



Department
of Energy &
Climate Change

Smart Metering Implementation Programme

**A Consultation on New Smart Energy Code Content and Related Licence
Amendments - February 2016**

25 February 2016

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This document is also available from our website at www.gov.uk/decc

General information

Purpose of this document:

This document is a Government consultation on additional Smart Energy Code content and related matters.

Issued: 25 February 2016 **Closes:** 24 March 2016

Consultation responses and other enquiries related to this consultation to:

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Your response will be most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcome.

Territorial extent:

This consultation applies to the gas and electricity markets in Great Britain. Responsibility for energy markets in Northern Ireland lies with the Northern Ireland Executive's Department of Enterprise, Trade and Investment.

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<https://www.gov.uk/government/consultations/a-consultation-on-new-smart-energy-code-content-and-related-licence-amendments>

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Confidentiality and data protection:

DECC intends to publish the individual responses to this consultation on its website and you should therefore let us know if you are not content for the response or any part of it to be published. We will not publish people's personal names, addresses or other contact details. If you indicate that you do not want your response published we will not publish it automatically but it could still be subject to information requests as detailed below.

Further, information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

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Quality assurance:

This consultation has been carried out in accordance with the Government's Consultation Principles, which can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60937/Consultation-Principles.pdf

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

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1 Executive summary

1.1 The Smart Energy Code

1. Smart meters are the next generation of gas and electricity meters. They will offer a range of intelligent functions and provide consumers with more accurate information, bringing an end to estimated billing. Consumers will have near-real time information on their energy consumption to help them control and manage their energy use, save money and reduce emissions.
2. The Smart Energy Code (SEC) is an industry code concerning the arrangements for the provision of the smart metering communication service. It has been created through the Data and Communications Company (DCC) Licence, and it was first designated on 23 September 2013. Further content of the SEC is being introduced progressively over time to reflect the evolving DCC design implementation of the legal content necessary to support the delivery of the smart metering programme in Great Britain.
3. This is primarily a consultation on new legal drafting for incorporation into the SEC (Chapters 4-11) and also into the Gas and Electricity Supply Licences and the Electricity Distribution Licence (Chapter 3). Draft legal text as revised by the proposals in this consultation is published in parallel with this document.

1.2 Coverage of this SEC Consultation

4. The principal areas covered in this document are described below.
 - **Chapter 2:** provides a general introduction to the consultation.
 - **Chapter 3:** Rollout Strategy – sets out the proposed draft additions to the standard conditions of electricity and gas supply (the ‘Supply Licence Conditions’) and the Electricity Distribution Licence for the Early Roll-Out Obligation and the DCC User Mandate, covering two of the policy conclusions outlined in the response to the Smart Metering Rollout Strategy consultation¹.
 - **Chapter 4:** Communications Hubs – sets out the proposed SEC content dealing with Special Installation Mesh Communications Hubs and Network Enhancement Plans. It also provides an update on the Re-Use of Communications Hubs and proposes a minor legal drafting amendment on the issue of WAN Coverage Database data availability.

1

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/450167/Smart_Meters_Rollout_Strategy_Government_response_FINAL.pdf

- **Chapter 5:** User to non-User Churn - The SEC Stage 4 consultation² noted that we would assess whether our conclusions on User to non-User churn necessitated modification to the regulatory framework. This chapter provides such an assessment.
 - **Chapter 6:** Enduring Change of Supplier – sets out our proposed approach to handling the re-design of the Change of Supplier process to securely manage the security credentials for smart meters.
 - **Chapter 7:** DCC Additional Support – sets out proposed amendments to Section H of the SEC to include provisions for the DCC to provide reasonable additional support to assist Users in understanding and resolving problems with User Systems or Devices.
 - **Chapter 8:** Further Requirements relating to Testing as a result of the DCC release strategy – sets out proposed changes in the SEC which are required as a consequence of the approved DCC request for contingency³ which involves the introduction of functionality in split releases DCC Live (Release 1.2) and Release 1.3.
 - **Chapter 9:** SEC Panel and DCC Live Criteria Assessment – sets out proposed changes to the SEC in relation to a role for the SEC Panel in supporting Implementation Milestone proposals.
 - **Chapter 10:** Security, Privacy and Miscellaneous – sets out a number of proposed minor changes to the SEC including, for example: clarifications on Security Disputes, a proposed definition of Explicit Consent; and drafting changes to the Inventory, Enrolment and Withdrawal Procedures in relation to Post Commissioning Reporting and Subscriber Obligations for certain IKI File Signing Certificates.
 - **Chapter 11:** Consistency and Consequential Changes – sets out our proposed approach on a more consistent and transparent usage of the terminology of ‘all reasonable steps’ in the SEC, and provides a restructured, clarified and expanded Incident Management Policy.
5. There are a number of references throughout the document to ‘DCC Live’. Although not a defined regulatory term in the SEC, DCC Live (which is also referred to as ‘Release 1.2’ in this document) is taken to mean the point at which the DCC has completed Release 1.2 Interface Testing and is able to offer enrolment and communication services in relation to the services that form part of Release 1.2. The revised DCC plan approved on behalf of the Secretary of State on 18 December 2015⁴ identifies DCC Live for 20 July 2016, excluding four weeks of potential contingency. The central planning assumption (which includes contingency) is 17 August 2016.

² A Consultation on New Smart Energy Code Content (Stage 4) and consequential/ associated changes to licence conditions. [www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4 -
_Consultation_Document.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4_-_Consultation_Document.pdf)

³ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

⁴ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

2 Introduction

2.1 The Smart Energy Code

6. Smart meters are the next generation of gas and electricity meters. They will offer a range of intelligent functions and provide consumers with more accurate information, bringing an end to estimated billing. Consumers will have near-real time information on their energy consumption to help them control and manage their energy use, save money and reduce emissions.
7. On 23 September 2013, a new licensed entity, the DCC, was established. Together with its service providers, the Data Service Provider (DSP) and Communications Service Providers (CSPs), the DCC will provide a smart meter communications service. The DCC will offer a means by which Suppliers, Network Operators and others can communicate remotely with smart meters in Great Britain.
8. The SEC was created through, and came into force under, the DCC Licence. The SEC is a multiparty contract which sets out the terms for the provision of the DCC's smart meter communications service, and specifies other provisions to govern the end-to-end management of smart metering.
9. The DCC, Suppliers of energy to domestic and smaller non-domestic customers, and Network Operators are required by their licences to become parties to the SEC and to comply with its provisions. Other bodies who wish to use the DCC's services, such as energy efficiency and energy service companies, or those that require Smart Metering Key Infrastructure (SMKI) Certificates to be placed on smart metering devices, must accede to the SEC in order to do so.
10. Consistent with other energy industry codes, the SEC is self-governed, enabling participants to raise change proposals, debate issues, and resolve disputes without the need for day-to-day regulatory intervention. It is managed by a panel drawn from SEC Parties ('the SEC Panel') and is subject to the regulatory oversight of Ofgem. The SEC Panel is supported in the day to day administration of the SEC by a Code Administrator and Secretariat (SECAS).

2.2 Content of this consultation

11. The remaining regulatory changes are primarily the detailed implementation of agreed policy ahead of transitioning the SEC to be an industry-managed code. This is therefore primarily a consultation on new legal drafting, which in many cases derives from previous policy consultations or previous SEC and other Supply Licence Condition consultations. The sections of new draft legal text which are the subject of this consultation are described in detail in Chapters 3 to 11.

2.3 Structure of each section

12. In general the sections of this consultation are split into four parts as follows:

- the first part (**‘Description of the Issue’**) sets out the policy approach which provides the basis for the proposed legal text. We reference previous consultations where appropriate;
 - the second part (**‘Translation into Detailed Requirements’**) summarises how each policy approach has been translated into the proposed legal requirements for consultation;
 - the third part (**‘Legal Text’**) cross-references the proposed approach to the appropriate draft legal text of the SEC for ease of use; and
 - the fourth part (**‘Consultation Questions’**) sets out the questions inviting a response. Most sections include a general question inviting views on the proposed legal text for the SEC, while some only seek views on proposed policy approaches. Furthermore, some sections include additional questions seeking views on specific topics. **Annex A** provides the full list of consultation questions asked throughout this document.
13. **Annex B** (published together with this document) sets out the SEC legal text proposed in this consultation as it would look combined with all the SEC drafting most recently published. The most recently published text is either text published for consultation (if not yet concluded) or text on which the Government has concluded (where this has been published). The version published at **Annex B** alongside this consultation should therefore not be read as the latest in legal effect version of the SEC. The version ‘in legal effect’ can be found on the SEC website⁵.
 14. **Annex C** sets out how the proposed text would look once incorporated into the Gas and Electricity Supply Licences, and **Annex D** sets out how the proposed text would look once incorporated into the Electricity Distribution Licence.
 15. **Annexes E, F, and G** set out how the proposed changes to the Incident Management Policy, Certified Products List Requirements Document and Inventory Enrolment and Withdrawal Procedures respectively would look once incorporated into the SEC.
 16. **Annex H** sets out the draft direction letter to amend Section X of the SEC to introduce a new Section (X9), requiring the provision of GBCS Integration Testing (GIT) for Industry and Pre-User Entry Process Testing services in time for the planned 18 April 2016 start date for Pre-User Integration Testing commencement (see chapter 8.1 of this consultation document).
 17. Every effort has been made to ensure that the explanatory text in the main body of this consultation document reflects the legal drafting included in **Annexes B, C, D, E, F, G and H**. We have sought to ensure that the explanatory text provides a clear and simplified overview of our proposals. However, only the legal drafting should be treated as the definitive text. Where SEC defined terms are used in this consultation document, they are capitalised.
 18. An Impact Assessment for Smart Metering was published in January 2014. This estimated the costs and benefits associated with the GB roll-out of smart meters and identified a substantial net benefit of £6.2bn for the period to 2030 from the programme. A further update to the impact assessment is expected to be published later in 2016 and will incorporate any proposals within this document that were not captured previously.
 19. It is intended that the Government response covering the areas included in this consultation will be published in Spring 2016. We will schedule the laying of legal text in

⁵ <https://www.smartenergycodecompany.co.uk/sec/sec-and-guidance-documents>

order to continue to support the delivery of the DCC's services in line with the revised plans that were approved by the Secretary of State on 18 December 2015⁶. A number of known further issues will be consulted on in future, but they are not considered matters that need to be addressed in advance of DCC Live. Further, DECC will continue to consult on the activation of SEC provisions and incorporation of subsidiary documents in the lead up to DCC Live, as set out in our Open Letter of 26 January 2016⁷. Further, DECC will continue to consult on the activation of SEC provisions and subsidiary documents to the SEC.

⁶ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

⁷ <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/developing-sec/information-letter-on-sec-arrangements-for-1-2-live-tbrd.pdf?sfvrsn=2>

3 Rollout Strategy

20. The Government's Response to the Rollout Strategy consultation was published in July 2015⁸. This included, among other topics, details of the Early Rollout Obligation (ERO) and DCC User Mandate which are set out below. It also set out our intention to consult further on Install & Leave policy which we expect to do later in 2016.
21. Following the contingency request process and revision to the DCC delivery plan, a central planning assumption of 17 August 2016 has been established for DCC Live. This has been reflected in the dates for introduction of the Early Rollout Obligation and the DCC User Mandates on suppliers and DNOs. Details of the revised timing are set out in the relevant sections below.

3.1 Early Rollout Obligation

Description of the Issue

22. The ERO will require large suppliers to take all reasonable steps to install, commission and enrol 1,500 SMETS2 meters or 0.025% of their total meter points (whichever is the lower) by 17 February 2017 or a later date as specified by the Secretary of State. Following the contingency request process and revision to the DCC delivery plan, a central planning assumption of 17 August 2016 has been established for DCC Live. The ERO date of 17 February 2017 is revised from the previously published date of 1 February 2017.

Translation into Detailed Requirements

23. The ERO is an 'all reasonable steps' obligation on large suppliers to install, commission and enrol 1,500 SMETS2 meters or 0.025% of total meter points for which it is a relevant supplier (whichever is the lower) by 17 February 2017 or a later date as specified by the Secretary of State. The use of the term 'commission' is not included in the legal drafting as this is not necessary to achieve the policy intent because enrolment relies on the smart metering system being commissioned.
24. Suppliers can meet the ERO by installing and enrolling gas and/or electricity SMETS2 meters at domestic or non-domestic premises. There is no requirement to install a minimum number of gas meters and a minimum number of electricity meters, the obligation is simply to install and enrol a minimum number of SMETS2 meters regardless of fuel type.
25. The ERO applies to suppliers that supplied electricity and/or gas to 250,000 or more domestic premises on 15 February 2015. This aligns with the date at which suppliers were

⁸

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/450167/Smart_Meters_Rollout_Strategy_Government_response_FINAL.pdf

deemed to be large for purposes of the obligation relating to Interface Testing. The ERO applies on a per-organisation basis.

26. In order to meet the ERO a supplier will need to become a DCC User (by completing the User Entry Process as set out in Section H1.11 of the SEC) for all the licensed capacities (i.e. Import Supplier or Gas Supplier) in which they are operating, if they are supplying gas or electricity to a customer, whether through a smart meter or otherwise (thus enabling it to enrol meters) and this is set out in the draft regulations. This requirement was not explicitly set out in the Rollout Strategy but was implied through the requirement to comply with the ERO. As with the wider supplier DCC User mandate, the User mandate on large suppliers is an absolute requirement.

Legal Text

Summary of changes to Electricity Supply Licence Conditions and Changes to Gas Supply Licence Conditions

Changes to Electricity Supply Licence Condition 48 and Gas Supply Licence Condition 42	Condition 48 of the Electricity Supply licence and Condition 42 of the Gas Supply licence has been expanded to require that large suppliers become a DCC User by no later than 17 February 2017 (or such later date as may be specified in a direction issued by the Secretary of State).
Changes to Electricity Supply Licence Condition 54 and Gas Supply Licence Condition 48	Condition 54 of the Electricity Supply licence and Condition 48 of the Gas Supply licence has been expanded to introduce an obligation on large suppliers to take all reasonable steps to install and enroll 1,500 SMETS2 meters or 0.025% of Metering Systems (whichever is the lower) by 17 February 2017, or a later date as specified by the Secretary of State.

