



Department
of Energy &
Climate Change

Smart Metering Implementation Programme

March 2015 Government Response to parts of the previous consultations on: Stage 4 Smart Energy Code (SEC) (June 2014), Additional SEC Content consulted on as part of the SEC 4 Part A response (November 2014) and January 2015 SEC Consultation.

26 March 2015



© Crown copyright 2015

URN 15D/035

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence.

To view this licence, visit www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Any enquiries regarding this publication should be sent to us at smartmetering@decc.gsi.gov.uk.

General information

Purpose of this document:

This document sets out the Government's response to part of the consultation on the content of stage four part of the Smart Energy Code, additional SEC content consulted on as part of the SEC 4 Part A response and the January 2015 SEC Consultation. These set out arrangements related to the management of smart metering in Great Britain.

Issued: 26 March 2015

Enquiries to:

Smart Metering Implementation Programme - Regulation
Department of Energy & Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
London, SW1H 0ET

Telephone: 0300 068 5325

Email: smartmetering@decc.gsi.gov.uk

Territorial extent:

This consultation response applies to the gas and electricity markets in Great Britain. Responsibility for energy markets in Northern Ireland lies with the Northern Ireland Executive's Department of Enterprise, Trade and Investment.

Additional copies:

You may make copies of this document without seeking permission. An electronic version can be found at:

<https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-4>

<https://www.gov.uk/government/consultations/consultation-on-additional-smart-energy-code-sec-content>

<https://www.gov.uk/government/consultations/new-smart-energy-code-content-january-2015>

Other versions of the document in Braille, large print or audio-cassette are available on request. This includes a Welsh version. Please contact us under the above details to request alternative versions.

Quality assurance:

This consultation has been carried out in accordance with the Government's Consultation Principles, which can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60937/Consultation-Principles.pdf

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

DECC Consultation Co-ordinator
3 Whitehall Place
London SW1A 2AW

Email: consultation.coordinator@decc.gsi.gov.uk

Contents

General information	4
Contents.....	5
1 Executive summary.....	7
1.1 The Smart Energy Code	7
1.2 March 2015 Government Conclusions.....	7
2 Introduction.....	9
2.1 A new industry code	9
2.2 Stage 4 of the Smart Energy Code	9
Table 1: Summary of March 2015 SEC Government Response Content and Legal Drafting Approach	10
2.3 Responses to the SEC Stage 4 and Stage 4A consultations.....	11
2.4 Responses to the January 2015 SEC consultation.....	12
2.5 Introducing this legal drafting into the regulatory framework.....	12
2.6 The future	13
3 DCC User Interface Service Schedule (previously DCC User Gateway Services Schedule) (SEC 4)	14
4 Provision of Data for the Central Delivery Body (SEC 4)	16
5 Power Outage Alerts (SEC 4)	18
6 Non-Domestic Supplier Opt Out (SEC 4)	20
7 User Supplier to Non-User Supplier Churn (SEC 4)	22
8 Communications Hubs Dimensions (SEC 4)	24
9 Movement of some Technical Arrangements into Subsidiary Documents (SEC 4 and SEC 4A)	25
10 SMKI,DCCKI and IKI-related changes (SEC 4 and SEC 4A).....	27
11 Further Security requirements and Post Commissioning Obligations (SEC 4A)	34
12 Notifying new commencement dates for SEC testing phases (January 2015 Consultation) 38	
13 Testing (SEC 4A & January 2015 Consultation)	41
14 Changes to when Communications Hubs can be ordered and associated forecasts are required to be submitted (January 2015 Consultation)	46
15 Minor consequential change to Electricity and Gas Supply Licences (January 2015 Consultation).....	48
16 Glossary.....	50
Annex A: Responses Received.....	57

Annex B: Consultation questions responded to in this document.	60
Annex C: SEC Legal Text	64
Annex D: DCC Licence Text	64
Annex E: Supply Licences Text	64
Annex F: User Interface Services Schedule (SEC Appendix E).....	65
Annex G: Informal Testing Direction Letter	65

1 Executive summary

1.1 The Smart Energy Code

1. The Smart Energy Code (SEC) is a new industry code concerning the arrangements for the provision of the smart metering communication service. It has been created under the Data Communications Company (DCC) Licence, and it was first designated on 23 September 2013. A consultation on stage 4 of the SEC (SEC 4) was published on 30th June 2014. A substantial part of the SEC 4 content was concluded upon in a document published on 17 November 2014 (SEC 4A), which contained both SEC 4A conclusions and some further items for consultation. An additional consultation was published on 26 January 2015 which included a number of new policy areas, principally resulting from the DCC publishing its consultation entitled 'Resetting the DCC Delivery Programme' in November 2014.
2. This document sets out conclusions on a number of outstanding topics from the original SEC 4 consultation and from the additional consultation content in SEC 4A and the January 2015 Consultation. The majority of the related legal drafting will be laid in Parliament in parallel with the publication of this document (please refer to Chapter 2.5 for more information).

1.2 March 2015 Government Conclusions

3. Chapter 2 provides an overview of the content of this document and the associated SEC legal text.
4. Chapters 3 – 14 provide policy conclusions for a number of previous consultations (as outlined in Chapter 1.1 above). These include:
 - Chapter 3 - DCC User Interface Service Schedule: this forms Appendix E of the SEC.
 - Chapter 4 – Provision of Data for the Central Delivery Body: this includes a new condition in the DCC Licence, allowing the DCC to provide the CDB (Smart Energy UK) with market share information.
 - Chapter 5 – Power Outage Alerts: provides and update on our approach in relation to Power Outage Alerts.
 - Chapter 6 – Non–Domestic Supplier Opt Out: this concludes on the question asked in the SEC4 consultation on the opt out for this group of meters and refers to a further separate consultation¹.
 - Chapter 7 – User Supplier to Non-User Supplier Churn: this sets out the process for suppliers and the DCC to follow in the event of a User supplier to Non-User supplier churn.

¹ <https://www.gov.uk/government/consultations/consultation-on-non-domestic-smart-metering>.

- Chapter 8 – Communications Hubs Dimensions: legal text will be in parallel with publication of this document having previously concluded that the DCC will be required to consult SEC Parties on the physical dimensions of Communications Hubs, obliged to publish the physical dimensions of any Communications Hubs that it makes available and required to consult SEC parties on any changes to the financing arrangements for the procurement of communications hubs where they could have a material impact on parties.
- Chapter 9 - Movement of Technical Arrangements into Subsidiary Documents: this concludes on the proposal that some technical arrangements concerning DCC Services (Section H) will be moved into subsidiary documents.
- Chapter 10 – SMKI/DCCKI and IKI: provides policy and legal drafting conclusions on a number of PKI-related issues, notably Infrastructure Key Infrastructure and DCC Key Infrastructure.
- Chapter 11 – Further Security Requirements: this changes to the security related drafting including adding requirements applicable to Registration Data Providers.
- Chapter 12 - Notifying new commencement dates for SEC testing phases: this provides the mechanism by which the DCC can be required to give notice of a new commencement date for SEC testing phases.
- Chapter 13 - Testing: conclusions on our consultations regarding informal testing services offered by the DCC, and on whether additional provisions are needed in the SEC to support remote testing. Additionally legal drafting that will enable third-party service providers to undertake testing with the DCC.
- Chapter 14 - Changes to when Communication Hubs can be ordered: this sets out our intended approach for designating the date for the initial delivery of Communications Hubs, in light of the timings in the new DCC delivery plan approved on 5th March 2015.
- Chapter 15 - Minor Consequential change to the electricity and gas supply licence conditions: consequential changes to the definitions of 'Relevant Electricity Meter' and 'Relevant Gas Meter' in the supply licence conditions on roll-out reporting, setting and achieving annual milestones, and provision of information to the Authority

2 Introduction

2.1 A new industry code

5. Smart Meters are the next generation of gas and electricity meters. They will offer a range of intelligent functions and provide consumers with more accurate information, bringing an end to estimated billing. Consumers will have near-real time information on their energy consumption to help them control and manage their energy use, save money and reduce emissions.
6. On 23 September 2013, a new licensed entity, the Data and Communications Company (DCC), was established. Together with its sub-contractors, the Data Service Provider (DSP) and Communications Service Providers (CSPs), the DCC will provide a Smart Meter communications service. The DCC will offer a means by which Suppliers, Network Operators and others can communicate remotely with Smart Meters in Great Britain.
7. The Smart Energy Code (SEC) is a new industry code which has been created through, and came into force under, the DCC Licence. The SEC is a multiparty contract which sets out the terms for the provision of the DCC's Smart Meter communications service, and specifies other provisions to govern the end-to-end management of smart metering.
8. The DCC, Suppliers of energy to domestic and smaller non-domestic customers, and Network Operators are required by their licences to become parties to the SEC and comply with its provisions. Other bodies who wish to use the DCC's services, such as energy efficiency and energy service companies, or those that require Smart Metering Key Infrastructure (SMKI) Certificates to be placed on smart metering devices, must accede to the SEC to do so.
9. Consistent with other industry codes, the SEC is self-governed, enabling participants to raise change proposals, debate issues, and resolve disputes without the need for day-to-day regulatory intervention. It is managed by a Panel drawn from SEC Parties ('the SEC Panel') and is subject to the regulatory oversight of Ofgem. The Panel is supported in the day to day administration of the SEC by a Code Administrator and Secretariat (SECAS).

