

SEC – January 2015 Consultation – New Definition for Section A – Consultation Draft

Following New Definition to be added to Section A:

DCCKI PMA Functions

has the meaning given to that expression in Section L13.55 (the DCCKI PMA Functions).

SECTION L – SMART METERING KEY INFRASTRUCTURE AND DCC KEY INFRASTRUCTURE

L13 DCC KEY INFRASTRUCTURE

The DCCKI Services

The DCCKI Services

L13.1 For the purposes of this Section L13, the “DCCKI Services” means all of the activities undertaken by the DCC in its capacity as the DCCKI Certification Authority in accordance with the applicable requirements of the Code.

DCCKI Authorised Subscribers

L13.2 Any Party or RDP may apply to become a DCCKI Authorised Subscriber in accordance with, and by following the relevant procedures set out in, the DCCKI Certificate Policy and the DCCKI RAPP.

L13.3 The DCC shall authorise any Party or RDP to submit a DCCKI Certificate Signing Request, and so to become a DCCKI Authorised Subscriber, where that Party or RDP has successfully completed the relevant procedures and satisfied the criteria set out in the DCCKI Certificate Policy and the DCCKI RAPP.

L13.4 The DCC shall provide any DCCKI Services that may be requested by a DCCKI Authorised Subscriber where the request is made by that DCCKI Authorised Subscriber in accordance with the applicable requirements of the DCCKI SEC Documents.

L13.5 The DCC shall ensure that in the provision of DCCKI Services it acts in accordance with Good Industry Practice.

Registration Data Providers

L13.6 Where a Registration Data Provider (other than an Electricity Network Party

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or Gas Network Party which is deemed to be an RDP, acting in its capacity as such) has become a DCCKI Authorised Subscriber, the Network Party that nominated that Registration Data Provider shall ensure that the RDP complies with all of its obligations in that capacity under this Section L13.

L13.7 Where a Registration Data Provider has been nominated as such by more than one Network Party:

- (a) to the extent to which that RDP can be clearly identified as acting on behalf of one Network Party, that Network Party shall be subject to the requirements of Section L13.6 in respect of the actions of the RDP;
- (b) to the extent to which that RDP cannot be clearly identified as acting on behalf of one Network Party, each of the Network Parties which nominated that RDP shall be subject to the requirements of Section L13.6 in respect of the actions of the RDP.

DCCKI Eligible Subscribers

L13.8 A DCCKI Authorised Subscriber:

- (a) shall be known as a "DCCKI Eligible Subscriber" in respect of a DCCKI Certificate if it is entitled to become a DCCKI Subscriber for that DCCKI Certificate; and
- (b) will be entitled to become a DCCKI Subscriber for a DCCKI Certificate only if it is identified as a DCCKI Eligible Subscriber in respect of that DCCKI Certificate in accordance with the provisions of the DCCKI Certificate Policy and the DCCKI RAPP.

DCCKI Subscribers

L13.9 A Party or RDP shall be entitled to become a DCCKI Subscriber in accordance with, and by following the relevant procedures set out in, the DCCKI Certificate Policy and the DCCKI RAPP.

The DCCKI Service Interface

DCC: Obligation to Maintain the DCCKI Service Interface

L13.10 The DCC shall maintain the DCCKI Service Interface in accordance with the DCCKI Interface Design Specification and make it available, to DCCKI Authorised Subscribers, for sending and receiving communications in accordance with the DCCKI Code of Connection.

L13.11 The DCC shall ensure that the DCCKI Service Interface is available at all times (subject to Planned Maintenance undertaken in accordance with Section H8.3):

- (a) from the date on which the DCC is first obliged to provide the DCCKI Services in accordance with this Section L13; and
- (b) prior to that date, on such dates and to such extent as is necessary for the purpose of facilitating Entry Process Testing.

The DCCKI Service Interface

L13.12 For the purposes of this Section L13, the “DCCKI Service Interface” means a communications interface designed to allow communications to be sent between a DCCKI Authorised Subscriber and the DCC for the purposes of the DCCKI Services.

DCCKI Interface Design Specification

L13.13 For the purposes of this Section L13, the “DCCKI Interface Design Specification” shall be a SEC Subsidiary Document of that name which:

- (a) specifies the technical details of the DCCKI Service Interface;
- (b) includes the protocols and technical standards that apply to the DCCKI Service Interface; and
- (c) bases those technical standards on PKIX/IETF/PKCS open standards,

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where:

- (i) PKIX is the Public Key Infrastructure for X.509 Certificates, being an IETF set of standards for certificate and certificate revocation list profiles as specified in IETF RFC 5280;
- (ii) the IETF is the Internet Engineering Task Force; and
- (iii) PKCS is the Public Key Cryptography Standard.

DCCKI Code of Connection

L13.14 For the purposes of this Section L13, the “DCCKI Code of Connection” shall be a SEC Subsidiary Document of that name which;

- (a) sets out the way in which DCCKI Authorised Subscribers may access the DCCKI Service Interface;
- (b) specifies the procedure by which DCCKI Authorised Subscribers and the DCC may communicate over the DCCKI Service Interface; and
- (c) includes a description of the way in which the mutual authentication and protection of communications taking place over the DCCKI Service Interface will operate.

DCCKI Interface Document Development

L13.15 The DCC shall develop drafts of the DCCKI Interface Design Specification and DCCKI Code of Connection:

- (a) in accordance with the process set out at Section L13.16; and
- (b) so that the drafts are available by no later than the commencement of Systems Integration Testing or 2 March 2015 (whichever is earlier), or such later date as may be specified by the Secretary of State.

L13.16 The process set out in this Section L13.16 for the development of drafts of the

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DCCKI Interface Design Specification and DCCKI Code of Connection is that:

- (a) the DCC shall, in consultation with the Parties, RDPs and such other persons as it considers appropriate, produce a draft of each document;
- (b) where a disagreement arises with any person who is consulted with regard to any proposal as to the content of either document, the DCC shall endeavour to reach an agreed proposal with that person consistent with the purposes of the document;
- (c) the DCC shall send a draft of each document to the Secretary of State as soon as is practicable after it is produced, and shall when doing so provide to the Secretary of State:
 - (i) a statement of the reasons why the DCC considers that draft document to be fit for purpose; and
 - (ii) a summary of any disagreements that arose during consultation and that have not been resolved by reaching an agreed proposal; and
- (d) the DCC shall comply with any requirements in a direction given to it by the Secretary of State in relation to either draft document, including in particular:
 - (i) any requirement to produce and submit to the Secretary of State a further draft of either document; and
 - (ii) any requirement as to the process to be followed by the DCC (and the time within which that process shall be completed) prior to submitting a further such draft.

The DCCKI Repository Service

The DCCKI Repository

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L13.17 For the purposes of this Section L13, the “DCCKI Repository” means a System for storing and (subject to the provisions of this Section) making available copies of the following:

- (a) all DCCKI Certificates;
- (b) all DCCKI CA Certificates;
- (c) all versions of the DCCKI Certificate Policy;
- (d) all versions of the DCCKI RAPP;
- (e) the latest version of the DCCKI CRL;
- (f) the latest version of the DCCKI ARL;
- (g) such other documents or information as may be specified by the SMKI PMA from time to time; and
- (h) such other documents or information as the DCC, in its capacity as the provider of the DCCKI Services, may from time to time consider appropriate.

The DCCKI Repository Service

L13.18 The DCC shall establish, operate, maintain and make available the DCCKI Repository in accordance with the provisions of this Section L13 (the “DCCKI Repository Service”).

L13.19 The DCC shall ensure that the documents and information described in Section L13.17 may be lodged in the DCCKI Repository by itself for the purpose of providing the DCCKI Services or complying with any other requirements placed on it under the Code.

L13.20 The DCC shall ensure that no person may lodge documents or information in the DCCKI Repository other than in accordance with Section L13.19.

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L13.21 The DCC shall ensure that the DCCKI Repository may be accessed for the purpose of viewing and/or obtaining a copy of any document or information stored on it by any Party or RDP which reasonably requires such access in accordance, or for any purpose associated, with the Code.

L13.22 The DCC shall ensure that no person may access documents or information in the DCCKI Repository other than in accordance with Section L13.21.

L13.23 The DCC shall make available a copy of any document stored on the DCCKI Repository to the Panel or the SMKI PMA (or the Code Administrator acting on their behalf) following receipt of a reasonable request to do so.

Parties: Duties in relation to the DCCKI Repository

L13.24 No Party or RDP may access the DCCKI Repository for the purpose of viewing and/or obtaining a copy of any document or information stored on it except to the extent that it reasonably requires such access in accordance, or for any purpose associated, with the Code.

The DCCKI Repository Interface

DCC: Obligation to Maintain the DCCKI Repository Interface

L13.25 The DCC shall maintain the DCCKI Repository Interface in accordance with the DCCKI Repository Interface Design Specification and make it available to the Parties and to RDPs to send and receive communications in accordance with the DCCKI Repository Code of Connection and (where applicable) for the purpose of Entry Process Testing.

L13.26 The DCC shall ensure that the DCCKI Repository Interface is available at all times (subject to Planned Maintenance undertaken in accordance with Section H8.3):

- (a) from the date on which the DCC is first obliged to provide the DCCKI Services in accordance with this Section L13; and

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- (b) prior to that date, on such dates and to such extent as is necessary for the purpose of facilitating Entry Process Testing.

The DCCKI Repository Interface

L13.27 For the purposes of this Section L13, the “DCCKI Repository Interface” means a communications interface designed to allow communications to be sent from and received by the DCCKI Repository for the purposes of the DCCKI Repository Service.

DCCKI Repository Interface Design Specification

L13.28 For the purposes of this Section L13, the “DCCKI Repository Interface Design Specification” shall be a SEC Subsidiary Document of that name which:

- (a) specifies the technical details of the DCCKI Repository Interface; and
- (b) includes the protocols and technical standards that apply to the DCCKI Repository Interface.