Consultation Questions

Early Rollout Obligation

Q1	Do you agree that the proposed legal drafting implements the policy to introduce an Early Rollout Obligation on large suppliers by 17 February 2017? Please provide a rationale for your views.
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3.2 DCC User Mandate

Description of the Issue

Domestic Energy Suppliers

27. It is important that consumers who have had a SMETS2 meter installed can continue to receive smart services if they choose to change supplier. We also consider that commercial incentives alone should not be relied on to ensure this happens. Therefore, we intend to introduce a User Mandate for all domestic energy suppliers. Domestic energy suppliers not subject to the Early Rollout Obligation (ERO) will be required to become DCC Users by 17 August 2017 or a later date as specified by the Secretary of State. Following the contingency request process and revision to the DCC delivery plan, a central planning assumption of 17 August 2016 has been established for DCC Live. This is reflected in the User Mandate for domestic energy suppliers which has been revised to 17 August 2017 from that previously published of 1 August 2017.
28. The DCC User Mandate for suppliers will continue on an enduring basis so that suppliers entering the market on or after 17 August 2017 will be required to become DCC Users before they supply gas or electricity to customers.
29. The decision on whether a user mandate will apply to non-domestic suppliers will be confirmed in the forthcoming Government response to the consultation on the non-domestic DCC opt out published in March last year.⁹

Distribution Network Operators

30. We are also introducing an obligation for all electricity Distribution Network Operators (DNOs) to become DCC Users by 28 April 2017 or a later date as determined by the Secretary of State. This is 6 months after the central planning assumption for DCC Release 1.3 of 28 October 2016 at which network operator functionality is expected to be available. The DNO mandate has been revised to 28 April 2017 from the previously published date of 1 February 2017 to reflect the revision to the DCC delivery plan. In order to start realising the network benefits associated with smart metering as soon as possible, DNOs will need to have DCC interfaces in place and be ready to receive and respond to smart meter data at or shortly after DCC Live. However, a mandate for DNOs to be Users from DCC Live could present practical challenges for the DCC's test management and we recognise the need for flexibility to prioritise large suppliers in the Interface Testing phase. The date for the DNO mandate reflects a pragmatic approach to DCC testing that minimises the potential for additional risk to DCC Live timescales and costs.

Translation into Detailed Requirements

31. The DCC User mandate for domestic energy suppliers applies to domestic suppliers not already required to be a DCC User through the Early Rollout Obligation. The mandate requires that on or after 17 August 2017, or a later date to be directed by the Secretary of State, each relevant supplier must become a DCC User (by completing the User Entry Process as set out in Section H1.11 of the SEC) for all the licensed capacities (i.e. Import

⁹ <https://www.gov.uk/government/consultations/consultation-on-non-domestic-smart-metering>

Supplier or Gas Supplier) in which they are operating, if they are supplying gas or electricity to a customer, whether through a smart meter or otherwise.

32. The DCC User Mandate for DNOs requires that by 28 April 2017 or a later date to be directed by the Secretary of State that DNOs take all reasonable steps to become DCC Users (by completing the User Entry Process as per SEC Section H1.11) for the Electricity Distributor role. This applies to organisations that are classified as Distribution Service Providers in line with Standard Licence Condition 32 of the Electricity Distribution Licence.

Legal Text

Summary of changes to Electricity and Gas Supply Licence Conditions

Electricity Supply Licence Condition 48 and Gas Supply Licence Condition 42	Condition 48 of the Electricity Supply Licence and Condition 42 of the Gas Supply Licence has been expanded to require domestic energy suppliers to take all reasonable steps to become a DCC User by 17 August 2017 and for new entrants on and after 17 August to become a DCC User prior to supplying electricity or gas.
Electricity Distribution Licence Condition 21A	Condition 21A of the Electricity Distribution Licence has been expanded to require Distribution Services Providers to take all reasonable steps to become a DCC User by 28 April 2017.

Consultation Questions

DCC User Mandate

Q2	Do you agree that the proposed legal drafting implements the policy to introduce an obligation for domestic energy suppliers to become DCC users by 17 August 2017 and for new entrants to become a DCC User before supplying gas or electricity? If you disagree please provide a rationale for your views.
Q3	Do you agree that the proposed legal drafting implements the policy to introduce an obligation for DNOs to become DCC users by 28 April 2017? If you disagree please provide a rationale for your views.

4 Communications Hubs

4.1 Special Installation Mesh Communications Hubs

Description of the Issue

33. Section F7.5 to F7.7 of the SEC sets out that the DCC may, in certain circumstances, need to attend a premises to perform duties for the Supplier to support the installation and maintenance of Communications Hubs. The DCC has now provided further details related to this matter and a number of changes to the SEC are required in relation to forecasting and ordering and installation. Consequential changes to the Communications Hub Installation and Maintenance Support Materials are also required, which the DCC plans to consult on in the near future.
34. Where there are Smart Metering Wide Area Network (SM WAN) connectivity issues in the South Region and Central Region (and the Incident cannot be resolved remotely), the DCC may send a technician to the site to assist the Supplier with the installation and subsequent maintenance of a Special Installation Mesh Communications Hub. A Special Installation Mesh Communications Hub is a type that can be fitted with a specific high gain aerial to improve connectivity in harder to reach locations or/ premises.

Translation into Detailed Requirements

35. It is proposed that Suppliers will not forecast or order their requirement for Special Installation Mesh Communications Hubs. Furthermore, Parties will not be required to maintain a stock of such devices. Instead, the DCC will deliver the relevant device to site when required given a current SM WAN coverage Incident. When on site, the Supplier will install the Special Installation Mesh Communications Hubs as provided by the DCC and then following successful installation, the DCC will install an external aerial in order to provide for SM WAN connectivity. The DCC will also be required to attend premises to support Incident resolution associated with installed Special Installation Mesh Communications Hubs where necessary.

Legal Text

Summary of new SEC Provisions

Section F

F5 and F6 amended so that Special Installation Mesh Communications Hubs are not covered by the standard forecasting and ordering regime.

Further detail added to F7 and F8 related to the provision and installation of Special Installation Mesh Communications Hubs.

Consultation Questions

Special Mesh Communications Hubs

Q4	Do you agree with the proposal and associated legal drafting to reflect matters related to the installation and maintenance of Special Installation Mesh Communications Hubs in the SEC? Please provide a rationale for your views.
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4.2 Network Enhancement Plans

Description of the Issue

36. The December 2015 SEC Conclusion¹⁰ finalised provisions placing a performance obligation on the DCC such that Incidents raised that relate to a lack of WAN coverage should be resolved within 90 days for 99% of such Incidents (where the SM WAN database had earlier shown that coverage should exist at the premises). The December 2015 SEC Conclusion also set out that the DCC had indicated that there should be an allowance within this performance obligation related to Network Enhancement Plans. The December 2015 SEC Conclusion set out that this issue would be further consulted upon.
37. Network Enhancement Plans relate to the South and Central regions only and cover the circumstance where the CSP is seeking to improve WAN connectivity via the existing local network development during the rollout period. This arrangement doesn't apply to the North Region where a new network infrastructure is being rollout out. Each Network Enhancement Plan will cover a cohort of customer premises within a defined geographic region and will have an estimated completion date.

Translation into Detailed Requirements

38. The envisaged approach is that the metric for resolving coverage Incidents for 99% of premises within 90 days will not apply where a Network Enhancement Plan is in force. Network Enhancement Plans are limited to the Central and South Region and are plans where the DCC has obtained reasonable evidence to justify that the works are required in order to improve SM WAN connectivity. For every premises excluded from the metric the DCC will be required to provide further details to the Supplier via the incident management log setting out the name of the Network Enhancement Plan that impacts this location and a likely date by when coverage is expected to be provided.
39. DCC will also have an obligation to provide quarterly reporting to SEC Parties and Ofgem (and DECC upon request) on all Network Enhancement Plans covering: the geographic region, the cohort of customer premises, and the scheduled completion date.
40. There is also a minor drafting change as the existing SEC drafting on the 99% threshold could be strictly interpreted as an exact target to be met by the DCC (i.e. resolving 99.5% of incidents would mean the DCC was in breach) rather than a threshold to be exceeded.

Legal Text

Summary of new SEC Provisions

Summary of new SEC Provisions	
Section F	F7.18 and F7.19 amended to account for Network Enhancement Plans. F7.20 to provide for quarterly reporting on Network Enhancement Plans.

¹⁰

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484710/15_11_26_December_2015_SEC_Government_Response_final.pdf

	Minor amendment to F7.18 and F7.19 so that the 99% is clearly a threshold.
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Consultation Question

Network Enhancement Plans

Q5	Do you agree with the proposal and associated legal drafting to reflect matters related to Network Enhancement Plans in the SEC? Please provide a rationale for your views.
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4.3 Miscellaneous Communications Hubs Issues

Re-Use of Communications Hubs

41. In the December 2015 SEC Conclusion¹¹ we stated that the DCC would be commissioned to conduct an impact assessment into the changes to its systems (and the associated costs and timescales) that would be required to accommodate changing the charging arrangements for Communications Hubs that had been removed from premises for re-use but had yet to be redeployed. The DCC has indicated that it will not complete this impact assessment until after DCC services have gone live, and so we will review whether any changes to the SEC should be progressed when the DCC has completed its impact assessment.

Legal Text

Summary of new SEC Provisions

No legal text on this matter.

WAN-Coverage Database Data Availability

42. On a different matter, we propose a minor clarificatory amendment to section H8.16 (f) which sets out the information on SM WAN coverage that the DCC will make available to Parties.

Legal Text

Summary of new SEC Provisions

H8.16 (f)	The drafting relating to WAN-Coverage Database Data Availability has been simplified by removing the explicit reference to geographical areas which are subject to a Service Exemption Category, which has been replaced with a more straightforward description.
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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484710/15_11_26_December_2015_SEC_Government_Response_final.pdf

5 User to non-User churn

Description of the Issue

43. The SEC Stage 4 consultation¹² noted that we would review whether any modifications would be required to the Supply Licence Conditions to meet our policy intention of allowing DCC-enrolled SMETS 2 meters to churn from DCC Users to non-DCC Users in the period after DCC live operations (until requirements come into effect for Suppliers to become DCC Users). This included assessing the extent to which a non-User gaining supplier would be able to comply with obligations relating to access to data and security. We consider that modifications are not required in respect of Supply Licence Conditions where they apply to domestic premises because we deem the obligations to be sufficiently flexible to allow compliance by non-DCC Users.
44. In assessing the ability of non-User gaining suppliers to meet obligations in relation to SMETS 2 DCC enrolled meters in non-domestic premises, we gave close attention to Supply Licence Conditions 51.12 (Electricity) and 45.8 (Gas) which require suppliers to provide half-hourly consumption data to non-domestic customers on request. These differ from the equivalent requirement for domestic consumers by not being subject to an exception for meters that are churned from a DCC-user to a non-user. The reason for the difference in approach is that when we set out the policy for these conditions in 2013¹³ we noted that where a Supplier gains a Smart Meter in a non-domestic premises, it could meet the requirement by entering into a contract with a third party to make arrangements for accessing data on its behalf. For non-DCC User Suppliers which gain DCC enrolled meters, we recognise that the option of using a third party to allow continued access to half-hourly consumption data would not be viable and that an alternative means would need to be used. We consider that sufficient options are available to non-User suppliers that mean that they would not find themselves in breach of this licence requirement.

Legal Text

Summary of new SEC Provisions

None	Consultation only at this stage.
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¹² A Consultation on New Smart Energy Code Content (Stage 4) and consequential/ associated changes to licence conditions. www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4_-_Consultation_Document.pdf

¹³

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/253093/smip_cons_doc_gov_response_open_letter.pdf

Consultation Question

User to non-User churn

Q6	Do you agree with our approach that no changes are required to the Supply Licence Conditions as a result of churn of SMETS2 SMSs from DCC Users to non-DCC Users?
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6 Enduring Change of Supplier

Description of the Issue

45. The industry workshops to design the technical and security architecture for smart metering in 2012/13 identified that the Change of Supplier (CoS) process needed to be re-designed for meters enrolled in the DCC to manage the exchange of security credentials for smart meters. Industry confirmed that moving to an Enduring Change of Supplier (ECoS) model would require significant re-engineering of their systems and business processes. The move to ECoS was therefore deferred for future consideration.
46. Transitional Change of Supplier (TCoS) process was agreed using the DCC as a broker to manage the CoS process but this does not uphold the security trust models agreed with the Government's Technical Authority (CESG) because the DCC rather than the supplier, signs the change of credentials command. TCoS has been supplemented with a range of checks and balances e.g. anomaly detection and TCoS is a segregated function within DCC as a temporary measure until the move to ECoS.

Design Implications

47. Ofgem's Blueprint phase for a Central Registration Service (CRS) has started and is due to publish initial new switching proposals by October 2016 with the aim of having CRS in place from 2019 to support reliable next day switching.
48. We recognise that faster switching through CRS could progress as a separate initiative. However, from an efficient and effective system and process design perspective, there is a strong incentive to align the design of ECoS systems and processes with CRS.
49. We are therefore seeking comments on a DECC 'minded to' position, supported by Ofgem, to align the start of the feasibility and design of the ECoS process with the Blueprint phase of CRS (and the 'Switching Programme' more broadly being led by Ofgem) with the aim of linking the design and build of the ECoS system with CRS development.

Implementation Start

50. Suppliers will have to upgrade systems and change business processes for ECoS. However, suppliers may find it easier to align ECoS design and development with their arrangements to support a CRS.
51. Whilst some suppliers will not wish to disrupt rollout plans to introduce new ECoS business processes, others may wish to introduce ECoS as part of other business change initiatives. We are therefore seeking comments on a 'minded to' position that suppliers should take 'reasonable steps' to start to use ECoS from the point at which it becomes available.

