

Department for Business, Energy & Industrial Strategy 1 Victoria Street, London SW1H 0ET www.gov.uk/beis

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

23 October 2020

Dear Colleague,

Smart Metering Implementation Programme: consultation on matters relating to the BEIS elements of the November 2020 SEC Release

This document relates to the BEIS elements of the November 2020 Smart Energy Code (SEC) Release, and constitutes a consultation on:

- The date on which a number of SEC technical specifications and Subsidiary Documents are proposed to be designated/re-designated;
- ii) A number of proposed corrections to a subset of the documents referred to above;
- iii) The date from which changes to Section L of the SEC that were previously suspended should take effect; and
- iv) The form of the directions that give effect to the above.

This consultation runs until 17:00 on 13 November 2020. Details of how to respond are provided in the Consultation Document at Annex A.

Yours faithfully,

Duncan Stone

Deputy Director and Head of Delivery, Smart Metering Implementation Programme

ANNEXES

Annex A Consultation Document

Annex B Draft Directions to designate/re-designate SEC technical specifications and Subsidiary Documents for BEIS-directed changes in the November 2020 SEC Release and to

bring into effect a modification to Section L3.18 of the SEC (published separately, alongside this document)

Annex C Documentation Corrections for the November 2020 Release (published separately, alongside this document)

Annex D Proposed Legal Drafting for the November 2020 Documents (published separately, alongside this document)

- SEC Schedule 8 Great Britain Companion Specification v4.0 Draft 3
- SEC Schedule 9 Smart Metering Equipment Technical Specifications 2 29 November 2019 Draft 5
- SEC Schedule 11 TS Applicability Tables v9.1
- SEC Appendix O SMKI Repository Interface Design Specification v2.1
- SEC Appendix AD DCC User Interface Specification v4.0 Draft 2
- SEC Appendix AF Message Mapping Catalogue v4.0 Draft 2

Annex A: Consultation Document

1. General Information

Why we are consulting

This document seeks stakeholders' views on:

- The date on which a number of Smart Energy Code (SEC) technical specifications and Subsidiary Documents are proposed to be designated/re-designated to support the BEIS elements of the November 2020 SEC Release;
- ii) A number of proposed corrections to a subset of the documents referred to above;
- iii) The date from which changes to Section L of the SEC that were previously suspended should take effect; and
- iv) The form of the directions that give effect to the above.

Timing

Responses to this consultation should be submitted by 17:00 on 13 November 2020.

Responding to the consultation

Your response will be most useful if it is framed in direct response to the questions posed, by reference to our numbering, though further comments and evidence are also welcome.

Responses should be submitted to: smartmetering@beis.gov.uk

When responding, please state whether you are responding as an individual or representing the views of an organisation.

Confidentiality and data protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential please tell us but be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

We will process your personal data in accordance with all applicable data protection laws. See our <u>privacy policy</u>.

We will summarise all responses and publish this summary on the SECAS website. The summary will include a list of names or organisations that responded, but not people's personal names, addresses or other contact details.

Territorial extent

This consultation applies to the gas and electricity markets in Great Britain.

Quality assurance

This consultation has been carried out in accordance with the government's consultation principles.

If you have any complaints about the way this consultation has been conducted, please email: beis.bru@beis.gov.uk

2. Consultation Proposals

Background

- 2.1 In August 2019, we published a consultation¹ on a proposal to introduce proportional load control functionality into the Smart Metering System, via the designation of a new Smart Metering Equipment Technical Specifications 2 (SMETS2) that includes an Electricity Smart Equipment (ESME) with Auxiliary Proportional Controller (APC) capability and an additional Standalone APC (SAPC) Device with APC capability that connects to the HAN via the Communications Hub (CH). Unlike Auxiliary Load Control Switch (ALCS) and HAN Connected Auxiliary Load Control Switch (HCALCS), which are limited to two levels of load control, APC and SAPC offer more granular load control.
- 2.2 In October 2019, we published a response to our August 2019 consultation, along with a new consultation on changes to Great Britain Companion Specifications (GBCS) and Communications Hub Technical Specifications (CHTS) to support the introduction of APC functionality². We published our response in February 2020³, confirming our intention to proceed with the implementation of APC functionality and notifying the baselining of the changes to SMETS2, GBCS and CHTS to the Technical and Business Design Group (TBDG). These changes are planned to be incorporated into the SEC at the same time as the November 2020 SEC Release, when the DCC is expected to implement changes to its systems to allow the use of APC functionality (for use initially on single band 2.4GHz CHs only).
- 2.3 In April 2020, we then published a consultation⁴ that proposed changes to the wider regulatory framework to underpin the designation of these technical specifications and GBCS. These proposed changes included modifying standard conditions of gas and electricity supply licences as well as the DCC licence and the SEC.
- 2.4 In June 2020, we published a response⁵ to our April 2020 consultation confirming that we will make these changes, along with a new consultation⁶ on:
 - Changes to SMETS2 and Technical Specification Applicability Tables (TSAT) to introduce device-specific technical specifications;

