February 14, 2014

Dear Sir,

Smart Metering Implementation Programme – A Consultation on New Smart Energy Code Content (Stage 3)

Please find Co-Operative Energy's response to the above consultation below.

3.2 SMKI Policy Management Authority

Q1 Do you agree with our proposed approach and text for the SEC with respect to the Policy Management Authority?

This seems appropriate in order to ensure that any potential threat to the security and integrity of the SMKI service is monitored and appropriately managed.

Q2 Do you agree with our proposed approach to securing the timely appointment of PMA members?

We agree that it is important that the PMA membership be in place when SEC drafting relating to SMKI takes effect. We also agree that it is appropriate to stagger the initial appointment period for successful candidates in order to avoid a loss of expertise resulting from simultaneous retirement of a large number of members.

3.3 The SMKI Service

Q3 Do you agree with our proposed approach and text for the SEC with respect to provision of the SMKI Service?

This seems appropriate.

3.4 SMKI Assurance

Q4 Do you agree with our proposed approach and text for the SEC with respect to SMKI Assurance?

Yes, this should provide the necessary assurance to SEC Parties that the SMKI Service is being operated in accordance with the SMKI SEC Document Set.

3.5 Certificate Policies

Q5 Do you agree with our proposed approach and text for the SEC with respect to the Device Certificate Policy?

Yes, we agree that this is appropriate in order to ensure that a robust framework is created for the purposes of enabling communication to and from the relevant devices.

Q6 Do you agree with our proposed approach and text for the SEC with respect to the Organisation Certificate Policy?

Yes, as this will ensure a robust framework equivalent to that provided for under the Device Certificate Policy but for the purposes of communications to and from relevant organisations.

3.6 Using the SMKI Service

Q7 Do you agree with our proposed approach to parties using the SMKI service including by Opted Out Non-Domestic Suppliers?

We agree that it would be highly inefficient for the incoming Opted-In Supplier to have to replace the metering equipment in order to confirm the status of the cryptographic keys on the meter in the case that these were not SMKI Device certificates. It therefore seems appropriate to require all SMETS2 equipment to have these.

Q8 Do you agree with our proposed approach for the SEC with respect to the Organisation Certificate Policy?

Yes, as it is important that a framework be established for issuance of organisation certificates for the purposes of communication with organisations in accordance with the rules laid out in the SEC.

3.7 Providing the SMKI Repository

Q9 Do you agree with our proposed approach and text for the SEC with respect to the SMKI Repository?

Yes, it is logical that the certificates and relevant policies be stored in a central repository in order to ensure robust retention of and easy access to these. We agree that it is appropriate that only the DCC itself should be allowed to lodge information within the repository.

3.8 SMKI Recovery Processes

Q10 Do you agree with our proposed approach and text for the SEC with respect to SMKI Recovery Processes?

Given that this is potentially highly complex and essential to the smooth operation of the overall system, we agree that it is important that technical solutions employed by the DCC to support the provisions of the service as well as the responsibilities of the DCC, SEC parties and the PMA and the procedures for regeneration of Recovery Key Pairs after their use in a recovery situation be made available and periodically reviewed.

3.9 SMKI Testing

Q11 Do you agree with our proposed approach and text for the SEC with respect to SMKI and Repository Testing?

We feel that, for reasons of ensuring overall systems and process robustness and providing the necessary assurances to participants, it would be most appropriate for testing of the service and repository to take place alongside the wider tests in Interface

Testing. This should follow the completion of testing by DCC users of their own processes for applying for and receiving the necessary certificates.

Q12 Where appropriate, when do you consider your organisation will first need to obtain live Device and Organisation certificates to be placed on Devices ordered from manufacturers?

This will most likely be required shortly after the completion of testing of the SMKI service and repository.

Q13 Do you agree that Large Supplier Parties should be obliged under the SEC to be ready to participate in SMKI and Repository Testing?

