



Department for  
Business, Energy  
& Industrial Strategy

**Department for Business,  
Energy & Industrial Strategy**  
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Penny Brown  
Chief Operating Officer  
Smart DCC Limited  
Ibex House  
42-47 Minories  
London EC3N 1DY

**By email only**

10 May 2022

Dear Penny,

### **Smart Metering Implementation Programme: Live Service Criteria for the Enduring Change of Supplier (ECoS) Arrangements**

On 14 April 2022 the SEC Panel agreed with Government's proposed ECoS Live Service Criteria. These are the criteria that DCC is to use to evidence to the SEC Panel (who will advise Government) and to Government (who will decide on whether to make enabling legal changes) for the commencement of migration of Devices from using transitional CoS Certificates to enduring CoS Certificates. These criteria have previously been discussed with DCC and with the Chairs of the SEC Operations Group, Security Sub-Committee and Testing Advisory Group.

The finalised ECoS Live Service Criteria are set out below. Please note that Government has made one minor alteration to the criteria, which is to require assurance that energy suppliers are using XML Signing Private Keys with *the correct* MPIDs in the associated Certificates. This is to reflect the fact that DCC is now reporting on whether this activity is taking place, and confirmation that the correct MPIDs are being used provides greater assurance that energy suppliers are sufficiently ready for commencement of migration.

The Live Services Criteria are that:

1. ECoS Testing is Complete (including core solution, migration, capacity testing);
2. Any defects have been resolved or accepted;
3. DCC is operationally ready to commence migration;
4. Business continuity and disaster recovery arrangements are in place;

5. Any potential consumer impacts have been considered and appropriate arrangements are in place to manage them;
6. The arrangements have been assured from a security perspective;
7. Pre-existing services remain stable; and
8. A sufficient number of DCC Users have demonstrated that they are ready for ECoS Go-live.

The evidence that Government will be seeking DCC provides to it and to the SEC Panel in order to be assured that these criteria have been met is:

- a) An assurance letter on readiness covering each of the live services criteria from a director (i.e. board member) of Smart DCC Limited;
- b) (shortly before go-live) a statement from the DCC's COO that DCC systems are stable;
- c) a copy of a signed letter from the DCC CISO to the SSC confirming that all security risks are within tolerance;
- d) a copy of a letter from the SSC Chair to the SEC Panel confirming that SSC accepts the assertion of the DCC CISO based on the information presented to them;
- e) Evidence from DCC that energy suppliers are using XML signing Private Keys with the correct MPIDs in the associated Certificates to sign 6.23 Service Requests has been submitted to BEIS; and
- f) A recommendation to proceed on ECoS has been received by BEIS from the SEC Panel, having taken advice from the Testing Advisory Group, the Operations Group and SSC.

I trust that DCC will put in place arrangements that allow for this evidence to be provided in a timely manner in advance of the planned date for ECoS live. My team continues to be at hand to support DCC in this process.

This letter is also being published on the SECAS website.

Yours sincerely,



**Duncan Stone**

Deputy Director & Head of Delivery,  
Smart Metering Implementation Programme

(An official of the Department for Business, Energy & Industrial Strategy authorised to act on behalf of the Secretary of State).

cc Rachel Clarke, Ofgem; the SEC Panel; Robin Healey, chair of the Testing Advisory Group; Gordon Hextall, chair of the Security Sub-Committee; David Warner, chair of the SEC Operations Group; Ro Crawford, DCC.