¹ https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-proportional-load-control-and-associated-smets-drafting/

² https://smartenergycodecompany.co.uk/latest-news/beis-response-to-consultation-on-proportional-load-control-and-associated-smets-drafting-new-consultation-on-gbcs-and-chts-drafting/

³ https://smartenergycodecompany.co.uk/latest-news/beis-response-to-consultation-on-the-gbcs-and-the-chts-changes-for-proportional-load-control/

^{4 &}lt;a href="https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-the-dccs-provision-of-an-enrolment-service-for-edmi-smets1-meters-changes-to-dcc-electricity-and-gas-supply-licence-conditions-and-changes-to-the-sec-bscs-and-unc/">https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-the-dccs-provision-of-an-enrolment-service-for-edmi-smets1-meters-changes-to-dcc-electricity-and-gas-supply-licence-conditions-and-changes-to-the-sec-bscs-and-unc/

⁵ https://smartenergycodecompany.co.uk/latest-news/beis-consultation-response-government-response-to-6-april-2020-consultation-and-outstanding-matters-from-14-january-2020-consultation/

⁶ https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-changes-to-smart-energy-code-technical-specifications-and-subsidiary-documents/

- Introduction of SMETS2 29 November 2020 and changes to User Interface Service Schedules (UISS), the Service Request Processing Document (SRPD) and Inventory Enrolment and Decommissioning Procedures (IEDP) to support the introduction of SAPC functionality as part of the November 2020 Release;
- Changes to SEC Appendices B (Organisation Certificate Policy), D (SMKI Registration Authority Policies and Procedures) and M (SMKI Interface Design Specification) to support the introduction of XML signing Certificates; and
- A proposal to issue a Direction under SEC Section X3.1 to delay the coming into effect of elements of the changes relating to the introduction of XML signing Certificates such that these Certificates cannot be used until the date of the November 2020 SEC Release.
- 2.5 We published a response⁷ to our June 2020 consultation in September 2020, where we confirmed our intention to re-designate SMETS and TSAT with Device Level Versioning (DLV) on 19 September 2020, as well as our intention to issue a Direction under SEC Section X3.1 to delay the coming into effect of elements of the changes relating to the introduction of XML signing Certificates. We also proposed that we would repeal this Direction as XML signing becomes functional in November 2020.
- 2.6 SAPCs and ESMEs with APC functionality are dependent on the DCC's November 2020 system change release. As a result, although the main body SEC changes to support the designation of technical specifications and GBCS had been implemented in September 2020, we had decided to hold back on the designation of the supporting technical specifications and SSDs indicated below until November 2020 to align with the DCC's November 2020 Release:
 - SEC Schedule 9 Smart Metering Equipment Technical Specifications 2 29
 November 2019;
 - SEC Schedule 8 Great Britain Companion Specification v4.0;
 - SEC Schedule 11 TS Applicability Tables v9.1;
 - SEC Schedule 10 Communications Hub Technical Specifications v1.4;
 - SEC Appendix AD DCC User Interface Specification v4.0;
 - SEC Appendix AF Message Mapping Catalogue v4.0;
 - SEC Appendix E User Interface Service Schedules v4.0;
 - o SEC Appendix AB Service Request Processing Document v4.0; and
 - SEC Appendix AC Inventory Enrolment and Decommissioning Procedures v3.0.

⁷ https://smartenergycodecompany.co.uk/latest-news/sec-designation-implemented-beis-consultation-response/

