



Department
of Energy &
Climate Change

**Department of Energy &
Climate Change**
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The Authority (Ofgem), the SEC Panel, SEC Parties and other interested parties 5 July 2016

DIRECTION TO:

- **DESIGNATE AND INCORPORATE THE REGISTRATION DATA INTERFACE SPECIFICATION AND REGISTRATION DATA INTERFACE CODE OF CONNECTION INTO THE SEC AND REMOVE A RELATED TRANSITIONAL VARIATION;**
- **MAKE A TRANSITIONAL VARIATION TO SECTION H13.4 OF THE SEC (PERFORMANCE STANDARDS AND REPORTING);**
- **RE-DESIGNATE THE SMART METERING KEY INFRASTRUCTURE REGISTRATION AUTHORITY POLICIES AND PROCEDURES (SMKI RAPP) AND INFRASTRUCTURE KEY INFRASTRUCTURE (IKI) CERTIFICATE POLICY;**
- **DESIGNATE THE ACTIVATION DATE FOR THE ALTERNATIVE HOME AREA NETWORK (ALT HAN) SOLUTIONS.**

Dear Colleague,

Introduction

1. Our consultation letter of 15 June 2016 set out our intention to designate and incorporate into the SEC provisions necessary to allow Registration Data Providers (RDPs) to connect to the DCC's Registration Data Interface on **6 July 2016** (subject to the DCC satisfying our activation criteria contained in that letter), supporting the new 'RDP Technical Readiness Testing on Production Environment Commences' milestone included in the Data and Communications Company's (DCC) revised plan. This would include designating and incorporating the Registration Data Interface Specification (REGIS) and the Registration Data Code of Connection (REGI CoCo), as well as removing a related transitional variation.
2. Our consultation letter of 15 June 2016 also set out our intention to, on **6 July 2016**, re-designate the SMKI RAPP and IKI Certificate Policy in order to

incorporate changes to support SECCo becoming a subscriber for IKI Certificates (as well as some additional consequential changes). We also proposed to make a transitional variation to Section H13.4 (Performance Standards and Reporting) on 6 July 2016 and to designate the activation date for the modifications to the SEC related to Alt HAN Solutions as being the date on which the SEC is first modified to include these provisions.

3. Separately, in our response letter to the User Entry Process and DCCKI activation consultation of 3 June, we noted our intention to designate Section L13 (DCCKI), and designate and incorporate into the SEC the DCCKI Interface Design Specification, the DCCKI Repository Interface Design Specification, the DCCKI Code of Connection and Repository Code of Connection (the remaining DCCKI Subsidiary Documents) on **6 July 2016**. This is the date in the revised DCC plan of 'DCCKI Certificates available', as set out in the SRO's DCC contingency request response letter of 7 June 2016. As of the time of writing, the DCC has not yet been able to fully confirm that it has met the readiness criteria set out in our letter of 16 May 2016. Provided we receive such confirmation from the DCC by 12 July, we will issue a direction to designate these provisions without further consultation.

Designation of the Registration Data Interface Specification and Registration Data Interface Code of Connection with minor drafting changes and consequential and supplementary provisions, and removing transitional variations relating to the Registration Data Interface

4. The majority of the nine respondents to the questions set out in our consultation of 15 June 2016 in relation to designating and incorporating into the SEC the REGIS and REGI CoCo (as well as removing a transitional variation in relation to the Registration Data Interface) agreed with us doing so on **6 July 2016**. The majority also supported our proposal to cancel further transitional variations to require full sets of Registration Data to be provided to the DCC by 8 August (subject to our activation criteria being met).
5. One respondent disagreed, stating as its reason that the duration between these two activation events (the REGIS and REGIS CoCo designation date and the date for the registration data to be provided to the DCC) should remain constant. The respondent argued that if there was delay to the first activation point, this would not automatically result in a delay to the second and that this was unreasonable. The respondent argued that it would be appropriate to define the length of time between both activation points as being 22 working days.
6. We do not think that it is necessary to have a regulatory link between these two events and note that designating the REGIS and the REGI CoCo on 6

July 2016 will not automatically result in 8 August 2016 being set in the regulatory framework as the date by which RDPs must have sent the full set of Registration Data to the DCC. We plan to direct this date in due course, as described below. Therefore we do not consider that the lack of a link between these two events should prevent the designation of the REGIS and the REGI CoCo on the 6 July.

