



Department  
of Energy &  
Climate Change

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The Authority (Ofgem), the SEC Panel, SEC Parties  
and other interested parties

14 April 2016

Dear Colleague,

**INITIAL RESPONSE TO THE FEBRUARY 2016 SMART ENERGY CODE (SEC)  
AND RELATED LICENCE AMENDMENTS CONSULTATION**

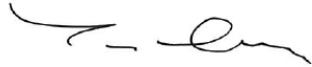
1. This document sets out conclusions on 9 of the 28 chapters consulted upon in the consultation of 24 February 2016<sup>1</sup> (Annex A). These 9 topics are those that DECC considers need to be addressed early, primarily because they affect activities that are due take place in advance of DCC Live. The related legal text for incorporation into the SEC (apart from that relating to Early Testing Services – see below) will be laid in Parliament in parallel with the publication of this document. That legal text can be found at Annex B to this letter.
2. Subject to no objection being raised in Parliament during the 40 day Parliament laying period, and to subsequent signature by a Minister, we expect that the SEC legal text that is laid will be incorporated into the SEC in June 2016.
3. The variation of the SEC to include a new Section X9 relating to the provision of Early Testing Services by the DCC is being made pursuant to powers under Section X of the SEC. The legal direction giving effect to this is published separately alongside this letter and this text will take effect from 18 April 2016.

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<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/503345/February\\_2016\\_SEC\\_consultation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/503345/February_2016_SEC_consultation.pdf) - the “February Consultation”.

4. The conclusions on the remaining 19 chapters in the February 2016 SEC consultation will be published in May 2016.

Yours faithfully



T J Guy  
DECC Delivery  
DECC Smart Metering Implementation Programme (SMIP)  
(an official of the Department of Energy & Climate Change authorised to act on behalf of the Secretary of State)

Annex A – Initial Conclusion to Parts of the February 2016 SEC Consultation.  
Annex B – Concluded Smart Energy Code Legal Text.  
Annex C – List of respondents to the February SEC Consultation.

**ANNEX A - INITIAL CONCLUSIONS ON THE FOLLOWING PARTS OF THE FEBRUARY 2016 SEC AND RELATED LICENCE AMENDMENTS CONSULTATION<sup>2</sup>:**

- I. PROVISION OF EARLY TESTING SERVICES BY THE DATA AND COMMUNICATIONS COMPANY (DCC);**
- II. ADDITIONAL PHASES OF SYSTEMS INTEGRATION TESTING (SIT), INTERFACE TESTING AND SMKI AND REPOSITORY (SRT) TESTING;**
- III. LENGTH OF END-TO-END TESTING PERIOD;**
- IV. ADDITIONAL PHASES OF SERVICE REQUEST TESTING BY USERS;**
- V. SEC PANEL AND DCC LIVE CRITERIA ASSESSMENT;**
- VI. RELEVANT VERSION OF THE SEC FOR TESTING PURPOSES;**
- VII. CHANGES TO SUPPORT SECCO BECOMING A SUBSCRIBER FOR IKI CERTIFICATES;**
- VIII. CHANGES TO THE OBLIGATIONS ON SUBSCRIBERS FOR IKI FILE SIGNING CERTIFICATES;**
- IX. MINOR CHANGES TO SECTION E.**

*Note: References to defined terms in this letter have the meanings given in Section A of the SEC.*

**I Provision of Early Testing Services by the DCC (Chapter 8.1<sup>3</sup>)**

1. In the February Consultation, we explained that as a result of the release strategy in the revised DCC delivery plan, we proposed to make the provision of early informal testing services (specifically GBCS Integration Testing for Industry (**GFI**) and Pre-User Entry Process Testing (**Pre-UEPT**)) mandatory to de-risk device and system integration activities as well as future DCC test phases. Views were invited on the proposal to make these early testing services mandatory, on the associated proposals to insert a new Section X9 into the SEC and on the associated timing of when the services must be provided. We also asked respondents to set out the benefits of providing Pre-UEPT services beyond the go live date for Release 1.3.

