



Response to DECC: Consultation on further changes to the Smart Energy Code

General Comments

It is sensible to align both the Smart Metering Key Infrastructure (SMKI) and the Data Communication Company Infrastructure Key Infrastructure (DCCIKI) governance arrangements within the Smart Energy Code (SEC).

Whilst we believe the proposals are generally sensible and appropriate we are concerned that the Data Communication Company (DCC) is consulting separately on its DCCIKI policy with a different timescale for responses from interested parties. We would like assurance that the responses to both this consultation and DCCIKI policy consultation will ultimately be considered together when DECC finalises the text for the SEC. This should ensure that both documents are aligned, negating a need to revisit, should changes be made as a result of these separate processes.

We recognise the need for DCC to ensure its systems are protected at all times and understand situations may arise, that result in actions taken by the DCC, to protect the overall integrity of the DCC system estate that will have major impacts on DCC Users. The proposals to enable DCC to take action when needed are sensible.

The proposal for remote testing to be undertaken by non-SEC parties is sensible. However, it is not clear what the process will be for non-SEC parties to request, access and utilise remote testing facilities or how the costs incurred in doing so will be recovered from such parties. Further work is required in respect of this proposed approach.

Answers to specific 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?

It is sensible to align the existing SMKI process as far as possible. However, it should be noted that the detail of the DCCIKI, certificate policy and assurance is subject to a separate DCC consultation in parallel with this DECC consultation.

There may be issues relevant to the policies adopted here from the DCCIKI certificate assurance and policy approach. It would be a more efficient process and advantageous to parties if these two separate consultations are reviewed together when finalising the content for the SEC.



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

Yes, subject to any specific requirements that may arise from the separate consultation from DCC with regards to its DCCIKI certificate policy.

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

Yes, this is a sensible approach.

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, we believe this is a sensible approach.

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, this is a positive step forward and should reduce the time it will take to update credentials.

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

Yes, it is sensible that the assurance provider and its role are independent from the DCC and the DCC's service providers.

Security Related requirements and Post commissioning Obligation legal drafting

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

In general we support the need for the DCC to protect its systems and also those of Users. Any suspension of the DCC services will have a significant impact on Users, and the end customer (for example Pay As You Go customers and remote top-ups). We recognise that this action may be needed in exceptional circumstances to protect the overall integrity of the DCC. This would be a major security incident which may occur at any time and therefore necessitates the DCC to have robust security incident management procedures developed in conjunction with the industry, the SEC Panel, the Security Sub-Committee and Government.

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

Yes. We are generally supportive of this approach.



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

We believe this should take place either at, or post the commissioning 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?

The approach seems sensible. However, in order to provide unqualified support we would like assurance that the movement of the legal text will be a "cut and paste" into the proposed subsidiary document without alterations.

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?

This also seems sensible. However we would caution that any new dates proposed to replace milestones should also take into account inter dependencies within the overall Smart Metering Implementation Programme to ensure a consistent plan is retained overall.

Test Services to Support System Providers and Shared Systems, and Possible DCC Gateway Connation 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?

Yes we are comfortable with the proposed approach.

Question 13: Based on your 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 impacts this may have on their plans.

As an existing SEC party we have no specific comment to make in response to this question. We do however have a general observation regarding the governance of these arrangements. It is not clear how non-SEC parties' requests for access and use of the remote testing facilities will be managed. For example it is not clear how or if non-SEC parties would be charged for using the service, or how the costs of setting up the service for non-SEC parties may be recovered from such parties. This is an area that we believe, requires further consideration.