2.2 Stage 4 of the Smart Energy Code

10. The SEC is being introduced in stages. The consultation on Stage 4 of the SEC ('the SEC 4 consultation') was published on 30 June 2014². Conclusions on a substantial parts of the content of SEC 4 (SEC 4A) was published on 17 November 2014³ and part of the associated legal text was laid in Parliament and came into effect on 14 January 2015. That publication also included a further consultation on a number of areas. Conclusions on a number of other areas were published in January 2015 and the associated legal text was laid in Parliament and came into effect on 18 March 2015. Also in January 2015 we issued a further consultation on a number of policy areas, principally resulting from the

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4_-_Consultation_Document.pdf

³ <https://www.gov.uk/government/consultations/consultation-on-additional-smart-energy-code-sec-content>

DCC publishing its consultation entitled Resetting the DCC Delivery Programme in November 2014. This document provides conclusions to a number of the policy areas from the above three consultations. In some cases we are laying the associated legal text in Parliament, in others we are publishing our concluded text but not yet laying it in Parliament. Where we are not laying the concluded text in Parliament this is typically because we expect the drafting to be impacted by consequential changes from other areas of the SEC under development, particularly the detail arising from subsidiary documents. The table below sets out the policy areas and the associated legal text that we are concluding on and that we are laying in Parliament.

Table 1: Summary of March 2015 SEC Government Response Content and Legal Drafting Approach

Chapter	Concluded Legal Text	Legal Text to be Laid in Parliament
3: DCC User Interface Services Schedule	Latest iteration of the UISS is published alongside this document for information only.	N/A (this will form part of a future set of changes to be Laid before Parliament)
4: Provision of Data for the CDB	<ul style="list-style-type: none"> • M4.22 • DCC Licence, Condition 45 	<ul style="list-style-type: none"> • DCC Licence, Condition 45
5: Power Outage Alerts	N/A (this will form part of a future Document)	N/A (following any necessary further consultation this will form part of a future set of changes to be Laid before Parliament)
6: Non-Domestic Supplier Opt Out	N/A (under a separate consultation)	N/A (under a separate consultation)
7: User Supplier to Non-User Supplier Churn	<ul style="list-style-type: none"> • A • O1 • O2 • O3 • O4 	N/A (this will form part of a future set of changes to be Laid before Parliament)
8. Communication Hubs Dimensions	<ul style="list-style-type: none"> • F4.10 – 4.14 	<ul style="list-style-type: none"> • F4.10 – 4.14
9: Movement of some Technical Arrangements into Subsidiary Documents	<ul style="list-style-type: none"> • H4 • H5 • H6 	<ul style="list-style-type: none"> • H4 • H5 • H6
10: SMKI,DCCKI and IKI-related changes	<ul style="list-style-type: none"> • A • B1.19 -1.20 • E2.15-16 • L • X3.2(h) and X3.5(b) • Appendix A • Appendix B 	<ul style="list-style-type: none"> • N/A (this will form part of a future set of changes to be Laid before Parliament)
11: Further Security Requirements	<ul style="list-style-type: none"> • E2.14 • G1.7 • G3.8 	<ul style="list-style-type: none"> • E2.14 • G1.7 • G3.8

	<ul style="list-style-type: none"> • H10.1 – H10.8 	<ul style="list-style-type: none"> • H10.1 – H10.8
12: Notifying New Commencement Dates for SEC Testing Phases	Various amendments to: <ul style="list-style-type: none"> • T2 • T3 • T4 • T5 	Various amendments to: <ul style="list-style-type: none"> • T2 • T3 • T4 • T5
13: Testing	Various amendments to: <ul style="list-style-type: none"> • H14.7 • H14.20 • H14.29 • H14.31 • H14.32 • Schedule 7 Direction Letter (as set out in Annex G)	Various amendments to: <ul style="list-style-type: none"> • H14.7 • H14.20 • H14.29 • H14.31 • H14.32 • Schedule 7
14: Changes to when Communication Hubs can be Ordered	N/A - under a separate consultation and introduced via Direction letter.	N/A – under a separate consultation and introduced via Direction letter.
15: Minor Consequential Changes to Electricity and Gas Supply Licences	Amendments to the Electricity and Gas Supply Licence Conditions	Amendments to the Electricity and Gas Supply Licence Conditions

11. Please note that we are also laying legal text in Parliament for a number of changes to Section H (H1,2,3,8 and 9) of the SEC as part of this package of amendments. These changes have been subject to previous consultation and, having carefully considered the responses received, we are concluding on the legal text and it is being laid in Parliament to ensure the provisions are available as needed to support the later phases of the DCC delivery plan. We will set out our full response in relation to these changes as part of a future response document.

2.3 Responses to the SEC Stage 4 and Stage 4A consultations

12. The SEC 4 consultation on draft legal text for Stage 4 of the SEC was published on 30 June 2014 and closed on 25 August 2014. It contained 66 questions in total; this response document relates to 5 of them. The SEC Stage 4A Government response and further consultation was published on 17 November 2014 and closed on 31 December 2014. It contained 13 questions in total; this response relates to 9 of them. Responses to many of the other questions were set out in the SEC Stage 4 Part A response⁴. Conclusions on the remainder of the questions will be published later in 2015.
13. A list of those who responded to these consultations is provided at Annex A. Responses are available on the Government website.
14. There were 35 responses to the SEC4 consultation and 17 responses to the SEC4A consultation across a range of organisations, including:
- Large and Small energy Suppliers;
 - electricity distribution and gas transportation networks (Network Operators);

⁴ <https://www.gov.uk/government/consultations/consultation-on-additional-smart-energy-code-sec-content>

- trade bodies;
- energy data managers;
- energy code administrators;
- Data and Communications Company (DCC);
- meter technology providers; and,
- Ofgem.

2.4 Responses to the January 2015 SEC consultation

15. The January 2015 SEC consultation was published on 26 January 2015 and closed on 23 February 2015. It contained 7 questions in total and this document provides a response to all of them. A list of those who have responded to these consultations is provided at Annex A. Responses are available on the Government website⁵.
16. There were 14 responses to the January 2015 consultation across a range of organisations, including:
 - Large and Small energy Suppliers;
 - electricity distribution and gas transportation networks (Network Operators);
 - energy data managers;
 - energy code administrators;
 - Data and Communications Company (DCC); and
 - meter technology providers.

2.5 Introducing this legal drafting into the regulatory framework

17. The final legal text supporting a number of policy areas concluded on as part of this publication will be laid in Parliament in parallel with the publication of this document and will follow the procedure under Sections 88 and 89 of the Energy Act 2008. Table 1 above sets out the topic areas that we are concluding on within this publication together with the relevant legal drafting and details of when the provisions will be laid in Parliament and incorporated into the SEC. The items concluded on here will be ‘switched on’ i.e. made legally effective, immediately on incorporation into the SEC.
18. Subject to no objection being raised in Parliament during the 40 day period, and subsequent signature by a Minister, we expect it to come into legal force by summer 2015 – the precise timing is subject to Parliamentary recess dates which are yet to be set. Where policy is concluded on but not laid before Parliament, we will do so as part of a future set of legal text changes being laid.
19. We will also be using this opportunity to make some minor typographical changes which have been identified in the current version of the SEC that is in force. These will be laid in Parliament alongside the changes outlined in this document.

⁵ <https://www.gov.uk/government/consultations/new-smart-energy-code-content-january-2015>

20. Annex C (attached separately to this document) sets out the concluded SEC legal text as it would look combined with all the SEC drafting most recently published, either consulted upon text (if not yet concluded) or the concluded text.
21. Annex D sets out how the DCC Licence will look once the proposed text is incorporated into the current Licence. Annex E sets out how the proposed text will look once incorporated into the Gas and Electricity Supply Licences.
22. Changes to the legal text we consulted on are marked up and the final conclusion text is highlighted in blue.
23. Every effort has been made to ensure that the explanatory text in the main body of this response document reflects the legal drafting included in Annexes C, D and E. We have sought to ensure that the explanatory text provides a clear and simplified overview of our proposals. However, in the event of any discrepancy the legal drafting should be treated as the definitive text. Where terms are capitalised in this consultation document they are SEC defined terms.
24. The broad requirements of this stage of the SEC are not new, so cost implications have been generally considered in the Impact Assessment published in January 2014.

2.6 The future

25. Looking ahead, we have reviewed our plans for implementing the remainder of the initial drafting of the Smart Energy Code to ensure that it will be able to support the plan for the delivery of the DCC's services in line with the revised plan that was approved by the Secretary of State on 5 March 2015, and also that it remains fully aligned with the content and conclusions of the various consultations on subsidiary documents.
26. It is expected that a small number of known issues will be consulted on in further consultations during 2015. There may also be further requirements that are identified from the experience of implementation, for example in the course of testing. In addition, further detailed and technical material will be incorporated as subsidiary documents to the SEC following the separate process that has been established for those.