*GFI Service – obligation to provide*

2. All eleven respondents agreed with the proposal to set a mandatory requirement on the DCC to provide an enhanced GFI service. There was broad support for the enhancements to GFI that are associated with the Gas Proxy Function (GPF) element of Communications Hubs.

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<sup>2</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/503345/February\\_2016\\_SEC\\_consultation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/503345/February_2016_SEC_consultation.pdf) - the "February Consultation".

<sup>3</sup> Chapter numbers relate to corresponding Chapter in the February Consultation

3. A number of respondents requested that the DCC be required to provide and support the GFI tool on an enduring basis. For the requirement to be enduring, it was suggested that the regulatory text should be moved from a transitional section (Section X) of the SEC to elsewhere. This comment is addressed in the section on GFI timing and duration below.
4. Respondents requested that the GFI tool be made available as soon as possible. In DCC's response it was noted that, to deliver the tool more quickly (and before the start of End-to-End testing), the DCC plans to enhance GFI to mimic the GPF functionality without utilising a Test Communications Hub. However, DCC intends to return to the Technical and Business Design Group (TBDG) with further analysis as to how they could, over a longer timescale, enhance GFI such that it would work with Test Communications Hubs.
5. One respondent expressed concern that GFI has not been formally accepted by DECC or Ofgem as acceptable evidence of proving the interoperability of metering equipment with DCC systems. Compliance with regulatory obligations relating to evidence of metering equipment compliance is a matter for Ofgem. However DECC notes that ultimately it is for each energy supplier to satisfy themselves that they have undertaken appropriate and adequate testing.
6. Another respondent asked for clarification of the charges associated with the provision of GFI. There will not be an explicit charge for utilising the service; any DCC costs incurred in the provision of this service will be recovered on a smeared basis from those paying fixed charges.
7. One respondent noted that they did not agree with the drafting of sections X9.1 and X9.2(b), and specifically the exclusions relating to Communications Hubs that allowed simulations to be used. The respondent viewed that use of an actual Test Communications Hub would be preferable to using a simulation of the Test Communications Hub. DCC has proposed that the enhanced GFI tool will provide a simulation of messages as if they were emerging from the Communications Hub, as the existing tool currently does, but with the enhancement to include the GPF functionality. We support this approach, noting that from the start of End-to-End testing, Suppliers will be able to order Test Communications Hubs for use in their own test environments.
8. One respondent noted that section X9.2(c) indicates that section H14.4 should not apply to the GFI service and that they did not support this exclusion. H14.4 provides for concurrent use of the testing services by Testing Participants where practicable and where this is not possible, scheduling by the DCC in a non-discriminatory manner. Whilst we do not expect this to be the case in relation to the GFI test tool as the DCC have indicated to us that it can be provided very quickly upon request, we agree that H14.4 should apply in the unlikely scenario that its provisions are needed and so have revised the legal text.

9. Finally, some respondents noted that they were concerned that sections H14.37 to H14.45, which relate to the testing issue resolution process, do not apply to issues encountered with the use of the GFI tool. We have required the DCC to take reasonable steps to provide support and assistance and consider this to be sufficient. However it should be noted that once End-to-End testing is available the full issue resolution process, under H14, will be available to resolve issues.
10. We conclude that we will make changes to the SEC to include a mandatory requirement on the DCC to provide GFI Testing as soon as reasonably practicable, but no later than the start of End-to-End testing. Some other minor changes to the legal drafting have been made to reflect comments received. Changes are shown as track changes in Annex B.