Implementation Finish

52. Irrespective of when ECoS starts to be operational, TCoS will need to remain in place and operational until all the TCoS SMKI certificates on all devices have been replaced by the DCC which will take some time (exact length yet to be determined). ECoS and TCoS will therefore have to operate in parallel and processes will need to cater for churn between ECoS and TCoS suppliers during the transition from TCoS to ECoS.
53. We are therefore seeking comments on the principle of suppliers completing the move to ECoS within 6 months of the end of roll out i.e. 2020 or earlier, to minimise the period of

churn between TCoS and ECoS, to allow time for suppliers to implement the new systems and processes and for the DCC to manage the replacement of TCoS certificates.

Governance and Oversight

54. If, following consultation, there is a case for aligning the design of ECoS with CRS, then the initial feasibility, costing, impact analysis and design work for ECoS will need to start as soon as possible as part of the transitional arrangements agreed between DECC and the SEC Panel. DECC proposes to establish an ECoS Working Group within the existing DECC transitional governance arrangements with industry and Ofgem involvement.

55. A transition of governance from DECC to industry would need to be agreed as part of the existing transitional governance arrangements between DECC and the SEC Panel. Comments are sought on the proposed approach to governance and oversight as part of the broader transition of governance.

Translation into Detailed Requirements

56. This is a consultation on a set of principles and ‘minded to’ positions. There is no legal text.

Legal Text

Summary of new SEC Provisions	
None	Consultation only at this stage.

Consultation Questions

Enduring Change of Supplier	
Q7	Do you agree with the ‘minded to’ position to align the start of the feasibility and design of the ECoS process with the Blueprint phase of CRS with the aim of linking the design and build of the ECoS system with CRS development? Please provide a rationale for your views.
Q8	Do you agree with the ‘minded to’ proposal for suppliers to take reasonable steps’ to start to use ECoS from the point at which it becomes available? Please provide a rationale for your views.
Q9	Do you agree with the principle of suppliers completing the move to ECoS within 6 months of the end of roll out i.e. 2020 or earlier? Please provide a rationale for your views.
Q10	Do you agree with the proposal for DECC to establish an industry working group under the transitional arrangements that will subsequently transfer to industry at a point to be agreed as part of the wider transitional arrangements? Please provide a rationale for your views.

7 DCC Additional Support

Description of the Issue

57. Section H9 of the SEC provides for Incident Management capabilities to be provided by the DCC to resolve issues associated with DCC Services. Additionally, H14.33 provides for DCC consultancy support during testing to be available to Testing Participants. Despite these provisions, prospective Users have identified additional requirements for the DCC to assist them with issues encountered during their testing and implementation activities. This is referred to as 'Additional Support'.

Translation into Detailed Requirements

58. It is proposed that the SEC includes provision for the DCC to provide reasonable Additional Support to assist a Testing Participant in understanding and resolving problems with its User Systems or communications between the DCC and Devices or between Smart Metering System Devices. DECC believes that this is beneficial as the DCC may be in a unique position to understand a wide array of problems related to its services, including during a critical programme period, where provision of equivalent services with the requisite knowledge from the open market may be immature.

59. This proposed Additional Support service will extend the scope of the assistance that the DCC can currently provide upon request (as set out in H14.33). It will permit the DCC to also provide Testing Participants with assistance with issues related to User Systems and Devices, and to provide such assistance either during or after testing (when Systems and Devices are operating in the live environment). The Government has considered imposing limitations on the period for which Additional Support services could be provided by the DCC, but considered that the option for Testing Participants to seek advice from the DCC on an enduring basis may be beneficial, due to the key role that the DCC will play in remotely communicating with DCC enrolled Smart Metering Systems.

60. Charges for such Additional Support might be subject to an explicit charge levied on the Testing Participant seeking the support, or might be subject to no explicit charge for a specified amount of support, with any Additional Support requested by that Testing Participant subject to an explicit charge. Were this proposal to be implemented, we would expect the DCC to review its Charging Statement to determine the appropriateness of any charging arrangements. In so doing the DCC will need to have regard to its licence obligations, and the detail of any explicit charging arrangements would need to be included in the DCC's Charging Statement. We would expect the DCC to consult stakeholders on its proposed approach.

61. We expect that any knowledge gained by the DCC whilst providing Additional Support services would be shared as appropriate via knowledge articles and through the subsequent provision of any Additional Support, and used to assist other Testing Participants as they use DCC's Testing Services (subject to commercial and confidentiality considerations).

Legal Text

Summary of new SEC Provisions

Section H	H14.33 has been amended to expand its scope to intended or actual User Systems and to Devices that are or are intended to comprise part of a Smart Metering System. New 14.33A added.
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Consultation Question

DCC Additional Support

Q11	Do you agree with the proposal to extend the scope of H14.33 to allow the DCC to also provide Testing Participants with assistance with issues related to User Systems and Devices and allowing this assistance to be provided during or after testing?
Q12	Do you have any views on how Additional Support services should be charged for?

8 Further Requirements relating to testing as a result of the DCC release strategy

8.1 Provision of early Testing Services by the DCC

Description of the Issue

62. On 5 March 2015, the Secretary of State approved a new DCC delivery plan¹⁴. One of the elements that underpinned this plan was the provision of informal testing by the DCC. The DCC proposed that informal testing would be voluntary and consist of both Pre-User Integration Testing (Pre-UIT) and GBCS Integration Testing (GIT) for Industry (GFI).
63. These proposals for informal testing were reflected in transitional variations made to Section H14.31 of the SEC by the Secretary of State in a direction letter issued on 24 April 2015¹⁵. To provide the DCC with some flexibility and maintain focus on the provision of formal testing services, the Secretary of State directed the DCC to take reasonable steps to provide these informal testing services (i.e. it was not a mandatory requirement). The DCC also had discretion to determine the scope of the functionality included within these testing services.
64. On 18 December 2015¹⁶, the Secretary of State approved a revised DCC delivery plan, which included the move to a multiple release go-live strategy. As a result of this release strategy, the Secretary of State set out the intention to make the provision of the informal testing services mandatory to de-risk device and system integration activities as well as future DCC test phases.

Translation into Detailed Requirements

Pre-UIT (Pre-UEPT)

65. In line with the Secretary of State's direction of 18 December 2015¹⁷, we propose that a new mandatory obligation is included in Section X of the SEC, which requires the DCC to provide a Pre-User Entry Process Testing (UEPT) service. Section X is proposed as this will be a transitional service (rather than enduring). We also believe that reference to UEPT is more appropriate as the purpose of this service is to de-risk this important and specific testing activity.
66. While its provision by the DCC is mandatory, use of the Pre-UEPT service remains a voluntary activity. The objective is to de-risk the formal UEPT (and End-to-End testing) activity while balancing the risk of delivering live services on schedule. As such, we propose a less prescriptive set of requirements for Pre-UEPT than the formal test phases under H14, as outlined below.

¹⁴ https://www.smartdcc.co.uk/media/205577/dcc_replan_-_sofs_direction_v1_0_-_final.pdf

¹⁵ <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/secretary-of-state-variations/sos-letter-of-designation-of-section-h14-31-to-support-informal-testing.pdf?sfvrsn=6>

¹⁶ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

¹⁷ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

67. The DCC has confirmed its intention to use the DSP's User Interface Testing (UIT) environment (which supports both Interface and End-to-End Testing) and a CSP SMWAN Interface simulator (developed by the DSP) to support Pre-UEPT. For the avoidance of doubt, Pre-UEPT will not include testing of the physical CSP network or the Self Service Interface (SSI). Further detail on the testing capabilities provided in Pre-UEPT is set out in the table below:

Capability Verified	
1.	DCC Gateway Connection
2.	DCCKI
3.	Interface to each Web Service
4.	Interpretation of DUIS for each Service Request supported
5.	Receipt of Service Responses
6.	User Verification of MAC / Signatures
7.	Verification of Correlate
8.	Verification of GBCS Payload

68. Pre-UEPT will support an increasing number of Service Requests and Use Cases over time. GBCS payload will be static but realistic and in some cases may have non-realistic dummy data and it is likely that no GBCS data will be encrypted.

69. We propose that the new SEC obligations set out in Section X require:

- The DCC to provide a Pre-UEPT service that enables Parties to test key components of user entry process tests prior to the formal UEPT phase commencing. This service will include the sending of a subset of Service Requests (SRs) to the DCC via a DCC Gateway Connection. It is currently proposed that the minimum set of SRs that must be provided as part of this service are the 36 SRs aligned to Release 1.1 set out in Attachment 1 (*Service Request Variants by Release Candidate*) of the Secretary of State Direction on 18 December 2015¹⁸.
- The DCC to provide the Pre-UEPT service (e.g. availability and support services) in line with the general terms and conditions for the provision of informal testing services currently set out in the Secretary of State's direction relating to the provision of informal testing¹⁹.
- Parties using the Pre-UEPT service to comply with any supplemental obligations that the DCC may notify to them (provided that such obligations are not inconsistent with anything set out in the SEC). This could include information on connectivity and entry requirements; service and support levels; issue resolution approach; basis for termination or suspension of service; and notifications of outages.

70. We note that the DCC is currently in negotiations with its Service Providers following the contingency request process and that further refinement of the scope of the Pre-UEPT service set out above, may be required post-consultation.

¹⁸ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

¹⁹ <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/secretary-of-state-variations/sos-letter-of-designation-of-section-h14-31-to-support-informal-testing.pdf?sfvrsn=6>

71. As this is a voluntary service, we do not propose to introduce any additional new SEC requirements on the DCC to produce an associated Testing Approach document. However the DCC will update the Guide for Pre-UEPT in Q1 2016.
72. We also note that the DCC must provide services in an efficient and economic manner and that the DCC currently believes that there is benefit in providing the service through to the planned Release 1.3 milestone central planning assumption of 28 October 2016. We would welcome views on whether there is benefit in providing the service beyond this date (e.g. until the end date set out in the DCC User Mandate for domestic suppliers).

Device Testing (GFI)

73. The DCC has been providing the GFI tool to Testing Participants under the informal testing provisions since May 2015. The tool currently generates GBCS remote party messages in the form they are transmitted by the Communications Hub. GFI has proved very popular with Testing Participants and many have asked for it to be provided on an enduring basis as it allows device manufacturers and other interested parties to test their smart meters with GBCS messages without the need to connect to the DCC via a DCC Gateway Connection.
74. The DCC has already stated its intention to provide the GFI throughout 2016, with major releases planned for February 2016. However, we propose to introduce a mandatory requirement on the DCC to provide the GFI ((this is currently a reasonable steps requirement), including removing some of the flexibility that currently exists regarding the testing that the GFI facilitates. This is necessary as the configuration of the GFI tool does not currently allow Testing Participants to test the GBCS messages associated with the Gas Proxy Function of the Communications Hub. The DCC is considering a configuration where the GFI will connect with a Test Communications Hub, thus allowing Testing Participants to test their smart meters with the Gas Proxy Function of the Communications Hub.
75. While Testing Participants will be able to test smart meters against all GBCS messages during End-to-End Testing, this will not now be available for all Service Requests until after DCC Live (End-to-End Testing for Release 1.2 and Release 1.3 are due to be available in July and September respectively) . Where energy suppliers install SMETS2 devices, they will be required to be fully compliant with the SMETS2 and GBCS requirements (i.e. there will be no variations in the technical specifications for devices to reflect the staggered Release 1.2 / Release 1.3 approach). Therefore, to assist with interoperability testing we propose to require that the DCC is required to provide an enhanced form of the GFI (i.e. connection via the Test Communications Hub). The GFI would not be required to include a WAN simulation or to be part of End-to-End Testing. We would expect that this 'enhanced-GFI' tool is available in advance of the availability of 1.2 End-to-End Testing.
76. It would be for Testing Participants to decide if they use the GFI. However, where they do choose to use GFI, they would be required to comply with any supplemental obligations prescribed by the DCC.

Timing of Pre-UEPT and GFI

77. It is proposed that from 18 April 2016 the DCC is required to provide:
- Pre-UEPT testing (in line with the Secretary of State approved plan for testing and trialling purposes (pursuant to Condition 13 Part D of the DCC's Licences) which has a commencement date for pre-UIT of 18 April 2016), and
 - GFI testing as soon as it can, but in any event no later than the start of End-To-End Testing.

78. Early provision of both of these testing services is considered necessary in order to achieve the Transition Objective (which is to ensure the efficient, economical, co-ordinated, timely, and secure process of transition to the Completion of Implementation). Accordingly, we propose to use its powers set out in Section X6 of the SEC to amend Section X of the SEC to introduce a new Section (X9) to require the provision of these GFI and Pre-UEPT testing services. This will enable these variations to be made in time for the planned 18 April 2016 start date for pre-UIT commencement set out in the approved plan.
79. The legal drafting provides for the GFI and Pre-UEPT service provision to cease when Section X itself ceases to apply (as set out in X1.5). However the Secretary of State can (pursuant to X6.3 of the SEC) specify an earlier end date by issuing a direction. We would welcome views on these proposals, including the proposed form of direction and the proposed start and end dates (Annex H of this consultation document).
80. The introduction of a Pre-UEPT testing service and the GFI testing service will supersede the current obligations to provide a limited form of User System testing and a limited form of Device testing as per the Secretary of State's direction of 24 April 2015. As such, we propose that once the Pre-UEPT testing service has commenced, the DCC shall no longer be obliged to take reasonable steps to provide the more limited form of User System testing. Similarly once the GFI testing service has commenced, the DCC shall no longer be obliged to take reasonable steps to provide the more limited form of Device Testing.
81. The enduring provisions under H14.31 related to User System Testing, Device Testing and Device and User System Testing will apply from the start of End-to-End Testing, noting that the End-to-End Test Approach Document will set out the scope of the End-to-End testing provision at its start (recognising that this may initially be limited to the scope of services available from DCC Live).