DCCKI Repository Code of Connection

L13.29 For the purposes of this Section L13, the “DCCKI Repository Code of Connection” shall be a SEC Subsidiary Document of that name which sets out the way in which the Parties and RDPs may access the DCCKI Repository Interface.

DCCKI Repository Interface Document Development

L13.30 The DCC shall develop drafts of the DCCKI Repository Interface Design Specification and DCCKI Repository Code of Connection:

- (a) in accordance with the process set out at Section L13.31; and
- (b) so that the drafts are available by no later than the commencement of Systems Integration Testing or 2 March 2015 (whichever is earlier), or

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such later date as may be specified by the Secretary of State.

L13.31 The process set out in this Section L13.31 for the development of drafts of the DCCKI Repository Interface Design Specification and DCCKI Repository Code of Connection is that:

- (a) the DCC shall, in consultation with the Parties, RDPs and such other persons as it considers appropriate, produce a draft of each document;
- (b) where a disagreement arises with any person who is consulted with regard to any proposal as to the content of either document, the DCC shall endeavour to reach an agreed proposal with that person consistent with the purposes of the document;
- (c) the DCC shall send a draft of each document to the Secretary of State as soon as is practicable after it is produced, and shall when doing so provide to the Secretary of State:
 - (i) a statement of the reasons why the DCC considers that draft document to be fit for purpose; and
 - (ii) a summary of any disagreements that arose during consultation and that have not been resolved by reaching an agreed proposal; and
- (d) the DCC shall comply with any requirements in a direction given to it by the Secretary of State in relation to either draft document, including in particular:
 - (i) any requirement to produce and submit to the Secretary of State a further draft of either document; and
 - (ii) any requirement as to the process to be followed by the DCC (and the time within which that process shall be completed) prior to submitting a further such draft.

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The DCCKI Document Set

Obligations on the SMKI PMA

L13.32 The SMKI PMA shall exercise the functions that are allocated to it under and (in so far as they apply to it) comply with the requirements of the DCCKI Document Set.

Obligations on DCCKI Participants

L13.33 Each DCCKI Participant shall (in so far as they apply to it) comply with the requirements of the DCCKI SEC Documents.

The DCCKI Document Set

L13.34 For the purposes of this Section L13, the “DCCKI Document Set” means:

- (a) **the DCCKI SEC Documents; and**
- (b) **the DCCKI CPS.**

The DCCKI SEC Documents

L13.35 For the purposes of this Section L13, the “DCCKI SEC Documents” means the provisions of the Code comprising:

- (a) **the following SEC Subsidiary Documents:**
 - (i) **the DCCKI Certificate Policy;**
 - (ii) **the DCCKI RAPP;**
 - (iii) **the DCCKI Interface Design Specification;**
 - (iv) **the DCCKI Code of Connection;**
 - (v) **the DCCKI Repository Interface Design Specification;**
 - (vi) **the DCCKI Repository Code of Connection;**

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- (b) the provisions of this Section L13; and
- (c) every other provision of the Code which relates to the provision or the use of the DCCKI Services or the DCCKI Repository Service or to any matters directly arising from or affecting the provision or the use of those Services.

The DCCKI Registration Authority Policies and Procedures: Document Development

L13.36 The DCC shall develop a draft of the DCCKI RAPP:

- (a) to make provision for such matters as are specified in the DCCKI Certificate Policy as being matters provided for in the DCCKI RAPP;
- (b) to make provision for such other matters as are necessary or appropriate in relation to the exercise of its functions as the DCCKI Registration Authority;
- (c) in accordance with the process set out at Section L13.37;
- (d) so that the draft is available by no later than the commencement of Systems Integration Testing or 2 March 2015 (whichever is earlier), or such later date as may be specified by the Secretary of State.

L13.37 The process set out in this Section L13.37 for the development of a draft of the DCCKI RAPP is that:

- (a) the DCC shall, in consultation with the Parties, RDPs and such other persons as it considers appropriate, produce a draft of the DCCKI RAPP;
- (b) where a disagreement arises with any person who is consulted with regard to any proposal as to the content of the DCCKI RAPP, the DCC shall endeavour to reach an agreed proposal with that person consistent with the purposes of the DCCKI RAPP specified in Section L13.36;

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- (c) the DCC shall send a draft of the DCCKI RAPP to the Secretary of State as soon as is practicable after it is produced, and shall when doing so provide to the Secretary of State:
 - (i) a statement of the reasons why the DCC considers that draft to be fit for purpose; and
 - (ii) a summary of any disagreements that arose during consultation and that have not been resolved by reaching an agreed proposal;
- (d) the DCC shall comply with any requirements in a direction given to it by the Secretary of State in relation to the draft of the DCCKI RAPP, including in particular:
 - (i) any requirement to produce and submit to the Secretary of State a further draft of the document; and
 - (ii) any requirement as to the process to be followed by the DCC (and the time within which that process shall be completed) prior to submitting a further such draft.

The DCCKI Certification Practice Statement

L13.38 The DCC shall establish, give effect to, maintain and comply with a document which shall be known as the “DCCKI CPS”.

L13.39 The DCCKI CPS shall be a document which:

- (a) sets out the policies and procedures of the DCC designed to ensure that it will comply with the requirements of the DCCKI Certificate Policy;
- (b) incorporates the detailed operating procedures to be used by the DCC for the purposes of its compliance with the requirements of that Policy;
- (c) incorporates such other provisions as may be required by or in accordance with that Policy or any other part of the Code; and

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- (d) is reviewed by the SMKI PMA to assess whether it is appropriate for these purposes.

L13.40 For the purposes of the review of the DCCKI CPS by the SMKI PMA in accordance with Section L13.39(d), the DCC shall submit an initial draft of the DCCKI CPS to the SMKI PMA by no later than the commencement of Systems Integration Testing or 2 March 2015 (whichever is earlier), or such later date as may be agreed by the SMKI PMA.

L13.41 The DCC shall keep the DCCKI CPS under review, and shall in particular carry out a review of the DCCKI CPS:

- (a) whenever (and to the extent to which) it may be required to do so by the SMKI PMA; and
- (b) following receipt of a notification from the SMKI PMA in accordance with Section L1.17(e) (Duties of the SMKI PMA).

L13.42 Following:

- (a) any review of the DCCKI CPS, the DCC may propose amendments to it, which it shall submit to the SMKI PMA for its review;
- (b) a review carried out in accordance with Section L13.41(b), the DCC shall report to the SMKI PMA any remedial steps taken or proposed to be taken in order for it to continue to meet its obligations under Section G (Security).

Enquiries in relation to the DCCKI Document Set

L13.43 The DCC shall respond within a reasonable time to any reasonable request for information made by a Party or RDP in relation to the DCCKI Services, the DCCKI Repository Service or the DCCKI Document Set, but excluding any request for a copy of any document or information which can be accessed through the DCCKI Repository.

The DCCKI Subscriber Obligations

DCCKI Certificate Signing Requests

L13.44 Each DCCKI Eligible Subscriber shall ensure that all of the information contained in each DCCKI Certificate Signing Request made by it is true and accurate.

L13.45 No DCCKI Eligible Subscriber may make a DCCKI Certificate Signing Request which contains:

- (a) any information that constitutes a trade mark, unless it is the holder of the Intellectual Property Rights in relation to that trade mark; or
- (b) any confidential information which would be contained in a DCCKI Certificate Issued in response to that DCCKI Certificate Signing Request.

Subscribing for or Rejecting DCCKI Certificates

L13.46 Where any DCCKI Certificate is Issued to a DCCKI Eligible Subscriber in response to a DCCKI Certificate Signing Request, that DCCKI Eligible Subscriber shall:

- (a) establish whether the information contained in that DCCKI Certificate is consistent with information that was contained in the DCCKI Certificate Signing Request;
- (b) if it identifies that the DCCKI Certificate contains any information which is untrue or inaccurate immediately inform the DCC that it rejects the DCCKI Certificate and give to the DCC its reasons for doing so;
- (c) in the absence of any such rejection, become a DCCKI Subscriber for that DCCKI Certificate.

Use of DCCKI Certificates

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L13.47 Each DCCKI Subscriber shall ensure that it does not use any DCCKI Certificate held by it other than for the purposes of creating, sending, receiving and processing communications sent to and from the DCC pursuant to the Code.

DCCKI Certificates: Protection of Private Keys

L13.48 Each DCCKI Subscriber shall (in addition, if it is the DCC, a User or an RDP, to its obligations under Section G (Security)) use its reasonable endeavours to ensure that no Compromise occurs to any:

- (a) Private Key which is associated with a Public Key contained in a DCCKI Certificate for which it is the DCCKI Subscriber; or
- (b) Secret Key Material associated with that Private Key.

The DCCKI Relying Party Obligations

DCCKI Relying Parties

L13.49 For the purposes of this Section L13, a "DCCKI Relying Party" in relation to a DCCKI Certificate or DCCKI CA Certificate, means any Party or RDP which relies on the Certificate for the purposes of creating, sending, receiving or processing communications sent to and from the DCC or another Party or RDP pursuant to this Code.

Duties in relation to DCCKI Certificates and DCCKI CA Certificates

L13.50 Each DCCKI Relying Party shall:

- (a) before relying on any DCCKI Certificate:
 - (i) check the version of the DCCKI CRL on the DCCKI Repository, in accordance with IETF RFC 5280; and
 - (ii) where that DCCKI Certificate is shown on the DCCKI CRL as having been revoked, not rely on the DCCKI Certificate; and

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- (b) before relying on any DCCKI CA Certificate:
 - (i) check the version of the DCCKI ARL on the DCCKI Repository, in accordance with IETF RFC 5280; and
 - (ii) where that DCCKI CA Certificate is shown on the DCCKI ARL as having been revoked, not rely on the DCCKI CA Certificate.

L13.51 No DCCKI Relying Party may rely on a DCCKI Certificate where the Validity Period of that DCCKI Certificate has expired.