#### *GFI Service – Timing and Duration*

11. Most respondents agreed with the proposed timing of section X9 coming into effect on 18 April 2016 with an obligation on the DCC to provide GFI Testing as soon as reasonably practicable, noting that this service needs to be in place for the start of End-to-End Testing (4 July 2016), at the latest. A number of respondents queried the timing of when the enhanced GFI tool will be available and indicated a preference for GFI to be provided as soon as possible.
12. DCC has indicated that it hopes to provide the first release of GFI with GPF support by the end of June 2016. It is our understanding that updates to the tool will be provided on an on-going basis, to incorporate support for additional devices and maintenance releases.
13. A number of respondents noted that there is a need to ensure that the provision of the GFI test service does not end prematurely, noting that there is value in GFI being available on an enduring basis. These respondents did not support the placement of the regulatory text in section X9, which is a transitional section of the SEC. Instead, it was requested that the Secretary of State extend requirements or that the text be placed elsewhere in the SEC, so that the GFI service may be supported on an enduring basis. Section X ends on 31 October 2018 or when Completion of Implementation has occurred under the SEC (as set out in section X1), whichever event comes earlier. DECC acknowledges that there may be benefits associated with the provision of the GFI tool on an enduring basis. However DECC considers that this issue can be given due consideration through the SEC modifications process and suggests SEC Parties that wish for GFI to be provided on an enduring basis raise a Modification Proposal.
14. We conclude that we will bring section X9 into effect on 18 April 2016 which will require the provision of the GFI service as soon as reasonably practicable, but in any event no later than the start of End-to-End Testing.

*Pre-UEPT Service – obligation to provide and timing*

15. There was broad support from all respondents to these proposals. Some respondents raised minor points of clarification.
16. Two large suppliers noted that the DCC had advised industry of proposed changes to the timeframes of Pre-UEPT services since the consultation was opened which would reduce the time over which they could complete testing prior to the commencement of User Entry Process Tests (**UEPT**). One large supplier also sought consistency in terminology, noting the use of both Pre-UIT (Pre-User Integration Testing) and Pre-UEPT in industry discussions. One small supplier sought clarification on the charging arrangements for Pre-UEPT services.
17. We are aware of the DCC's proposed revisions to the provision of Pre-UEPT services, which were also set out in its response to the consultation. These changes are reflected in our conclusions below. We also agree that consistent terminology is important for the industry and as per the recent Implementation Managers Forum (IMF) decision have agreed to call these Pre-UEPT services. Pre-UEPT service costs are socialised and recovered as part of the DCC's fixed charges.
18. Two large suppliers raised concerns with the scope of the legal drafting suggesting that:
  - X9.3(a) should be updated to ensure all Service Requests for Release 1.2 and Release 1.3 UEPT are included in the scope of Pre-UEPT;
  - Drafting in X9.4a (ii) may result in a limited service if Service Requests omit Certificates, GBCS payloads, Digital Signatures or Message Authentication Codes (MACs);
  - H14.4 (i.e. enabling concurrent use of the service (or where this is not possible, scheduling in a non-discriminatory manner)) should apply to the Pre-UEPT service;
  - H14.11 should apply to the Pre-UEPT service as it relates to the use of 'Test Certificates', which will be used for accessing this service; and
  - Sections H14.37 to H14.45, which relate to the testing issue resolution process, should apply to Pre-UEPT services as the Pre-UEPT service is now a mandatory requirement and is a key stage to de-risk a subsequent test stage.

The DCC supported the proposals and provided clarification on the scope of the proposed Pre-UEPT services it could provide and their timing. This covers the provision of early connectivity testing from 18 April 2016 – which would enable participants to test secure system connections to the environment (which includes testing connection to all three web service interfaces described in the DCC User Interface Specification (DUIS)). We understand

that this environment will also be used to provide both UEPT and End-to-End Testing services.

