCCKI certificates will be available needs to be confirmed as part of the contingency decision, all the proposed scenarios would have DCCKI live before DCC live and therefore this test continues to be appropriate.

**Section L13 and DCCKI-related Subsidiary Documents**

8. All respondents agreed with our proposed designation date of 6 June 2016 for the DCCKI Certificate Policy (CP) and DCCKI Registration Authority Policy and Procuredures (RAPP), In particular, the DCC highlighted that the designation of these documents will enable it to generate the DCCKI Root Certificate that is needed to support the processes required for DCCKI registration. One large supplier respondent pointed out discrepancies between the definitions of the DCCKI Certificate Revocation List (DCCKI CRL) and DCCKI Authority Revocation List (DCCKI ARL) in Section A of the SEC with the definitions in the DCCKI Certificate Policy. Whilst the DCCKI ARL is correctly aligned between the two documents, a correction is being made to Section A of the SEC to amend 'DCCKI Certificate Revocation List' to 'EII DCCKI CA Certificate Revocation List' to correctly align this to the relating DCCKI Certificate Policy definition. An amendment is also being made to Section L13.49 of the SEC to replace the references to DCCKI CRL with EII DCCKI CA CRL.

9. All respondents but the DCC agreed with the proposed designation date for activation of Section L13 and the remaining DCCKI-related Subsidiary Documents. The DCC did not support the proposed designation date of 13 June 2016 for Section L13 and the remaining DCCKI-related Subsidiary Documents because this date is affected by the DCC's request to use contingency subsequent to our letter of 16 May 2016. The DCC requested that the final activation date should be considered in conjunction with the planning being undertaken as part of the contingency request (as per further information submitted by DCC to DECC on 1 June 2016) which, if agreed, would require activation from 6 July 2016.

10. Subject to the outcome of the contingency request and the DCCKI activation criteria, we therefore intend to designate L13 and the remaining DCCKI-related Subsidiary Documents, including the proposed variations to be made concurrently, on 6 July 2016. Our consultation proposed activation within a month from 13 June, so we reserve the right to, if necessary, designate these provisions later within this period without further consultation.

**Activating the regulatory framework**

11. We have concluded that it is appropriate to designate 6 June 2016 as the date from which Sections H1, H2, H3.22 will take legal effect and on which the DCCKI Certificate Policy and DCCKI Registration Authority Policies and Procedures will be incorporated into the SEC and will take effect. In reaching

this view, we have taken into account the ongoing need for timely implementation of the Smart Metering Programme and the activation criteria set out in the consultation. We have also concluded that we will incorporate the variations proposed to the definition of User Systems, H1.5-6 and H3.22.

12. We also conclude that it is appropriate to re-designate the Common Test Scenarios Document on 6 June 2016, including the changes set out in the consultation and this response.

13. In light with the reasons set out above and subject to the Secretary of State decision on the DCC request for contingency, we intend to activate Section L13 and incorporate the remaining DCCKI Subsidiary Documents into the SEC on 6 July 2016 assuming the DCC is able to provide the DCCKI service on this date in line with the activation criteria contained in our letter of 16 May 2016.

14. An update to the Testing Baseline Requirements Document (TBRD) in consequence of this direction is also being issued on today's date.


**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.

Pursuant to Section X3.1(b) (Effective Dates) of the SEC, the Secretary of State hereby designates **6 June 2016** as the date from which the following provisions of the SEC shall have legal effect:

(a) Section H1 (User Entry Process);

(b) Section H2 (Registered Supplier Agents); and

(c) Section H3.22 (Managing Demand for DCC User Interface Services).


Pursuant to Section X3.6 (Provisions to be Effective Subject to Variations) of the SEC, the Secretary of State hereby directs that the following variations shall apply:

(a) In respect of Section A1 (Definitions), in the definition of "User Systems":

(i)  in paragraph (e), after "(including any Systems which store or use Secret Key Material for such purposes)" the words "but excluding communications in relation to Devices that do not have an SMI Status of "commissioned" or "installed not commissioned"; and/or" shall be inserted;

(ii)  paragraph (f) shall be deleted; and

(iii)  existing paragraph (g) shall be renumbered as paragraph (f).