Legal Text

Summary of new SEC Provisions

Section X9	A new Section X9 is proposed that requires the DCC to provide Pre-UEPT and GFI testing services in line with the provisions described above.
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Consultation Questions

Provision of early Testing Services by the DCC

Q13	Do you agree with the proposal and associated legal drafting to set a mandatory requirement on the DCC to provide a Pre-UEPT service and a GFI service? Please provide a rationale for your views.
Q14	<p>Please provide your views on the draft direction for the insertion of a new X9 and the proposal to:</p> <ul style="list-style-type: none"> bring the new X9 into effect on 18 April 2016 (or as soon as possible thereafter), require the provision of the Pre-UEPT service from the date that X9 is effective, require the provision of the GFI service as soon as reasonably

	<p>practicable, but in any event no later than the start of End-to-End testing,</p> <ul style="list-style-type: none"> • provide that the Pre-UEPT and GFI service will end when Section X ends, noting that the Secretary of State has the ability to direct an earlier end date? <p>Please provide a rationale for your views.</p>
<p>Q15</p>	<p>What are the benefits of providing Pre-UEPT services beyond the go live date for Release 1.3 functionality? Please provide a rationale for your views.</p>

8.2 Additional phases of SIT, Interface Testing and SRT Testing

Description of the Issue

82. As set out in the Secretary of State's letter of 18 December 2015²⁰, an additional period of Systems Integration Testing (SIT), Interface Testing and SMKI and Repository Testing (SRT) will be required prior to Release 1.3 going live. Sections T2, T3 and T5 of the SEC set out the current requirements for SIT, Interface Testing and SRT Testing, and therefore changes will need to be made to those sections to provide for these additional periods of testing to be undertaken.

Translation into Detailed Requirements

83. The approach proposed is to require additional periods of SIT, Interface Testing and SRT where so directed by the Secretary of State. This will provide flexibility, and the Secretary of State plans to direct a further period of SIT, Interface Testing and SRT Testing in accordance with v3.0 of the Joint Industry Plan. The existing SIT, Interface and SRT Testing Approach Documents will apply in relation to these additional periods of testing. Should the content of those documents need to change for the purposes of additional testing, then the governance arrangements for changes to those documents (which includes SEC Panel approval) set out in Sections T2, T3 and T5 will continue to apply. In addition the proposed legal drafting provides that:

- The objective of testing remains the same, but the relevant functionality that needs to be proven during the additional testing period will:
 - o In the case of the SEC Sections, include functionality that previously did not have to be proven due to a transitional variation relieving the DCC of the obligation to provide such functionality; and
 - o In the case of Subsidiary Document/Schedules containing technical or procedural requirements, be the functionality referred to in a document published by the Secretary of State (the Testing Baseline Requirements Document) for the purposes of the additional testing.
- Services will not have to be proven again to the extent that they have already been sufficiently proven through earlier testing;
- Registration Data Providers (RDPs) are not required to participate in additional phases of SIT unless directed to do so by the Secretary of State and Large Suppliers are not required to participate in additional phases of SRT unless directed to do so by the Secretary of State. The ability to direct the participation of RDPs in SIT or Large Suppliers in SRT provides flexibility should testing requirements change;
- The same requirements apply for participation in additional Interface Testing as exist for the first phase of Interface Testing; that being that Large Suppliers are ready to commence testing of the additional Service Requests (see section 8.4 of this document) and that Network Operators are required to do so if so directed by the Secretary of State;
- The DCC is required to provide one months' notice to other SEC Parties of the start date of the further phase of Interface Testing or such shorter period as directed by the Secretary of State. There are no notice requirements relating to additional SIT and SRT

²⁰ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

unless the Secretary of State directs otherwise, as no external parties are expected to be required to participate in these test phases; and

- The Device Models to be used in the additional periods of SIT and Interface Testing are those used in the most recent earlier phase of testing.

Legal Text

Summary of new SEC Provisions	
Sections T2, T3, T5	<p>New sections T2.25 – T2.27 have been added to deliver the changes described in paragraph 83.</p> <p>New sections T3.34 – T3.36 have been added to deliver the changes described in paragraph 83.</p> <p>New sections T5.30 – T5.32 have been added to deliver the changes described in paragraph 83.</p>

Consultation Question

Additional phases of SIT, Interface Testing and SRT Testing	
Q16	Do you agree with our proposed amendments for additional SIT, Interface Testing and SRT Testing? Please provide a rationale for your views.

8.3 Length of End to End Testing Period

Description of the Issue

84. Currently Section T4.15 states that End to End test phase ceases 12 months after it starts (or 18 months after it starts, if so determined by the SEC Panel). However due to the revised DCC release strategy, when End to End testing starts, the User System testing facilities will not contain the full testing functionality, but instead only the functionality that relates to the Service Requests that are available at DCC Live. Consequently we consider that it may be more appropriate to provide that End to End testing runs for 12 months after the provision of the full End to End test environment, rather than it running for 12 months after the start of End to End testing. An amendment to the drafting in T4 is therefore proposed to provide for the Secretary of State to direct that this is the case, should it prove appropriate to do so.

Translation into Detailed Requirements

85. An amendment to T4.15 is proposed to state that End to End Testing shall end 12 months after it commences or shall end 12 months after a later date that the Secretary of State may specify (or 18 months later if determined by the SEC Panel). A consequential change is also proposed to T4.16.

Legal Text

Summary of new SEC Provisions

Section T

T4.15 is amended to add that End to End Testing shall cease 12 months after it commenced or 12 months after such later date that the Secretary of State specifies.

A consequential change is made to T4.16.

Consultation Question

Length of End to End Testing Period

Q17

Do you agree with our proposed amendments for the length of the End to End Testing Period? Please provide a rationale for your views.

8.4 Additional Phases of Service Request Testing by Users

Description of the Issue

86. Consistent with the revised DCC release strategy, a transitional variation is planned to be made to the Common Test Scenarios Document when it is designated so that User Entry Process Tests (UEPT) commenced during the first period of Interface Testing may only be undertaken in relation to the subset of Service Requests available at DCC Live. Such a variation would be removed at the point at which the DCC provides the facility to test the additional Service Requests that will be available when Release 1.3 goes live, which will be during the additional phase of Interface Testing prior to Release 1.3. DECC has issued a consultation on these transitional variations as part of its consultation on the designation of the Common Test Scenarios Document²¹.
87. The proposed variation means that a SEC Party that commences UEPT during the first phase of Interface Testing (planned to commence on 13 June 2016) will be able to qualify as a User in a particular User Role having only tested the Service Requests that are available at DCC Live. To prevent the sending of Service Requests in the live environment where a User has not previously tested them, changes will be required to the SEC to prohibit Users from being eligible to send the remaining Service Requests that become available at Release 1.3 until they have undertaken testing of those Service Requests. Such testing will only be able to first commence during the additional period of Interface Testing undertaken prior to Release 1.3 going live. It is proposed that these additional SEC provisions are contained in Section X of the SEC, as they apply for a transitional period only.

Translation into Detailed Requirements

88. The proposed legal drafting provides for:
- The Service Requests that are to be made available subsequent to DCC Live to be known as 'Additional Release Services';
 - Parties that commence UEPT prior to having the ability to test the Additional Release Services can complete UEPT without having tested those Additional Release Services;
 - A User that completes UEPT without having tested the Additional Release Services shall not be eligible to use those Additional Release Services without first having successfully completed additional testing of the relevant Service Requests ('Additional SR Tests');
 - The DCC shall be obliged to provide Additional SR Testing, which shall be subject to the terms that apply to the provision of Testing Services generally in H14 and shall operate on the same basis as User Entry Process Tests (including being undertaken in accordance with the Common Test Scenarios Document); and
 - Capability does not have to be proven during Additional SR Testing if it has already been sufficiently proven as part of UEPT (which is subject to the DCC's discretion) and the Self-Service interface does not have to be re-tested as part of Additional SR Testing.

²¹ <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/sos-consultations/11-february-2016-decc-consultation-on-bringing-various-sec-provisions-into-effect.zip?sfvrsn=2>

Legal Text

Summary of new SEC Provisions

Section X1.17	A new Section X1.17 has been added to deliver the changes described in paragraph 88.
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Consultation Question

Additional Phases of Service Request Testing by Users

Q18	Do you agree with our proposed amendments for additional phases of Service Request testing? Please provide a rationale for your views.
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8.5 Relevant version of the SEC for Testing Purposes

Description of the Issue

89. Sections T2.3 (a), T3.3 (a) and T5.3 (a) of the SEC specify which versions of the Sections of the SEC (A-X) are relevant for the purposes of testing. Currently these are the versions that existed on 14th December 2015, being the last time that the Secretary of State laid amended SEC text before Parliament. We propose to change these dates to the date that the section 88 modifications that would have the effect of changing T2.3(a), T3.3(a) and T5.3(a) are laid before Parliament. For example, if the proposed amendment to change the date from 14th December 2015 is laid on 16th May 2016, then the proposed dates in T2.3(a), T3.3(a) and T5.3(a) will be 16th May 2016. This will have the effect of ensuring that the relevant versions of the SEC Sections for the purposes of exiting testing are up to date.
90. It is also necessary to ensure that, for the purposes of exiting testing phases prior to DCC Live, the DCC will not have to prove the functionality that is being 'de-scoped' for DCC Live. We therefore propose to amend the SEC drafting to state that when determining the relevant functionality that has to be proven during testing, any transitional modifications to enduring functionality should be taken into account (such modifications being those which are achieved through transitional variations to SEC Sections (made using Section X powers) and which will continue to apply beyond DCC Live).
91. The relevant version of the SEC Schedules and Subsidiary Documents for testing purposes is set out in the Testing Baseline Requirements Document, as published by the Secretary of State from time to time. The most recent version of this document was published on 8 February 2016²².

Translation into Detailed Requirements

92. Proposed amendments to Sections T2.3(a), T3.3(a) and T5.3(a) to insert a new date to specify which versions of the SEC Sections are relevant for the purposes of SIT, Interface Testing and SRT, including any transitional variations that have been made to those Sections pursuant to powers in Section X of the SEC that persist beyond the services that are being tested going live.

Legal Text

Summary of new SEC Provisions

Sections T2.3(a), T3.3(a) and T5.3(a)

Sections T2.3 (a), T3.3 (a) and T5.3 (a) have been amended to replace 14 December 2015 with the date that the modification of these sections are to be laid before Parliament and to include reference to any variations to the Sections that will continue to apply once the Services being tested during SIT, Interface Testing or SRT (as the case may be) first become

²² <https://smartenergycodecompany.co.uk/docs/default-source/sec-documents/developing-sec/tbrd---testing-baseline-requirements-document-v1-2-final.pdf?sfvrsn=4>

	available.
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Consultation Question

Relevant version of the SEC for Testing Purposes

Q19	Do you agree with our proposed amendments to the relevant versions of the SEC for testing purposes? Please provide a rationale for your views.
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9 SEC Panel and DCC Live Criteria Assessment

Description of the Issue

93. The DCC's Implementation Performance Regime is set out in Schedule 3 of the DCC Licence and is designed to incentivise the delivery of key Implementation Milestones (IMs). These include the completion of design documentation; start/finish of test phases; and DCC Live.
94. Paragraph 3.9 of Part F of Schedule 3 of the DCC Licence places a duty on DCC to undertake a general review of the IMs. In November 2014, DCC consulted on variations to IM7, IM8 and IM9 to align with the, then proposed, DCC plan. DCC then further reviewed the IMs following the finalisation of the DCC plan and issued a consultation on 8 May 2015²³ setting out proposed changes to all of the remaining IMs. The DCC provided final conclusions to the Secretary of State on 29 July 2015.
95. In its consultation on the IM that is relevant to the start of live Enrolment and Communication Services (IM10) – i.e. DCC Live, the DCC proposed that a set of readiness criteria ('the Routine Live Enrolment and Communication Services – now known as 'DCC Live Criteria') are developed and approved by the Secretary of State. It was also proposed that the SEC Panel play a role in assessing the DCC's performance against the criteria.
96. We see merit in the SEC Panel taking a role in assessing performance against the DCC Live Criteria as it offers further independent assurance and supports the overall goal to transition responsibility to enduring governance arrangements. As such, it is proposed that the Secretary of State is provided with the ability to direct the SEC Panel to carry out this assessment and that these requirements are added to the SEC now (in advance of a final decision on DCC IM proposals).

Translation into Detailed Requirements

97. We propose amending the SEC to provide a role for the Panel to consider whether the DCC has achieved the DCC Live Criteria (in line with any criteria, scope or timing requirements set out in the Secretary of State's direction) if directed by the Secretary of State. It is envisaged that were this approach to be adopted, the criteria themselves would be developed by the DCC and approved by the Secretary of State.

Legal Text

Summary of new SEC Provisions

Section X

We propose to add a new Section (X1.18) setting out these transitional responsibilities for the SEC Panel, if so directed by

²³ https://www.smartdcc.co.uk/media/235115/2015_05_08_dcc_implementation_milestones_consultation.pdf

the Secretary of State.

Consultation Question

SEC Panel and Live Criteria Assessment

Q20 Do you agree with the proposal and associated legal drafting? Please provide a rationale for your views.

10 Security, Privacy and Miscellaneous Provisions

10.1 Security

Description of the Issue

Security Disputes

98. Section G1.8 of the SEC provides for disputes regarding the compliance of a User with its obligations under Sections G3 to G6 (System, Organisational, Information and Anomaly Detection related security obligations) to be capable of being referred to the Panel for its determination and where a Party disagrees with any such determination, for the matter to be referred to Ofgem.
99. The existing drafting of Section G1.8 reflects our intention that Ofgem should be the body that ultimately determines disputes relating to whether or not a User has complied with its obligations under Section G. However, it was not intended that Ofgem would be the dispute resolution body for other disputes that might arise as a consequence of any non-compliance: for example disputes as to whether a Party has sustained any loss because of the breach, or over the level of any damages to which the Party may be entitled to compensate it for that loss. Instead, we believe that it would be appropriate for any disputes of this type to be resolved in accordance with the standard SEC drafting on such matters set out in Section M. The proposed changes to Section G1.8, including the addition of a new Section G1.9, are designed to clarify this point.