19. The second element of Pre-UEPT would provide Service Request processing testing, which the DCC proposes to make available from 6 May 2016. The DCC set out an intention to initially support the Service Requests in scope for Release 1.2, with Release 1.3 Service Requests being added once they become available. The DCC also clarified that this service would allow test participants to verify MAC and Signatures as well as the verification of correlate. They also proposed that a limited number of Service Responses will have Valid GBCS payload, with all others returning 'dummy' GBCS payload.
20. We conclude that we will bring Section X9 into effect on 18th April 2016, obliging DCC to provide a Pre-UEPT service that consists of early connectivity testing and Service Request testing. We have amended the legal text such that connectivity testing is required from 18 April 2016 and the remainder of Pre-UEPT testing from 6 May 2016. The minimum set of Service Requests to be made available are those planned for delivery in Release 1.1 (as set out in the re-planning direction of 18 December 2016<sup>4</sup>)
21. We have also amended the text to require that the DCC expands the scope of the Pre-UEPT Service Request validation service to reflect the additional functionality available at Release 1.2 and 1.3 as soon it reasonably can. Finally we have removed Service Request 8.5 from the functionality that needs to be available for testing from 6<sup>th</sup> May 2016, noting that the DCC have confirmed that the inclusion of that Service Request in the functionality available for DCC Live was an error.
22. We have required the DCC to take reasonable steps to provide support and assistance in the resolution of testing issues and consider this to be sufficient for test issue resolution. However it should be noted that once End-to-End testing is available the full issue resolution process, under section H14, will be available to resolve issues.
23. We agree with the challenges raised by two large suppliers that sections H14.4 and H14.11 should be applied for the purposes of Pre-UEPT testing and have amended the legal text accordingly. Some other minor changes to the legal drafting have been made to reflect comments received. Changes are shown as track changes in Annex B.
24. In regards to longevity, four large suppliers and two small suppliers believed that there was merit in extending Pre-UEPT services beyond the Release 1.3 live date, on the basis that this would help support new entrants and smaller suppliers who may not engage with DCC until a later date. Some suppliers also argued that it would be useful to provide Pre-UEPT services beyond Release 1.3 Live to support early testing of new functionality (e.g. 868 MHz

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<sup>4</sup> [https://www.smartdcc.co.uk/media/346883/contingency\\_request\\_supporting\\_info.pdf](https://www.smartdcc.co.uk/media/346883/contingency_request_supporting_info.pdf)

services). Two large suppliers did not see merit in extending the Pre-UEPT service beyond Release 1.3 going live as from this point on, a connectivity and 'full functionality' test environment will be available for use.

25. We conclude that Pre-UEPT services will be made available until Section X terminates (which is the earlier of Completion of Implementation or 31 October 2018). Based on current plans, this timeframe will provide significant time for new entrants to access the service.
26. However, we appreciate that there may be value in providing Pre-UEPT on an enduring basis and encourage SEC Parties that wish for it to be available on an enduring basis to raise a SEC Modification Proposal so that the benefits of its continued provision can be assessed as part of that process.

## **II. Additional Phases of SIT, Interface Testing, and SRT Testing (Chapter 8.2)**

27. In the February Consultation, we explained that the Secretary of State's letter of 18 December 2015 on the DCC contingency request identified the need for an additional period of Systems Integration Testing (SIT), Interface Testing and SMKI and Repository Testing (SRT) prior to Release 1.3. It was noted that Sections T2, T3 and T5 of the SEC set out the current requirements for SIT, Interface Testing and SRT, and views were invited on the proposed changes to those sections to provide for the additional periods of testing to be undertaken.
28. All respondents agreed with the proposed amendments to allow for an additional period of testing for SIT, Interface Testing and SRT prior to Release 1.3 going live. Among the supporting comments, one respondent pointed to the need for sufficient time being allowed for the approval processes for completing the additional stages to ensure robust decision making on behalf of industry. Another respondent pointed to the need for rigorous testing and transparent feedback to industry. One respondent noted that the period of notice by the DCC in advance of additional Interface Testing (proposed to be one month) ought to be related to the size of the changes to be tested. Although there is currently no requirement for additional SMKI and Repository Entry Process Tests (SREPT) as part of Release 1.3, one respondent noted that, if in the future, large suppliers are required to participate in additional SREPT, then three months' notice ought to be allowed for preparation and readiness.
29. We note the comments and propose to implement the SEC amendments to enable an additional period of testing prior to Release 1.3 going live. Some minor changes to the legal drafting have been made to reflect some detailed comments received and these are shown as track changes in Annex B.