7. On a related point, a number of respondents commented that, at this time, they could not support our proposal to oblige RDPs to have sent a full set of data to the DCC by **8 August 2016**, because their ability to meet such an obligation is contingent upon both adequate progress being made in the testing activities currently being undertaken, and the ability to successfully establish their connection to the live DCC environment and send the first data file between the 3 and 8 August. We would like to reiterate that, prior to taking the legal steps that would result in the 8 August date forming a regulatory obligation, we will seek updates from relevant stakeholders as shown in our activation criteria (set out in our consultation letter of 15 June 2016).
8. One respondent also stated that it did not support the proposed provision which prevented the sending of the first data file to the DCC prior to 3 August, owing to the limited time that this provides for them to attempt to send the first data file to the DCC by the proposed deadline of 8 August. The DCC have stated that its systems will not be able to process Registration Data prior to 3 August 2016. However, as stated above, we will seek updates from relevant stakeholders as shown in our activation criteria prior to activating the obligations in question.
9. One respondent disagreed with our approach of not activating the DCC's obligation to send DCC Status Files¹ to the RDPs on designation of the REGI CoCo, arguing that this was an important aspect of functionality. We can confirm what we said in our letter of 15 June - that rather than not activating it at all, we will do so at DCC Live, the point at which the status of Smart Metering Systems can first be recorded in the DCC systems.
10. In our consultation of 15 June we proposed an amendment to the provision in Clause 3.19 of the REGIS which allows Electricity Data Providers to send Registration Data Refresh Files to the DCC via alternative means (if agreed between the DCC and the Electricity Data Provider), provided that these alternative means are at least as robust as those that apply to the FTPS²

¹ Setting out the status of Smart Metering Systems.

² File Transfer Protocol with Transport Layer Security

connection. Two respondents questioned why the same right was not granted to Gas Registration Data Providers and argued that it should be to provide an appropriate level of flexibility should disruption to the FTPS connection occur. One of those respondents also suggested that in addition to applying this provision to Registration Data Refresh Files, it should apply in relation to any Registration Data Files (i.e. to include both the initial file sent to the DCC and Daily Update files) and to DCC Status Files, as extending the provisions would provide a sensible level of flexibility in the event of disruption. We agree with all these comments and have amended the legal drafting to this effect, resulting in a revision to Clause 1.3 in the REGI CoCo, the insertion of new Clauses 3.8-3.10 in the REGIS and the deletion of the old Clause 3.19 from the REGIS.

11. One respondent questioned whether the existing connections provided by the DCC to support RDP data transfer are of sufficient bandwidth. We note that the DCC has an obligation in Section E of the SEC to ensure that this is the case.
12. Finally, one respondent voiced concern that the SEC changes made via direction letters did not appear within the SEC document itself, and that there was a need to cross-refer to associated Department of Energy and Climate Change (DECC) letters. The respondent said this could lead to misunderstandings. All relevant legal drafting (including the Directions issued by the Secretary of State³, cross-referenced against SEC Sections) can be accessed via the SEC website⁴. However, the respondent may wish to suggest to the SEC Administrator that it also annotates the 'Development Version' of the SEC on the SEC website to capture relevant Secretary of State Directions.
13. Based on the responses received we have concluded that we will designate and incorporate the REGIS and REGI CoCo, remove the relevant transitional variation and implement supplementary provisions as detailed in our consultation on **6 July 2016**. This includes the right for RDPs to first send data to the DCC on 3 August 2016. This decision has been taken having considered the information received from the DCC in response to our activation criteria set out in the consultation of 15 June, as well as the responses to the consultation.
14. We also currently intend to activate in due course the obligation on RDPs to send their full data set by **8 August 2016**. As set out above, before publishing

³ <https://www.smartenergycodecompany.co.uk/sec/secretary-of-state-variations-to-the-sec>

⁴ <https://www.smartenergycodecompany.co.uk/home>

such a direction, we will consider the information gathered from the DCC, Network Parties and RDPs in relation to the activation criteria set out in our letter of 15 June.

Re-designation of the Infrastructure Key Infrastructure Certificate Policy (IKI CP) and Smart Metering Key Infrastructure Registration Authority Policies and Procedures (SMKI RAPP)

15. Of those respondents who commented, all agreed to our proposal to re-designate the amended versions of the IKI Certificate Policy and SMKI RAPP to (in addition to other minor changes) allow SECCo to obtain IKI Certificates linked to digital signing of the Certified Products List. We therefore do so as part of this direction.

Addition of a transitional variation on Performance Standards and Reporting

16. Of those respondents who commented, all agreed with our proposed transitional variation to Section H13.4 (Performance Standards and Reporting) to require the DCC to provide proxy measures for reports on Service Levels achieved in respect of Code Performance Measures 1, 2 and 3 until Release 1.3. We therefore do so as part of this direction.

Activation of regulations related to Alternative Home Area Networks

17. Of those respondents who commented, all agreed with our proposed activation approach for the modifications to the SEC related to Alternative HAN Solutions. We proposed that this Section will take effect as soon as the legal instrument has been brought into force following completion of the Parliamentary process, expected to be during July 2016. We therefore conclude to do so as part of this direction. It is noted that the Alternative HAN related changes to standard conditions of gas and electricity supply licences and the DCC Licence will take effect at the same time.

