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DP173 'SMKI & DCCKI Document Set reviews'

Modification Report

Version 0.1

21 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:

Joe Hehir

020 7770 6874

joe.hehir@gemserv.com

1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA).

The SMKI PMA has carried out a review of the SMKI and Data Communications Company (DCC) Key Infrastructure (DCCKI) Document Sets as required by Smart Energy Code (SEC) Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' (paragraph 1.17). It has identified a number of typographical, cosmetic and alignment changes that need to be made due to updated SEC versions since 2014 that have not been fully or accurately reflected throughout the extensive SMKI Document Set.

In addition, the review identified a number of inconsistencies, omissions and improved drafting needed between different parts of the SEC together with standards that need to be amended. This is because they have been superseded or discontinued. Lastly, it has been identified that the SMKI Recovery processes require greater clarity for Subscribers.

2. Issue

What are the current arrangements?

Review of the SMKI and DCCKI Document Sets

The SMKI PMA has an obligation in SEC Section L1.17 to periodically review the effectiveness of the SMKI Document Set (which is defined in SEC Section L9.3) and DCCKI Document Set (which is defined in SEC Section L13.31):

Duties of the SMKI PMA

L1.17 The SMKI PMA shall undertake the following duties:

[...]

- (c) to periodically review (including where directed to do so by the Panel) the effectiveness of the SMKI Document Set (including so as to evaluate whether the SMKI Document Set remains consistent with the SEC Objectives), and report to the Panel on the outcome of such review (such report to include any recommendations for action that the SMKI PMA considers appropriate);*

[...]

- (e) to periodically review the effectiveness of the DCCKI Document Set and to:*
 - (i) notify DCC where it considers that changes should be made to the DCCKI Document Set in order to ensure that DCC meets its obligations under Section G (Security) (such notification to include any recommendation for action that the SMKI PMA considers appropriate); and*

- (ii) *copy any such notification to the Security Sub-Committee and, except to the extent that it is appropriate to redact information for security purposes, to other SEC Parties;*

The SEC Panel approved budgetary expenditure for a review in 2020/21 and the SMKI Specialist was commissioned to undertake a thorough review that concluded at the end of April 2021.

The review also considered specific Request for Comments (RFC) references (RFCs are recognised industry standards) and to confirm whether they continue to be accurate and appropriate.

The review consulted and was advised by a SMKI PMA Working Group that comprised of:

- The SMKI PMA Chair;
- The Technical Architecture and Business Architecture Sub-Committee (TABASC) Representative;
- The Department for Business, Energy and Industrial Strategy (BEIS) Regulatory Expert; and
- The BEIS Security Lead.

What is the issue?

Recommended changes to the SMKI Document Set

The review identified a large number of relatively minor typographical, cosmetic and alignment changes that have arisen due to updated SEC versions since 2014 that have not been fully or accurately reflected throughout the extensive SMKI Document Set. These are considered by the SMKI PMA to be straightforward corrections that need to be made via a Modification Proposal.

The review further identified a number of apparent inconsistencies, omissions or improvements between different parts of the SEC. These apply to standards that have been superseded or discontinued and, in the SMKI Recovery processes, that need clarification for Subscribers. Each of these examples have been considered by the SMKI PMA.

Changes are required to the SMKI Document Set in SEC Appendices A, B, C, D, L, M, N and Q.

Recommended changes to the DCCKI Document Set

As with the SMKI Document Set, there are relatively minor typographical and cosmetic changes proposed to the DCCKI Document Set as well as a number of apparent inconsistencies.

Changes are required to the DCCKI Document Set in SEC Appendices S, T, U, V and W.

What is the impact this is having?

If this issue is not resolved, the SMKI and DCCKI Document Sets will contain a large number of inconsistencies. These vary in nature but include minor typographical, cosmetic and alignment inconsistencies, as well as apparent inconsistencies and omissions between different SEC documents.

If these continue to remain, it could make it harder for Parties to comply with these documents and make the documents in question harder to maintain, increasing the chance of further inconsistencies occurring in the future.

Impact on consumers

The issue outlined in this proposal does not impact consumers.

Appendix 1: Progression timetable

This proposal will be presented to Change Sub-Committee (CSC) for initial comment on 29 June 2021.

Timetable	
Event/Action	Date
Draft Proposal raised	21 Jun 2021
Presented to CSC for initial comment	29 Jun 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
BEIS	Department for Business, Energy and Industrial Strategy
CSC	Change Sub-Committee
DCC	Data Communications Company
DCCKI	Data Communications Company Key Infrastructure
RFC	Request for Comments
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
TABASC	Technical Architecture and Business Architecture Sub-Committee