Cryptographic Credential Tokens

100. As outlined in the Smart Metering Key Infrastructure (SMKI) Registration Authority Policy and Procedures (RAPP) document, where an Authorised Responsible Officer wishes to access the SMKI Portal Interface, the DCC shall provide them with a Cryptographic Credential Token . The Token contains a credential issued by Infrastructure Key Infrastructure (IKI) Certificate Authority which can be used by the DCC to authenticate the ARO to the portal. Tokens will also be issued to AROs to facilitate digital signing of Comma Separated Variable (CSV) files that must be submitted to DCC to support a range of other security related functions.
101. Given the Tokens' security enforcing role, Authorised Subscribers will need to place reliance on them to function as intended. We are therefore minded to require that the DCC ensures that Tokens are adequately tested before being issued to Authorised Subscribers. This testing should include a code review, code in this context being a set of instructions typically written in a specified computer programming language that can be interpreted and executed by the Token hardware to perform a defined action. In discussion with the DCC it has been confirmed that testing of this nature is already due to be undertaken.
102. Should a vulnerability subsequently emerge that could call into question the capability for the device to function as expected the DCC will be obligated to inform relevant Authorised Subscribers.

Manufacturer Release Notes

103. The SEC requires that the SEC Panel maintain and make available a list, the Certified Products List (CPL), of all Device Models which have obtained the necessary Assurance

Certificates and are thus authorised to be operated within the live smart metering environment. Under current arrangements the CPL will include Manufacturer Release Notes for each new version of firmware associated with a Device Model.

104. Manufacturer Release Notes will outline the changes made to a firmware version, and the reasons behind those changes. It is therefore possible that Manufacturer Release Notes may include information that could then be used by an adversary to exploit a vulnerability on a device. We have considered this issue with industry via our Transitional Security Expert Group (TSEG) and have determined that Manufacturer Release Notes should therefore be securely maintained by device owners and not made publically available via the CPL.
105. Energy suppliers are responsible for the security of the Smart Metering System installed in each consumer premises they supply with gas and/or electricity, including responsibility for deciding whether or not to move to a newer version of firmware on their devices. This responsibility may be more difficult to manage where equipment has been inherited due to a change of supplier, in particular where the energy supplier does not have a direct commercial relationship with the product vendor.
106. We understand that Energy UK is currently considering ways in which to support energy suppliers in managing this situation, potentially through a centralised firmware library. Such a solution would likely include storage of Manufacturer Release Notes. In anticipation of this capability we consider it appropriate to preserve a reference to Manufacturer Release Notes within the SEC and require that these are securely maintained for each Device Model by the Responsible Supplier.

Unique Transaction Reference Number (UTRN) Generation and Key Management

107. Smart metering prepayment customers will have the capability to remotely or locally top up credit on their devices. This is facilitated through the use of a UTRN, which is in part generated using an energy supplier's prepayment top up Key. The protection of this key material will be of critical importance to energy suppliers since it is relied upon to ensure prepayment customers are able to top up their devices and maintain energy supply.
108. It is intended that the use and storage of the prepayment top up Key be included within the scope of the User System definition and thus be in scope for consideration under a number of the key SEC Section G security obligations. This longstanding policy intent is delivered within the current User Systems definition.
109. Through discussion with some energy suppliers we are aware of a desire to ensure the User Systems definition is made clearer on this point such that it explicitly references those systems used to generate a UTRN. The User System definition is therefore being updated to provide clarity on this point, for the purpose of the SEC drafting the UTRN is considered to be generated at the point at which the supplier Message Authentication Code (MAC) is calculated and applied.

Translation into Detailed Requirements

Security Disputes

110. Changes to Section G have been proposed to clarify the relevant appeal routes in relation to the different types of disputes that may arise. These clarify that only disputes that relate specifically to compliance with obligations under Section G may be referred to Ofgem for determination (following a determination by the Panel) and other disputes follow the 'normal' dispute arrangements under the SEC included within Section M (e.g. arbitration).

Cryptographic Credential Tokens

111. We propose the DCC be required to:

- establish a relationship with the manufacturer of the Cryptographic Credential Token to ensure it is notified of any vulnerabilities in the device or supporting software;
- inform relevant subscribers where it is made aware of any such vulnerability, and take action to address it;
- ensure the Cryptographic Credential Token is tested to ensure it satisfies the intended purpose; and
- ensure the Cryptographic Credential Token has been subject to a code review.

Manufacturer Release Notes

112. We propose that:

- the requirement for the CPL to include Manufacturer Release Notes will be removed;
- energy suppliers will be required to securely store a copy of the Manufacturer Release Notes for each Device Model for which they are the Responsible Supplier.

Unique Transaction Reference Number (UTRN) Generation and Key Management

113. We propose that the User Systems definition be updated to include systems used to generate any UTRN.

Legal Text**Summary of new SEC Provisions**

SEC Section A, G and the CPL Requirements Document	<p>Revised G1.8 and a new proposed G1.9 for Security Disputes</p> <p>New G2.36 to 2.38 for Cryptographic Credential Tokens (and associated definitional change in Section A).</p> <p>Change to the CPL Requirements Document in relation to Manufacturer Release Notes.</p> <p>Change to User Systems definition.</p>
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Consultation Questions**Security**

Q21	Do you agree with the proposed approach and legal drafting that seeks to ensure that only disputes associated directly with the issue of compliance with Section G are determined by Ofgem, with other disputes following the “normal” path for resolution?
Q22	In relation to the need for DCC to test and monitor the security of Cryptographic Credential Tokens, do you agree with the proposed approach and legal drafting?

Q23	In relation to the removal of Manufacturer Release Notes from the CPL and the associated requirements for secure storage, do you agree with the proposed approach and legal drafting?
Q24	In relation to the inclusion of systems used to generate a UTRN within the scope of the User System, do you agree with the proposed approach and legal drafting?

10.2 Privacy and Explicit Consent

Description of the Issue

114. Several respondents to DECC's July 2015 SEC consultation document²⁴ raised supplementary comments in relation to what constituted "explicit consent" to join and un-join Consumer Access Devices (CADs) to Smart Metering Systems.

115. In the December 2015 SEC Conclusion²⁵ (Paragraphs 174-177), we explained that, in light of these comments it believed that it would be appropriate to include a definition of 'Explicit Consent' in the SEC making it clear, amongst other things, that:

- a consumer request to join a Consumer Access Device (CAD) constitutes consent to do so; and
- we did not believe that a standard condition of a contract, for example to supply energy, that deals with the issue of consent would be sufficient.

116. We have now developed a proposed definition for inclusion in Section A.

Translation into Detailed Requirements

117. We propose to include in Section A of the SEC a new definition of Explicit Consent and to capitalise the current uses of the term "explicit consent" in Section I and in the definition of 'Appropriate Permission' so that the defined term is appropriately referenced.

Legal Text

Summary of new SEC Provisions

A	New definition of Explicit Consent Capitalisation of the term 'explicit consent' where currently used in the Code (definition of 'Appropriate Permission' and Section I).
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Consultation Question

Privacy and Explicit Consent

Q25	Do you agree with the proposal to include a definition of Explicit Consent and do you have any comments on the proposed drafting? Please provide a rationale for your views.
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²⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/446617/15_07_17_Summer_2015_SEC_and_Supply_Licence_Consultation_Doc_Final_revised_version.pdf

²⁵https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484721/15_11_26_December_2015_SEC_Government_Response_final.pdf

10.3 Changes to Section H (DCC Services)

Description of the Issue

System Changes and Releases

118. Sections H8.8 – H8.12 of the SEC require the DCC to consult Users and the Technical Sub-Committee prior to making any changes to DCC Internal Systems or the DCC Release Management Policy.
119. However, changes to DCC Internal Systems or the DCC Release Management Policy have the potential to impact Parties who are not Users. Since these sections of the SEC were drafted, new non-User capacities in which SEC Parties may act have been introduced, such as Authorised Subscribers for Certificates. As they may be impacted, Parties acting in these capacities must also be included in the consultation prior to the changes set out above. Further, there may be Parties who are not yet Users but intend to become Users within the timescales of the proposed change. Accordingly, we consider that all Parties should be consulted.
120. We also propose that Registration Data Providers (RDPs) must be consulted as they may also be impacted by changes to DCC Internal Systems or the DCC Release Management Strategy.
121. Section H8.8 (c) provides Users with the opportunity to be involved in testing DCC Internal System changes and H14.36 sets out the Testing requirements under these circumstances. We therefore consider that this involvement needs to be expanded to include all Parties and RDPs.

Unsolicited Transmission of Registration Data

122. Registration Data is maintained by the RDPs through a mechanism of regular registration data refresh files as specified in the Registration Data Interface Specification (REGIS)²⁶. The REGIS also sets out how to handle issues with this exchange of data. Specifically, in the situation where an RDP should identify an anomaly with a file which they have sent to the DCC, the REGIS allows the RDP to send an unsolicited registration data refresh file if that will resolve the issue. Under these circumstances the issue would be resolved and we propose to amend H9.6(b) to remove the requirement on the RDP to raise an Incident with the DCC when this occurs.

Changes to Section H10.13

123. We confirmed in the December 2015 SEC Response²⁷ that, upon the occurrence of a Disaster, the DCC would ensure that its services are restored within 8 hours. We noted an issue raised by respondents, specifically that it is considered unreasonable to oblige the DCC to restore a Gateway Connection within 8 hours in the event DCC connectivity has been lost if the DCC User had not themselves followed industry best practice and procured backup DCC gateway connections to its own sites which it relies on for the provision of service.

²⁶ Version 1.1 of the Registration Data Interface Specification can be found at

https://www.smartdcc.co.uk/media/345302/draft_version_1.1_of_the_regis_rebaselined_16.12.15_clean.pdf

²⁷

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484710/15_11_26_December_2015_SEC_Government_Response_final.pdf

124. We noted in the December 2015 SEC response document²⁸ that in principle we agreed with this point and stated that we would consult on a further change to the drafting in section H10.13 accordingly. The loss of a Gateway Connection may require a site visit by the DCC or one of its sub-contractors to rectify it and the resulting risk of a lengthy DCC User outage is largely mitigated by a diversely routed backup connection to the DCC User Gateway. Whilst it is not considered appropriate to oblige DCC Users to install a backup connection, we consider it would be reasonable to limit the DCC's obligations in the circumstance where a backup connection to the DCC User Gateway is not present.
125. Section 5.1.5 of the Incident Management Policy (IMP) references "Recovery Point Objective" (RPO) associated with the Services. RPO relates to the DCC Service Providers' data loss obligation and is currently undefined in the SEC. This will be removed from the Incident Management Policy and replaced with a reference to section H10.13.
126. The IMP will also be updated to remove the undefined term "Recovery Time Objective" (RTO) which relates to the time taken to recover the Services in the event of a Disaster. This will be replaced with a reference to section H10.13 which already addresses recovery times in the event of a Disaster. The updated Incident Management Policy with the amended text is included as part of this consultation.

Translation into Detailed Requirements

System Changes and Releases

127. It is proposed that the impact assessment and consultation prior to changes to DCC Internal Systems or the DCC Release Management policy will be expanded to include Parties and Registration Data Providers.
128. It is also proposed that the testing requirement for Internal System Changes will be expanded to include Parties and Registration Data Providers.

Unsolicited Transmission of Registration Data

129. A modification to Section H9.6(b) is proposed to remove the obligation on RDPs to raise an Incident when the Incident can be resolved by the submission of an unsolicited registration data refresh file.

Changes to Section H10.13

130. We are proposing a change to H10.13(b) of the SEC, which would limit the DCC's obligations in the event of a Disaster caused by loss of DCC connectivity where the DCC User has failed to procure a backup DCC Gateway Connection. The effect of the change would be to require DCC to take 'all reasonable steps' to restore the relevant services, rather than being required to do so within 8 hours.
131. To replace the Incident Management Policy text relating to Recovery Time Objectives we will include a new obligation in section H10.13 (c) for a maximum data loss obligation aligned to the Recovery Point Objectives contained within the DCC's Service Provider contracts.

28

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484721/15_11_26_December_2015_SEC_Government_Response_final.pdf

Legal Text

Summary of new SEC Provisions

Section H	<ul style="list-style-type: none">• Replacement of Users by Parties and Registration Data Providers to ensure that all those potentially impacted are consulted (H8.8, H8.10, H8.11, H14.36).• Removal of obligation on RDPs to raise an Incident if the incident can be resolved by submission of an unsolicited registration data refresh file (H9.6).• Amendments to H10.13(b) to include an exclusion to the 8 hours recovery requirement and the inclusion of H10.13(c) covering data loss obligations.
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Consultation Questions

Changes to Section H (DCC Services)

Q26	Do you agree with the proposal and associated legal drafting to consult with Parties and Registration Data Providers prior to changes to DCC Internal Systems or the Release Management Strategy? Please provide a rationale for your views.
Q27	Do you agree with the proposed change to remove the requirement on RDPs to raise an Incident where the issue can be resolved by the transmission of an unsolicited registration data refresh file? Please provide a rationale for your views.
Q28	Do you agree with the proposals and associated legal drafting to the recovery and data loss obligations in regard to a Disaster? Please provide a rationale for your views.

10.4 Rectifying Errors in relation to Device Credentials

Description of the Issue

132. Clause 17.1 of the Service Request Processing Document requires Parties to cooperate in order to rectify the situation where the Device Security Credentials on a Device erroneously include information from one or more of their Organisation Certificates, including by sending Service Requests if necessary.
133. Section H3.6 of the SEC places restrictions on which Service Requests may be sent by any particular User. We believe that a minor change is needed to H3.6 to make it clear that Users are permitted to send Service Requests in situations when they are rectifying errors in accordance with Clause 17.1 of the Service Request Processing Document.