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**").

Unless stated otherwise, words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

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:

- (a) with effect from 6 July 2016, the **IKI Certificate Policy** previously designated and incorporated into the SEC as Appendix Q is hereby re-designated in the form set out at **Annex A** in this direction; and
- (b) with effect from 6 July 2016, the **SMKI Registration Authority Policies and Procedures** previously designated and incorporated into the SEC as Appendix D is hereby re-designated in the form set out at **Annex B** in this direction.

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

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 with effect from 6 July 2016:

- (a) the document set out at **Annex C** in this direction is hereby designated as the **Registration Data Interface Specification**, and shall be incorporated into the SEC as Appendix X.
- (b) the document set out at **Annex D** in this direction is hereby designated as the **Registration Data Interface Code of Connection** and shall be incorporated into the SEC as Appendix Y.

Pursuant to Section X3.1(b) (Effective Dates) of the SEC, the Secretary of State hereby designates 6 July 2016 as the date from which the documents designated in paragraphs (a) and (b) above 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:
 - (i) by replacing the words "Appendix [TBC]" in the definition of Registration Data Interface Specification with the words "Appendix X"; and
 - (ii) by replacing the words "Appendix [TBC]" in the definition of Registration Data Interface Code of Connection with the words "Appendix Y".
- (b) Notwithstanding the requirement in Clause 1.3 of the Registration Data

Interface Code of Connection that Registration Data only be sent over a DCC Gateway Connection, the RDPs shall not send Registration Data over a DCC Gateway Connection before 3 August 2016 (or such later date as the Secretary of State may direct).

- (c) On or before the date on which the variation under Section X2.4(d) is cancelled in relation to Sections E2.1 and E2.2, each RDP must provide the first full set of Data (as referred to in Section E2.5).
- (d) Each RDP's obligation to send a Registration Data Update File under Clause 1.7 or 1.8 (as applicable) of the Registration Data Interface Code of Connection shall not commence until the day after the day on which each RDP provides the first full set of Data (as referred to in Section E2.5). On the first occasion that each RDP sends a Registration Data Update File under Clause 1.7 or 1.8 (as applicable) of the Registration Data Interface Code of Connection, the file must show the changes since the first full set of Data provided by the RDP (as referred to in Section E2.5). 'Registration Data Update File' is defined in the Registration Data Interface Specification.
- (e) The DCC shall not be obliged to send a DCC Status File under Clause 1.9 of the Registration Data Interface Code of Connection until the day after the date on which the variation under Section X2.4(d) has been cancelled in relation to Section E2.3. On the first occasion that the DCC sends a DCC Status File to an RDP under Clause 1.9 of the Registration Data Interface Code of Connection, the file must show the changes since the first full set of Data provided by the DCC to the RDP (as referred to in Section E2.5). "DCC Status File" is defined in the Registration Data Interface Specification.
- (f) Some or all of the SEC Subsidiary Documents designated by the Secretary of State in paragraphs (a)(i) to (ii) above may contain 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 T3.3 of the SEC (known as the Testing Baseline Requirements Document).

Cancellation of Variations

The Secretary of State hereby designates 6 July 2016 as the date on which the variation to the SEC set out in Section X2.4(f) ceases to apply (so that the relevant provisions of the SEC apply without variation after that date).

Variation to Performance Standards and Reporting

Pursuant to Section X6 (Transitional Variations) of the SEC, the Secretary of State hereby directs that Section H13 (Performance Standards and Reporting) shall be

varied with effect from 6 July 2016 so that the DCC can use a reasonable proxy measure for Code Performance Measures 1, 2 and 3 (set out in Section H13.1).

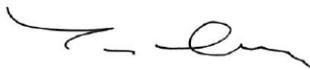
The date from which such variation shall cease to apply is the date of Service Release 1.3. Service Release 1.3 is, where the Secretary of State makes directions pursuant to Section X3 whereby the DCC User Interface Services Schedule is varied on it first becoming effective so that there are Service Requests that are deemed to be omitted from the document, the date on which one or more of those variations are cancelled.

Giving Effect to Section Z

Pursuant to Section X3.1(b) (Effective Dates) of the SEC, the Secretary of State hereby designates the date on which the SEC is first modified to include Section Z (The Alt HAN Arrangements) as the date from which Section Z shall have legal effect.

This direction is also being notified to the SEC Administrator and an updated version of the SEC to reflect these changes, as well as an updated Testing Baseline Requirements Document (TBRD) in consequence of them, 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: IKI Certificate Policy
Annex B: SMKI Registration Authority Policies and Procedures
Annex C: Registration Data Interface Specification
Annex D: Registration Data Interface Code of Connection