Proposed corrections to SEC Technical Specifications and Subsidiary Documents

- 2.7 We are proposing additional corrections to the version of SMETS2 29 November 2020 that we consulted upon in June 2020, and these additional corrections are described in Annex C and shown in an updated version of the document in Annex D. We are also proposing further corrections to GBCS v4.0 Draft 2 that we published in February 2020 as part of our response to our October 2019 consultation, which are again described in Annex C and provided in an updated version of the document in Annex D. CHTS v1.4 was consulted upon in October 2019 and we have made no further changes to this document. UISS v4.0, SRPD v4.0 and IEDP v3.0 were consulted upon in June 2020 and we also made no further changes to these documents. We did not consult upon a draft version of TSAT v9.1 as part of our June 2020 consultation as further amendments to it were expected to take place ahead of the November 2020 Release, and we are therefore consulting upon this today.
- 2.8 Please note that the XML schemas in the versions of DUIS and MMC in Annex D, include amendments not only to support the BEIS changes being made for the November 2020 SEC Release, but also to support changes that are being made by SEC Modifications for the November 2020 SEC Release. XML schemas with changes only to support the BEIS changes will never have any practical application, since when the BEIS changes are incorporated into the SEC, both DUIS and MMC and their XML schemas will be immediately further modified by SEC Modifications which also form part of the November 2020 SEC Release. Legally, BEIS is only making a subset of the changes to the schemas in these two documents. For technical and practical reasons, we decided not to produce XML schemas showing only the BEIS changes, but instead only XML schemas that included the combined BEIS and SEC Modification changes. The draft directions in Annex B make it clear that some of the changes included in the XML schemas in the versions of DUIS and MMC in Annex D are not being made by BEIS. They will instead be made by the SEC Modifications.
- 2.9 Functionality to support XML signing Certificates is also included as part of the systems changes that DCC is making to support the November 2020 SEC Release. In addition to holding back on the re-designation of the subsidiary document changes that support this functionality until the date of the November 2020 release, we additionally suspended a main body SEC change that would otherwise have come into effect on 19 September to make it clear that XML signing Certificates could not be issued. We did this using our powers under Section X3.1 of the SEC. The SSDs that we are now proposing be re-designated to support these arrangements are:
 - 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.
- 2.10 In our response to the June 2020 consultation, we highlighted that one respondent suggested that the table 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 Section L of the SEC. We agreed in the consultation response that this housekeeping change should be made and that we would include it in a version of SEC Appendix O SMKI Repository Interface Design Specification that we would redesignate as part of the November 2020 Release.
- 2.11 We are also proposing a further correction to Appendix B of the SEC (Organisation Certificate Policy or (OCP)) for the November 2020 SEC Release. In our subsidiary document consultation in June 2020⁵ we proposed changes to the OCP to support the introduction of XML signing Certificates. One of the changes proposed was to change the Organisation Certificate Profile to allow the "Subject X520 Common Name" field to be populated with hexadecimal values of "02" or "86" in certain circumstances. The hexadecimal value "86" corresponds to a decimal Remote Party Role Code of 134. In fact, and as reflected in the current Annex A to Section L of the SEC, the decimal value of the Remote Party Role Code for XML signing Certificates is 135 (as the 134 value has been reserved for the Centralised Switching Service). Consequently, the two instances of "86" in the OCP should in fact be "87". We propose to make this change in the version of the OCP that we re-designate as part of the November 2020 SEC Release. We have not included a marked-up version of the OCP showing this change in Appendix D because the change is minor, and we do not think the re-publication of the entire document is warranted in this case.
- 2.12 The DCC consulted upon changes to DUIS and MMC for the November 2020 Release in April 2020 and is now separately consulting upon versions 3.0 and 3.1 of DUIS which includes other changes relating to SMETS1. In parallel, we made additional corrections to DUIS and MMC required for the November 2020 Release. Today, we are therefore consulting upon version 4.0 of DUIS and MMC which include all of the above changes. To the extent that the SMETS1 text changes are a consequence of DCC's consultation, we will make the equivalent changes to version 4.0 of DUIS and MMC prior to their incorporation into the SEC.

Summary of status of each relevant SEC Schedule and Appendix for the November 2020 Release:

SEC Schedule or Appendix	Name	Date changes for Nov 2020 version originally consulted upon	Date any further changes were consulted upon	Additional changes included in this consultation ?	Re- Designation or Designation	Version number in this consultation	Version number for (re) designation ⁸
Schedule 8	Great Britain Companion Specification	October 2019	N/A	Yes	Designation	4.0 Draft 3	4.0
Schedule 9	Smart Metering Equipment Technical Specifications 2	August 2019	June 2020	Yes	Designation	29 November 2019 Draft 5	29 November 2019
Schedule 10	Communications Hub Technical Specifications	October 2019	N/A	No	Designation	N/A	1.4
Schedule 11	TS Applicability Tables	N/A	N/A	Yes	Re- designation	9.1	10.0
Appendix B	Organisation Certificate Policy	June 2020	N/A	Yes	Re- Designation	N/A	B3.0

⁸ These are the expected final version numbers, but we propose to carry out a final confirmatory check on these numbers before (re)designation.