3 DCC User Interface Service Schedule (previously DCC User Gateway Services Schedule) (SEC 4)

Summary of Issue under Consideration

Service Requests, Service Responses, Alerts and a number of other communications passing between the DCC and Users will transfer through the DCC User Gateway. The DCC User Interface Services Schedule (UISS) sets out, amongst other things, the list of services available over this interface, with the DCC User Interface Specification (which is being developed and consulted upon by DCC) providing additional detail.

Views were previously sought on a draft User Gateway Services Schedule (UGSS) in Annex 5 of the SEC Stage 2 consultation with respondents being generally supportive of the proposals. We concluded in the SEC 2 response document that we would implement the drafting proposed with a few changes taking into account comments made and including more detail on the Monthly Services Metrics which are also included in the document.

A number of consequential changes to the document have been made as part of the SEC 4 consultation, principally to ensure that the list of services and their treatment continues to be aligned with DUIS (in addition to changing the name of the document from UGSS to UISS to more accurately reflect its role under the SEC).

The consultation asked one question on this area:

- **DCC User Interface Service Schedule:** question 30 sought views on the proposed approach and legal drafting in relation to the document (which at the time was referred to as the User Gateway Services Schedule).

Government Consideration of Issue

27. The great majority of respondents to this question agreed with the proposal that the document should be incorporated within the SEC along with the DUIS, and should also align with the GBCS for consistency. Overall, they considered this to be a sensible, efficient and cost effective approach, also noting that the documents would then be subject to, and benefit from, formal SEC Governance and Change Control Processes (including the Urgent Modification Process if needed). A number caveated their response to note that both the DUIS and GBCS were still in development. In light of this, the UISS would need to be reviewed on finalisation of these documents.
28. The DCC disagreed with the proposed approach, noting that the proposed drafting changes had introduced significant alignment issues between the SEC documents and the DUIS, leading to potential for user confusion. They strongly recommended that the DUIS should be the master document for Service Request definitions, amending the UISS to point to this.
29. The great majority of respondents agreed with the proposed legal drafting, although a number of these caveated their responses with detailed comments. These comments related particularly to changes which are likely to impact on Target Response Times (TRTs):

- the increased emphasis on ‘On Demand’ (rather than ‘scheduled’) Services. The DCC noted that the current drafting is likely to set a User expectation that Service Requests should be issued on demand rather than scheduled, but that this balance was not currently reflected in contracted solution with the Service Providers;
- the DCC also raised concerns over GBCS message size, and its impact upon TRTs for On Demand Service Requests (particularly if the use of these rises in line with the point above). They maintained that the definition of the associated commands within the GBCS is not compatible with the intended TRT of 30 seconds for all On Demand Service Requests. Thus, their view is that the SEC 4 and the GBCS are misaligned;
- Suppliers, in particular, strongly supported the reduction in the TRT for the On Demand Update Security Credentials (CoS) from 24 hours to 30 seconds, although would not disagree strongly with a compromise position put forward by the DCC of 35 seconds. For the Future Dated version of this SR, the DCC strongly disagreed with the proposed 30 second TRT, proposing instead one of 60 minutes.

30. Comments were also raised in relation to a number of other areas of detailed drafting. These included the definitions of Import Supplier and Export Supplier; the ‘Read Instantaneous Export’ and ‘Add Auxiliary Load to Boost Button’ services; the inclusion of a Job Completion Report as a Service Request, and additional provision for the use of UTRNs, particularly in ‘no WAN’ situations. Finally, one respondent noted that between 10 and 20 service request variants are currently under discussion, and that these should be captured in the SEC for consistency.

Summary of Government Conclusion

Whilst noting the concerns of DCC, the Government recognises that there is value to Users in having the set of Service Requests provided by the DCC laid out separately to the DCC User Interface Specification. The Government therefore proposes that the User Interface Services Schedule* is maintained within the SEC to provide a summary of the services available. This gives Users visibility of the range of services available to them, although the detail of the implementation of each of the services, and specific attributes of those services will be contained within the DCC User Interface Specification (also a SEC Subsidiary Document). An updated version of the User Interface Services Schedule is set out at Annex F published alongside this document. This version has been aligned with the extant version of the DCC User Interface Specification, and which the Government considers addresses the detailed points above.

* The User Interface Services Schedule was previously known as the User Gateway Services Schedule.

Summary of Changes to the Legal Drafting

SEC Section	Content
Appendix E	An updated version of the User Interface Services Schedule is set out at Annex F.

4 Provision of Data for the Central Delivery Body (SEC 4)

Summary of Issue under Consideration

Energy suppliers' licence conditions (LC39 for gas, LC45 for electricity) oblige them to set up and fund an independent organisation to lead the national consumer engagement campaign for smart meters. In June 2013 the Smart Meter Central Delivery Body (CDB), now known publically as Smart Energy GB, was established to perform this function.

The licence conditions require larger suppliers to establish a mechanism to allocate capital, fixed operating and CDB engagement activity costs between themselves on a market share basis, as well as to work with smaller suppliers to establish a mechanism to allocate fixed operating costs between all domestic suppliers on a market share basis.

Section E of the SEC already provides for the DCC to routinely obtain relevant data from a range of gas transporters and electricity distributors. We therefore consider it would be economically efficient to require the DCC to provide the CDB with routine summary market share information based on the data that is readily available to the DCC, rather than the CDB building separate systems to obtain and process the data directly. This will also provide consistency in the basis for the allocation of central costs associated with smart meters.

The Government was therefore minded to include an additional Licence Condition in the DCC Licence to allow it to provide the CDB with market share information based on the data readily available in a format that they have agreed. The provision of this information would be subject to confidentiality restrictions being placed on the CDB via an agreement between the CDB and the DCC.

The consultation asked one question on this area:

- **Provision of Data to CDB:** question 42 sought views on the proposed approach and legal drafting in relation to provision of market share information to the CDB including Ofgem determining disputes between the CDB and the DCC

Government Consideration of Issue

31. A subset of stakeholders provided a response to the question. Almost all respondents to this question agreed with the proposal that the DCC should provide market share information to the Smart Meter Central Delivery Body as set out in draft LC45 of the DCC Licence.
32. Furthermore there was widespread support for the view that Ofgem should determine disputes between the DCC and the Smart Meter Central Delivery Body rather than disputes being resolved via independent arbitration with some respondents indicating that they considered that the use of an independent arbiter would be economically inefficient compared to Ofgem performing this function. Only Ofgem expressed a view that an independent arbiter would be preferable as this was a commercial matter however Ofgem do have similar roles in relation to some other energy licences where there is an element of monopoly service provision.

33. One respondent rejected the proposal, however its rejection was based on an incorrect assumption that the CDB already has sourced registration data from Gas Transporters and Electricity Distributors whereas the CDB presently has no right to obtain such data from the energy network companies under the relevant network codes⁶.
34. The DCC set out an alternative approach based on the CDB costs being treated in a similar manner to SECAS costs as a DCC licence pass through item i.e. recharged by the DCC to the relevant SEC Parties under the SEC. This approach would be extremely complex to implement as the DCC’s charging principles do not reflect the differing cost allocation between large and small suppliers within the CSB financial regime. Furthermore, the governance of the CDB is solely between Suppliers via their licences whereas there is wider stakeholder governance under the SEC each with a different approval processes for change. Thus the alternative proposed by the DCC is not considered appropriate as it would require widespread changes to Supply licences, the DCC licence and SEC to ensure the existing CDB charging allocation regimes was preserved within its existing governance structure. Such a step is considered disproportionate given the transitory nature of the CDB.

Summary of Government Conclusion

The DCC licence will be amended to include the additional Licence Condition on the DCC to allow it to provide the CDB with market share information subject to a minor drafting amendment to one of the definitions.

Summary of Changes to the Legal Drafting

Licence Condition	Content
DCC Licence Condition: 45	<ul style="list-style-type: none"> There is a minor change to a definition in LC 45.4 (b) to clarify that the market share data may relate to an historic period.

⁶ Uniform Network Code - <http://www.gasgovernance.co.uk/UNC>
 Master Registration agreement - <http://www.mrasco.com>.

5 Power Outage Alerts (SEC 4)

Summary of Issue under Consideration

Where there is an electricity power supply interruption, smart meters have the functionality to allow Electricity Network Parties (DNOs) to respond in a more timely manner to power outages and to quickly identify the nature of any supply disruption.

For interruptions affecting more than fifty homes, whilst it is important for DNOs to be alerted to power outage events, other monitoring systems will be in place to identify wider network issues. However, for interruptions affecting fewer than 50 homes, the receipt of reliable power outage alerts by DNOs allow them to accurately identify and resolve supply interruptions that impact certain elements of their infrastructure, such as individual homes or low-voltage cables.

Energy suppliers will also benefit from being alerted to power outages as this will help them manage their services to the consumer including arrangements to support getting customers re-connected.