### **III. Length of End-to-End Testing Period (Chapter 8.3)**

30. The February Consultation explained that section T4.15 currently states that the End to End Testing phase ceases 12 months after it starts (or 18 months after it starts, if so determined by the SEC Panel). However due to the revised DCC release strategy, when End to End Testing starts, the User System testing facilities will not contain the full testing functionality, but instead only the functionality that relates to the Service Requests that are available at DCC Live. Consequently we proposed that it may be more appropriate to provide that End to End Testing runs for 12 months after the provision of the full End to End Testing environment, rather than it running for 12 months after the start of End to End Testing. Views were invited on an amendment to the drafting in section T4 to provide for the Secretary of State to direct that this is the case, should it prove appropriate to do so.
31. All respondents apart from one agreed that the proposal was sensible given the fact that full functionality would not be available at DCC Live. One respondent stated that the End to End Testing environment should be retained beyond 12 months from full Release 1.3 functionality becoming available to support enduring testing requirements. Three respondents requested confirmation that the wording of ‘...full End to End test environment...’ related to Release 1.3 for clarity.
32. It should be noted that once the End To End Testing period finishes, test environments will continue to be provided in order to meet the requirements of the enduring testing services as set out in section H14 of the SEC. We therefore conclude that we will amend section T4.15. However based on comments received, we have made a change to the legal drafting to state that End to End Testing shall end 12 months after the date from which the ability to test all the Service Requests listed in the Common Test Scenarios Document has been provided (or shall continue for a further 6 months if determined by the SEC Panel). The reference to the ability to test all Service Requests captures the full Release 1.3 functionality. The drafting change is shown as track changes in Annex B.

### **IV. Additional Phases of Service Request Testing by Users (Chapter 8.4)**

33. Again, as a consequence of the revised DCC release strategy, it was noted in the February Consultation that a transitional variation was planned to be made to the Common Test Scenarios Document when it is designated so that UEPT, commenced during the first period of Interface Testing, may only be undertaken in relation to the subset of Service Requests available at DCC Live. Such a variation would be removed at the point at which the DCC provides the facility to test the additional Service Requests that will be available when Release 1.3 goes live, which will be during the additional phase of Interface Testing prior to Release 1.3. We noted that DCC had

issued a consultation on these transitional variations as part of its consultation on the designation of the Common Test Scenarios Document<sup>5</sup>.

34. It was explained that this proposed variation means that a SEC Party that commences UEPT during the first phase of Interface Testing (planned to commence on 13 June 2016) will be able to qualify as a User in a particular User Role having only tested the Service Requests that are available at DCC Live. To prevent the sending of Service Requests in the live environment where a User has not previously tested them, it was proposed that changes will be required to the SEC to prevent Users from being eligible to send the remaining Service Requests that become available at Release 1.3 until they have undertaken testing of those Service Requests in accordance with the Common Test Scenarios Document. Such testing will only be able to first commence during the additional period of Interface Testing undertaken prior to Release 1.3 going live. It was proposed that these additional SEC provisions are contained in Section X of the SEC, as they apply for a transitional period only.
35. All seven respondents to this issue supported the proposal as a sensible treatment of the Service Requests appropriate to the DCC release strategy. One respondent commented that the DCC should reject any incorrect Service Requests that a User is not eligible to send during the additional testing phases. The Section X drafting proposed confines itself to placing obligations on Users to undertake additional testing prior to becoming an Eligible User for the additional Service Requests made available when Release 1.3 goes live 1.3 Live. The arrangements for what happens in the event that a User inadvertently sends such a Service Request prior to becoming an Eligible User is a matter for other parts of the SEC, more specifically the transitional changes to the User Interface Services Schedule (and potentially DUIS and the Service Request Processing Document). We will be consulting on specific transitional changes to these documents in due course in which we will address the points raised on this matter
36. We will therefore add the new Section X1.17 to deliver the changes to support the revised DCC release strategy.

## **V. SEC Panel and DCC Live Criteria Assessment (Chapter 9)**

37. In the February Consultation we explained that we saw merit in the SEC Panel undertaking a role in assessing the DCC performance against the DCC Live Criteria as it offers further independent assurance of Implementation Milestone delivery and supports the overall goal to transition responsibility of

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<sup>5</sup> <https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/sos-consultations/11-february-2016-decc-consultation-on-bringing-various-sec-provisions-into-effect.zip?sfvrsn=2>

enduring governance to the industry. As such, we proposed that the Secretary of State may direct the SEC Panel to carry out this assessment and that these requirements are added to the SEC. Views were invited on this proposal and the associated legal drafting.