Translation into Detailed Requirements

134. A change is proposed to H3.6 to clarify that Users are permitted to send Service Requests when acting in accordance with Clause 17.1 of the Service Request Processing Document.

Legal Text

Summary of new SEC Provisions

Section H	Change to Section H3.6 to permit the Service Requests rectifying this situation to be sent.
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Consultation Question

Rectifying Errors in Relation to Device Credentials

Q29	Do you agree with the proposal to clarify that Users are permitted to send the relevant Service Requests? Please provide a rationale for your views.
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10.5 SEC Panel / IKI Subscribers

Description of the Issue

135. Clause 7.1 of the Certified Products List (CPL) Requirements Document requires the SEC Panel to provide a Digitally Signed version of the Certified Products List when it provides an update to the DCC. Discussions between the DCC and the Panel have resulted in a proposal that, for the initial solution at least, private keys associated with an Infrastructure Key Infrastructure (IKI) File Signing Certificate will be used for such Digital Signing purposes.
136. In order for this solution to be facilitated, a change is needed to the SEC, in order to permit the Panel to become a Subscriber for the necessary Certificates and to become subject to the Subscriber obligations where it uses the IKI solution for this purpose. In practice, in line with other SEC provisions which require or permit the Panel to enter into direct contractual arrangements the vehicle through which this is achieved is SECCo.
137. Consequently, it is proposed to permit SECCo to become a Subscriber for IKI Certificates which may then be used by SECCo to arrange on behalf of the Panel for the CPL to be digitally signed using the associated Private Key.
138. In practice, it is expected that SECCo will put in place arrangements (potentially with SECAS) to carry out the activities of Senior Senior Responsible Officer (SRO) and Authorised Responsible Officer (ARO) for these purposes.
139. We are also proposing to make the associated consequential changes to subsidiary documents. For example to make it clear within the IKI Certificate Policy that SECCo can become a Subscriber for IKI File Signing Certificates acting on behalf of the Panel.

Translation into Detailed Requirements

140. It is proposed to change Section L to permit SECCo to become a Subscriber for these certificates and to make an associated change to Section C to make it clear that becoming a subscriber for certain Certificates falls within the scope of the SECCo role. We have also aligned the language in Clause 7 of the CPL Requirements Document with that in F2.8 (a) (to refer to the extract from the CPL that is actually Digitally Signed by the Panel and sent to DCC). In making these changes we have also reviewed a number of definitions, including those of Digital Signature, Digitally Sign and Check Cryptographic Protection to broaden out the “thing” that may be signed – from a “communication” to “electronic Data”.

Legal Text

Summary of new SEC Provisions

Sections A, C, L, CPL Requirements Document	Changes to Section A: Definitions of Authorised Subscriber, Digital Signature, Digitally Signed and Check Cryptographic Protection. Change to Section C 7.12(b) Changes to Sections L3 Change to CPL Requirements Document
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	We also propose consequential changes to subsidiary documents (other than the CPL Requirements Document), although DECC will consult on the detail of these changes prior to their implementation.
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Consultation Question

SEC Panel / IKI Subscribers

Q30	Do you agree with the proposal and associated legal drafting to permit SECCo to become a Subscriber for IKI File Signing Certificates for the purposes of Digitally Signing the CPL as set out above? Please provide a rationale for your views.
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10.6 Status of Associated Devices and Device Security Credentials

Description of the Issue

141. The current version of the Inventory Enrolment and Withdrawal Procedures (IEWP) requires DCC, in some cases, to update the SMI Status of a Device when there is a change in the SMI Status of a Device with which it is Associated. For example if a Type 1 Device or a Gas Proxy Function has been joined to a Smart Meter in a premises in circumstances where there is no WAN connection, both the Smart Meter and the Associated Gas Proxy Function or Type 1 Device would be expected to have an SMI Status of “installed not commissioned”.
142. Where the WAN connection is established and the supplier subsequently commissions the Smart Meter, Clause 4.10(b) of the IEWP requires DCC to update the SMI Status of the associated Gas Proxy Function or Type 1 Device to “commissioned” as well.
143. Similarly, Section H6.6 of the SEC requires DCC to change the SMI Status of Devices comprising a Smart Metering System to “decommissioned” in circumstances where the Communications Hub Function of that Smart Metering System is decommissioned and not replaced.
144. In practice, DCC Systems will not be capable of applying this functionality, i.e. they will not be capable of changing the SMI Status of a Device based upon a change in the SMI Status of a Device with which it is Associated.
145. This issue has been discussed with prospective users in the Technical Specification Issue Resolution Sub Group and no material concerns were raised at the lack of this functionality. In light of this it is proposed that the requirement for DCC to provide this functionality should be removed from the SEC on a permanent basis (rather than on a transitional basis).
146. We are also proposing a further minor change to the IEWP to clarify by when Suppliers are required to ensure that the appropriate Device Security Credentials are placed on a Device (noting that there are a number of options that suppliers may elect to use for the Supplier and Network Operator trust anchor cells).
147. It should be noted that Clause 3.3 of the IEWP) was the subject of a recent consultation (11 January 2016²⁹) proposing an obligation on suppliers to configure Devices in line with Network Operator requirements prior to being installed and commissioned. This proposal received a mixed consultation response and as a result this matter will be discussed further with stakeholders before a conclusion is reached.

Translation into Detailed Requirements

148. DECC proposes to amend the IEWP and Section H6 to remove the obligation on DCC to change the SMI Status of a Device in response to a change in the SMI Status of a Device with which it is Associated and to make a minor change to Clause 3.1(a).

²⁹ <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/sos-consultations/11-january-2016-decc-consultation-on-key-custodians-and-comms-hubs.zip?sfvrsn=2>

Legal Text**Summary of new SEC Provisions****Inventory
Enrolment and
Withdrawal
Procedures**

Changes to the IEWP to:

- delete paragraph 4.8
- Modifications to (the new) 4.9, 4.10, 4.12 and 4.13.

Change to Section H6.6.

Change to Clause 3.1(a).

Consultation Question**Status of Associated Devices**

Q31

Do you agree with the proposals to remove the requirement for DCC to modify the SMI Status of a Device in circumstances where the status of a Device with which it is associated changes, and to clarify by when suppliers must ensure that the appropriate Device Security Credentials are placed on a Device? Please provide a rationale for your views.

10.7 Post Commissioning Reporting

Description of the Issue

149. As part of the recent DCC replan, it was acknowledged that a number of change requests to DCC's service provider contracts would not be implemented until Release 1.3. One consequence of this that arises from change request CR110a V2, is that DCC will not be able to meet certain obligations in relation to post-commissioning reporting set out in the IEWP. There are two aspects to this. First the nature of the information that DCC will have access to will be slightly more limited in relation to Devices that are Commissioned between DCC Live (Release 1.2) and Release 1.3. More specifically, whilst DCC will be able to determine that Devices have sent a Service Response to confirm that the necessary post-commissioning actions have been undertaken, it will not be able to inspect the content of the response to verify that the Command has successfully executed. It is proposed to modify the Inventory, Enrolment and Withdrawal Procedures (IEWP) to reflect this and we are seeking views on this proposal.
150. The second issue that arises is that DCC will be unable to produce the various post-commissioning reports that are required of it under the IEWP until Release 1.3. We propose therefore to transitionally switch off these obligations until that time (at which point DCC will be required to report on Devices that have been Commissioned in the meantime). We will consult on this transitional variation prior to re-designating the IEWP in advance of DCC Live.

Translation into Detailed Requirements

151. We have proposed drafting changes to the IEWP to reflect the first of the above two proposals, the reason being that these changes will need to be made to the IEWP on an enduring basis (since DCC will never have access to the more detailed post-commissioning information in relating to Devices that are Commissioned between Release 1.2 and Release 1.3). The second of the changes needs to be made only transitionally to switch off reporting obligations in the period between Releases 1.2 and 1.3 (and hence we will consult on this as a transitional variation in advance of DCC Live).

Legal Text

Summary of new SEC Provisions

Please indicate the SEC Section amended

Changes to Clauses 5.3 and 5.6(c) of the Inventory Enrolment and Withdrawal Procedures.

Consultation Question

Post Commissioning Reporting

Q32

Do you agree with the proposal to change the reporting obligations on DCC in relation to Devices Commissioned between DCC Live and Release 1.3? Please provide a rationale for your views.

10.8 Subscriber obligations for certain IKI File Signing Certificates

Description of the Issue

152. DCC has recently introduced the concept of Infrastructure Key Infrastructure (IKI) File Signing Certificates which are certificates associated with Private Keys that are used to sign files that are sent to DCC. These certificates are to be used for example by Users to sign Threshold Anomaly Detection files and by the Panel to sign the Certified Products List.
153. In some instances the Public Key to be included in the Certificate Signing Request for an IKI File Signing Certificate will be generated not by the prospective Subscriber for the Certificate, but by software provided by DCC on a Cryptographic Credentials Token. Where this is the case, it is not possible for the prospective Subscriber to meet the requirements placed on Subscribers in Section L11.3 of the SEC which states that:
- Each Eligible Subscriber shall ensure that any Public Key which is included within a Certificate Signing Request is part of a Key Pair that has been generated using random numbers which are such as to make it computationally infeasible to regenerate that Key Pair even with knowledge of when and by means of what equipment it was generated.*
154. We are proposing a change to this Section of the SEC to clarify that DCC, and not the Subscriber, is responsible for meeting this obligation in relation to IKI File Signing Certificates in circumstances where software provided by the DCC is used to generate the cryptographic keys.

Legal Text

Summary of new SEC Provisions

Section L	<p>Change to L11.3 to make an exception for Certificate Signing Requests that are generated using DCC software.</p> <p>Inclusion of obligations on DCC in the new G2.36(a) (please refer to Section 10.1 of this consultation document (cryptographic credentials tokens) for a wider discussion on the inclusion of G2.36).</p>
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Consultation Question

Subscriber Obligations for certain IKI File Signing Certificates

Q33	Do you agree with the proposals to modify the subscriber obligations in relation to Certificate Signing Requests generated by DCC-provided software and to place an additional obligation on DCC in relation to these in Section G?
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10.9 RDP IDs and DCC Reporting under Section E

Description of the Issue

155. In the Secretary of State's open letter of 26 January 2016 setting out the proposed approach to the staged implementation of the remainder of the SEC to support the revised DCC Plan, it was noted that the DCC had confirmed that its systems would be unable to support the use of multiple User IDs per User Role, and that an equivalent constraint applies to Registration Data Provider (RDP) IDs, i.e. that DCC systems would be able to accommodate only a single RDP ID per RDP.
156. In the open letter we stated that DECC is proposing to make a transitional change to the SEC to restrict Users to a single User ID per User Role and RDPs to a single RDP ID. We will be consulting on the transitional change to limit Users to a single User ID per User Role in advance of switching on Section H1.5 of the SEC (currently planned to take place on 6th June 2016).
157. On the issue of a single RDP ID, it would be possible to make an equivalent transitional change to Section E2.16(b) of the SEC. However, on reflection in the case of RDP IDs, we consider that it is sufficient to rely on RDPs restricting themselves to a single RDP ID for the time being, without having to formally underpin this with changes to the SEC. We are proposing to make a change in the case of Users since there are likely to be more of these and we consider the likelihood of Users wishing to use multiple IDs to be greater, and hence believe it is appropriate to explicitly incorporate the constraint for them.
158. A similar issue arises in relation to Section E1.4 and E1.5 of the SEC, which requires DCC, upon request, to provide Registration Data to the SEC Panel. Whether or not the DCC would be able to comply with such a request prior to the implementation of "CR110a V2" – a change to the DCC's Service Provider systems – at Release 1.3 would depend on the nature of the information requested by the Panel. The principal purpose of the provisions in E1.4 and E1.5 is to allow the Panel to determine into which Party Category a Party falls. Again rather than making minor transitional legal drafting changes in the period until Release 1.3, we propose to rely on the Panel and DCC discussing any potential need for Registration Data under these provisions prior to the Panel making any formal request for information under them, and for the Panel to refrain from doing so in circumstances in which DCC is unable to provide the information.

Translation into Detailed Requirements

159. As discussed above, we do not propose to make transitional variations to the SEC to deal with such matters.

Consultation Question

RDP IDs and DCC Reporting under Section E

Q34	Do you agree with the proposal not to make transitional changes to the SEC to deal with these matters and instead to rely upon RDPs and the Panel to work with DCC within the confines of its Systems Capability on a transitional basis?
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10.10 Miscellaneous Issues and Minor Amendments to Drafting

Description of the Issue

Indemnity for SEC Panel Members

160. Currently Section C3.12 of the SEC provides for Panel Members to be indemnified for actions taken against them, but C3.13 provides that this indemnity does not extend to actions arising as a result of them breaching the provisions of a contract. An amendment to this provision is proposed, such that Panel Members will be indemnified for any such action. This is proposed to ensure that those who serve on code bodies will not be liable for mistakes, and will only risk liability where they act fraudulently or wilfully default in the performance of their duties. This section already provided protection in the event of negligence, but didn't previously provide protection for breaches of contract. As those who serve on code bodies are routinely asked to sign a letter by which they agree to perform their duties in accordance with the SEC (which is in effect a contract), the provision of protection in the case of negligence, but not breach of contract, was not logical. This change brings the SEC in line with a number of the other industry codes – such as the BSC, section B2.9. Without this change, there is a risk that individuals are discouraged from serving on code bodies.

Minor Changes to Section E2

161. Section E2.1 (a) of the SEC had previously required that the identity of the Registration Data Provider was provided as a data item in relation to an MPAN in the set of Registration Data that an Electricity Network Party provided to DCC. The data item that is available within Registration Data is the identity of the Electricity Distributor that is responsible for that MPAN and therefore it is proposed to amend the legal drafting accordingly.