There was one question in this area:

- **Power Outage Alerts:** question 56 sought views on the proposed approach and legal drafting regarding power outage alerts

Government Consideration of Issue

35. The majority of respondents welcomed the proposed approach, noting that it would facilitate improved network management, which in turn would benefit consumers. However, a number of respondents raised significant caveats on the proposed drafting.
36. Five respondents were concerned that the DCC is mandated only to provide all alerts to the DNO where 50 homes (or fewer) are affected. Many argued that a relatively small sample could be misleading, and needed to be as high as 500 to be of practical use in network management. Respondents were also concerned about the DCC's inability to differentiate between faults that occur at different geographic locations at similar times, and to throttle back the number of alerts when they are 'related', (although to note the CSP has no means of establishing any such relation). One Network Operator noted that they are currently working with the DCC to understand how the Power Outage functionality can be best achieved to enable the customer benefits to be delivered.
37. Two respondents requested clarification of the requirement to send alerts originating from Communications Hubs in gas only / gas first premises to electricity Network Operators. One noted that the DCC has confirmed that it will not be possible for DCC to send alerts to electricity Network Operators in these cases and would like this to be reflected in the legal text. Two respondents noted that the proposed drafting does not cater adequately for the technical solutions being proposed by both CSPs and that changes may be needed to reflect them.
38. Two respondents were concerned that any requirement to send duplicate alerts to other SEC Parties should not impact on the overall performance of the DCC's systems, and thus the priority provision of such information to Network Operators in a timely manner. More generally, four respondents asked that the drafting is extended to place specific

performance requirements on the DCC across the end-to-end system, and not simply when the information has been received from the Communications Hub, given its time critical nature.

39. Three respondents queried who should receive power outage alerts. One noted that the facility should be extended to other DCC Users (such as Gas Suppliers) who might otherwise be trying to communicate with a Communications Hub. Two others suggested that Suppliers should be obliged to pass on the information to impacted consumers, and / or their nominated Agents.
40. Two large Suppliers disagreed with the proposed approach, arguing that also automatically sending power outage alerts to Suppliers as well as Network Operators would create additional data processing and storage costs for little consumer benefit. One of these suggested an amendment to allow Suppliers to choose the level of alerts they received (or opt out altogether) – a view supported by the DCC. The second Supplier argued that it may be more appropriate for them simply to access a log of all such alerts, as and when necessary.

Summary of Government Conclusion

When these requirements were previously drafted detail of the proposed DCC solution was not available. Given that there have been significant changes in the way that DCC proposes to deliver Power Outage Alerts, and given the concerns of many respondents it is proposed that DCC and relevant parties work together to devise a solution that meets the requirements of both recipients of Power Outage Alerts and the capabilities of DCC. This will be predominantly concerned with issues over the time within which DCC can return such alerts and the quantity of alerts that can be returned. When this exercise is completed the relevant SEC legal provisions will be drafted with a forecast of Summer 2015 for further consultation.

6 Non–Domestic Supplier Opt Out (SEC 4)

Summary of Issue under Consideration

The consultation noted that, for the non-domestic market, the Government’s position has been that, whilst (with some exceptions) suppliers should install SMETS meters, they should be able to opt into or out of the use of DCC services. In SEC Stage 3, we consulted on a minded to position that all SMETS 2 devices installed by opted-out suppliers should have a SMKI Device Certificate installed on the Device.

The consultation also noted that informal consultations had taken place with industry about extending the obligation so that SMETS 2 meters contain both SMKI Device Certificates and SMKI Organisation Certificates to ensure inter-operability on churn. A briefing paper had been provided to small and non-domestic suppliers and to the Transitional Security Expert Group to explain more about the process for an opted out non-domestic supplier to obtain SMKI certificates.

The consultation stated a minded to position that SMETS 2 meters must have both SMKI Device Certificates and SMKI Organisation Certificates installed whether they are operated by opted in or opted out suppliers. However, given the potential complications for opted out non-domestic suppliers who wish to use the full smart functionality and to operate meters with two-way communications, the Government’s intention was to consult further. The Government has recently published a separate consultation seeking views on the removal of “opt-out”, this consultation can be found at:

<https://www.gov.uk/government/consultations/consultation-on-non-domestic-smart-metering>.

Finally, the consultation noted that, in addition to consideration of the opt-out in the light of SMKI, the Programme had also had wider discussions with suppliers about the practical difficulties of operating a SMETS 2 meter with two-way communications where the meter was opted out of DCC. These difficulties go beyond issues associated with SMKI to interactions that are required by the design of the GBCS. Opted-out suppliers would, in effect, have to create a DCC-type arrangement for two-way communication with a SMETS 2 meter.

There was one question in this area:

- **Non – Domestic Opt out:** question 61 sought views on the operation of SMETS 2 meters that are opted out of DCC services in light of:
 - the conclusions on SMKI set out above; and
 - any other matters, including GBCS, that may affect two-way communications with an opted-out meter?

Government Consideration of Issue

41. There were 16 responses to the question, the majority from suppliers who are active in the non-domestic market. Several respondents expressed some doubts about how SMETS2 meters could be satisfactorily operated whilst “opted-out” of the DCC. Some also raised concerns about the security status of opted-out meters upon churn to opted-in suppliers. Some called for a reconsideration of the opt-out policy.

Summary of Government Conclusion

The Government has recently published a separate consultation seeking views on the removal of “opt-out”, this consultation can be found at:
<https://www.gov.uk/government/consultations/consultation-on-non-domestic-smart-metering>.

The Government does not intend at this stage to consider further detail on the operation of opted-out meters, such as SMKI requirements, because if a decision is taken to remove the opt-out there will be no need for separate procedures or SEC provisions for such devices.

7 User Supplier to Non-User Supplier Churn (SEC 4)

Summary of Issue under Consideration

There may be a period after DCC live operations have commenced when some suppliers have completed User Entry Process Tests to become Users, but others have not yet done so. During this period, a domestic consumer with a DCC-enrolled SMETS 2 smart metering system (SMS) could churn to a supplier which is not yet a User. The SEC 4 consultation proposed a process for suppliers and the DCC to follow in this scenario in order that the outgoing supplier's security credentials are replaced with those of the incoming supplier by use of a 'Non-Gateway Interface.' It was also proposed that the DCC should produce a Non-Gateway Interface Specification to set out, in detail, how the interface will operate, and sought stakeholder responses on the proposed approach and associated legal drafting.

The Government response to the SEC 4 Consultation⁷ stated that the DCC should produce and consult upon a Non-Gateway Interface Specification so that it is ready for incorporation into the SEC two months prior to Interface Testing. Therefore, Section X.9 which contains this requirement was laid before Parliament on 17 November 2014 and came into force on 14 January 2015. This Consultation Response sets out conclusions on Section O, which provides detailed requirements upon the DCC for how the Non-Gateway Interface should operate.

Government Consideration of Issue

42. Following detailed engagement with the DCC on other possible technical solutions for User to non-User churn as detailed in the SEC 4A Response, the Government continues to believe that it is appropriate to implement the non-gateway interface arrangements proposed in the SEC 4 Consultation. The DCC has therefore undertaken a consultation on the proposed Non-Gateway Interface Specification which closed on 19 March 2015 and is available on the DCC website at <http://www.smartdcc.co.uk/documents-and-publications/consultation-documents/non-gateway-interface-specification-consultation/>. The scope of the non-gateway interface extends to any Supplier who is not a DCC User, including both domestic and non-domestic suppliers.
43. As detailed in Chapter 9, the Government proposed in November 2014 that some of the technical arrangements included within section H4, H5 and H6 and Section O3 should be moved into SEC subsidiary documents because of their highly technical nature. In relation to Section O3, this proposed change was reflected in DCC's drafting of the Non-Gateway Interface Specification such that the scope of this subsidiary document incorporated the detailed processing steps that DCC would apply to communications received via the Non-Gateway Interface.

⁷ Government response to consultation on: Stage 4 Smart Energy Code (SEC) content (Part A) and Transitional arrangements in the Smart Energy Code (SEC), and Consultation on additional SEC content, November 2014.

Summary of Government Conclusion

The version of Section O which has been published as part of this document reflects the version of Section O originally consulted upon in June 2014 but with some of the detailed processing steps removed in order to reflect the fact that these will be dealt with in the associated subsidiary document (the Non-Gateway Interface Specification). For example it has been clarified that the Non-Gateway process culminates in the sending of a 'Change of Supplier Update Security Credentials Service Request' from DCC operating as the NGI Party to the "DSP" part of DCC. These are subsequently processed in a manner similar to such Service Requests when received from DCC Users via the DCC Gateway. A small number of other changes have also been made to ensure that the final drafting is consistent with the detail of the Non-Gateway Interface Specification and to link the arrangements in Section O to DCC's obligations on processing Service Requests. Some associated changes to definitions have been made, for example to Non-Gateway Supplier threshold Volume and to DCC Live Systems.

It is recognised that a number of other SEC areas that are being developed may have the potential to require further minor consequential changes to be made to Section O. These include the development of the security arrangements under Infrastructure Key Infrastructure (IKI) to support the submission of Non-Gateway Supplier (NGS) Change of Credentials Requests and the completion of the SEC subsidiary documents under Sections H4 and H5. In addition, we may need to consider consequential changes arising from the DCC consultation on the NGIS which has recently closed. In light of this DECC proposes to wait until these sections of the SEC are further developed before designating the changes to Section O noted above. In line with our past approach of designating the most up-to-date version of Section A (Definitions and Interpretation), the consequential changes to Section A that have been identified will however be designated.