L13.52 No DCCKI Relying Party may rely on a DCCKI Certificate or DCCKI CA Certificate where it suspects that the DCCKI Certificate has been Compromised.

L13.53 Each DCCKI Relying Party shall use its reasonable endeavours, by means of appropriate Systems, to verify Digital Signatures, Check Cryptographic Protection, Confirm Validity and perform other appropriate cryptographic operations before relying on any DCCKI Certificate or DCCKI CA Certificate.

The DCCKI PMA Functions

Performance of the DCCKI Functions

L13.54 The DCC shall make arrangements which shall ensure that:

- (a) a senior member of DCC Personnel;
- (b) a senior member of the personnel of a DCC Service Provider; or
- (c) a number of individuals, each of whom falls within either paragraph (a) or (b), acting together,

shall carry out the DCCKI PMA Functions.

The DCCKI PMA Functions

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L13.55 For the purpose of this Section L13, the “DCCKI PMA Functions” shall mean the activities of:

- (a) periodically:
 - (i) reviewing the effectiveness of the DCCKI Document Set (including so as to evaluate whether the DCCKI Document Set remains consistent with the SEC Objectives); and
 - (ii) identifying any changes that should be made to the DCCKI Document Set in order to ensure that the DCC meets its obligations under Section G (Security);

- (b) as soon as is reasonably practicable following the incorporation of each of the following documents into this Code, its re-incorporation, or its modification in accordance with section 88 of the Energy Act 2008, carrying out in relation to it the activities specified in paragraph (a) above:
 - (i) the DCCKI Certificate Policy;
 - (ii) the DCCKI RAPP;

- (c) on receipt by the DCC of a notification from the SMKI PMA in accordance with Section L1.17(e) (Duties of the SMKI PMA), carrying out in relation to the DCCKI Document Set the activities specified in paragraph (a) above, having regard in particular to any recommendation for action made by the SMKI PMA; and

- (d) performing any other duties expressly described as DCCKI PMA Functions elsewhere in this Code.

The Duties of the DCC

L13.56 Where the individual(s) carrying out the DCCKI PMA Functions notifies the DCC of any matter, or makes any recommendation with regard to the

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compliance by the DCC with its obligations under Section G (Security)
(including in particular any recommendation for the modification of the
DCCKI Document Set for the purpose of ensuring such compliance), the DCC
shall:

(a) consider and take into account the matter notified, or recommendation
made, to it; and

(b) where, having done so, it considers that a change to the DCCKI
Document Set would be appropriate, submit a Modification Proposal for
that purpose.

L13.57 The DCC shall ensure that, where either the SMKI PMA or Security
Sub-Committee requests to be provided with any notification or
recommendation made to the DCC by the individual(s) carrying out the
DCCKI PMA Functions, that information shall be provided to it.

T2 SYSTEMS INTEGRATION TESTING

Overview

T2.1 Systems Integration Testing tests the capability of the DCC and the component parts of the DCC Systems together with the Communications Hubs selected pursuant to Section T1 to interoperate with each other and with the RDP Systems.

SIT Objective

T2.2 The objective of Systems Integration Testing (the “**SIT Objective**”) is to demonstrate that the DCC and the component parts of the DCC Systems together with the Communications Hubs selected pursuant to Section T1 interoperate with each other and with the RDP Systems to the extent necessary in order that:

- (a) the DCC is capable of complying with its obligations under Sections E (Registration Data), G (Security) and H (DCC Services); and
- (b) the Registration Data Providers are capable of complying with the obligations under Section E (Registration Data) with which the Network Parties are obliged to procure that the Registration Data Providers comply,

in each case at levels of activity commensurate with the relevant Volume Scenarios.

T2.3 For the purposes of Section T2.2, the Sections referred to in that Section shall be construed by reference to:

- (a) the decision or consultation document concerning the intended future content of those Sections most recently published by the Secretary of State prior to the date on which this Section T2.3 comes into force (regardless of whether the content of those documents has yet been incorporated into this Code, or whether those Sections are stated to not yet apply under Section X (Transition)); and
- (b) to the extent not inconsistent with any document referred to in (a), any document regarding technical or procedural requirements which support those Sections which is published from time to time by the Secretary of State for the purposes of this Section T2.3.

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T2.4 Systems Integration Testing is to be undertaken on a Region-by-Region basis and an RDP-System-by-RDP-System basis; such that the SIT Objective is to be achieved in respect of each Region and each RDP System separately.

SIT Approach Document

T2.5 The DCC shall develop a document (the “**SIT Approach Document**”) which sets out:

- (a) the reasonable entry criteria to be satisfied with respect to each Registration Data Provider prior to commencement of Systems Integration Testing in respect of that Registration Data Provider;
- (b) the manner in which Systems Integration Testing is to be undertaken, including the respective obligations of the DCC, and each Registration Data Provider and the Volume Scenarios to be used;
- (c) a reasonable timetable for undertaking and completing Systems Integration Testing;
- (d) the frequency and content of progress reports concerning Systems Integration Testing to be provided by the DCC to the Panel (which the Panel shall make available to the Secretary of State, the Authority and Testing Participants), which reports must include details of Testing Issues identified and resolved and of any problems and solutions encountered with respect to Devices (the details of such Testing Issues to be anonymised and redacted as required in accordance with Section H14.44 (General: Testing Issue Resolution Process));
- (e) (to the extent it is not reasonably practicable to use actual Devices) details of the alternative arrangements (which may include Test Stubs) to be used in their place (together with an explanation of how such arrangements will provide sufficient assurance that the SIT Objective has been met), in which case there must also be a process describing whether and how to switch to the use of actual Devices as they become available;
- (f) where a Device Model is de-selected pursuant to the Device Selection Methodology, the process for switching to an alternate Device Model where practicable, or otherwise to Tests Stubs or an alternative arrangement;

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- (g) a Good Industry Practice methodology for determining whether the SIT Objective has been achieved in respect of each Region and each RDP System, including details of the exit criteria to be achieved and the level of assurance that will be delivered by achievement of those exit criteria; provided that one such exit criteria for each Region must include the successful use in that Region of each Communications Hub Device Model that the DCC first proposes to make available in that Region (save that such Communications Hub Device Models need not have CPA Certificates and need not (where the Secretary of State so directs) have a ZigBee Alliance Assurance Certificate);
- (h) that the DCC will produce a report where the DCC considers that the exit criteria referred to in (g) above have been achieved for a Region or an RDP System (providing evidence of such achievement in such report), having consulted with each Registration Data Provider in relation to the exit criteria applicable to that Registration Data Provider; and
- (i) how an auditor (that is sufficiently independent of the DCC, the DCC Service Providers and the Registration Data Providers) will be selected, and how such auditor will monitor the matters being tested pursuant to Systems Integration Testing, and confirm that the exit criteria referred to in (g) above have been achieved for a Region or an RDP System (such independent auditor to be appointed by the DCC on terms consistent with Good Industry Practice).

Approval of SIT Approach Document

- T2.6 The DCC shall submit the SIT Approach Document to the Panel for the Panel's approval as fit for the purposes envisaged by this Section T2.
- T2.7 The DCC shall not submit the SIT Approach Document to the Panel under Section T2.6 until after the DCC has first published the Device Selection Methodology.
- T2.8 Before submitting the SIT Approach Document to the Panel, the DCC shall consult with the Registration Data Providers regarding the SIT Approach Document. When submitting the SIT Approach Document to the Panel, the DCC shall also submit copies of the consultation responses received from the Registration Data Providers. In addition, the DCC shall publish such consultation responses (to the extent not marked

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confidential) on the DCC Website.

T2.9 Where the Panel decides not to approve the SIT Approach Document submitted for approval, the Panel shall notify such decision to the DCC and the Registration Data Providers giving the reasons why it considers that it is not fit for the purposes envisaged in this Section T2. In such circumstances, the DCC shall:

- (a) revise the document to address such reasons;
- (b) re-consult with the Registration Data Providers; and
- (c) re-submit the document to the Panel for approval and comply with Section T2.8 (following which this Section T2.9 or Section T2.10 shall apply).

T2.10 Where the Panel decides to approve the SIT Approach Document submitted for approval, the Panel shall notify such decision to the DCC and the Registration Data Providers. In such circumstances, the DCC and each Registration Data Provider shall have the ability (within the 14 days after notification by the Panel) to refer the matter to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs) to determine whether the SIT Approach Document:

- (a) should be approved as fit for the purposes envisaged by this Section T2;
- (b) is not fit for the purposes envisaged by this Section T2, but will be deemed to be approved if it is revised by the DCC in accordance with the determination; or
- (c) is not fit for the purposes envisaged by this Section T2 and should be revised and re-submitted by the DCC in accordance with Section T2.9,

(and any such determination shall be final and binding for the purposes of this Code).

Commencement of Systems Integration Testing

T2.11 Subject to Section T2.12, once the SIT Approach Document has been approved by the Panel (or deemed to be approved by the Panel under Section T2.10(b)), the DCC shall publish the approved document on the DCC Website and give notice to the Registration Data Providers of the date on which Systems Integration Testing is to

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commence. The SIT Approach Document must be published at least 3 months’ (or such shorter period as the Secretary of State may direct) in advance of the date on which Systems Integration Testing is to commence. Where so directed by the Secretary of State, the DCC shall give notice to the Registration Data Providers of the revised date from which Systems Integration Testing is to commence.

T2.12 The DCC shall not publish the SIT Approach Document and give notice under Section T2.11 where the Panel’s decision has been appealed under Section T2.10 (pending approval of the document thereunder or revision in accordance with a determination made under Section T2.10(b)), save that where:

- (a) the Panel’s approval of the SIT Approach Document is appealed by one or more Registration Data Providers, the DCC shall nevertheless publish the document and give notice under Section T2.11 insofar as the document relates to the other Registration Data Providers; and/or
- (b) the Panel’s approval of the SIT Approach Document is appealed by one or more Registration Data Providers or the DCC, the Panel may nevertheless direct that the matter appealed is not of a nature that should delay notice under Section T2.11, in which case the DCC shall publish the document and give notice under Section T2.11 (noting the appeal).