Yes, as these parties will most likely account for the majority of usage of the system so it seems prudent to ensure that their interaction in this respect is of a suitable level of robustness at as early a stage as possible. However, we have some concerns that the potential liability figure may be so high as to act as a barrier to both entry and competition. We would therefore request that DECC consider a lower potential liability level for smaller participants who have only recently crossed the threshold for consideration as a Large Supplier Party.

Q14 Do you agree that it is sufficient for only one large Supplier to complete SMKI and repository testing for the SMKI Service and repository to have been proved?

We are concerned that a single large supplier could potentially have expensive bespoke systems and interfaces to cover this and this would not necessarily prove the case. We would therefore suggest that completion of testing by two large and two smaller suppliers would be a more robust criteria for demonstration of this.

Q15 Do you agree that the SMKI entry processes should be aligned with the User Entry Process Testing in relation to the DCC User Gateway and Self Service Interface?

. Yes, as this will streamline efficiencies in relation to these.

3.10 Other Security Requirements

Q16 Do you agree with our proposed approach and text for the SEC with respect to the Location of System Controls?

This seems reasonable as these will comprise a key part of the national smart metering infrastructure. We agree that these should therefore be located in the UK for reasons of security.

Q17 Do you agree with our proposed approach and text for the SEC with respect to the Obligations for Cryptographic Material?

We agree that it is appropriate to make provision for the use by smaller suppliers of a different, less expensive form of secure storage which does not pose a potential barrier to entry or competition due to the cost of this.

4 Supplier Nominated Agents

Q18 Do you think that it is important that MOPs / MAMs are able to access DCC services directly?

Yes, as there will be occasions when these entities need to access DCC services in order to facilitate certain activities which may not be directly related to any individual supplier such as installer service requests or equipment procurement.

Q19 Do you have any views on the possible options identified for MOPs / MAMs to access DCC services?

We would favour option 2, whereby a distinction is created in the SEC between activities undertaken by a MOP/MAM on behalf of a relevant supplier and those activities that it undertakes on its own behalf. We agree that it is appropriate for a MOP/MAM to accede to the SEC and participate as part of a specific user category for these purposes.

Q20 Are there other options which should be considered for MOPs / MAMs to access DCC services?

We are unable to suggest any at this time.

5.1 Testing Phases

Q21 Do you agree with our proposed text for the SEC with respect to Test Phasing, consistent with our decisions on testing arrangements detailed in our recent consultation response?

Yes, we agree that this is reflective of the testing arrangements detailed in the recent consultation response.

Q22 Do you agree that the term "Enduring Testing" should be used to encompass both End-to-End and Enduring Test stages in order to assist comprehension and simplicity? Would the consequential removal of the terms "End-to-End Testing" and "User Integration Testing" cause confusion or be undesirable, such that we should reinstate this terminology?

We feel that it would be a greater aid to comprehension and simplicity if the terms "End to End Testing" and "User Integration Testing" were to be retained, as we believe their removal may be likely to lead to confusion amongst participants.

Q23 Do you agree with the proposed approach to include the Projected Operational Service Levels within the SEC?

We agree that it would be of benefit from a participant certainty point of view to include these in the SEC, particularly as this will then ensure wide scrutiny should a proposal be made to change these for whatever reason.

5.2 Issue Resolution During Testing

Q24 Do you agree with the need for an issue resolution process in testing? Does the proposed process meet that need?

Yes, as it seems highly likely that unexpected issues will arise during testing. We believe the contractual requirement on DCC Service Providers to offer an issue resolution process will be sufficient to meet that requirement.

Q25 Do you agree with our proposed text for the SEC with respect to Issue Resolution?

This seems appropriate.

6.1 Smart Metering System Requirements

Q26 Do you agree with our proposed text for the SEC with respect to Equipment Testing, and configuration of enrolled Smart Metering Systems?

Yes, we believe that these will provide the necessary guidance to users around the certified products list, SMETS and CHTS compliance, equipment configuration and interoperability.

Please do not hesitate to contact me should you have any questions or require any further information.

Yours faithfully,