8 Communications Hubs Dimensions (SEC 4)

Summary of Issue under Consideration

In the SEC 4A Government response we concluded that the DCC would be required to consult SEC Parties on the physical dimensions of Communications Hubs under specific circumstances which we set out. We confirmed that the DCC would also be obliged to publish the physical dimensions of any Communications Hubs that it makes available. We also confirmed that the DCC would be required to consult SEC parties on any changes to the financing arrangements for the procurement of Communications Hubs where they could have a material impact on parties.

Government Consideration of Issue

44. We explained in the SEC 4A Government response that legal drafting to give effect to the policy on Communications Hub procurement would be published alongside a future Government response document. The legal drafting can be seen at Annex C attached separately to this document. This legal drafting will now be laid before Parliament and provides for the drafting to come into effect when the SEC is modified to include this drafting.

Summary of Changes to the Consultation Legal Drafting

SEC Section	Content
Section F	<ul style="list-style-type: none">• F4.10 has been replaced with an ongoing requirement for the DCC to publish on its website the physical dimensions of any Communications Hub device models that it makes available.• F4.11 requires the DCC to consult SEC parties on the physical dimensions of the Communications Hub device models that it first made available. This consultation will be undertaken within 18 months (or a shorter period if the SEC Panel so determines) of when a smart metering system is capable of being commissioned with the DCC. DCC is required to give due consideration to the consultation responses received.• F12 requires the DCC to consult SEC parties on the physical dimensions of Communications Hubs prior to committing to their procurement where these Communications Hubs are of a different HAN or WAN variant than those previously procured and/or if their physical dimensions differ to those that have been previously made available. DCC is required to give due consideration to the consultation responses received.• F13 requires the DCC to consult parties on any arrangements (or changes in arrangements) for the financing of procuring Communications Hubs prior to committing to them, where they may have a material effect on parties. The consultation would include DCC's explanation of how the arrangements are consistent with the requirements of the DCC licence and the SEC.
Section X	<ul style="list-style-type: none">• X3.2 (a) will give legal effect to the above requirements (F4.10 to F4.13) on the date that the SEC is modified to include these sections.

9 Movement of some Technical Arrangements into Subsidiary Documents (SEC 4 and SEC 4A)

Summary of Issue under Consideration

There are four sections of the SEC (H4, H5, H6 and O3) which deal with highly technical arrangements associated respectively with Processing Service Requests, Smart Metering Inventory and Enrolment Services and Processing Non-Gateway Communications. We consider that, predominantly due to the highly technical nature of these provisions, it would be more appropriate for the content of these sections to be contained within subsidiary documents rather than being within the main body of the SEC. This approach would also provide flexibility to designate these sections of the SEC pursuant to Condition 22 of the DCC licence and Section X of the SEC.

The following question was asked in this area:

- **Movement of some Technical Arrangements into Subsidiary Documents :** question 10 sought views on the proposal to move four sections of the SEC (H4, H5, H6 and O3) from the SEC into SEC subsidiary documents, and the proposed changes to the legal drafting accommodate this.

Government Consideration of Issue

45. All respondents who commented on this issue agreed that it was reasonable to move the content of H4, H5, H6 and O3 into subsidiary documents. Some respondents expressed concern that the intent of these SEC sections should be maintained if and when they moved into being Subsidiary Documents. Some respondents also requested information on the timetable for publication of these sections as Subsidiary Documents and who would be responsible for drafting them.

Summary of Government Conclusion

The Government proposes to draft these documents (excluding O3 – see below), making changes where necessary for alignment purposes, as a result of previous consultation responses or to fix errors. It is further proposed that the high level text for these sections that is to remain in the SEC (i.e. to set the scope of and enable the Subsidiary Documents) will be incorporated into the SEC in the near future. The text of the Subsidiary Documents that are to replace the content of H4, H5, H6 will be provided for consultation in Summer 2015.

Summary of Changes to the Consultation Legal Drafting

SEC Section	Content
H4: Processing	<ul style="list-style-type: none"> • Conclude on and lay before Parliament the SEC 4A consultation text

Service Requests	
H5: Smart Metering Inventory and Enrolment Services	<ul style="list-style-type: none"> • Conclude on and lay before Parliament the SEC 4A consultation text, but with minor amendment to H5.3
H6: Decommissioning, Withdrawal and Suspension of Devices	<ul style="list-style-type: none"> • Conclude on and lay before Parliament the SEC 4A consultation text with exception of the removal of '[TBC]' in H6.7b

10 SMKI, DCCKI and IKI-related changes (SEC 4 and SEC 4A)

Summary of Issue under Consideration

Our SEC 4A consultation included proposals concerning the DCC's newly defined Public Key Infrastructures (PKIs), DCC Key Infrastructure (DCCKI) and Infrastructure Key Infrastructure (IKI). It also contained proposals to extend the Smart Metering Key Infrastructure (SMKI) for the use of Registration Data Providers (RDPs), introducing changes to DCC eligibility checks concerning the issuance of Device Certificates, and changes to SMKI Certificate Field sizes. The large number of these recent (currently not yet concluded) proposals included changes to a wide spectrum of SEC sections, notably Section A, B, E, L, and Appendices A and B.

Our January 2015 SEC Consultation included the proposal to require the DCC to set up a DCCKI PMA Function and further drafting was proposed in Section L13. Here, we also stated our intent to include new PKI-related SEC content (summarised in this and the above paragraph) in future SEC conclusions.

Question 1 of the SEC 4A consultation sought views on the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure.

Question 2 of the SEC 4A consultation sought views on the proposed approach and legal drafting in relation to DCC Key Infrastructure.

Question 3 of the SEC 4A consultation related to our proposal of permitting Registration Data Providers (RDPs) to become SMKI Authorised Subscribers for Organisation Certificates (to complement the new proposed obligation in Section E for them to sign registration data with an SMKI Private Key).

Question 4 of the SEC 4A consultation related to proposed checks the DCC would have to apply when deciding whether a Party could become a Subscriber for Device Certificates.

Question 5 of the SEC 4A consultation related to our proposal of specifying size restrictions on a number of fields in the structure of Organisation Certificates and Device Certificates.

Question 4 of the January 2015 SEC Consultation sought views in regard to our proposals and legal text in relation to the DCCKI PMA Function.

Question 5 of the January 2015 SEC Consultation sought views in regard to our proposal that, for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State.

There are a number of PKI related areas upon which we intend to consult further in Summer

2015. These include for example updates relating to the recovery procedures, possible changes to expand the scope of IKI to include certificates relating to keys used to secure communications over the Non-Gateway Interface and in relation to Threshold Anomaly Detection and to reflect arrangements in the latest version of GBCS.

Government Consideration of Issue

IKI topic area

46. Question 1 of the SEC 4A consultation sought views on the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure. Nearly all of the twelve respondents to this question agreed with our proposals. Two respondents suggested caveats, and one respondent disagreed with our approach.
47. The DCC highlighted that it is the only Eligible Subscriber for ICA Certificates in accordance with the IKI Certificate Policy (IKI CP), and that it is the only Relying Party of an ICA Certificate. The DCC therefore suggested removing the requirement to place ICA Certificates within the SMKI Repository. We agree with this argumentation and consider it prudent to remove this requirement, since as the DCC is the only relying party, other parties do not need access to IKI Certificates. It is recognised that this proposal may need to be reconsidered in light of any further developments to the use of IKI to secure communications across the non-user gateway and in relation to threshold anomaly detection.
48. One large supplier commented that it may be a more efficient process if the Government's IKI conclusions would be reviewed together with the DCC's IKI Document Set conclusions before finalising the approach taken in the SEC. Another large supplier respondent suggested that SMKI documents should be amended with appropriate cross-references to IKI where necessary. We agree, and can confirm that our conclusions will take into account DCC documentation on the matter, and that SEC consistency will be maintained when incorporating these Subsidiary Documents.
49. One large supplier did not agree with our approach in relation to IKI. This respondent commented that the way the text was drafted caused confusion with respect to the purpose and the role of IKI and its relationship with both SMKI and DCCKI. This supplier also suggested the use of a more explanative term, such as hard token SMKI User Identification Key. We believe the chosen drafting method is justified by the intent of not unnecessarily constraining the DCC's design of the service solution, including into the future. The IKI Document Set now contains much of the information needed to provide further clarity of how the IKI will operate.
50. Two large suppliers commented that it would be of benefit to add definitions for the terms IKI and SMKI. We agree, and have included these in the conclusions version of the legal text.
51. Two large suppliers mentioned they were supportive of the approach taken, but commented that it would be of benefit to further define IKI rules within the SEC, with one of these respondents remarking that this could provide more clarity as to the distinction between IKI and SMKI. We confirm that the legal draft will contain these distinctions in the form of the IKI Document Set that will be included as Subsidiary Documents.
52. One large supplier questioned whether the usage of the word 'person' in paragraph L3.18 of the SEC was correct in all cases. We have reviewed this clause and consider the drafting is appropriate.