T2.13 Prior to the commencement of Systems Integration Testing, the DCC shall assess whether or not each Registration Data Provider meets the entry criteria referred to in Section T2.5(a), and report to the Registration Data Provider and the Panel on the same. Each Network Party shall ensure that its Registration Data Provider:

- (a) cooperates with the DCC in its assessment of whether the Registration Data Provider meets the entry criteria referred to in Section T2.5(a);
- (b) takes all reasonable steps to meet those entry criteria by the date required in accordance with the SIT Approach Document; and
- (c) notifies the Panel and the DCC as soon as reasonably practicable if the Registration Data Provider considers that it will not meet those criteria by that date.

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T2.14 Systems Integration Testing in respect of each Registration Data Provider shall only commence once the Registration Data Provider meets the entry criteria referred to in Section T2.5(a). Any disagreement between the DCC and a Registration Data Provider as to whether the Registration Data Provider has met such entry criteria shall be determined by the Panel, provided that such disagreement must be notified to the Panel within 14 days of the DCC notifying its assessment to the Registration Data Provider. The Panel's decision on such matter may (within 14 days after the Panel's decision) be appealed by the DCC or the affected Registration Data Provider to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs), whose decision shall be final and binding for the purposes of this Code.

Systems Integration Testing

T2.15 The DCC shall comply with its obligations under the approved SIT Approach Document. The DCC shall use its reasonable endeavours to ensure that Systems Integration Testing is completed as soon as it is reasonably practicable to do so.

T2.16 Each Network Party shall ensure that its Registration Data Provider complies with its obligations under the approved SIT Approach Document.

T2.17 Where requested by the DCC and/or a Registration Data Provider, each Party shall take all reasonable steps to do all such things as are within its power and necessary or expedient in order to facilitate achievement of the SIT Objective.

T2.18 Where the DCC wishes to make amendments to the SIT Approach Document, the DCC shall consult with the Registration Data Providers regarding those amendments and submit those amendments to the Panel (in accordance with Section T2.8) for approval (following which Sections T2.9 to T2.12 shall apply as if the references in those Sections to approval of the document were to approval of the amendments and as if the references in Sections T2.11 and T2.12 to giving notice were not included).

Completion of Systems Integration Testing

T2.19 Subject to Section T2.20, Systems Integration Testing shall end in respect of each Region or RDP System on the date notified as the end of Systems Integration Testing for that Region or RDP System by the DCC to the Secretary of State, the Authority,

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the Panel, the Parties and the Registration Data Providers.

T2.20 The DCC shall not notify the end of Systems Integration Testing in respect of each Region or RDP System before the following reports have been produced in respect of that Region or RDP System:

- (a) the DCC's report in accordance with the SIT Approach Document demonstrating that the exit criteria have been met in respect of that Region or RDP System (as envisaged by Section T2.5(h)); and
- (b) the independent auditor's report to the DCC in accordance with the SIT Approach Document confirming that the exit criteria have been met in respect of that Region or RDP System (as envisaged by Section T2.5(i)).

T2.21 On notifying the end of Systems Integration Testing for one or more Regions or RDP Systems, the DCC shall provide to the Authority and the Panel and (on request) to the Secretary of State:

- (a) copies of the reports referred to in Section T2.20; and
- (b) where relevant, a list of sections of the report or reports which the DCC considers should be redacted prior to circulation of the reports to the Parties, Registration Data Providers or Testing Participants where the DCC considers that those sections contain information which may pose a risk of Compromise to the DCC Total System or RDP Systems.

T2.22 Once directed to do so by the Panel, the DCC shall make copies of the reports referred to in Section T2.20 available to the Parties, the Registration Data Providers and the Testing Participants. Prior to making such copies available, the DCC shall redact those sections of the reports which it is directed to redact by the Panel where the Panel considers that those sections contain information which may pose a risk of Compromise to the DCC Total System or RDP Systems (which sections may or may not include those sections which the DCC proposed for redaction).

Testing Issues

T2.23 Sections H14.37 to H14.45 (General: Testing Issue Resolution Process) shall apply for the purposes of Systems Integration Testing. Each Registration Data Provider shall

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be deemed to be a Testing Participant for such purposes, and may raise a Testing Issue in respect of Systems Integration Testing.

T2.24 During Systems Integration Testing, the DCC shall provide the Secretary of State with copies of the reports which are generated by the DCC or the DCC Service Provider in respect of Testing Issues (without redacting those reports as ordinarily required by Sections H14.37 to H14.45).

T3 INTERFACE TESTING

Overview

T3.1 Interface Testing tests the capability of the DCC and the DCC Systems together with the Communications Hubs selected pursuant to Section T1 to interoperate with User Systems and Non-Gateway Supplier Systems.

Interface Testing Objective

T3.2 The objective of Interface Testing (the “**Interface Testing Objective**”) is to demonstrate that the DCC and the DCC Systems together with the Communications Hubs selected pursuant to Section T1 interoperate with User Systems and Non-Gateway Supplier Systems to the extent necessary in order that the DCC is capable of complying with its obligations under Sections E (Registration Data), G (Security), H (DCC Services) and O (Non-Gateway Communications) (in each case) at levels of activity commensurate with the relevant Volume Scenarios.

T3.3 For the purposes of Section T3.2, the Sections referred to in that Section shall be construed by reference to:

- (a) the decision or consultation document concerning the intended future content of those Sections most recently published by the Secretary of State prior to the date on which this Section T3.3 comes into force (regardless of whether the content of those documents has yet been incorporated into this Code, or whether those Sections are stated to not yet apply under Section X (Transition)); and
- (b) to the extent not inconsistent with any document referred to in (a), any document regarding technical or procedural requirements which support those Sections which is published from time to time by the Secretary of State for the purposes of this Section T3.3.

T3.4 Interface Testing is to be undertaken on a Region-by-Region basis; such that the Interface Testing Objective is to be demonstrated in respect of each Region separately. Interface Testing for a Region cannot be completed until Systems

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Integration Testing has been completed for that Region. For the avoidance of doubt, Interface Testing cannot be completed until Systems Integration Testing has been completed for each and every Region and RDP System.

- T3.5 During Interface Testing, Parties who wish to do so, and who are ready to do so in accordance with the entry criteria for the User Entry Process Tests, shall be able to undertake the User Entry Process Tests (pursuant to Section H14 (Testing Services)).

Overlapping Provision of Systems Integration Testing and Interface Testing

- T3.6 Prior to the start of Interface Testing, the DCC may propose to the Secretary of State, having regard to the overriding objective of completing Interface Testing in a timely manner, that Interface Testing should be commenced from some point during System Integration Testing for any or all Regions. The DCC's proposal must set out its analysis of the benefits and risks of doing so. Prior to submitting its proposal to the Secretary of State, the DCC shall consult with the other Parties regarding the proposal. The DCC shall also submit copies of the consultation responses received from Parties. Where it has submitted the proposal to the Secretary of State, the DCC shall publish the proposal and such consultation responses (to the extent that they are not marked confidential) on the DCC Website.
- T3.7 Where the Secretary of State agrees with the DCC's recommendation pursuant to Section T3.6, then Interface Testing shall commence from the time recommended for the Regions included in the recommendation (notwithstanding anything to the contrary in the Interface Testing Approach Document or the SIT Approach Document).

Interface Testing Approach Document

- T3.8 The DCC shall develop a document (the “**Interface Testing Approach Document**”) which sets out:
- (a) the reasonable entry criteria to be satisfied by the DCC with respect to the DCC Systems and the Communications Hubs selected pursuant to Section T1, and to be met by the Registration Data Providers with respect to the RDP Systems prior to commencement of Interface Testing in each Region;

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- (b) the entry criteria to be met by the Parties prior to their commencing the User Entry Process Tests (which criteria shall be consistent with the relevant requirements of Section H14 (Testing Services), subject only to amendments reasonably required for the purposes of Interface Testing);
- (c) the manner in which Interface Testing is to be undertaken, including the respective obligations of the DCC, each other Party and each Registration Data Provider and the Volume Scenarios to be used;
- (d) a reasonable timetable for undertaking and completing Interface Testing;
- (e) the frequency and content of progress reports concerning Interface Testing to be provided by the DCC to the Panel (which the Panel shall make available to the Secretary of State, the Authority and Testing Participants), which reports must include details of Testing Issues identified and resolved and of any problems and solutions encountered with respect to Devices (the details of such Testing Issues to be anonymised and redacted as required in accordance with Section H14.44 (General: Testing Issue Resolution Process));
- (f) (to the extent it is not reasonably practicable to use actual Devices) details of the alternative arrangements (which may include Test Stubs) to be used in their place (together with an explanation of how such arrangements will provide sufficient assurance that the Interface Testing Objective has been met), in which case there must also be a process describing whether and how to switch to the use of actual Devices as they become available;
- (g) where a Device Model is de-selected pursuant to the Device Selection Methodology, the process for switching to an alternate Device Model where practicable, or otherwise to Tests Stubs or an alternative arrangement;
- (h) the process by which the DCC will facilitate the Parties undertaking and completing the User Entry Process Tests (which process shall be consistent with the relevant requirements of Section H14 (Testing Services), subject only to amendments reasonably required for the purposes of Interface Testing);
- (i) how, to the extent it is reasonably practicable to do so, the DCC will allow persons who are eligible to undertake User Entry Process Tests (pursuant to

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the Interface Testing Approach Document) to undertake those tests concurrently (provided that, where it is not reasonably practicable to do so, the DCC shall give priority to completion of the User Entry Process Tests by the Supplier Parties);

- (j) a Good Industry Practice methodology for determining whether or not the Interface Testing Objective has been achieved in respect of each Region, including details of the exit criteria to be achieved and the level of assurance that will be delivered by achievement of those exit criteria (including, as described in Section T3.27, completion of User Entry Process Tests for that Region by two Large Supplier Parties and (where applicable pursuant to Section T3.21) by at least one Network Party in respect of the ‘Electricity Distributor’ User Role and/or at least one Network Party in respect of the ‘Gas Transporter’ User Role); and
- (k) how the DCC will report to the Panel where the DCC considers that the exit criteria referred to in (j) above have been achieved in respect of a Region (providing evidence of such achievement), having consulted with the Registration Data Providers and the Parties who are obliged by this Section T3 to undertake the User Entry Process Tests.

