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## SEC Modification Proposal Form – SECMP0052

### Mod Title

Updates to the DCCKI CP and DCCKI RAPP

### Submission Date

26<sup>th</sup> April 2018

### Details of Proposer

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SECMP0052  
Modification  
Proposal Form

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### 1. What issue are you looking to address?

All Data Service Provider Interface, including the DCC User Interface, Self Service Interface and Registration Data Interface, is secured using a Public Key Infrastructure (PKI) known as the DCC Key Infrastructure (DCCKI).

In January 2017, an independent audit of the DCCKI Service was undertaken at the request of the DCC. The DCC commissioned the audit to gain reasonable assurance around the DCCKI Service's compliance with any applicable requirements of the DCCKI Document Set. The auditor raised several observations aimed at ensuring that the DCCKI Service is carried out in accordance with Good Industry Practice.

To address the observations of the audit, the DCC proposed changes intended to bring the following SEC Subsidiary Documents into alignment with current operational practices:

- SEC Appendix S – DCCKI Certificate Policy (DCCKI CP) and;
- SEC Appendix W – DCCKI Registration Authority Policies and Procedures (DCCKI RAPP).

On 19<sup>th</sup> December 2017, the SMKI Policy Management Authority (SMKI PMA) considered and formally approved DCC's proposed changes to these SEC Subsidiary Documents.

### 2. Why does this issue need to be addressed? (i.e. Why is doing nothing not an option?)

This modification will update the DCCKI CP and the DCCKI RAPP to avoid misunderstanding or confusion for SEC Parties reliant on the DCCKI Services.

The modification only seeks to bring the SEC into alignment with current operational practice. The changes do not impact how SEC Parties are required to operate, and they do not change the cryptographic purpose, design or functionality provided by the DCCKI Service.

### 3. What is your Proposed Solution?

This modification is seeking to make changes to the DCCKI CP and the DCCKI RAPP to bring those documents into alignment with current operational practices.

Most of the proposed solution relate to the Certificate Profiles in Annex B of the DCCKI CP. These changes fall into the following categories:

- Mandatory changes required to implement the DCCKI service;
- Recommended changes required to comply with common PKI practice; and
- Cosmetic changes and document corrections.

In addition to making changes to the existing DCCKI Certificate Profiles, this Modification Proposal adds a new Certificate Profile to support the SubjectAltName (SAN) attributes for Transport Layer Security (TLS) communication. This certificate profile shall be added to the DCCKI CP and all subsequent TLS certificate request must be issued in accordance with this certificate profile. Thus, DCCKI Service Users will not be required to change current certificates.

Full details of the proposed changes can be found in the accompanying draft legal text.

### 4. What SEC objectives does this Modification better facilitate?

This modification will better facilitate the following SEC objectives (Section C1.1):

(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code:

- The proposed changes will improve the clarity of the Certificate Profiles to be used to enable connectivity to DCC Total Systems Interfaces, and will ensure that the SEC requires Users to adhere to Good Industry Practice regarding the use of Certificate Profiles.

(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code

- The proposed changes will bring the SEC into alignment with Good Industry Practice regarding the use of PKI in accordance with the recommendations made by the independent auditor.

<b>5. What is the requested Path type?</b>	Path 3
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This modification is appropriate for Path 3 Modification as it is not likely to result in any material effects, and is not likely to unduly discriminate in its effect between one Party (or class of Parties) and another Party (or class of Parties).

The proposed changes only seek to bring the SEC into alignment with current operational practices.

<b>6. Are you requesting that the Modification Proposal be treated as Urgent?</b>	No
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Urgency is not required as the modification does not change the way the DCCKI Service is operated.

<b>7. What is your desired implementation date?</b>
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November 2018 SEC Release.

<b>8. Which SEC Parties are expected to be impacted? (Please mark with an X)</b>
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Large Supplier Parties	<input type="checkbox"/>	Small Supplier Parties	<input type="checkbox"/>
Electricity Network Parties	<input type="checkbox"/>	Gas Network Parties	<input type="checkbox"/>
Other SEC Parties	<input type="checkbox"/>		

This Modification is only intended to align the SEC with current operational practice. It is not expected that SEC Parties will need to take any action in response to this Modification.

**9. Which parts of the SEC will be impacted?**

The following SEC Subsidiary Documents will be impacted:

- SEC Appendix S – DCCKI Certificate Policy; and
- SEC Appendix W – DCCKI Registration Authority Policies and Procedures.

**10. Will there be an impact on Central Systems? (Please mark with an X)**

DCC Systems	<input type="checkbox"/>	Party interfacing systems	<input type="checkbox"/>
Smart Metering Systems	<input type="checkbox"/>	Communication Hubs	<input type="checkbox"/>
Other systems	<input type="checkbox"/>		

There will be no impact on Central Systems as a result of this modification. This modification is only intended to align the SEC with current operational practice.

**11. Will there be any testing required?**

No testing is required.

<b>12. Will this Modification impact other Energy Codes?</b>	No
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No other Energy Codes are impacted.

<b>13. Will this Modification impact Greenhouse Gas Emissions?</b>	No
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Greenhouse Gas Emissions will not be impacted.