DCCKI topic area

53. In our SEC 4A consultation, we stated that as part of its design, the DCC was proposing that communications relating to a number of its services should be subject to specific additional Transport Layer Security (TLS) protection. We outlined that this would apply for example to communications between DCC and DCC Users in relation to Service Requests and associated Service Responses and that the DCC had specified a DCC Key Infrastructure to be used to establish the TLS security. Question 2 of the SEC 4A consultation sought views on the proposed approach and legal drafting in relation to DCC Key Infrastructure.
54. The DCC stated that the DCCKI Interface Design Specification and the DCCKI Repository interface Design Specification are relatively small SEC Subsidiary Documents and that therefore both have been produced as a single document. We agree that for procedural purposes the DCC might wish to produce a single document, although we reiterate the need for a clear separation of issues within this document. These specifications, once ready, will be designated as two separate SEC Subsidiary Documents, as intended by the legal text.
55. A large supplier respondent highlighted that the new DCCKI definitions need to be moved within Section A (Definitions) in alphabetical order to aid the reader. We agree, and have amended the legal text.
56. Another large supplier respondent commented that while the proposed solution was sensible, they were concerned that the DCC was consulting separately on DCCKI policy with a different timescale to the SEC consultation for respondents from interested parties. They sought assurance that both the Government's consultation and the DCC's consultation would ultimately be considered together. We can confirm that the SEC will be compatible with the DCCKI Document Set that will ultimately be designated into the SEC.
57. A further large supplier respondent mentioned that although we stated that the SMKI PMA will receive sight of the DCC's ISO 27001 audit reports generated in relation to ISO 27001 certification, they found no reference to this requirement. This was omitted in error from the legal drafting in our consultation document, and we have included the legal text as part of this response document.
58. Lastly, a large supplier respondent stated that it was difficult to fully assess the DCCKI proposals without more information as to the technical and functional context. This context and further detailed information was provided on the DCC's consultation on the SEC Subsidiary Documents on the matter.
59. Question 4 of the January 2015 SEC Consultation asked respondents whether they agreed with our proposal and legal text in relation to establishing a DCCKI PMA Function. We outlined that the DCC proposed to establish a separate DCCKI PMA Function to oversee DCCKI as part of its overall PKI implementation, and that it was appropriate to recognise the arrangements in the SEC. We proposed to require the DCC in the SEC to establish the DCCKI PMA Function, through which we would require DCC to perform duties similar to the SMKI PMA, but in relation to the DCCKI. Most importantly, its duties include being used as a vehicle through which DCC reviews the effectiveness of the DCCKI Document Set and identifying whether it is consistent with the SEC Objectives, including whether changes should be made to it so the DCC meets its obligations under Section G (Security) of the SEC.
60. Two-thirds of respondents fully agreed with our proposal. The remaining third agreed with our proposal, but suggested caveats to the approach.

61. One respondent suggested inviting a SMKI PMA representative to attend the DCCKI PMA Function meetings, and to further specify the DCCKI PMA Function terms of reference and procedures (such as constitution and quoracy) similar to those of the SMKI PMA, where those were relevant. Notwithstanding the proposed drafting on the DCCKI Function, the DCC retains responsibility for ensuring that DCCKI is appropriate for the purpose for which it is used. It is not proposed to formalise the DCCKI PMA Function in a manner similar to the PMA, but instead that it remains a vehicle through which DCC fulfils its obligations under SEC Section G (Security) and L13, therefore the governance arrangements need to reflect accountability and responsibility for this solution clearly lying with the DCC. For transparency reasons, the SEC provisions allow the SMKI PMA and Security Sub-Committee to request any notification between the DCCKI PMA and the DCC, as well as those parts of the ISO 27001 report that relate to DCCKI. However, to maximise transparency of DCCKI PMA matters, we consider it reasonable to further oblige the DCC to make available to the SMKI PMA and Security Sub-Committee copies of all agendas and supporting papers relating to DCCKI PMA Function material upon request, insofar as those materials are relevant to the functions of the SMKI PMA or Security Sub-Committee. It is possible within the provisions for the SMKI PMA to request the DCC SMKI PMA representative to provide a report to the SMKI PMA of matters considered through the DCC PMA Function.
62. A large supplier respondent outlined that they would like to see a process where the SMKI PMA is given an opportunity to review any changes to the DCCKI SEC Document Set before they are submitted for approval. Since the relevant DCCKI documentation will form part of the SEC, any modification will follow the SEC Section D Modification process. There is therefore no need to outline further provisions around modifications within the SEC.
63. The same respondent suggested further defining how often the DCCKI Document Set needs to be reviewed by the DCCKI PMA Function. Currently, such a review must be undertaken 'periodically', in alignment with the provisions governing the operation of the SMKI PMA. Again, we also do not consider it appropriate to define how the DCC will comply with its obligations under Section G (Security) in practice.
64. The DCC responded that within L13.56 the references to the DCCKI Document Set should exclude the DCCKI Certification Practice Statement (DCCKI CPS), to reflect that this is a confidential document and is not included in the SEC. We agree, and have amended the drafting accordingly.
65. Question 5 of the January 2015 SEC Consultation asked respondents whether they agree that for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State. The vast majority of respondents agreed with our proposal.
66. The three respondents that suggested caveats argued that requirements should be placed on the DCCKI PMA Function to send such notifications to the Transitional Security Expert Group and the SMKI PMA first. We do not believe that this is appropriate since the DCCKI PMA function is an extension of DCC, not a separate body under the Code and it is the DCC, not the PMA function that is required to raise modifications where appropriate to do so under the Code. Where any proposed modification is relevant to the business of the SMKI PMA their views will be sought as part of the enduring modifications process.

SMKI topic area

67. Question 3 related to our proposal of permitting Registration Data Providers (RDPs) to become SMKI Authorised Subscribers for Organisation Certificates (to complement the new proposed obligation in Section E for them to digitally sign registration data with an SMKI Private Key). We proposed to specify that where Network Parties nominate persons to act as RDPs, these Network Parties are responsible for ensuring that RDPs exercise their duties as specified in the Subscriber and Relying Party Agreements (L11 and L12 respectively). We also proposed that where an RDP acts on behalf of more than one Network Party, that RDP would not be required to subscribe to more than one Organisation Certificate.
68. Most respondents agreed with the proposed approach. One large supplier respondent disagreed with our proposal, and one network respondent adopted a neutral stance.
69. The large supplier respondent who disagreed with our proposal expressed the view that the long term integrity of the security arrangements required that access to the SMKI would only be given to SEC Parties. They expressed their concern that if RDPs were given access to the SMKI without being a SEC Party, such a step might set a precedent that other Users would wish to follow in the future that could be detrimental to the rigour of the SEC security arrangements. We do not agree with this argument. RDPs are nominated by Network Parties who themselves are SEC Parties. In accordance with the SEC, Network Parties remain responsible for the actions of their RDPs and for their compliance with security obligations.
70. Another large supplier respondent said that DECC referenced the use of RDP ID in E2.15, however such a term was not used in Section E (Registration Data). Therefore the respondent sought clarification that this did not affect the intent of obligations in Section E (Registration Data). The allocation of RDP IDs is now covered in Section B and extended into the SMKI arrangements and consequently we believe that the drafting in Section E remains appropriate.
71. Question 4 of the SEC 4A consultation related to proposed checks the DCC would have to apply when deciding whether a Party could become a Subscriber for Device Certificates. For the purpose of controlling the issuance of Device Certificates and therefore limiting security risks (e.g. denial of service attacks), we had previously drafted the SEC to require the DCC to apply checks that required verification of both the Device type and the Smart Metering Inventory (SMI) Status of the Device. However the DCC had indicated in its consultation response to the SEC Stage 4 Consultation that, for systems design reasons, it will be unable to implement this requirement from the start of offering live services. In light of this, we proposed to modify the checks the DCC should apply to maintain a secure environment. In line with the policy intent, we proposed to require the DCC to check that an Authorised Subscriber is either a Supplier or the DCC for Devices that are either Commissioned or Installed not Commissioned. We argued that this maintained the policy intent and the security control for the DCC to ensure that only those roles that have a responsibility for equipment in the home could regenerate the Private Keys on Devices.
72. All bar one of the respondents fully agreed with this proposal. One large supplier respondent suggested a caveat to their agreement. Their view is that whilst our proposal is pragmatic, they did not consider it to be 'best practice' and should be reviewed after DCC has commenced live services. We accept that it may be appropriate to review these arrangements post DCC live but remain of the view that the proposed approach is appropriate for initial service provision.