Approval of Interface Testing Approach Document

T3.9 The DCC shall submit the Interface Testing Approach Document to the Panel for the Panel’s approval as fit for the purposes envisaged by this Section T3.

T3.10 Before submitting the Interface Testing Approach Document to the Panel, the DCC shall consult with the other Parties, the Panel and the Registration Data Providers regarding the Interface Testing Approach Document. When submitting the Interface Testing Approach Document to the Panel, the DCC shall also submit copies of the consultation responses received from the other Parties or the Registration Data Providers. In addition, the DCC shall publish such consultation responses (to the extent not marked confidential) on the DCC Website.

T3.11 Where the Panel decides not to approve the Interface Testing Approach Document submitted for approval, the Panel shall notify such decision to the DCC and the other

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Parties giving reasons for such decision. In such circumstances, the DCC shall:

- (a) revise the document to address such reasons;
- (b) re-consult with the other Parties and the Registration Data Providers; and
- (c) re-submit the document to the Panel for approval and comply with Section T3.10 (following which this Section T3.11 or Section T3.12 shall apply).

T3.12 Where the Panel decides to approve the Interface Testing Approach Document submitted for approval, the Panel shall notify such decision to the DCC, the other Parties and the Registration Data Providers giving reasons for such decision. In such circumstances, the DCC and each other Party and each Registration Data Provider shall have the ability (within the 14 days after notification by the Panel) to refer the matter to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs) to determine whether the Interface Testing Approach Document:

- (a) should be approved as fit for the purposes envisaged by this Section T3;
- (b) is not fit for the purposes envisaged by this Section T3, but will be deemed to be approved if it is revised by the DCC in accordance with the determination; or
- (c) is not fit for the purposes envisaged by this Section T3 and should be revised and re-submitted by the DCC in accordance with Section T3.11,

(which determination shall be final and binding for the purposes of this Code).

Commencement of Interface Testing

T3.13 Subject to Section T3.14, once the Interface Testing Approach Document has been approved by the Panel (or deemed to be approved by the Panel under Section T3.12(b)), the DCC shall publish the approved document on the DCC Website and give at least 6 months' (or such shorter period as the Secretary of State may direct) notice to the other Parties of the date on which Interface Testing is to commence.

Where so directed by the Secretary of State, the DCC shall give notice to the other Parties of the revised date from which Interface Testing is to commence.

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T3.14 Where the Panel's approval of the Interface Testing Approach Document is appealed by one or more persons under Section T3.12, the Panel may nevertheless direct that the matter appealed is not of a nature that should delay publication and the giving of notice under Section T3.13, in which case the DCC shall publish the document and give notice under Section T3.13 (noting the appeal). Subject to the foregoing provisions of this Section T3.14, the DCC shall not publish the Interface Testing Approach Document and give notice under Section T3.13 where the Panel's decision has been appealed under Section T3.12 (pending the approval of the document thereunder or revision in accordance with a determination made under Section T3.12(b)).

T3.15 Prior to the commencement of Interface Testing and in accordance with the Interface Testing Approach document, the DCC shall assess whether or not each Large Supplier Party (and, where directed pursuant to Section T3.21, each Network Party) meets the entry criteria referred to in Section T3.8(b), and report to the Panel and that Party on the same. Each Large Supplier Party (and, where directed pursuant to Section T3.21, each Network Party) shall:

- (a) take all reasonable steps to ensure that it meets the entry criteria referred to in Section T3.8(b) by the date required in accordance with the Interface Testing Approach Document; and
- (b) notify the Panel and the DCC as soon as reasonably practicable if the Party considers that it will not meet those criteria by that date.

T3.16 Section H14.16 (User Entry Process Tests) shall apply where there is any disagreement between the DCC and a Party as to whether that Party has met the entry criteria for the User Entry Process Tests (as modified by the Interface Testing Approach Document), provided that:

- (a) the Panel's decision on any such matter may be appealed to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs), whose decision shall be final and binding for the purposes of this Code; and
- (b) in the case of the Parties referred to in Section T3.15, any such disagreement

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must be notified to the Panel within 14 days of the DCC notifying its assessment to that Party and any appeal must be brought within 14 days after the Panel's decision.

Interface Testing

T3.17 The DCC shall comply with its obligations under the approved Interface Testing Approach Document. The DCC shall use its reasonable endeavours to ensure that Interface Testing is completed as soon as it is reasonably practicable to do so.

T3.18 Each Network Party shall ensure that its Registration Data Provider complies with its obligations under the approved Interface Testing Approach Document.

T3.19 Each Party that undertakes the User Entry Process Tests prior to completion of Interface Testing shall do so in accordance with Section H14 (Testing Services) and the approved Interface Testing Approach Document.

T3.20 Each Large Supplier Party shall use its reasonable endeavours to commence the User Entry Process Tests as soon as reasonably practicable (in respect of the User Roles of 'Import Supplier' and/or 'Gas Supplier', depending on which Energy Supply Licence or Energy Supply Licences it holds). Each Large Supplier Party shall, on request, notify the Panel and the DCC of the Party's progress towards completing such User Entry Process Tests.

T3.21 Where directed to do so by the Secretary of State, each Network Party shall use its reasonable endeavours to commence the User Entry Process Tests as soon as reasonably practicable (in respect of the User Roles of 'Electricity Distributor' or 'Gas Transporter', as applicable). Following any such direction, each Network Party shall, on request, notify the Panel and the DCC of the Party's progress towards completing such User Entry Process Tests.

T3.22 Section H14.21 (User Entry Process Tests) shall apply where there is any disagreement between the DCC and a Party as to whether that Party has completed the User Entry Process Tests (as modified by the Interface Testing Approach Document), provided that:

(a) the Panel's decision on any such matter be appealed to the Authority (or,

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where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs), whose decision shall be final and binding for the purposes of this Code; and

- (b) in the case of the Parties referred to in Section T3.15, any such disagreement must be notified to the Panel within 14 days of the DCC notifying its assessment to that Party and any appeal must be brought within 14 days after the Panel's decision.

T3.23 Where the DCC wishes to make amendments to the Interface Testing Approach Document, the DCC shall consult with the other Parties regarding those amendments and submit those amendments to the Panel (in accordance with Section T3.10) for approval (following which Sections T3.11 to T3.14 shall apply as if the references in those Sections to approval of the document were to approval of the amendments and as if the references in Sections T3.13 and T3.14 to giving notice were not included).

Completion of Interface Testing

T3.24 The DCC shall, once the DCC considers that the exit criteria (as envisaged by Section T3.8(j)) have been met in respect of any Region, in accordance with the Interface Testing Approach Document:

- (a) provide to the Panel a report evidencing that such criteria have been met;
- (b) where relevant, list those sections of the report which the DCC considers should be redacted prior to circulation of the report to the Parties, where the DCC considers that those sections contain information which may pose a risk of Compromise to the DCC Total System, RDP Systems, User Systems and/or Non-Gateway Supplier Systems; and
- (c) apply to the Panel to determine whether or not such exit criteria have been met,

and the DCC may either (as it reasonably considers appropriate in accordance with the Interface Testing Objective) do so in respect of individual Regions or some or all of the Regions collectively.

T3.25 On application of the DCC pursuant to Section T3.24, the Panel shall:

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- (a) determine whether or not the exit criteria have been met;
- (b) notify its decision to the Secretary of State, the Authority and the Parties, giving reasons for its decision; and
- (c) direct the DCC to publish its report, subject to the redaction of those sections of the report which the Panel considers to contain information which may pose a risk of Compromise to the DCC Total System, RDP Systems, User Systems and/or Non-Gateway Supplier Systems (which sections may or may not include those sections which the DCC proposed for redaction).

T3.26 Where the DCC has provided a report to the Panel in accordance with Section T3.24, the Panel shall provide a complete copy on request to the Secretary of State and/or the Authority.

T3.27 Subject to Section T3.28, Interface Testing shall be completed once the Panel has confirmed that the exit criteria referred to Section T3.8(j) have been met in respect of each and every Region, which must include (in respect of each Region) that the following persons have completed User Entry Process Tests (for that Region):

- (a) at least two Large Supplier Parties who are not an Affiliate of one another in respect of the ‘Import Supplier’ User Role, and at least two Large Supplier Parties who are not an Affiliate of one another in respect of the ‘Gas Supplier’ User Role; and
- (b) (only where applicable pursuant to Section T3.21) at least one Network Party in respect of the ‘Electricity Distributor’ User Role and/or at least one Network Party in respect of the ‘Gas Transporter’ User Role.

T3.28 Each Party shall have the ability (within the 14 days after notification by the Panel) to refer each of the Panel’s decisions pursuant to Section T3.25 to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs) to determine whether or not the exit criteria have been met in respect of the Region in question (which determination shall be final and binding for the purposes of this Code).

T3.29 Where, following the application of the DCC pursuant to Section T3.24, the Panel or

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the person which determines a referral under Section T3.28 determines that one or more of the exit criteria have not been met, the DCC shall undertake further testing in order to demonstrate that the exit criteria have been met and shall resubmit its report under Section T3.24.

Testing Issues

T3.30 Sections H14.37 to H14.45 (General: Testing Issue Resolution Process) shall apply for the purposes of Interface Testing. Each Party participating in Interface Testing shall be deemed to be a Testing Participant for such purposes, and may raise a Testing Issue in respect of Interface Testing.