Appendix D	SMKI Registration Authority Policies and Procedures	June 2020	N/A	No	Re- designation	N/A	D3.0
Appendix E	User Interface Service Schedules	June 2020	N/A	No	Re- designation	N/A	E4.0
Appendix M	SMKI Interface Design Specification	June 2020	N/A	No	Re- designation	N/A	M3.0
Appendix O	SMKI Repository Interface Design Specification	N/A	N/A	Yes	Re- Designation	02.1	O3.0
Appendix AB	Service Request Processing Document	June 2020	N/A	No	Re- designation	N/A	AB4.0
Appendix AC	Inventory Enrolment and Decommissioning Procedures	June 2020	N/A	No	Re- designation	N/A	AC3.0
Appendix AD	DCC User Interface Specification	April 2020	N/A	Yes	Designation	AD4.0 Draft 2	AD4.0

Appendix AF	Message	April 2020	N/A	Yes	Designation	AF4.0 Draft 2	AF4.0
	Mapping						
	Catalogue						

Proposed (re)designation date

- 2.13 We propose that the following technical specifications, GBCS and SSDs in the form set out in Annex D are designated/re-designated on 29 November 2020 (or as soon as practicable within one month after this date) as per the draft direction letter in Annex B to coincide with the November 2020 SEC Release (a summary of the proposed additional corrections introduced previously is provided in Annex C of this consultation and a redlined version of each affected document is included in Annex D and comments are invited upon them):
 - SEC Schedule 8 Great Britain Companion Specification v4.0 Draft 3 which includes some additional corrections related to APC functionality;
 - SEC Schedule 9 Smart Metering Equipment Technical Specifications 2 29
 November 2019 Draft 5 with DLV applied, which includes some minor additional corrections related to APC functionality;
 - SEC Schedule 10 Communications Hub Technical Specifications v1.4 which includes changes to accommodate APC functionality (this was consulted upon in October 2019 and has not changed since and is, therefore, not included in Annex D);
 - SEC Schedule 11 TS Applicability Tables v9.1 to include ESMETS v5.0 and SAPCTS v5.0 with associated IVP/ MVP start dates, and some title corrections;
 - SEC Appendix B Organisation Certificate Policy v1.2 in support of XML Signing (this was consulted upon in June 2020 and is therefore not included in Annex D);
 - SEC Appendix D SMKI Registration Authority Policies and Procedures v2.1 in support of XML signing (this was consulted upon in June 2020 and is therefore not included in Annex D);
 - SEC Appendix E User Interface Service Schedules v4.0 to introduce a revised version of this document which will include additional Service Requests that are required to operate SAPCs (this was consulted upon in June 2020 and is therefore not included in Annex D);
 - SEC Appendix M SMKI Interface Design Specification v1.4 in support of XML Signing (this was consulted upon in June 2020 and is therefore not included in Annex D);
 - SEC Appendix O SMKI Repository Interface Design Specification v2.1 in support of XML signing Certificates;
 - SEC Appendix AB Service Request Processing Document v4.0 to include SAPCs in this document (this was consulted upon in June 2020 and is therefore not included in Annex D);
 - SEC Appendix AC Inventory Enrolment and Decommissioning Procedures v2.1 to include SAPCs in this document (this was consulted upon in June 2020 and is therefore not included in Annex D);

- SEC Appendix AD DCC User Interface Specification v4.0 Draft 2 to introduce changes to support APC functionality consulted upon by the DCC⁹; and
- SEC Appendix AF Message Mapping Catalogue v4.0 Draft 2 to introduce changes to support APC functionality consulted upon by the DCC⁹.
- 2.14 Finally, we propose that the change to Section L3.18 of the SEC that was suspended by our X3.1 Direction of 18 September 2020 is also brought into effect on 29 November 2020 (or as soon as practicable with one month after this date).

Consultation Questions

- Q1. Do you agree with our proposal to designate/re-designate the documents identified in the summary status table above on 29 November 2020 (or as soon as practicable within one month after this date), to coincide with the currently planned date for the November 2020 SEC Release?
- Q2. Do you agree with the proposed corrections set out in Annex C (and reflected in the documents in Annex D) to the Great Britain Companion Specification, the Smart Metering Equipment Technical Specifications 2 29 November 2019, TS Applicability Tables, the DCC User Interface Specification and the Message Mapping Catalogue to support the introduction of proportional load control functionality as part of the November 2020 SEC Release?
- Q3. Do you agree with the proposed corrections to the SMKI Repository Interface Design Specification set out in Annex D in support of XML signing?
- Q4. Do you agree with the proposed correction to the Organisation Certificate Policy described in paragraph 2.11, to reflect the correct hexadecimal value of the Remote Party Role Code for XML signing Certificates?
- Q5. Do you agree with proposal to introduce the changes to Section L3.18 of the SEC on 29 November 2020 (or as soon as reasonably practicable within one month after this date)?
- Q6. Do you have any comments on our draft Directions (in Annex B) covering both the designations and re-designations and the introduction of the Section L3.18 changes?

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⁹ https://www.smartdcc.co.uk/customer-hub/consultations/changes-required-to-deliver-against-beis-q4-package-to-be-included-in-the-november-2020-sec-release/