73. Question 5 of the SEC 4A Consultation related to our proposal of specifying size restrictions on a number of fields in the structure of Organisation Certificates and Device Certificates. We proposed to modify the SMKI Certificate profiles to restrict the sizes of fields. As a minimum, we stated that it is important that the Organisation Certificate and Issuing Certification Authority (OCA) Certificate fit inside a ZigBee packet to reduce the amount of ZigBee packets being sent, minimising costs associated with this activity. We also stated that communication speed would also be improved, which is of importance where credentials need to be updated quickly. We also proposed to limit field sizes in Device Certificates to assist in their storage on devices and again to limit ZigBee packet sizes.
74. All respondents to this question agreed with our proposal. The DCC suggested two detailed technical amendments to the Organisation Certificate Policy. We will consider these in detail and may propose further amendments to the Organisation Certificate Policy in the Summer 2015 SEC Consultation.
75. The DCC outlined in response to question 7 of the SEC 4A Consultation that additional security controls must be applied to Test Participants within a testing environment. As a result of the DCC's engagement with prospective Users, and our continued engagement with the DCC, the DCC identified that the SMKI Registration Authority Policies and Procedures (SMKI RAPP) must cater for test certificates. To address this current lack of scope of the SMKI RAPP, we therefore agree to an expansion of the scope of the SMKI RAPP within these conclusions to make provision for such matters in relation to Test Certificates that are being made available to Testing Participants.

Summary of Government Conclusion

We conclude that it is appropriate to make the following amendments:

- We have introduced the definitions of Infrastructure Key Infrastructure and Smart Metering Key Infrastructure and ensured definitions are listed in correct alphabetical order.
- Since the DCC will be the only Eligible Subscriber for ICA Certificates, we have removed the requirement to place ICA Certificates within the SMKI Repository.
- We have made a change to Section L13 to require the DCC to make available to the SMKI PMA as soon as practicable those parts of the ISO 27001 audit report that relate to DCCKI.
- We have amended L13.56 to differentiate between the DCC SEC Documents and the DCCKI Certification Practice Statement (CPS) to reflect the differing modification routes for these documents.
- We have also amended the drafting to oblige the DCC to provide the SMKI PMA or Security Sub-Committee with copies of all agenda and supporting papers from the DCCKI PMA Function at any meeting upon request, insofar as those materials are relevant to the functions of the SMKI PMA or Security Sub-Committee.
- Finally, we have expanded the scope of the SMKI RAPP to make provision for such matters as are necessary or appropriate in relation to Test Certificates that are being made available to Testing Participants.

As noted above, it is expected that further changes to the PKI arrangements will be brought forward for consideration in Summer 2015.

Summary of Changes to the Consultation Legal Drafting

SEC Section	Content
Section A	<ul style="list-style-type: none"> We have added the definitions of Infrastructure Key Infrastructure and Smart Metering Key Infrastructure, as well ensured correct alphabetical ordering to aid the reader.
Section L	<ul style="list-style-type: none"> We amended L3.23 and L5.1 to remove the DCC requirement to place ICA Certificates on the SMKI Repository. We have expanded the scope of the SMKI RAPP in L9.4 to expand the scope of the SMKI RAPP to make provision for such matters as are necessary or appropriate in relation to Test Certificates that are being made available to Testing Participants. L13.56 has been amended to differentiate between the DCC SEC documents and the DCCKI CPS to reflect the differing modification routes for these documents. L13.56 has been amended to oblige the DCCKI PMA Function to provide the SMKI PMA or Security Sub-Committee with copies of all agenda and supporting papers at any meeting upon request, insofar as those materials are relevant to the functions of the SMKI PMA or Security Sub-Committee. L13.58 has been added in line with our proposal that the SMKI PMA will receive sight of DCCKI elements of the ISO27001 audit report in support of its obligation stated in L13.17e.

11 Further Security requirements and Post Commissioning Obligations (SEC 4A)

Summary of Issue under Consideration

In developing the contents of its DCC User Interface Specification for consultation, DCC identified a range of security obligations that it considered necessary to ensure its systems are appropriately protected from those of connected Parties. The DCC therefore proposed amendments be made to the Section G security obligations and associated definitions.

The consultation sought industry views on these changes and the associated legal drafting. These changes broadly fell into the following categories:

- an expansion of the scope of existing Section G obligations into new User Roles and RDPs;
- amendments to the definition of systems which connect to the DCC; and
- the provision of capability for the DCC to take action to protect its systems should a connected Party's systems pose an imminent threat

In addition, the consultation sought views on updated post-commissioning obligations that Users and the DCC will be subject to in respect of Devices they are responsible for.

There were three questions in this area:

Security-Related Requirements & Post-Commissioning Obligations legal drafting:

- Question 7 sought views on whether the proposed changes are necessary and proportionate to protect DCC Systems
- Question 8 sought views on the proposed changes to the post commissioning obligations and associated limitation of liabilities
- Question 9 sought views on at what point the Recovery Key on a meter should be validated

Government Consideration of Issue

76. In relation to Question 7, there was broad support for the proposals from all respondents, although caveats to this support were included in some cases.
77. Regarding the capability for the DCC to temporarily suspend a connection if under imminent threat of compromise, a number of respondents highlighted the importance of ensuring that the DCC was able to effectively protect its systems from security risks emanating from a connecting party. However, some respondents raised concerns about the potential impact on Users, and consumers, of having their connection suspended, even temporarily. The potential impact on customers operating meters in pre-payment mode was highlighted as a key concern.

78. We recognise the impact that the temporary suspension of services may have on a Party and their customers. We have been mindful of these in drafting the relevant SEC obligations to ensure that the decision to temporarily suspend services is only taken in extremis, and then only temporarily. The SEC clarifies the governance and escalation arrangements that will be in place to manage such a situation, and we continue to view these as necessary and proportionate to address the potential risks.
79. It is anticipated that the number and length of suspensions should be very low, as should any impact on consumers. It is expected that suppliers will enable local top-up in this situation in the same way that local top-up will need to be made available during periods of Wide Area Network (WAN) unavailability.
80. In respect of new SEC obligations on Registration Data Providers, two respondents raised concerns in relation to the timing of the changes and the potential for these to increase cost and system development time for RDPs. We agree that it would have been better if these changes had been raised by the DCC at an earlier stage. However, the need to consider such controls is outlined within the ISO/IEC 27001 standard which RDPs are already required to comply with. We do not consider these changes will result in a step change in the level of security that will be applied by RDPs.
81. In respect of SEC Sections G3.8 and G3.9, a number of respondents highlighted that the legal drafting does not meet the policy intention communicated through the SEC 4A consultation document. As such a change will be made to reflect the fact that these obligations are in scope for all Users and RDPs.
82. Within SEC 4A, a change to the definition of User System was proposed that will require the User/RDP System to be Separated from any other system. No significant issues or concerns were raised by respondents in relation to this change. However, in its 7 October 2014 DUIS, REGIS and SSI Code of Connection consultation, the DCC also requested views on these separation obligations. Since the definition is currently included within the SEC, and was consulted on alongside the SEC 4A content, these views have been considered as part of this consultation response.
83. In responding to the DCC's consultation a number of respondents questioned the rationale for the User System definition change, and requested clarity as to the definition of Separate. The changes proposed in SEC 4A aim to reinforce existing SEC Section G obligations to establish security controls at the User/RDP System boundary. Appropriate Separation between systems enables more granular control of the exchange of information between the User Systems/RDP System and any other systems to which they are connected, such that these exchanges are for a legitimate business purpose only.
84. The definition of Separate has previously been considered via consultation. We continue to consider the definition to be an appropriate way of ensuring necessary controls are in place. The definition is necessarily neutral of any specific technological implementation; this provides Users and RDPs with flexibility to implement controls in a way that is specific to their own system and risk assessment.
85. In respect of Question 8 - post commissioning obligations - the underlying requirement to ensure that devices are trusted is now well understood and agreed. In essence this means regenerating the device private key material and checking the integrity of the organisation, root and recovery certificates stored on the device. The steps required to complete the checks, and the consequences of failure to complete them, have been subject to previous consultations and consequential changes. After detailed discussions with both DCC and Users, a set of revised proposals for the resolution of this issue is being developed. Our revised proposals will be consulted on in the Summer of 2015, it is currently expected that these will be based on the following principles:

86. Obligations on the DCC:

- to undertake post commissioning checks with regard to Communications Hub Functions;
- to undertake checks of the recovery certificate on Communications Hub Functions, Gas Proxy Functions and Smart Meters;
- to report on this and on whether other post commissioning actions have been successfully undertaken by the DCC and Suppliers.

87. Obligations on Suppliers:

- to undertake post commissioning checks with regard to Gas Proxy Functions and Smart Meters.

88. Obligations on Suppliers and DCC:

- not to communicate with devices where the post commissioning checks have not been performed within seven days of commissioning, other than to complete the post commissioning checks or to maintain the supply of energy.

89. It is expected that these revised proposals will include a degree of reliance on DCC monitoring. This will include monitoring whether the relevant checks have been carried out and performing a check on the recovery certificates held on each relevant device. As there was no monitoring available previously, it had been proposed that the liability for any adverse consequences of failing to carry out these actions would be unlimited. Given that there will now be visibility of where these actions have not been completed, it is thought that a special liability regime is unwarranted. As such it is envisaged that the drafting currently in sections M2.7 and M2.8 will be deleted as part of the package of measures to implement this.