T3.31 During Interface Testing, the DCC shall provide the Secretary of State with copies of the reports which are generated by the DCC or the DCC Service Provider in respect of Testing Issues (without redacting those reports as ordinarily required by Sections H14.37 to H14.45).

Definitions of Large and Small Suppliers

T3.32 For the purpose of this Section T3, the question of whether a Supplier Party is a Large Supplier or a Small Supplier shall be assessed at the time that this Code is first modified to include this Section T3.32.

T3.33 Each Supplier Party that is a Large Supplier in accordance with Section T3.32 shall notify the DCC of their status as such within one month after the time that this Code is first modified to include Section T3.32.

T4 END-TO-END TESTING

Overview

T4.1 End-to-End Testing allows for provision of the User Entry Process Tests and Device and User System Tests, subject to any modifications necessary for the purposes of transition.

Overlapping Provision of Interface Testing and End-to-End Testing

T4.2 Prior to the start of End-to-End Testing, the DCC may recommend to the Panel, having regard to the overriding objective of completing Interface Testing in a timely manner, that End-to-End Testing should be provided from the commencement of or from some point during Interface Testing. Where the DCC so recommends, it must provide a report to the Panel on the benefits and risks of the DCC providing End-To-End Testing in parallel with Interface Testing (rather than following completion of Interface Testing). Prior to submitting its report to the Panel, the DCC shall consult with the other Parties regarding the recommendation. The DCC shall also submit copies of the consultation responses received from Parties. Where it has submitted its report to the Panel, the DCC shall publish the report and such consultation responses (to the extent that they are not marked confidential) on the DCC Website.

T4.3 Where the Panel agrees with the DCC’s recommendation pursuant to Section T4.2, then End-to-End Testing shall commence from the time recommended (notwithstanding the notice period in Section T4.9). Otherwise, End-to-End Testing shall commence on completion of Interface Testing (or such later date as is necessary to allow compliance with Section T4.9).

End-to-End Testing Approach Document

T4.4 The DCC shall develop a document (the “**End-to-End Testing Approach Document**”) which sets out:

- (a) the manner in which User Entry Process Tests and Device and User System Tests are to be provided during End-to-End Testing, which shall be consistent with the relevant requirements of Section H14 (Testing Services) subject only to amendments reasonably required for the purposes of transition;

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- (b) that, to the extent it is reasonably practicable to do so, the DCC shall allow persons who are eligible to undertake tests pursuant to the End-to-End Testing Approach Document to undertake those tests concurrently (provided that, where it is not reasonably practicable to do so, the DCC shall give priority to completion of the User Entry Process Tests by the Supplier Parties during the period prior to the completion of Interface Testing and the DCC shall otherwise schedule Testing Participants as is reasonable for the purposes of transition); and
- (c) the latest date from which the DCC will first make Test Communications Hubs available pursuant to Section F10 (Test Communications Hubs).

Approval of End-to-End Testing Approach Document

- T4.5 The DCC shall submit the End-to-End Testing Approach Document to the Panel for the Panel's approval as fit for the purposes envisaged by this Section T4.
- T4.6 Before submitting the End-to-End Testing Approach Document to the Panel, the DCC shall consult with the other Parties, the Panel and those persons entitled to undertake Device and User System Tests regarding the End-to-End Testing Approach Document. When submitting the End-to-End Testing Approach Document to the Panel, the DCC shall also submit copies of the consultation responses received from the other Parties and such persons. In addition, the DCC shall publish such consultation responses (to the extent not marked confidential) on the DCC Website.
- T4.7 Where the Panel decides not to approve the End-to-End Testing Approach Document submitted for approval, the Panel shall notify such decision to the DCC and the other Parties giving reasons for such decision. In such circumstances, the DCC shall:
 - (a) revise the document to address such reasons;
 - (b) re-consult with the other Parties and those persons entitled to undertake Device and User Systems Tests; and
 - (c) re-submit the document to the Panel for approval and comply with Section T4.6 (following which this Section T4.7 or Section T4.8 shall apply).
- T4.8 Where the Panel decides to approve the End-to-End Testing Approach Document

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submitted for approval, the Panel shall notify such decision to the DCC, the other Parties and the other persons who provided consultation responses in accordance with Section T4.6, giving reasons for such decision. In such circumstances, the DCC and each other Party shall have the ability (within the 14 days after notification by the Panel) to refer the matter to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs) to determine whether the End-to-End Testing Approach Document:

- (a) should be approved as fit for the purposes envisaged by this Section T4;
- (b) is not fit for the purposes envisaged by this Section T4, but will be deemed to be approved if it is revised by the DCC in accordance with the determination; or
- (c) is not fit for the purposes envisaged by this Section T4 and should be revised and re-submitted by the DCC in accordance with Section T4.7,

(and any such determination shall be final and binding for the purposes of this Code).

Commencement of End-to-End Testing

T4.9 Subject to Section T4.10, once the End-to-End Testing Approach Document has been approved by the Panel (or deemed to be approved by the Panel under Section T4.8(b)), the DCC shall publish the approved document on the DCC Website and (subject to Section T4.3) give at least 6 months' prior notice to Testing Participants of the date on which End-to-End Testing is to commence (or such shorter period as the Secretary of State may direct). Where so directed by the Secretary of State, the DCC shall give notice to the Testing Participants of the revised date from which End-to-End Testing is to commence.

T4.10 Where the Panel's approval of the End-to-End Testing Approach Document is appealed by one or more persons, the Panel may nevertheless direct that the matter appealed is not of a nature that should delay publication and the giving of notice under Section T4.9, in which case the DCC shall publish the document and give notice under Section T4.9 (noting the appeal). Subject to the foregoing provisions of this Section T4.10, the DCC shall not publish the End-to-End Testing Approach Document and give notice under Section T4.9 where the Panel's decision has been

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appealed under Section T4.8 (pending the approval of the document thereunder or revision in accordance with a determination made under Section T4.8(b)).

End-to-End Testing

- T4.11 The DCC shall comply with its obligations under the approved End-to-End Testing Approach Document.
- T4.12 Each Party that seeks to undertake User Entry Process Tests or Device and System Tests during End-to-End Testing shall do so in accordance with the approved End-to-End Testing Approach Document. Where the DCC is to provide Testing Services during End-to-End Testing to a person that is not a Party, the DCC shall act in accordance with any relevant provisions of the End-to-End Testing Approach Document.
- T4.13 Where the DCC wishes to make amendments to the End-to-End Testing Approach Document, the DCC shall consult with the other Parties, the Panel and those persons entitled to undertake Device and User System Tests regarding those amendments and submit those amendments to the Panel (in accordance with Section T4.6) for approval (following which Sections T4.7 to T4.10 shall apply as if the references in those Sections to approval of the document were to approval of the amendments and as if the references in Section T4.9 and T4.10 to giving notice were not included).

Disputes

- T4.14 Section T3.16 shall apply during Interface Testing in respect of the entry criteria for the User Entry Process Tests. Otherwise, in the case of those disputes relating to User Entry Process Tests and Device and User System Tests that would ordinarily be subject to the Authority's determination pursuant to Section H14 (Testing Services), during End-to-End Testing, the Secretary of State may direct that such disputes are determined by the Secretary of State (or, where the Secretary of State so directs such other person as the Secretary of State directs), rather than the Authority. The determination of such disputes by the Secretary of State (or such other person as the Secretary of State directs) shall be final and binding for the purposes of this Code.

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Completion of End-to-End Testing

- T4.15 Subject to Section T4.17, End-to-End Testing shall cease on the date 12 months after it commenced.
- T4.16 During the ninth month of End-to-End Testing (or at such other time as the DCC and the Panel may agree), the DCC shall submit a recommendation to the Panel as to whether or not the period of End-to-End Testing should be extended by an additional 6 months. Prior to submitting such recommendation to the Panel, the DCC shall consult the Testing Participants on the matter. When submitting such recommendation to the Panel, the DCC shall also submit copies of any consultation responses received from the Testing Participants. The DCC shall publish such consultation responses (to the extent not marked confidential) on the DCC Website.
- T4.17 The Panel shall, after receipt of the DCC's recommendation in accordance with Section T4.16, decide whether or not the period of End-to-End Testing should be extended by an additional 6 months. The Panel shall notify the Testing Participants of its decision, and of the reasons for its decision. Where the Panel decides that the period of End-to-End Testing should be extended by an additional 6 months, then End-to-End Testing shall end on the date 18 months after the date it started (which decision shall be final and binding for the purposes of this Code).

Testing Issues

- T4.18 Sections H14.37 to H14.45 (General: Testing Issue Resolution Process) shall apply for the purposes of End-to-End Testing. Each Party participating in User Entry Process Tests or Device and System Tests during End-to-End Testing shall be deemed to be a Testing Participant for such purposes, and may raise a Testing Issue in respect of Interface Testing.
- T4.19 During End-to-End Testing, the DCC shall provide the Secretary of State with copies of the reports which are generated by the DCC or the DCC Service Provider in respect of Testing Issues (without redacting those reports as ordinarily required by Sections H14.37 to H14.45).

T5 SMKI AND REPOSITORY TESTING

Overview

T5.1 SMKI and Repository Testing tests the capability of the DCC and the component parts of the DCC Systems to interoperate with the Systems of Parties to the extent necessary for the SMKI Services and the SMKI Repository Service.

SRT Objective

T5.2 The objective of SMKI and Repository Testing (the “**SRT Objective**”) is to demonstrate that the DCC and the DCC Systems interoperate with each other and with Systems of Parties to the extent necessary in order that the DCC is capable of complying with its obligations under Section L (Smart Metering Key Infrastructure) at (during the period of Interface Testing) the levels of activity reasonably anticipated during the period of Interface Testing, and (thereafter) the levels of activity set out in Section L (Smart Metering Key Infrastructure).