162. Section E2.2 (d) of the SEC had previously required that the Gas Network Party provide details of the effective date from when gas was first offtaken from a Supply Meter Point. The data that is actually recorded in Registration Data is the date that the status change from not offtaken to offtaken was first noted, it is therefore proposed to amend the legal drafting accordingly.

Translation into Detailed Requirements

Indemnity for Panel Members

163. C3.13 is amended to remove breach of contract from the provision.

Minor Changes to Section E2

164. It is proposed that Section E2.1(a) and E2.2(b) is updated as described above to the text below.

Legal Text

Summary of new SEC Provisions

Section C, E	Change to C3.13.
Section E	Changes to E2.1(a) and E2.2(b).

Consultation Questions

Miscellaneous Issues and Minor Amendments to Drafting

Q35	Do you agree with the proposal legal drafting amendment to C3.13? Please provide a rationale for your view.
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Q36	Do you agree with the proposed legal drafting amendments to Section E2? Please provide a rationale for your view.
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10.11 Changes to provide flexibility to accommodate changes arising during testing

Description of the Issue

165. The first versions of the SMKI Device Certificate Policy, SMKI Organisation Certificate Policy and SMKI Compliance Policy were introduced into Annexes A, B and C of the SEC using the Secretary of State's powers under Section 88 of the Energy Act 2008 in 31 July 2014. We are proposing a mechanistic change to the SEC to remove these three documents from Annexes A, B and C of the SEC and then to immediately designate and incorporate new versions of the documents as SEC Subsidiary Documents (incorporating any changes that have been made in the meantime using Section X of the SEC that are to endure) under the process in Condition 22 of the DCC Licence/Section X5 of the SEC. This change will enable further enduring modifications to the documents to be managed through the re-designation process, as is the case for the large majority of SEC Subsidiary Documents, rather than Section 88.

Translation into Detailed Requirements

166. Use of Section 88 to remove these Annexes from the SEC and immediate designation of these documents (incorporating any changes that have been made using Section X of the SEC that are to endure) under Condition 22 / Section X5.

Consultation Question

Changes to provide flexibility to accommodate changes arising during testing

Q37	Do you agree with the proposal to remove these documents from the SEC and to re-introduce them (including any enduring changes made using Section X) by designation under Condition 22/Section X5 of the SEC?
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10.12 Test Communications Hubs

Description of the Issue

167. The DCC is currently considering the cost, benefit and timescales of introducing a Test Communications Hub which would allow test participants to better interrogate the messages that are being sent and received over the HAN (this capability is known as an “Instrumented Test Communications Hub”). Such functionality (which does not exist in a Communications Hub) would enable those that are testing the interoperability of their devices with Test Communications Hubs to better diagnose and resolve testing issues.
168. The DCC are currently undertaking an impact assessment to support the provision of an Instrumented Test Communications Hub. If this impact assessment results in the ability to provide such functionality without any adverse impacts on the DCC’s preparations for DCC Live, we propose amending the SEC to enable the provision of such devices by the DCC (this should not result in an increase in DCC’s fixed charges as Test Communications Hubs are paid for by the person that orders them).

Translation into Detailed Requirements

169. A Test Communications Hub is currently defined (in Section A) as a Communications Hub that is provided for the purposes of testing. We propose to amend the definition to refer to a Communications Hub with such variations in functionality (as the DCC reasonably considers appropriate) to enable its use for the purpose of testing.

Legal Text

Summary of new SEC Provisions

Section A	Change to definition of Test Communications Hub.
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Consultation Question

Test Communications Hubs

Q38	Do you agree with our proposal and legal drafting in relation to Test Communications Hubs? Please provide a rationale for your response.
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11 Consistency and Consequential Changes

11.1 Consistent terminology on ‘all reasonable steps’

Description of the Issue

170. There are variations in the terminology used to place obligations on SEC Parties in the SEC and designated subsidiary documents. The terms ‘reasonable steps’ and ‘reasonable endeavours’ are both used for the same purpose. We consider these formulations to be identical in policy intent and legal meaning so we intend to amend the SEC to make the terminology consistent and more transparent as using different terms implies a difference in meaning.
171. In response to previous SEC consultations we have also received comments regarding the use of the term ‘best endeavours’ in several places in the SEC. We have considered alternative formulations, including similar terms used in licence conditions. However, we have decided that it is not appropriate to amend the SEC to replace the term ‘best endeavours’. We do not consider any of the alternatives to have the same legal or policy meaning, and are content that the term ‘best endeavours’ implements our policy intent appropriately.

Translation into Detailed Requirements

172. In line with regulatory best practice, and following discussion with Ofgem, we intend that in each occurrence of the phrases ‘reasonable endeavours’ and ‘all reasonable endeavours’ when used to place an obligation on a SEC Party, the word ‘endeavours’ is replaced with ‘steps’. No change is proposed where the term ‘endeavours’ is used in any other context.
173. The proposed amendments are summarised in the table below.

Current terminology	Proposed amended terminology
Reasonable endeavours	Reasonable steps
All reasonable endeavours	All reasonable steps

Legal Text

Summary of new SEC Provisions	
E2 F5, F7, F10 G2, G3 H3, H8, H11	The phrases “reasonable endeavours” and “all reasonable endeavours” are replaced with “reasonable steps” or “all reasonable steps” respectively when used to place an obligation on a SEC Party.

L8, L10, L12, L13 M4, M6 T2, T3, T5 Appendices A, B, G, H, J, K	
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Consultation Question

Consistent terminology on “all reasonable steps”

Q39	Do you agree with the proposal and associated legal drafting to align the wording of obligations throughout the SEC?
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11.2 Incident Management Policy

Description of the Issue

174. Previously, the SEC required that the DCC produce three subsidiary documents associated with the handling of Incidents: Incident Management Policy (IMP), Registration Incident Management Policy (RDIMP) and Error Handling Strategy (EHS).
175. In 2014, the DCC carried out two consultations³⁰ on these SEC subsidiary documents as required by the SEC, culminating with submission of drafts of all three documents to the Secretary of State on 18 December 2014^{31 32 33}.
176. The December 2015 SEC Conclusion³⁴ stated that structural changes should be made to this document set. Firstly, as Incident management was a generic process, there was no need for a separate policy for Incidents with Registration Data. The RDIMP has therefore been deleted from the SEC and the contents of the RDIMP merged into the IMP. Secondly, the EHS would be better handled as DCC Self-Help material. The EHS has been deleted from the SEC and requirements added to the IMP for the DCC to establish and manage changes to the EHS as Self-Help material.

Translation into Detailed Requirements

177. The changes set out above have been made incrementally by DECC.
178. Version 1.1³⁵ of the IMP was completely restructured to accommodate the aspects of Incident Management specific to Registration Data. DECC took the opportunity to reword some of the document for clarity and to remove duplication. The document was informally consulted both with the DCC and members of the DCC's Service Management Design Forum. This version was formally baselined by DECC's TBDG in September 2015 and published on the DCC's website.
179. IMP Draft Version 1.2 with changes tracked against Version 1.1 is included at Annex D to this consultation document. It contains the changes which follow in this section. This version was informally consulted both with the DCC and with members of the DCC's Service Management Design Forum in December 2015/January 2016. DECC is now inviting views on the proposed amendments as set out in Annex D.

³⁰ DCC Service Management Subsidiary Document consultations can be found at <https://www.smartdcc.co.uk/consultations/dcc-consultations/service-management-november-2014/>

³¹ Draft Incident Management Policy submitted to SoS can be found at https://www.smartdcc.co.uk/media/208512/draft_ssd_incident_management_policy_december_2014.pdf

³² Draft Registration Data Incident Management Policy submitted to SoS can be found at https://www.smartdcc.co.uk/media/208674/draft_ssd_registration_data_incident_management_policy_december_2014.pdf

³³ Draft Error Handling Strategy submitted to SoS can be found at https://www.smartdcc.co.uk/media/208664/draft_ssd_error_handling_strategy_december_2014.pdf

³⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484710/15_11_26_December_2015_SEC_Government_Response_final.pdf

³⁵ Draft Incident Management Policy V1.1 can be found at https://www.smartdcc.co.uk/media/343845/draft_version_1.1_of_the_incident_management_policy.pdf

- 180. A new Section 4 has been added setting out the requirements for the DCC to establish and maintain the EHS as self-help material
- 181. Section 2.10 has been amended to remove an unintended dependency on recording the Incident in the Incident Management Log.
- 182. Section 5.1.5 has been changed to remove the references to data recovery targets which are now proposed to be set out in H10.13 (see Section 9.3 above).

Legal Text

Summary of new SEC Provisions	
Incident Management Policy	<ul style="list-style-type: none"> • New section 4 added – Error Handling Strategy.

Consultation Question

Incident Management Policy	
Q40	Do you agree with the proposed changes to the Incident Management Policy? Please give reasons to support your answer

12 Glossary

This section provides a glossary of the principal terms used in this document.

A complete set of definitions and interpretations of terms used in the SEC can be found in Section A of that document.

The definitions in this glossary are not intended to be legally precise, but instead to assist in understanding the consultation document.

Alert

A message from a Device or from DCC and sent as a DCC Alert or a Device Alert to a DCC User across the DCC User Interface.

Command

A message sent by the DCC to a Device over the SM WAN (or to a DCC User over the DCC User Interface to be executed locally) in order to instruct the Device to carry out an action.

Commissioned

A Device status recorded in the Smart Metering Inventory. The steps a Device must go through to be Commissioned vary by Device type, but essentially this status is achieved when: the Device has been added to the Smart Metering Inventory; it has been demonstrated that DCC can communicate with it (and vice versa) over the SM WAN; and its relationship with either the Communications Hub Function or a Smart Meter has been established.

Communications Hub

A device which complies with the requirements of CHTS and which contains two, logically separate Devices; the Communications Hub Function and the Gas Proxy Function.

Communications Hub Function

A Device forming part of each Smart Metering System which sends and receives communications to and from the DCC over the SM WAN, and to and from Devices over the HAN.

Communications Hub Technical Specifications (CHTS)

A document (which is to form part of the SEC) which sets out the minimum physical, functional, interface and data requirements that will apply to a Communications Hub.

Communications Service Provider (CSP)

Bodies awarded a contract to be a DCC Service Provider of communications services to DCC as part of DCC's Relevant Services Capability. Arqiva Limited and Telefónica UK Limited have been appointed to provide these services.

Core Communication Services

The services associated with processing a specific set of Service Requests set out in the DCC User Interface Services Schedule in a manner that involves communication via the SM WAN, but excluding the Enrolment Services.

Correlate

A check, to be carried out by DCC Users, to ensure that the Pre-Command created by DCC after transforming a Critical Service Request (defined in Section A of the SEC) is substantively identical to the original Service Request.

CoS Party

A separate part of the DCC, responsible for signing critical Commands to update a Supplier's Security Credentials on a Device following the submission of a 'CoS Update Security Credentials' Service Request by an incoming Supplier to the DCC.

Data and Communications Company (DCC)

The holder of the Smart Meter communication licence, currently Smart DCC Ltd.

Data Service Provider (DSP)

The company awarded a contract to be a DCC Service Provider of data services to DCC as part of DCC's Relevant Services Capability. CGI IT UK Limited has been appointed to provide these services.

DCC Licence

The licence awarded under section 7AB of the Gas Act 1986, and the licence awarded under section 5 of the Electricity Act, each currently authorising Smart DCC Ltd to undertake the activity of providing a Smart Meter communication service.

DCC Service Providers

Companies or persons from whom DCC procures Relevant Services Capability; principally the DSP and the CSPs.

DCC Systems

The systems used by the DCC and its DCC Service Providers in relation to the Services and / or the SEC, including the SM WAN but excluding the Communications Hub Functions.

DCC Total System

All DCC Systems and Communications Hub Functions within the control of DCC.

DCC User

A SEC Party who has completed the User Entry Processes (defined in Section A of the SEC) and is therefore able to use DCC's Services in a particular User Role.

DCC User Interface

The communications interface designed to allow appropriate Smart Metering communications to be sent between DCC Users and the DCC.

DCC User Interface Services Schedule

The SEC Subsidiary Document summarising the services available to Users across the User Interface and specifying a number of other matters such as eligibility to receive those services.

Device

One of the following: (a) an Electricity Smart Meter; (b) a Gas Smart Meter; (c) a Communications Hub Function; (d) a Gas Proxy Function; (e) a Pre-Payment Interface Device; (f) a HAN Controlled Auxiliary Load Control; or (g) any Type 2 Device (e.g. IHD).

Distribution Network Operators (DNOs)

Holders of electricity distribution licences.

Elective Communications Services

The services associated with processing of Service Requests that are (or are to be) defined in a Bilateral Agreement (rather than the DCC User Gateway Services Schedule) in a manner that involves communication via the SM WAN (provided that such Service Requests must relate solely to the Supply of Energy or its use).

Electricity Smart Meter

A Device meeting the requirements placed on Electricity Smart Metering Equipment in the SMETS.

Eligible User

A DCC User who, acting in a particular User Role, is eligible to receive particular DCC Services, including in relation to a particular Device.

End-to-End Smart Metering System

Any DCC System, Smart Metering System, User System or RDP System.

Enrolled

The status of a Smart Metering System when the Devices which form part of it have all been Commissioned.

Enrolment Services

Services associated with the processing of Service Requests that are involved in the commissioning of Devices in the Smart Metering Inventory, and establishing their inter-relationships, and which ultimately result in the Enrolment of Smart Metering Systems ready for communication via DCC over the SM WAN.

Foundation stage

The period prior to the start of the mass roll-out stage.

Gas Proxy Function

The functionality in the Communications Hub specific to its operation as a data store of the gas meter's operational data.

Gas Smart Meter

A Device meeting the requirements placed on Gas Smart Metering Equipment in the SMETS.