(b) In respect of Section H1.5 and H1.6 (User IDs), a Party may only propose one identification number for each of its User Roles, and the DCC shall not be required to accept more than one identification number from each Party for each of its User Roles.

(c) In respect of Section H3.22 (Managing Demand for DCC User Interface Services):

(i)  each Party shall provide forecasts to the DCC in accordance with Section H3.22 as if it was a User; provided that Parties that are not Users and do not intend to submit Service Requests during the period referred to in that Section need not provide forecasts; and

(d) In respect of Sections H1 (User Entry Process), H2 (Registered Supplier Agents) and H3.22 (Managing Demand for DCC User Interface Services), references in those Sections (and in definitions used in those Sections) to the "DCC User Interface Services Schedule" shall be read as references to the document of that name 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).

Re-designation of SEC Subsidiary Documents

Pursuant to Condition 22.28 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 **6 June 2016**, the **Common Test Scenarios Document** previously designated and incorporated into the SEC as Appendix R is hereby re-designated in the form set out at **Annex A** in this direction.

For the avoidance of doubt such re-designation shall be without prejudice to the continued application of the transitional variations to that document made under the direction dated 8 March 2016, or to the continuing effectiveness of anything done under the Common Test Scenarios Document prior to its re-designation (which shall have effect as if done under the re-designated document).

<u>Designation of SEC Subsidiary Documents</u>

Pursuant to Condition 22.27 of the DCC Licence and Section X5 of the SEC, the Secretary of State directs that with effect from **6 June 2016**:

(a) the document set out at **Annex B** in this direction is hereby designated as the **DCCKI Certificate Policy**, and shall be incorporated into the SEC as Appendix S; and

(b) the document set out at **Annex C** in this direction is hereby designated as the **DCCKI Registration Authority Policies and Procedures**, and shall be incorporated into the SEC as Appendix W.

Pursuant to Section X3.1(b) (Effective Dates) of the SEC, the Secretary of State hereby designates **6 June 2016** as the date from which the documents designated in paragraphs (a) to (b) shall have legal effect.

Pursuant to Condition 22.29 of the DCC Licence and Section X5.6 of the SEC:

(a) Section A1 of the SEC is hereby amended by:

(i) replacing the words "Appendix [TBC]" in the definition of DCCKI Certificate Policy with the words "Appendix S";

(ii) replacing the words "Appendix [TBC]" in the definition of DCCKI Registration Authority Policies and Procedures with the words "Appendix W";

(iii) inserting, in the appropriate place in alphabetical order, the following new definition:

| "EII DCCKICA Certificate Revocation List (or EII DCCKICA CRL) | has the meaning given to that expression in the DCCKI Certificate Policy." |

(b) Section L13.49 (Duties in relation to DCCKI Certificates and DCCKICA Certificates) is hereby amended by, in each of Sections L13.49(a)(i) and L13.49(a)(ii), deleting the words "DCCKI CRL" and inserting in their place the words "EII DCCKICA CRL (or, in the case of DCC only, any DCCKI Certificate Revocation List relevant to that DCCKI Certificate)".

(c) Some or all of the SEC Subsidiary Documents designated by the Secretary of State in paragraphs (a)(i) to (ii) above, 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 of the SEC (known as the Testing Baseline Requirements 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
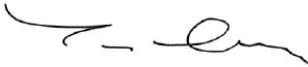
T J Guy
DECC Delivery
DECC Smart Metering Implementation Programme (SMIP)
(an official of the Department of Energy & Climate Change authorised to act on behalf of the Secretary of State)

**Annexes:**

Annex A:    Common Test Scenarios Document
Annex B:    DCCKI Certificate Policy
Annex C:    DCCKI Registration Authority Policies and Procedure