Smart Energy Code

DP160

'Certificate Signing Request forecasting'

Modification Report

Version 0.3

11 June 2021

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

If you have any questions on this modification, please contact:

Bradley Baker

020 7770 6597

bradley.baker@gemserv.com

1. Summary

This proposal has been raised by Graeme Liggett from the Data Communications Company (DCC).

Smart Energy Code (SEC) Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' currently sets out the obligation whereby each Party which is an Authorised Subscriber shall provide the DCC each quarter with a forecast of the number of Certificate Signing Requests (CSRs) it expects to send in the following eight months. The forecasts contain a breakdown of the total number of CSRs for Device Certificates, including the issue of a single Device Certificate and ones that are batched together.

The DCC believes that the obligation on Users to provide these forecasts should be removed. There is sufficient capacity within the Smart Metering Key Infrastructure (SMKI) services to no longer require the CSR forecasting process except in the case when exceptional volumes of CSRs are to be sent in a given period by a SEC party.

2. Issue

What are the current arrangements?

SEC Parties will utilise the SMKI and DCC Key Infrastructure (DCCKI) services (SEC Section L) in order to manage Organisational, Device and Infrastructure Key Infrastructure (IKI) Certificates. The SMKI service provides Certificates used for the means of establishing trust and secured communications between parties and smart metering Devices across the DCC network. The DCCKI service provides SEC Parties and Registration Data Providers with Certificates used to authenticate and secure access to DCC interfaces such as the DCC Gateway Connection, Self-Service Interface (SSI), the Registration Data Interface and the DCC User Interface.

SEC Parties which have completed the relevant SMKI and Repository Entry Process Tests and have access to the SMKI services are known as 'Authorised Subscribers'. SEC Sections L8.7-L8.12 currently set out the obligations for each Authorised Subscriber to the SMKI Services to provide the DCC with quarterly forecasts of the number of CSRs it expects to send in the following eight months.

The DCC will provide a monthly report to each Authorised Subscriber setting out the actual number of CSRs sent against those that were forecast. Furthermore, the DCC must provide a report to the SEC Panel setting out the aggregate number of CSRs by all Authorised Subscribers collectively during the month. This will also be compared with forecasted numbers.

The DCC shall not be considered to be in breach of its obligation to achieve the Target Response Times if, during the month in question, the aggregate Certificate Signing Requests for Device Certificates sent by all Authorised Subscribers exceeds 110% of the last forecast of the expected demand for that month.

What is the issue?

CSR Forecasting is resource-intense despite its low value to the DCC. This means that despite the effort each User puts in to complete each forecast, the benefit and value of the process is not apparent.

The DCC believes that the obligation on Users to provide these forecasts should be removed, as actual CSR requests are relatively stable and are restricted by the volume of assets a Party can install. The DCC carries enough data for this to be largely predictable. The DCC has also stated that there is significant headroom within the SMKI services to facilitate increases in CSRs being sent.

What is the impact this is having?

If nothing is changed, Service Users will continue to expend resources to submit CSR forecasts despite the value of the forecasts being diminished. The SMKI services carry significant headroom, measured in many months of CSRs, and can replenish within several weeks. Furthermore, there is no cost incurred in maintaining additional headroom.

The time and effort taken to complete a CSR forecast by an Authorised Subscriber can also consume 30 minutes of resource. By removing the obligation to submit CSR forecasts, the Service User will be able to reallocate resources accordingly.

Impact on consumers

The issue has no impact on Consumers.

3.   Assessment of the proposal

Observations on the issue

During the Development Stage, DP160 was presented to the Panel Sub-Committees. Each Sub-Committee agreed that the issue is clearly defined and were happy for the proposal to proceed to the Refinement Process. The Operations Group (OPSG) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) will be consulted upon the Proposed Solution.

Views of the Change Sub-Committee

SECAS presented DP160 to the Change Sub-Committee (CSC) for initial comment in April 2021. CSC members commented that each quarterly forecast takes between 30 minutes to an hour to complete. They felt that there was an issue regarding providing the desired level of accuracy. The reason given for this is that customers can now change Supplier much easier and faster than before and this is difficult to predict or forecast. This will be the case more so when the Faster Switching Programme[1] goes live in 2022 which actively encourages customers to change Supplier.

A CSC member advised that, like MP116 'Service Request Forecasting', this modification will need to be supported by a DCC guidance document that sets out what is expected of Authorised Subscribers once the obligation to provide the forecasts has been removed. The member advised that this will need to be provided in advance of the modification proceeding to vote. SECAS will ensure that the DCC provides the guidance document to the SEC Working Group for review.

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[1] https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme

The proposal was taken to the CSC in May 2021 for final comments and recommendation. The CSC reiterated that the DCC guidance document must be reviewed by the Working Group and on this basis, was happy for the proposal to proceed to the Refinement Process.

Appendix 1: Progression timetable

This Draft Proposal will be taken to the SEC Panel for decision on 18 June 2021. Once the proposal enters the Refinement Process SECAS will work with the Proposer to develop the solution.

Timetable	
Event/Action	**Date**
Draft Proposal raised	19 Apr 2021
Presented to CSC for initial comment	27 Apr 2021
Presented to SEC Sub-Committees for initial comment	May 2021
Presented to CSC for final comment and recommendations	25 May 2021
Panel converts Draft Proposal to Modification Proposal	18 Jun 2021
SECAS to develop solution with the Proposer	Jun – Jul 2021
Modification discussed with Working Group	4 Aug 2021
Modification discussed with Sub-Committees	Aug 2021
Modification discussed with Working Group	1 Sep 2021
Refinement Consultation	6 Sep – 24 Sep 2021
Modification discussed with Working Group	6 Oct 2021
Modification Report approved by CSC	26 Oct 2021

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
CSC	Change Sub-Committee
CSR	Certificate Signing Request
DCC	Data Communications Company
DCCKI	DCC Key Infrastructure
IKI	Infrastructure Key Infrastructure
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI	Smart Metering Key Infrastructure
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority

Glossary	
Acronym	**Full term**
SSI	Self-Service Interface