

## DCC Notice: Amendment of submission dates of draft SMKI-related Subsidiary Documents

### 1.1 Purpose of this Notice

This Notice explains that the Secretary of State has agreed that there will be amendments to the submission dates of the draft SMKI-related SEC Subsidiary Documents.

### 1.2 Background

Section L of the SEC specifies that DCC must submit six draft SMKI-related Subsidiary Documents to the Secretary of State six months prior to the commencement of Systems Integration Testing (SIT) or at such later date as may be specified by the Secretary of State. Six months in advance of SIT was 1<sup>st</sup> September 2014.

The relevant documents are: SMKI Interface Design Specification, SMKI Code of Connection, SMKI Repository Interface Design Specification, SMKI Repository Code of Connection, SMKI Registration Authority Policies and Procedures (RAPP), and SMKI Recovery Procedure.

On 19 August 2014, DCC requested a direction from the Secretary of State to amend the submission date for the first four Documents above, which DCC issued for consultation on 1 August 2014, from six months before SIT to five months before SIT. DCC also requested a direction from the Secretary of State to amend the submission date for the fifth and sixth Documents from six months before SIT to two months before SIT.

### 1.3 Determination on amendment of submission dates

On 22 August 2014, the Secretary of State wrote to DCC agreeing that the dates by which drafts of the SMKI-related Subsidiary Documents must be submitted should be made later. These new dates are set out in the table below:

Draft Document	SEC Ref	Submission to Sec of State
1. SMKI Interface Design Specification	L4.6(b)	1 October 2014 <i>five months in advance of SIT</i>
2. SMKI Code of Connection	L4.6(b)	
3. SMKI Repository Interface Design Specification	L6.6(b)	
4. SMKI Repository Code of Connection	L6.6(b)	
5. SMKI Registration Authority Policies and Procedures (RAPP)	L9.5(d)	2 January 2015 <i>two months in advance of SIT</i>
6. SMKI Recovery Procedure	L10.4(b)	

#### **1.4 Rationale for alteration to submission dates**

The requested delay to the Documents' submission is to allow the development of documents which are robust from both a regulatory and technical standpoint, so as to minimise the risk of the documents requiring further development / consultation after their initial submission to the Secretary of State in order to be designated.

It is our intention that the SMKI documents numbered five and six can be submitted sooner than two months before SIT, however we feel it prudent to ensure that enough time and resource can be deployed so that we do not run the risk of further consultation after initial submission.

The requirement for later submission dates has been discussed with DECC and there is a shared confidence that such a change is prudent in minimising the risks to the key milestones and to the start of Initial Live Operations, whilst having no material impact on Parties.

#### **1.5 Consultation**

The consultation on the first four Documents above closed on 29 August. We expect the consultation on the last two documents to take place over October.

#### **1.6 Contact**

If you would like to discuss any part of this Notice, please contact Richard Sullivan at [richard.sullivan@smartdcc.co.uk](mailto:richard.sullivan@smartdcc.co.uk).