38. All 11 respondents who provided views on this question provided full or conditional support for the proposals and legal drafting.
39. Three large suppliers recommended that the DCC consult industry on the DCC Live Criteria before they are approved by the Secretary of State. In addition, one large supplier also noted the technical nature of the decision and the importance of the Panel's sub-committees in informing the decision. The supplier also stated that the criteria must be of appropriate scope and ensure they cover issues such as security readiness – not just technical testing. One large supplier recommended that the Secretary of State be required to publically respond to any concerns set out in the SEC Panel's decision.
40. The SEC Panel noted the importance of allowing enough time between the approval of the criteria and the time at which it may be asked to review performance. It also noted the importance of allowing enough time to complete the review process to ensure that it can provide due consideration and seek input from its sub committees and/or advisory groups.
41. We welcome stakeholder support for the proposal to provide a potential role for the SEC Panel to review the DCC's performance against an agreed set of operational criteria and conclude that we will make the modifications to the SEC as per the consultation drafting as shown in Annex B.
42. We also recognise the value of SEC Panel assessment of the DCC Live criteria before they are formally approved by the Secretary of State – particularly given their potential role in assessing performance against them. As such, we will ensure that the SEC Panel are given the ability to comment on the criteria and provide views to the Secretary of State. However, we do not consider it necessary to include a formal requirement for consultation given our intention to engage directly with SEC Panel members.
43. While the scope of the criteria is still under consideration, we can confirm that the intention is that it is appropriately broad and captures all relevant readiness elements (including security).
44. We also recognise the importance of providing the SEC Panel with adequate time to prepare for and carry out an assessment of the DCC's performance against the criteria and will ensure the SEC Panel is engaged on future planning for this review process.

## **VI. Relevant Version of the SEC for Testing Purposes (Chapter 8.5)**

45. In the February Consultation we explained that sections T2.3 (a), T3.3 (a) and T5.3 (a) of the SEC specify which versions of the Sections of the SEC (A-X) are relevant for the purposes of testing. Currently these are the versions that

existed on 14<sup>th</sup> December 2015, being the last time that the Secretary of State laid amended SEC text before Parliament. We therefore proposed to change these dates to the date that the section 88 modifications that we are laying alongside this response letter are laid before Parliament. This ensures that the relevant versions of the SEC sections for the purposes of exiting testing are up to date. We also noted that the relevant version of the SEC Schedules and Subsidiary Documents for testing purposes is set out in the Testing Baseline Requirements Document, as published by the Secretary of State from time to time. The most recent version of this document was published on 8 February 2016<sup>6</sup>

46. We also proposed to amend the SEC to ensure that, for the purposes of exiting testing phases prior to DCC Live, the DCC will not have to prove the functionality that is being 'de-scoped' for DCC Live.
47. All the respondents agreed with proposed amendments to the SEC. One respondent pointed out that it is beneficial for all Testing Participants, not just the DCC, to be able to easily identify the requirements that need to be tested against, especially in a transitional period where documents are at different stages.
48. We therefore conclude that the relevant amendments will be made to the SEC in sections T2.3 (a), T3.3 (a) and T5.3 (a) to replace 14 December 2015 with the date that the modification of these sections are to be laid before Parliament (14 April 2016) and to include reference to any variations to the sections that will continue to apply once the Services being tested during SIT, Interface Testing or SRT (as the case may be) first become available.

## **VII. Changes to support SECCo becoming a Subscriber for IKI Certificates (Chapter 10.5)**

49. In the February Consultation we explained that Clause 7.1 of the Certified Products List (CPL) Requirements Document requires the SEC Panel to provide a Digitally Signed version of the CPL when it provides an update to the DCC and that, for the initial solution at least, Private Keys associated with an Infrastructure Key Infrastructure (IKI) File Signing Certificate would be used for such Digital Signing purposes.
50. SEC changes were proposed to support this solution, in particular to permit SECCo to become a Subscriber for IKI Certificates which may then be used by SECCo to arrange on behalf of the Panel for the CPL to be digitally signed using the associated Private Key. Comments were invited on these proposed changes.