T5.3 For the purposes of Section T5.2, the Sections referred to in that Section shall be construed by reference to:

- (a) the decision or consultation document concerning the intended future content of those Sections most recently published by the Secretary of State prior to the date on which this Section T5.3 comes into force (regardless of whether the content of those documents has yet been incorporated into this Code, or whether those Sections are stated to not yet apply under Section X (Transition)); and
- (b) to the extent not inconsistent with any document referred to in (a), any document regarding technical or procedural requirements which support those Sections which is published from time to time by the Secretary of State for the purposes of this Section T5.3.

T5.4 During SMKI and Repository Testing, Parties who wish to do so, and who are ready to do so in accordance with the entry criteria for the SMKI and Repository Entry Process Tests, shall be able to undertake the SMKI and Repository Entry Process Tests (pursuant to Section H14 (Testing Services)).

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SRT Approach Document

T5.5 The DCC shall develop a document (the “**SRT Approach Document**”) which sets out:

- (a) the reasonable entry criteria to be satisfied by the DCC with respect to the DCC Systems and the Communications Hubs selected pursuant to Section T1 prior to commencement of SMKI and Repository Testing;
- (b) the entry criteria to be met by each Party prior to its commencing the SMKI and Repository Entry Process Tests (which criteria shall be consistent with the relevant requirements of Section H14 (Testing Services), subject only to amendments reasonably required for the purposes of SMKI and Repository Testing);
- (c) the manner in which SMKI and Repository Testing is to be undertaken, including the respective obligations of the DCC and each other Party;
- (d) a reasonable timetable for undertaking and completing SMKI and Repository Testing;
- (e) the frequency and content of progress reports concerning SMKI and Repository Testing to be provided by the DCC to the Panel (which the Panel shall make available to the Secretary of State, the Authority and Testing Participants), which reports must include details of Testing Issues identified and resolved and of any problems and solutions encountered with respect to Devices (the details of such Testing Issues to be anonymised and redacted as required in accordance with Section H14.44 (General: Testing Issue Resolution Process));
- (f) the process by which the DCC will facilitate Parties undertaking and completing the SMKI and Repository Entry Process Tests (which process shall be consistent with the relevant requirements of Section H14 (Testing Services), subject only to amendments reasonably required for the purposes of SMKI and Repository Testing);
- (g) a Good Industry Practice methodology for determining whether or not the SRT

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Objective has been achieved, including details of the exit criteria to be achieved and the level of assurance that will be delivered by achievement of those exit criteria (including completion of SMKI and Repository Entry Process Tests by two Large Supplier Parties as described in Section T5.20); and

- (h) how the DCC will report to the Panel where the DCC considers that the exit criteria referred to in (g) above have been achieved (providing evidence of such achievement), having consulted with the Parties who have participated in SMKI and Repository Testing.

Approval of SRT Approach Document

- T5.6 The DCC shall submit the SRT Approach Document to the Panel for the Panel's approval as fit for the purposes envisaged by this Section T5.
- T5.7 Before submitting the SRT Approach Document to the Panel, the DCC shall consult with the other Parties, the Panel and the SMKI PMA regarding the SRT Approach Document. When submitting the SRT Approach Document to the Panel, the DCC shall also submit copies of the consultation responses received from the other Parties. In addition, the DCC shall publish such consultation responses (to the extent not marked confidential) on the DCC Website.
- T5.8 The Panel shall consult with the SMKI PMA prior to deciding whether or not to approve the SRT Approach Document submitted for approval.
- T5.9 Where the Panel decides not to approve the SRT Approach Document submitted for approval, the Panel shall notify such decision to the DCC and the other Parties giving reasons for such decision. In such circumstances, the DCC shall:
 - (a) revise the document to address such reasons;
 - (b) re-consult with the other Parties; and
 - (c) re-submit the document to the Panel for approval and comply with Section T5.7 (following which Section T5.8 shall apply and this Section T5.9 or Section T5.10 shall apply).

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T5.10 Where the Panel decides to approve the SRT Approach Document submitted for approval, the Panel shall notify such decision to the DCC and the other Parties giving reasons for such decision. In such circumstances, the DCC and each other Party shall have the ability (within the 14 days after notification by the Panel) to refer the matter to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs) to determine whether the SRT Approach Document:

- (a) should be approved as fit for the purposes envisaged by this Section T5;
- (b) is not fit for the purposes envisaged by this Section T5, but will be deemed to be approved if it is revised by the DCC in accordance with the determination; or
- (c) is not fit for the purposes envisaged by this Section T5 and should be revised and re-submitted by the DCC in accordance with Section T5.9,

(which determination shall be final and binding for the purposes of this Code).

Commencement of SMKI and Repository Testing

T5.11 Subject to Section T5.12, once the SRT Approach Document has been approved by the Panel (or deemed to be approved by the Panel under Section T5.10(b)), the DCC shall publish the approved document on the DCC Website and give at least 3 month's (or such shorter period as the Secretary of State may direct) notice to the other Parties of the date on which SMKI and Repository Testing is to commence. The SRT Approach Document must be published at least 3 months (or such shorter period as the Secretary of State may direct) in advance of the date on which Systems Integration Testing is to commence. Where so directed by the Secretary of State, the DCC shall give notice to the other Parties of the revised date from which SMKI and Repository Testing is to commence.

T5.12 Where the Panel's approval of the SRT Approach Document is appealed by one or more persons under Section T5.10, the Panel may nevertheless direct that the matter appealed is not of a nature that should delay publication and the giving of notice under Section T5.11, in which case the DCC shall publish the document and give notice under Section T5.11 (noting the appeal). Subject to the foregoing provisions of this

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Section T5.12, the DCC shall not publish the SRT Approach Document and give notice under Section T5.11 where the Panel's decision has been appealed under Section T5.10 (pending the approval of the document thereunder or revision in accordance with a determination made under Section T5.10(b)).

T5.13 Prior to the commencement of Interface Testing and in accordance with the SRT Approach document, the DCC shall assess whether or not each Large Supplier Party meets the entry criteria referred to in Section T5.5(b), and report to the Panel and that Party on the same. Each Large Supplier Party shall:

- (a) take all reasonable steps to ensure that it meets the entry criteria referred to in Section T5.5(b) prior to the commencement of Interface Testing; and
- (b) notify the Panel and the DCC as soon as reasonably practicable if the Party considers that it will not meet those criteria prior to the commencement of Interface Testing.

T5.14 Section H14.25 (SMKI and Repository Entry Process Tests) shall apply where there is any disagreement between the DCC and a Party as to whether that Party has met the entry criteria for the SMKI and Repository Entry Process Tests (as modified by the SRT Approach Document), provided that:

- (a) the Panel's decision on any such matter may be appealed to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs), whose decision shall be final and binding for the purposes of this Code; and
- (b) in the case of the Parties referred to in Section T5.13, such disagreement must be notified to the Panel within 14 days of the DCC notifying its assessment to that Party and any appeal must be brought within 14 days after the Panel's decision.

SMKI and Repository Testing

T5.15 The DCC shall comply with its obligations under the approved SRT Approach Document. The DCC shall use its reasonable endeavours to ensure that SMKI and Repository Testing is completed as soon as it is reasonably practicable to do so.

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- T5.16 Each Party that undertakes the SMKI and Repository Entry Process Tests pursuant to the SRT Approach Document shall do so in accordance with Section H14 (Testing Services) and the approved SRT Approach Document.
- T5.17 Each Large Supplier Party shall use its reasonable endeavours to commence the SMKI and Repository Entry Process Tests as soon as reasonably practicable (in respect of all the roles to which the SMKI and Repository Entry Process Tests apply). Each Large Supplier Party shall, on request, notify the Panel and the DCC of the Party's progress towards completing such SMKI and Repository Entry Process Tests.
- T5.18 Where the DCC wishes to make amendments to the SRT Approach Document, the DCC shall consult with the other Parties regarding those amendments and submit those amendments to the Panel (in accordance with Section T5.7) for approval (following which Sections T5.8 to T5.12 shall apply as if the references in those Sections to approval of the document were to approval of the amendments and as if the references in Sections T5.11 and T5.12 to giving notice were not included).

Completion of SMKI and Repository Testing

- T5.19 The DCC shall, once the DCC considers that the exit criteria (as envisaged by Section T5.5(g)) have been met, in accordance with the SRT Approach Document:
- (a) provide to the Panel a report evidencing that such criteria have been met;
 - (b) where relevant, list those sections of the report which the DCC considers should be redacted prior to circulation of the report to the Parties, where the DCC considers that those sections contain information which may pose a risk of Compromise to the DCC Total System, RDP Systems and/or User Systems; and
 - (c) apply to the Panel to determine whether or not such exit criteria have been met.
- T5.20 Such exit criteria must include a requirement that at least two Large Supplier Parties who are not an Affiliate of one another have each completed the SMKI and Repository Entry Process Tests to become:
- (a) an Authorised Subscriber under the Organisation Certificate Policy;

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- (b) an Authorised Subscriber under the Device Certificate Policy; and
- (c) eligible to access the SMKI Repository.

T5.21 On application of the DCC pursuant to Section T5.19, the Panel shall:

- (a) determine whether or not the exit criteria have been met;
- (b) notify its decision to the Secretary of State, the Authority and the Parties, giving reasons for its decision ; and
- (c) direct the DCC to publish its report, subject to the redaction of those sections of the report which the Panel considers to contain information which may pose a risk of Compromise to the DCC Total System, RDP Systems and/or User Systems (which sections may or may not include those sections which the DCC proposed for redaction)

T5.22 Where the DCC has provided a report to the Panel in accordance with Section T5.19, the Panel shall provide a complete copy on request to the Secretary of State and/or the Authority.

T5.23 Subject to Section T5.24, SMKI and Repository Testing shall be completed once the Panel has determined that the exit criteria referred to Section T5.5(g) have been met in respect of the Parties referred to in Section T5.20.