GB Companion Specification (GBCS)

A document setting out amongst other things, the detailed arrangements for communications between the DCC and Devices and the behaviour required of Devices in processing such communications.

Hand Held Terminal (HHT)

A HAN-connected Device used by authorised personnel for meter installation and maintenance purposes.

Home Area Network (HAN)

The means by which communication between Devices forming part of Smart Metering System takes place within a premises.

In-Home Display (IHD)

An electronic Device, linked to a Smart Meter, which provides information on a consumer's energy consumption and ambient feedback.

Mass roll-out stage

The period between the date at which the DCC starts providing Core Communication Services and the fulfilment of the roll-out obligation as specified in the roll-out licence conditions.

MPAN

The Meter Point Administration Number, being a unique reference number for each metering point on the electricity distribution network and allocated under the Master Registration Agreement (defined in Section A of the SEC).

MPRN

The Meter Point Reference Number, being a unique reference number for each metering point on the gas distribution network and allocated under the Uniform Network Codes (defined in Section A of the SEC).

MPxN

A collective reference to the MPAN and MPRN.

Network Operators

A collective term for holders of electricity distribution licences and gas transportation licences.

Outage Detection

The ability for an electricity supply interruption to be identified and communicated to the SM WAN.

Parse

The conversion of Service Responses and Device Alerts received from the DCC over the DCC User Interface into a more user-friendly format.

Parse and Correlate Software

Software to be provided by the DCC which enables the carrying out of the Parse and Correlate activities.

Party (SEC Party)

A person that has acceded to the SEC Framework Agreement.

Pre-Command

A message generated as part of the processes of converting of Service Requests into Commands, i.e. after Transformation by DCC. For Critical Service Requests, Pre-Commands are returned to the DCC User for correlation and signing after DCC has transformed the Service Request.

RDP System

The systems used by, or on behalf of a Network Operator for the collection storage, back-up, processing, or communication of Registration Data (defined in Section A of the SEC) prior to being sent to DCC.

Registration Data Provider (RDP)

A person nominated by a Network Operator to provide Registration Data to DCC under the SEC.

Release Management

The process adopted for planning, scheduling and controlling the build, test and deployment of releases of IT updates procedures and processes.

Relevant Services Capability

The internal and external resources which the DCC relies upon in order to provide services as part of its Mandatory Business (as defined in the DCC Licence).

SEC Panel

A Panel of persons drawn from the energy industry and consumer organisations who oversee governance of the SEC, subject to the regulatory oversight of Ofgem.

SECAS

The company appointed and contracted to SECCo to carry out the functions of the Code administrator and the Code Secretariat - Gemserv.

SECCo

A company established under the SEC, owned by SEC Parties and which acts as a contracting body for the SEC Panel.

SEC Subsidiary Documents

Documents that are referenced by and forming part of the SEC, and thus subject to the SEC modification process.

Service Request

A communication to the DCC over the DCC User Interface (and in a form set out in the DCC User Interface Specification) that requests one of the Services identified in the DCC User Interface Services Schedule (or, in future an Elective Communications Service).

Service Response

A message sent from DCC to a DCC User over the User Interface (and in a form set out in the DCC User Interface Services Schedule) in response to a Service Request.

Services

This refers to the services provided or that will be provided by the DCC pursuant to the requirements in the SEC (including the bilateral agreements).

Smart Energy Code (SEC)

The Code designated by the Secretary of State pursuant to Condition 22 of the DCC Licence and setting out, amongst other things, the contractual arrangements by which DCC provides services to DCC Users as part of its Authorised Business (defined in the DCC Licence).

Smart Meter

A Gas Smart Meter or an Electricity Smart Meter.

Smart Metering Equipment Technical Specifications (SMETS)

A specification (which is to form part of the SEC) of the minimum technical requirements of Smart Metering equipment (other than Communications Hubs which are separately dealt with in CHTS).

Smart Metering Inventory

An inventory of Devices which comprise Smart Metering Systems which are (or are to be) Enrolled with DCC. The Smart Metering Inventory also holds information about Devices and their inter-relationships.

Smart Metering System (SMS)

A particular collection of Commissioned Devices installed in a premises:

- a Gas SMS comprises a Communications Hub Function, a Gas Smart Meter, a Gas Proxy Device and any additional Type 1 Devices (as defined in the SEC); and
- an Electricity SMS comprises a Communications Hub Function, an Electricity Smart Meter and any additional Type 1 Devices.

Smart Metering Wide Area Network (SM WAN)

The network that is used for two way communication between Communications Hub Functions and the DCC.

Supplier

The holder of a gas supply licence or an electricity supply licence.

Technical Architecture

The DCC Systems and the Smart Metering Systems together, including as documented in the Technical Specifications (defined in Section A of the SEC).

Transformation

The conversion, by DCC, of a Service Request into an associated Pre-Command - the format ultimately required in order for the Command to be executed by a Device.

User Role

One of a number of different capacities in which a User may (if appropriately authorised and having gone through the necessary User Entry Processes) act, including: Import Supplier; Export Supplier; Gas Supplier, Electricity Distributor, Gas Transporter or Other User.

User System

Any Systems (excluding any Devices) which are operated by or on behalf of a User and used in whole or in part for:

- constructing Service Requests;
- sending Service Requests over the DCC User Gateway;
- receiving, sending, storing, using or otherwise carrying out any processing in respect of any Pre-Command or Signed Pre-Command;
- receiving Service Responses or alerts over the DCC User Gateway;
- generating or receiving Data communicated by means of the Self-Service Interface
- communicating with the SMKI or Repository Services or other PKI Services; and
- any other Systems from which the Systems used for the above are not Separated.

Annex A: Consultation Questions

Early Roll-Out Obligation

Q1 Do you agree that the proposed legal drafting implements the policy to introduce an Early Rollout Obligation on large suppliers by 17 February 2017? Please provide a rationale for your views.

DCC User Mandate

Q2 Do you agree that the proposed legal drafting implements the policy to introduce an obligation for domestic energy suppliers to become DCC users by 17 August 2017 and for new entrants to become a DCC User before supplying gas or electricity? If you disagree please provide a rationale for your views.

Q3 Do you agree that the proposed legal drafting implements the policy to introduce an obligation for DNOs to become DCC users by 28 April 2017? If you disagree please provide a rationale for your views.

Special Installation Mesh Communications Hubs

Q4 Do you agree with the proposal and associated legal drafting to reflect matters related to the installation and maintenance of Special Installation Mesh Communications Hubs in the SEC? Please provide a rationale for your views.

Network Enhancement Plans

Q5 Do you agree with the proposal and associated legal drafting to reflect matters related to Network Enhancement Plans in the SEC? Please provide a rationale for your views.

User to non-User churn

Q6 Do you agree with our approach that no changes are required to the Supply Licence Conditions as a result of churn of SMETS2 SMSs from DCC Users to non-DCC Users?

Enduring Change of Supplier

Q7 Do you agree with the 'minded to' position to align the start of the feasibility and design of the ECoS process with the Blueprint phase of CRS with the aim of linking the design and build of the ECoS system with CRS development? Please provide a rationale for your views.

Q8 Do you agree with the 'minded to' proposal for suppliers to take reasonable steps' to start to use ECoS from the point at which it becomes available?

	Please provide a rationale for your views.
Q9	Do you agree with the principle of suppliers completing the move to ECoS within 6 months of the end of roll out i.e. 2020 or earlier? Please provide a rationale for your views.
Q10	Do you agree with the proposal for DECC to establish an industry working group under the transitional arrangements that will subsequently transfer to industry at a point to be agreed as part of the wider transitional arrangements? Please provide a rationale for your views.
DCC Additional Support	
Q11	Do you agree with the proposal to extend the scope of H14.33 to allow the DCC to also provide Testing Participants with assistance with issues related to User Systems and Devices and allowing this assistance to be provided during or after testing?
Q12	Do you have any views on how Additional Support services should be charged for?
Further Requirements on Testing	
Q13	Do you agree with the proposal and associated legal drafting to set a mandatory requirement on the DCC to provide a Pre-UEPT service and a GFI service? Please provide a rationale for your views.
Q14	<p>Please provide your views on the draft direction for the insertion of a new X9 and the proposal to:</p> <ul style="list-style-type: none"> bring the new X9 into effect on 18 April 2016 (or as soon as possible thereafter), require the provision of the Pre-UEPT service from the date that X9 is effective, require the provision of the GFI service as soon as reasonably practicable, but in any event no later than the start of End-to-End testing, provide that the Pre-UEPT and GFI service will end when Section X ends, noting that the Secretary of State has the ability to direct an earlier end date? <p>Please provide a rationale for your views.</p>
Q15	What are the benefits of providing Pre-UEPT services beyond the go live date for Release 1.3 functionality? Please provide a rationale for your views.
Q16	Do you agree with our proposed amendments for additional SIT, Interface Testing and SRT Testing? Please provide a rationale for your views.
Q17	Do you agree with our proposed amendments for the length of the End to End Testing Period? Please provide a rationale for your views.
Q18	Do you agree with our proposed amendments for additional phases of

	Service Request testing? Please provide a rationale for your views.
Q19	Do you agree with our proposed amendments to the relevant versions of the SEC for testing purposes? Please provide a rationale for your views.
SEC Panel and DCC Live Criteria Assessment	
Q20	Do you agree with the proposal and associated legal drafting? Please provide a rationale for your views.
Security	
Q21	Do you agree with the proposed approach and legal drafting that seeks to ensure that only disputes associated directly with the issue of compliance with Section G are determined by us, with other disputes following the “normal” path for resolution?
Q22	In relation to the need for DCC to test and monitor the security of Cryptographic Credential Tokens, do you agree with the proposed approach and legal drafting?
Q23	In relation to the removal of Manufacturer Release Notes from the CPL and the associated requirements for secure storage, do you agree with the proposed approach and legal drafting?
Q24	In relation to the inclusion of systems used to generate a UTRN within the scope of the User System, do you agree with the proposed approach and legal drafting?
Privacy and Explicit Consent	
Q25	Do you agree with the proposal to include a definition of Explicit Consent and do you have any comments on the proposed drafting? Please provide a rationale for your views.
Changes to Section H (DCC Services)	
Q26	Do you agree with the proposal and associated legal drafting to consult with Parties and Registration Data Providers prior to changes to DCC Internal Systems or the Release Management Strategy? Please provide a rationale for your views.
Q27	Do you agree with the proposed change to remove the requirement on RDPs to raise an Incident where the issue can be resolved by the transmission of an unsolicited registration data refresh file? Please provide a rationale for your views.
Q28	Do you agree with the proposals and associated legal drafting to the recovery and data loss obligations in regard to a Disaster? Please provide a rationale for your views.
Rectifying Errors in Relation to Device Credentials	

Q29	Do you agree with the proposal to clarify that Users are permitted to send the relevant Service Requests? Please provide a rationale for your views.
Panel/IKI Subscribers	
Q30	Do you agree with the proposal and associated legal drafting to permit SECCo to become a Subscriber for IKI File Signing Certificates for the purposes of Digitally Signing the CPL as set out above? Please provide a rationale for your views.
Status of Associated Devices	
Q31	Do you agree with the proposals to remove the requirement for DCC to modify the SMI Status of a Device in circumstances where the status of a Device with which is associated changes, and to clarify by when suppliers must ensure that the appropriate Device Security Credentials are placed on a Device? Please provide a rationale for your views.
Post Commissioning Reporting	
Q32	Do you agree with the proposal to change the reporting obligations on DCC in relation to Devices Commissioned between DCC Live and Release 1.3? Please provide a rationale for your views.
Subscriber Obligations for certain IKI File Signing Certificates	
Q33	Do you agree with the proposals to modify the subscriber obligations in relation to Certificate Signing Requests generated by DCC-provided software and to place an additional obligation on DCC in relation to these in Section G?
RDP IDs and DCC Reporting under Section E	
Q34	Do you agree with the proposal not to make transitional changes to the SEC to deal with these matters and instead to rely upon RDPs and the Panel to work with DCC within the confines of its Systems Capability on a transitional basis?
Miscellaneous Issues and Minor Amendments to Drafting	
Q35	Do you agree with the proposal legal drafting amendment to C3.13? Please provide a rationale for your view.
Q36	Do you agree with the proposed legal drafting amendments to Section E2? Please provide a rationale for your view.
Changes to provide flexibility to accommodate changes arising during testing	
Q37	Do you agree with the proposal to remove these documents from the SEC and to re-introduce them (including any enduring changes made using Section X) by designation under Condition 22/Section X5 of the SEC?

Test Communications Hubs

Q38	Do you agree with our proposal and legal drafting in relation to Test Communications Hubs? Please provide a rationale for your response.
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Consistent terminology on “all reasonable steps”

Q39	Do you agree with the proposal and associated legal drafting to align the wording of obligations throughout the SEC?
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Incident Management Policy

Q40	Do you agree with the proposed changes to the Incident Management Policy? Please give reasons to support your answer.
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Annex B: Draft SEC Legal Text

The associated SEC legal drafting will be published separately alongside this document.

Annex C: Draft Supply Licences Text

The amended Gas and Electricity Supply Licence drafting will be published separately alongside this document.

Annex D: Draft Electricity Distribution Licence Text

The amended Electricity Distribution Licence will be published separately alongside this document.

Annex E: Draft Incident Management Policy Text

The amended Incident Management Policy will be published separately alongside this document.

Annex F: Draft Certified Products List Requirements Document

The amended CPL Requirements Document will be published separately alongside this document.

Annex G: Draft Inventory Enrolment and Withdrawal Procedures Text

The amended Inventory Enrolment and Withdrawal Procedures will be published separately alongside this document.

Annex H: Draft X6 Direction Letter

The draft direction letter to amend Section X of the SEC to introduce a new Section (X9), requiring the provision of GBCS Integration Testing (GIT) for Industry and Pre-User Entry Process Testing services in time for the planned 18 April 2016 start date for Pre-User Integration Testing commencement will be published separately alongside this document.

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