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<sup>6</sup> <https://smartenergycodecompany.co.uk/docs/default-source/sec-documents/developing-sec/tbrd---testing-baseline-requirements-document-v1-2-final.pdf?sfvrsn=4>

51. All of the eight respondents who commented on this issue agreed with the proposals. One raised a question on the detail of the proposed drafting querying whether "Party or RDP" can be substituted with "Authorised Subscriber" in sections L3.13 and L3.14 as the person concerned will have ceased to be an Authorised Subscriber in certain circumstances. However, the provisions in L3.13 and 3.14 only apply to persons who are Authorised Subscribers and hence would not apply to a person that had ceased to be one. Consequently we believe that the proposed drafting is correct.
52. It is recognised that supporting changes will also need to be made to the SMKI Registration Authority Process and Procedures (SMKI RAPP) and the IKI Certificate Policy and we will consult on these proposed changes in due course.
53. We conclude that the changes proposed to the SEC to support SECCo becoming a subscriber for IKI Certificates will be made.

#### **VIII. Changes to the Obligations on Subscribers for IKI File Signing Certificates (Chapter 10.8)**

54. The February Consultation noted that DCC has recently introduced the concept of IKI File Signing Certificates which are certificates associated with Private Keys that are used to sign files that are sent to DCC. Keys associated with these certificates are to be used for example by Users to sign Threshold Anomaly Detection files and by the Panel to sign the Certified Products List.
55. It was explained that in some instances the Public Key to be included in the Certificate Signing Request (CSR) for an IKI File Signing Certificate will be generated not by the prospective Subscriber for the Certificate, but by software provided by DCC on a Cryptographic Credentials Token and changes were proposed to the subscriber obligations in Section L11.3 of the SEC to reflect this arrangement. Views were invited on these proposals and the associated SEC drafting.
56. All nine respondents who commented on these proposals agreed with them, although the DCC noted that any Key Pair generated on the token and the associated CSR will be transparent to the Eligible Subscriber.
57. We conclude that we will make the proposed changes to Section L11.3, but modified in light of DCC's comments such that the Eligible Subscriber is required only to ensure that the Certificate Signing Request is generated on a DCC-provided Cryptographic Credential Token. The revised drafting is included in Annex B. We will address the associated obligations in Section G in the May conclusions document.

#### **IX. Minor Changes to Section E (Chapter 10.10)**

58. We proposed that Sections E2.1(a) and E2.2(d) should be subject to minor amendments to more accurately reflect the actual Registration Data that

would be provided to the DCC by Electricity Network Parties and Gas Network Parties. Specifically:

- a. In the case of electricity, rather than identifying the RDP in relation to an MPAN, the identity of the Electricity Distributor would be provided; and
- b. In the case of gas, rather than listing the effective date that gas is first offtaken at a Supply Meter Point, the DCC would be notified of the date that the status change for the Supply Meter Point from 'not offtaken' to 'offtaken' was first noted.

59. Nine respondents commented upon this proposal, and all were in agreement with it.
60. We conclude that the proposed minor amendments to E2.1(a) and E2.2(d) of the SEC will be made.

**Annex B – Concluded Smart Energy Code Legal Text**

*Annex B1 – Concluded Smart Energy Code Legal Text (clean version) enclosed.*

*Annex B2 – Concluded Smart Energy Code Legal Text (tracked-changed version) enclosed.*

## Annex C – List of Respondents to the February SEC Consultation

BEAMA	First Utility
British Gas	Ofgem
Community of Meter Asset Providers	RWE npower
Data Communications Company	Scottish Power
European Copper Institute and Waide Strategic Efficiency Limited	SEC Panel
EDF Energy	SMDA Co Ltd
E.ON	SSE
Energy UK	UK Power Networks
Haven Power	Utilita