T5.24 Each Party shall have the ability (within the 14 days after notification by the Panel) to refer the Panel's decision pursuant to Section T5.21 to the Authority (or, where the Secretary of State so directs, to the Secretary of State or such other person as the Secretary of State directs) to determine whether or not the exit criteria have been met in respect of the Parties referred to in Section T5.20 (which determination shall be final and binding for the purposes of this Code).

T5.25 Where, on the application of the DCC pursuant to Section T5.19, it has been determined that one or more of the exit criteria have not been met, the DCC shall undertake further testing in order to demonstrate that the exit criteria have been met and shall resubmit its report in accordance with Section T5.19.

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Testing Issues

T5.26 Sections H14.37 to H14.45 (General: Testing Issue Resolution Process) shall apply for the purposes of SMKI and Repository Testing. Each Party participating in SMKI and Repository Testing shall be deemed to be a Testing Participant for such purposes, and may raise a Testing Issue in respect of SMKI and Repository Testing.

T5.27 During SMKI and Repository Testing, the DCC shall provide the Secretary of State with copies of the reports which are generated by the DCC or the DCC Service Provider in respect of Testing Issues (without redacting those reports as ordinarily required by Sections H14.37 to H14.45).

Definitions of Large and Small Suppliers

T5.28 For the purpose of this Section T5, the question of whether a Supplier Party is a Large Supplier or a Small Supplier shall be assessed at the time that this Code is first modified to include this Section T5.28.

T5.29 Each Supplier Party that is a Large Supplier in accordance with Section T5.28 shall notify the DCC of their status as such within one month after the time that this Code is first modified to include Section T5.28.

X3 PROVISIONS TO BECOME EFFECTIVE FOLLOWING DESIGNATION

Effective Dates

X3.1 Each Section, Schedule and SEC Subsidiary Document (or any part thereof) not referred to in Section X2.1 or X2.2 shall only be effective from the date:

- (a) set out or otherwise described in this Section X3; or
- (b) designated in respect of that provision by the Secretary of State for the purpose of this Section X3.

X3.2 The following Sections, Schedules and Appendices shall be effective from the following dates (subject to the other provisions of this Section X):

- (a) Section F1 (Technical Sub-Committee) shall have effect from the date on which this Code is first modified to include that Section;
- (b) Sections F5 (Communications Hub Forecasting and Orders) shall have effect from the date designated by the Secretary of State for the purposes of this Section X3.2(b);
- (c) Section G (Security) shall have effect from the date on which this Code is first modified to include that Section;
- (d) Section I (Data Privacy) shall have effect from the date on which this Code is first modified to include Section I2 (Other User Privacy Audits);
- (e) Section H14 (Testing Services) shall have effect as follows:
 - (i) Section H14.8 (General: Forecasting) shall have effect from the commencement of Interface Testing;
 - (ii) Section H14.11 (General: SMKI Test Certificates) shall have effect from the commencement of Systems Integration Testing; and
 - (iii) all the other provisions of Section H14 (Testing Services) shall have effect:

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- (A) in respect of the User Entry Process Tests, from the commencement of Interface Testing;
 - (B) in respect of the SMKI and Repository Entry Process Tests, from the commencement of SMKI and Repository Testing;
 - (C) in respect of Device and User System Testing, from the commencement of End-to-End Testing; and
 - (D) in respect of all other Testing Services, from the end of End-to-End Testing;
- (f) Sections L1 (SMKI Policy Management Authority), L2 (SMKI Assurance), L4 (The SMKI Service Interface), L6 (The SMKI Repository Interface), L8 (SMKI Performance Standards and Demand Management), L9 (The SMKI Document Set) and L10 (The SMKI Recovery Procedure) shall have effect from the date on which this Code is first modified to include those Sections;
- (g) Sections L3 (The SMKI Services), L5 (The SMKI Repository Service), L7 (SMKI and Repository Entry Process Tests), L11 (The Subscriber Obligations) and L12 (Relying Party Obligations) shall have effect from the commencement of Interface Testing;
- (h) Section L13 (DCC Key Infrastructure) shall have effect from the date designated by the Secretary of State for the purposes of this Section X3.2(h);
- ~~(h)~~(i) Section N (SMETS1 Meters) shall have effect from the date on which this Code is first modified to include that Section;
- ~~(i)~~(j) Section T (Testing During Transition) shall have effect from the date on which this Code is first modified to include that Section;
- ~~(j)~~(k) Schedule 7 (Specimen Enabling Services Agreement) shall have effect from the date on which this Code is first modified to include that Schedule;
- ~~(k)~~(l) Appendices A (SMKI Device Certificate Policy), B (SMKI Organisation Certificate Policy) and C (SMKI Compliance Policy) shall all have effect from the date on which this Code is first modified to include those Appendices; and

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~~(m)~~ Appendix F (Minimum Communication Services for SMETS1 Meters) shall have effect from the date on which this Code is first modified to include that Appendix.

Variations in respect of Section F

X3.3 Notwithstanding that Section F5 (Communications Hub Forecasting and Orders) is stated in Section X3.2 to be effective from a date to be designated, it shall apply once effective as varied by this Section X3.3. For the purposes of this Section X3.3, the “**Initial Delivery Date**” shall be 1 November 2015 (or such later date as the Secretary of State may designate as such date for the purposes of this Section X3.3). The variations to apply pursuant to this Section X3.3 are that:

- (a) each Supplier Party shall (and each other Party that intends to order Communications Hubs may), subject to any contrary timings specified by the Secretary of State on designating the date from which Section F5 is to have effect:
 - (i) submit its first Communications Hub Forecast during the month ending nine months in advance of the start of the month in which the Initial Delivery Date occurs;
 - (ii) submit further Communications Hub Forecasts on a monthly basis until the month ending five months in advance of the month in which the Initial Delivery Date occurs (from which time further Communications Hub Forecasts shall be submitted without reference to this Section X3.3); and
 - (iii) ensure that the Communications Hub Forecasts submitted pursuant to this Section X3.3 cover a 24-month period commencing with the month in which the Initial Delivery Date occurs;
- (b) no Communications Order may specify a Delivery Date that is prior to the Initial Delivery Date; and
- (c) until 1 June 2015 (or such later date as the Secretary of State may direct for the purposes of this Section X3.3(d)):

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- (i) the DCC shall not be obliged to make the CH Ordering System available;
- (ii) Parties shall submit the Communications Hub Forecasts required in accordance with Section X3.3(a) by a secure means of communication (as reasonably determined by the DCC) using the template made available by the DCC for such purposes (such template to be in a readily available and commonly used electronic format);
- (iii) the DCC shall accept Communications Hub Forecasts submitted by other Parties in accordance with Section X3.3(d)(ii), and shall take all reasonable steps to verify that the forecasts so submitted were submitted by the Party by which they are purported to have been submitted; and
- (iv) the DCC shall make the following information available to other Parties (using a readily available and commonly used electronic format), in respect of each post code area within Great Britain:
 - (A) that the SM WAN is expected to be available within that post code area on the date from which the Enrolment Services first become available;
 - (B) where the SM WAN is not expected to be available within that post code area on that date but is expected to be available within that postcode area before 1 January 2021, the date from which the SM WAN is expected to first become available within that post code area; or
 - (C) that the SM WAN is not expected to be available within that post code area before 1 January 2021.

Variations in respect of Sections G and I

X3.4 Notwithstanding that Sections G (Security) and I (Data Privacy) are stated in Section X3.2 to be effective, they shall apply as varied by this Section X3.4. The variations to apply pursuant to this Section X3.4 are that:

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- (a) the process to appoint the first Independent Security Assurance Service Provider and the process to appoint the first Independent Privacy Auditor shall be run concurrently with the intent that the same person is appointed to carry out both such roles. For the avoidance of doubt, this requirement shall apply on in respect of the process to appoint the first person to carry out each such role; and
- (b) the first annual SOC2 assessments pursuant to Section G9.3(b)(i) do not need to be completed until 12 months after the commencement of any Enrolment Services or Communications Services

Variations in respect of Section L

X3.5 Notwithstanding that:

- (a) Section L8 (SMKI Performance Standards and Demand Management) is stated in Section X3.2 to be effective, it shall apply as varied by this Section X3.5(a). The variation to apply pursuant to this Section X3.5 is that Sections L8.1 (SMKI Services: Target Response Times) to L8.6 (Code Performance Measures) will not apply until the Stage 2 Assurance Report has been published (or such later date as the Secretary of State may designate for the purposes of this Section X3.5(a)); and
- (b) Section L13 (DCC Key Infrastructure) is stated in Section X3.2 to be effective from a date to be designated, Section L13.56 (Duties of the DCC) shall apply as varied by this Section X3.5(b). The variation to apply pursuant to this Section X3.5(b) is that Section L13.56 (Duties of the DCC) shall apply so that the DCC is obliged to notify to the Secretary of State of the Modification Proposals that the DCC would otherwise be required to raise under that Section.

Provisions to be Effective Subject to Variations

X3.6 In designating the date from which a provision of this Code is to be effective for the purpose of this Section X3, the Secretary of State may direct that such provision is to apply subject to such variation as is necessary or expedient in order to facilitate achievement of the Transition Objective (which variation may or may not be specified

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to apply until a specified date).

- X3.7 Where the Secretary of State directs that a provision of this Code is to apply subject to such a variation, the Secretary of State may subsequently designate a date from which the provision is to apply without variation.
- X3.8 Where the Secretary of State directs that a provision of this Code is to apply subject to more than one such variation, then the Secretary of State may:
- (a) designate different dates from which each such variation is to cease to apply; and/or
 - (b) designate a date from which one or more such variations are to cease to apply (without prejudice to the continued application of the other such variations).

General

- X3.9 Before designating any dates and/or making any directions for the purpose of this Section X3, the Secretary of State must consult the Authority, the Panel and the Parties in respect of the proposed date and/or the draft direction (as applicable). Such consultation must allow such period of time as the Secretary of State considers appropriate in the circumstances within which to make representations or objections with respect to the proposed date and/or the draft direction (as applicable).