

Smart Metering Implementation Programme – Regulation
Department of Energy & Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
London
SW1H 0ET

By email only to: smartmetering@decc.gsi.gov.uk

30 December 2014

Dear Sirs

Smart Metering Implementation Programme: consultation on additional SEC content

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. It is not confidential and can be published via the DECC website.

Where appropriate, we have provided answers to the consultation questions in the appendix to this letter and hope that you will find our comments helpful. If any part of our response requires further explanation or clarification please do not hesitate to contact me.

Yours faithfully

Appendix

Smart Metering Implementation Programme: consultation on additional SEC content

UK Power Networks' answers to the consultation questions

Additional Public Key Infrastructures and SMKI-related changes

Question 1: Do you agree with the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure?

Yes.

Question 2: Do you agree with the proposed approach and legal drafting in relation to DCC Key Infrastructure?

Yes.

Question 3: Do you agree with the proposed approach and legal drafting in relation to allowing RDPs to become Authorised Subscribers for Organisation Certificates?

Yes – we believe this will clarify the security position should a Network Operator wish to appoint an RDP sub-contractor.

In addition we are comfortable with the principle that no director or employee of DCC or the DCC Service Provider can influence the outcome of the SMKI Assessment Reports.

Question 4: Do you agree with the proposed approach and legal drafting in relation to the checks the DCC must apply when deciding if a Subscriber is an Eligible Subscriber?

Yes.

Question 5: Do you agree with the proposed approach and legal drafting in relation to the size restrictions on a number of fields in Device and Organisation Certificates?

Yes

Question 6: Do you agree with the proposed approach and legal drafting in relation to the clarified Independent SMKI Assurance Scheme?

Yes – we welcome the continued flexibility given to Network Operators, allowing a vulnerability assessment to be completed in line with our own risk assessment.

Security-related requirements and post-commissioning obligations legal drafting

Question 7: Do you agree that the proposed changes are necessary and proportionate to protect DCC Systems?

Yes.

Question 8: Do you agree with the proposed changes to the post commissioning obligations and associated limitation of liabilities?

Yes.

Question 9: At what point should the Recovery Key on a meter be validated?

We'd prefer for the validation to occur prior to the installation process

Movement of some technical arrangements into subsidiary documents and providing for some SEC Milestones to be turned into dates

Question 10: Do you agree with the proposal to move four sections of the SEC (H4, H5, H6 and O3) from the SEC into SEC subsidiary documents, and the proposed changes to the legal drafting accommodate this?

Given their technical nature, we support the proposal to move these sections into the appropriate SEC subsidiary documents. We also agree with the proposed changes to the legal drafting.

Question 11: Do you agree with the proposed approach to amending the legal drafting to provide for the Secretary of State to direct that an activity is required to be carried out in advance of a specified date instead of a milestone?

Yes – we believe it will provide more clarity on the programme plan.

Test Services to support System Providers and Shared Systems, and possible DCC Gateway Connection requirements for remote testing

Question 12: Do you agree with the approach and proposed legal drafting supporting Parties undertaking tests equivalent to UEPT and SREPT on their own account?

We support the proposed amendments as they will allow Parties to rely on previous test results for a shared system as part of the UEPT and SREPT processes. This will result in a more efficient and cost effective process for Parties and the DCC.

Question 13: Based on our understanding of the DCC's remote testing offering, it may be that a DCC Gateway Connection is required, which would mean that remote testing would only be available to SEC Parties. We welcome views from prospective testing participants on the impact this may have on their plans.

It is our view that all organisations wishing to use DCC test environments should be required to accede to the SEC, as this will obviate the need for separate access agreements. Accession to the SEC will also allow these participants to have full access to the SEC change process.