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MP160 'Certificate Signing Request forecasting'

Modification Report

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Corporate member of
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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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This document also has two annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the Data Communications Company (DCC) User Guidance document that accompanies the proposed legal text changes.

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1. Summary

This proposal has been raised by Graeme Liggett from the 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.

The Proposed Solution is to amend SEC Section L to remove the requirement on Users to provide CSR forecasts except where exceptional volumes are expected. The new process is set out in a DCC Guidance Document. This modification will impact DCC Users and the DCC. There are no DCC costs to implement this modification. Implementation is targeted for the November 2022 SEC Release. This is a Self-Governance Modification.

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 trusted 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 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.

What is the issue?

CSR Forecasting is resource-intensive 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. Solution

Proposed Solution

The Proposed Solution will remove the obligation for Authorised Subscribers to have to provide quarterly eight-month CSR forecasts to the DCC. The DCC has advised there is sufficient capacity within the SMKI services to no longer require the CSR forecasting process, instead the DCC will produce its own forecasts internally. Except in the case of exceptional demand of CSRs which the DCC request be sent in the relevant month by an Authorised Subscriber.

‘Exceptional demand’ is considered when an Authorised Subscriber is aware of future requests will be over 50% of their usual CSRs sent each month.

Producing forecasts and reporting

The DCC will produce a single CSR forecast (covering the following six months) and a single variance report each quarter (covering the previous three months) that will be issued to the SEC Panel or a delegated Sub-Committee for review and comment. This single CSR forecast will account for CSRs to be sent in the following six months by both Parties and Service Providers. Historically, these separate Party and Service Provider forecasts were produced independently and then aggregated, but for efficiency a single forecast will be produced.

These reports will include:

1. A six-month forecast of the number of CSRs that Parties and Service Providers will (collectively) send in each of the six months following the end of the month in which such forecast is provided. This forecast will also report on the number of available CSRs

through the forecast period. This forecast report will set out and comment on expected future CSR volumes and will be published on SharePoint as a PDF document.

2. A CSR forecast accuracy report that sets out the number of CSRs that Parties and Service Providers (collectively) sent during each of the previous three months. This will evidence the accuracy of previous forecasts and identify steps to improve future forecast accuracy. This variance report will review and comment on the variance between actual and forecast CSR volumes and will be published on SharePoint as a PDF document.

User input

SEC Parties are asked to notify the DCC Service Desk where the number of Certificate Signing Requests sent in a month is expected to increase by 50% or more compared to the average number of Certificate Signing Requests sent in each of the previous three months. Full details are set out in the DCC User Guidance document (Annex B).

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
✓	Other SEC Parties	✓	DCC

All DCC Users will be impacted as they will no longer have to provide quarterly eight-month CSR forecasts. This will result in resource requirements being reduced. SEC Parties will however have the option to provide input into the DCC forecasts in cases of exceptional demand.

DCC System

This modification has no impact on the DCC System.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Consumers

This modification will have no impact on Consumers.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC System costs to implement this modification. Any costs associated with DCC providing resource will be accounted for through the DCC's price control.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

Details regarding SEC Party costs will be gathered during the Refinement Consultation.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 21 October 2022; or
- **23 February 2023** (February 2023 SEC Release) if a decision to approve is received after 21 October 2023 but on or before 10 February 2023.

The earliest Release this modification could be implemented in is the November 2022 SEC Release. This modification does not have any DCC System impacts so if a decision is received after the cut-off date, it could be implemented in the February 2023 SEC Release.

7. 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 Programme¹ 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.

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.

Legal Text

The proposed changes to the SEC can be found in Annex A.

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

Views against the General SEC Objectives

Proposer's views

The Proposer believes that MP160 better facilitates SEC Objectives (a)² and (b)³. This is due to the efficiencies removal of the forecasting CSR process will deliver with only exceptional demand CSR volumes needing flagging to the DCC. This aids the efficient provision, installation, operation, and interoperability of smart metering systems at energy consumers' premises and allows the DCC to comply with the objectives of the DCC licence while optimising DCC System capacity.

Industry views

Industry views will be gathered during the Refinement Consultation.

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on safety and reliability of the smart metering systems.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the cost of energy bills.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will free up time for the Authorised Subscribers, as the DCC has enough head room to handle the current load of CSRs, and only in exceptional demand periods will there be a need to report their quantity of CSRs to the DCC.

Benefits for society as a whole

This modification will have a neutral impact on society.

² Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

³ Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

Appendix 1: Progression timetable

SECAS has worked with the SEC Lawyer and the Proposer to draft the legal text and the DCC has produced a User Guidance Document. These will be presented to the Working Group on the 4 May 2022. This proposal will then be presented to the CSC to progress to Report Phase.

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	25 May 2021
Presented to CSC for final comment and recommendations	25 May 2021
Panel converts Draft Proposal to Modification Proposal	18 Jun 2021
Legal text developed with the Proposer	Feb – Apr 2022
Guidance document produced by the DCC	Feb – Apr 2022
Proposed Solution developed with the Proposer	Feb – Apr 2022
Modification discussed with Working Group	4 May 2022
Refinement Consultation	4 May – 27 May 2022
Modification Report to be presented to CSC	21 Jun 2022
Modification Report Consultation	27 Jun – 15 Jul 2022
Change Board Vote	27 Jul 2022

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
OPSG	Operational Sub Group
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
SSI	Self-Service Interface