

Annex 1: Consultation Questions Consultation Questions

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? Please provide a rationale for your views.

Yes. This approach seems appropriate

Q2 Do you agree with our proposed approach to securing the timely appointment of PMA members? Please provide a rationale for your views.

Yes. This approach seems appropriate

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? Please provide a rationale for your views.

3.4: SMKI Assurance

Q4 Do you agree with our proposed approach and text for the SEC with respect to SMKI Assurance? Please provide a rationale for your views.

No comment. This approach seems appropriate, but is outside the scope of our expertise and interests.

3.5: Certificate Policies

Q5 Do you agree with our proposed approach and text for the SEC with respect to the Device Certificate Policy? Please provide a rationale for your views.

Yes, with the following clarification desired:

Referring to clause 118, bullet 2. With no certificate revocation, will the DCC maintain a blacklist or a list of no longer valid Device Certificates? Imagine device generates key pair, generates CSR and receives a Device Cert (as in manufacturing case). Then, shortly after install, the device must be re-keyed and a new device cert sought (as in SEC obligation to update device cert within 7 days of install.) This means there is knowledge of two certificates for the same device. How do ensure the old one is no longer used/usable

Q6 Do you agree with our proposed approach and text for the SEC with respect to the Organisation Certificate Policy? Please provide a rationale for your views.

Yes

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? Please give a rationale for your views.

No. It is very unlikely that an Opted Out Non-Domestic Supplier would choose to procure devices that are capable of operating within the SMKI when they have no obligation to do so, thus meters which churn to a Supplier using the DCC will likely be required to replace the metering equipment on site anyway. The reverse scenario of meters churning from a DCC user to an opted out supplier also pose strong technical challenges to maintain the metering equipment on the wall depending on the Supplier's chosen system.

We suggest that the SMKI users should be full SEC parties rather than allowing some suppliers to use only part of the system.

That observation having been made, this part of SEC has no direct impact on our interests.

Q8 Do you agree with our proposed approach for the SEC with respect to Liabilities, Warranties and Indemnities? Please provide a rationale for your views.

Yes

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? Please provide a rationale for your views.

Yes

3.8: SMKI Recovery Processes

Q10 Do you agree with our proposed approach and text for the SEC with respect to SMKI Recovery Processes? Please provide a rationale for your views.

No comment.

3.9: SMKI Testing

Q11 Do you agree with our proposed approach and text for the SEC with respect to SMKI and Repository Testing? Please provide a rationale for your views.

Yes. By mimicking other testing approaches, this facilitates the Test Approach for all parties.

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 help to determine when the SMKI Service and SMKI Repository should Go Live. Please provide a rationale for your views.

As a manufacturer, we support this approach. Our expectation is to prove the devices' functionality using test certificates. We would like to see the SMKI go live in early Q2 2015 to enable live certificates to be used in UIT and to enable a build up of stock pre DCC go live. Depending on customer contracts, we have up to a 16 week lead time between order and delivery of product.

The interfaces to the SMKI through the Service Users will need to be defined and built well before UIT is possible, so the earliest definition possible of the system is desired.

Q13 Do you agree that Large Supplier Parties should be obliged under the SEC to be ready to participate in SMKI and Repository Testing? Please provide a rationale for your views.

Yes. Though we would be surprised if large suppliers were not commercially motivated to participate, obligations aside.

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? Please provide a rationale for your views.

No. We believe that SMKI testing should be performed with as many Suppliers as possible, and that upper limits need to be defined to avoid overloading the work on DCC. In our view DCC should be obligated to accept up to 5 interested Suppliers including at least two smaller Suppliers if they apply. We suggest that SMKI testing exit criteria should require them to have completed testing with at least two Suppliers to ensure that the interface is exercised beyond a single implementation.

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? Please provide a rationale for your views.

Yes, this is consistent with other testing.

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? Please provide a rationale for your views.

No. We see low risk in these systems being operated outside of the UK. The obligations on end-to-end security should reside with the Service Users, though the manner in which they interact with these systems should be permitted to be located abroad.

Q17 Do you agree with our proposed approach and text for the SEC with respect to the Obligations for Cryptographic Material? Please provide a rationale for your views.

Yes, with the following clarification desired:

It is not clear whether the FIPS 140-2, level 3 comment apply only to Supplier back-end systems that store cryptographic material. i.e. not include the supplier's devices (CH and meters etc) that store crypto material. The latter class being governed by the CPA scheme requirements more than FIPS.

4: Supplier Nominated Agents

Q18 Do you think that it is important that MOPs / MAMs are able to access DCC services directly? Please provide a rationale for your views.

Yes. Smaller suppliers will outsource metering services to these MOPs/MAMs and it makes the most economic sense for them to provide the end to end service in its entirety for those suppliers; one end of the system being the MOP/MAM.
Not doing so will create barriers to entry for new Energy Suppliers

Q19 Do you have any views on the possible options identified for MOPs / MAMs to access DCC services? Please provide a rationale for your views.

We believe option 3 offers the best overall solution for MOPs/MAMs and suppliers.
Option 2 adds additional complication to an already complex system.
Option 1 will create barriers to entry for new suppliers

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

No comment

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? Please provide a rationale for your views.

Yes, seems appropriate

Q22 Do you agree that the term 'Enduring Testing' should be used to encompass both the 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? Please provide a rationale for your views.

Yes, seems appropriate

Q23 Do you agree with the proposed approach to include the Projected Operational Service Levels within the SEC? Please provide a rationale for your views.

Yes, seems appropriate

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? Please provide a rationale for your views.

Yes, seems appropriate

Q25 Do you agree with our proposed text for the SEC with respect to Issue Resolution? Please provide a rationale for your views.

Yes, 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? Please provide a rationale for your views.

Yes, seems appropriate