90. The details of these arrangements are still to be finalised, including whether any additional arrangements are necessary to manage Change of Supplier where these actions have not been completed. The precise details of DCC's reporting arrangements are also yet to be defined. It is proposed that the full set of Post Commissioning Obligations will be published for consultation in the Summer of 2015.

91. Regarding the point at which the recovery key should be validated (Question 9), a range of views were provided to the consultation question. A minority of respondents were in favour of allowing the validation to be completed prior to installation, with a slightly larger minority expressing a preference for checks to be completed after installation. The remainder of respondents provided no clear view either way.

92. Whilst enabling checks to be performed prior to installation will provide suppliers with flexibility in approach, no realistic view was provided by respondents as to how this check might reasonably be performed. Completing the checks after the commissioning process should be relatively easily absorbed into new business processes that will be developed by suppliers, and should not result in significant additional cost. Given the lack of consensus that resulted from the consultation we will continue to require the recovery key to be checked after the commissioning of a Device.

Summary of Government Conclusion

Question 7: Based on the consultation responses the proposed changes are considered to be necessary and proportionate to protect DCC Systems. We will implement the proposed

text set out in the SEC 4A response.

Question 8: We remain committed to ensuring responsible parties validate the integrity of cryptographic key material on a Device after the commissioning process has been completed. Given industry views on the proposed legal drafting we will be consulting on revised arrangements later this year.

Question 9: Given the lack of consensus that resulted from the consultation we will continue to require the recovery key to be checked after the commissioning of a Device, although we are continuing to investigate whether a DCC solution to this may also be possible and, further details and legal drafting will be consulted on later this year.

Summary of Changes to the Consultation Legal Drafting

SEC Section	Content
System Security and Obligations on Users - Sections: G, E, M and H	<p>G1.7: The revised text consulted on as part of SEC 4A will be concluded on as drafted.</p> <p>E2.14: The revised text consulted on as part of SEC 4A will be concluded on as drafted.</p> <p>H10.1 – H10.3: The revised text consulted on as part of SEC 4A will be concluded on as drafted.</p> <p>M2.7 and M2.8: The revised text consulted on as part of SEC 4A will be reviewed as part of the changes to post commissioning obligations. The current view is that it may be appropriate to delete these sections, although revised text will be consulted on later this year.</p> <p>G3.8: Amended to align with the consultation position. All Users are subject to the obligation.</p>

12 Notifying new commencement dates for SEC testing phases (January 2015 Consultation)

Summary of Issue under Consideration

Given the new DCC plan⁸, the anticipated start date of Systems Integration Testing (SIT) has moved. We proposed new SEC provisions to allow the Secretary of State to direct the DCC to notify a new start date for SIT.

We also proposed that it would be prudent to provide the ability for the Secretary of State to direct the DCC to notify a new start date for any previously notified start date in relation to any of the testing phases set out in the SEC. This would help provide flexibility and ensure that start dates for test phases in the DCC delivery plan could be amended when required.

The following question was asked in this area:

- **Notifying new commencement dates for SEC testing phases:** question 1 sought agreement on the proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing.

Government Consideration of Issue

93. All 14 respondents fully agreed, or agreed with caveats to this question.
94. The majority of those respondents who agreed with caveats to this question expressed their view that prior to the DCC's notification of a new start date for a testing phase (when directed to do so by the Secretary of State), the DCC should consult with industry on what this revised date should be. In particular, respondents were concerned that test phases could be moved at short notice, and that the proposals could be misconstrued as suggestive that a laissez-fair approach will be adopted to any subsequent delays. One respondent also argued that the degree of change to commencement dates should define the level of consultation required. We agree, and based on these responses we consider that a mechanism for appropriate consultation prior to a new notification of a testing phase start date should be included in the regulation. Given the variety of fora that may be used to inform and consult with stakeholders in relation to revised testing timings, this regulatory solution needs to allow flexibility for the Secretary of State to direct with whom (if anyone) the DCC needs to consult in the particular circumstances of the case. In any case, the new start date notification must be given at least three (SIT, SRT), or six (IT, End-to-End Testing) months in advance of such revised date (or such shorter period as directed by the Secretary of State).
95. This flexibility also extends to allowing the Secretary of State to direct the DCC to make consequential amendments to the relevant Approach Document as part of a direction for notifying a new start date for a testing phase.

⁸ <https://www.gov.uk/government/speeches/smart-meter-delivery-plan>

96. Another respondent mentioned that the change to a date of testing phases might impact the start date of User Entry Process Testing (UEPT) and SMKI and Repository Entry Process Testing (SREPT), and that such impact should be clarified. We agree that a dependency exists between these activities, and that any revision of dates for testing phases could impact UEPT and SREPT as well. However if the timing of SREPT changes as a consequence of a revised test date, it will be consequentially amended within the relevant SRT Approach Document. The start date for UEPT is linked to the start date of Interface Testing pursuant to Section X3.2. Therefore we do not consider that there is a regulatory timing problem that would need to be solved in relation to UEPT/ SREPT.
97. In addition, one respondent asked whether the drafting would not better be phrased as 'any revised date', and not 'the revised date' from that previously notified, so as not to suggest that a revision will in all cases occur in relation to Interface Testing, SMKI and Repository Testing (SRT) and E2E Testing. We believe the legal drafting does not suggest that a re-notification will in all cases occur.
98. Lastly, one respondent suggested that the legal text is separated from the existing paragraph that includes the provision that allows the Secretary of State to shorten the period between publication of the relevant Approach Document and the start of the relating testing phase. This would clarify that the Secretary of State can direct the DCC to issue a new start date. We agree that this would improve clarity but are mindful that a split to a new paragraph would consequentially impact other documents. Therefore we have moved the relevant legal text to the end of the relevant paragraph.
99. We have also made an amendment in relation to the SRT Section (T5) of the SEC. Currently the DCC is obliged to publish the SRT Approach Document three months ahead of SIT and Large Suppliers must ensure they meet the entry criteria stated within it prior to Interface Testing (IT).⁹ In light of the Secretary of State's approval of the DCC's alternative delivery plan¹⁰ the timelines resulting from such linkages are not appropriate. For example, SREPT (a part of SRT) were previously expected to commence during IT. The new start date for SREPT is November 2015, with the new start date for IT being February 2016. To address this inconsistency, we have amended the drafting to state that activities relating to Large Supplier readiness for SREPT must be completed prior to SREPT, rather than SIT or IT. These amendments allow for the original intent of those provisions to be retained in the light of DCC plan changes
100. Similarly, we have amended the SRT Objective to retain the original intent of this provision in the light of DCC plan changes. Previously, the SRT Objective stated that the DCC demonstrates that it 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 the levels of activity reasonably anticipated during the relevant period of Interface Testing. Given the new DCC plan, this link to Interface Testing is not appropriate anymore as live SMKI Certificates will be available earlier. We have amended the legal draft to reflect the period between the availability of live SMKI Certificates and date from which Smart Meters are capable of being Commissioned pursuant to Section H5 (Smart Metering Inventory and Enrolment Services). We have also made consequential amendments to Section X (Transition).

⁹ The DCC is consequently required to assess Large Supplier readiness prior to IT.

¹⁰ <https://www.gov.uk/government/speeches/smart-meter-delivery-plan>

Summary of Government Conclusion

We will adopt the text proposed in the January SEC Consultation which allows the Secretary of State to direct the DCC to issue a new start date for a specified testing phase with the addition that the DCC must consult on any revised testing phase start date with any such person identified by the Secretary of State. This includes allowing the Secretary of State to direct the DCC to consequentially revise the relevant Approach Document, and that the new start date notification and revised Approach Document must be published at least 3 (SIT, SRT), or six (IT, End-to-End Testing) months in advance of such revised date or such shorter period as the Secretary of State directs.

Furthermore we have de-linked the objective and activities relating to SRT from requiring action prior to SIT/IT to requiring action prior to SRT. We have consequentially amended Section X (Transition) to remove the link to Interface Testing that gives effect to relevant provisions of Section L (Smart Metering Key Infrastructure and DCC Key Infrastructure), to instead state that they will have effect when first incorporated into the SEC.

Summary of Changes to the Consultation Legal Drafting

SEC Section	Content
Section T: Testing During Transition	<ul style="list-style-type: none"> We have added to the legal text in T2.11, T3.13, T4.9, T5.11 so as to require the DCC to consult on a revised date for testing phases with such persons identified by the Secretary of State, and to allow the Secretary of State to direct consequential revisions to the relevant Approach Document. We have amended T2.18, T3.23, T4.13 and T5.18 to distinguish the provision from the consequential amendments to the relevant Approach Document referenced in T2.11, T3.13, T4.9, T4.13 and T5.11. We have amended T5.2 to reflect the period between the availability of live SMKI Certificates and date from which Smart Meters are capable of being Commissioned pursuant to Section H5 (Smart Metering Inventory and Enrolment Services). We have amended the provisions of T5.4, T5.5, T5.11 and T5.13 to link to SREPT, rather than SIT or IT, to ensure consistency in the light of DCC plan changes. Section X3.2 has been amended to give effect to relevant Section L (Smart Metering Key Infrastructure and DCC Key Infrastructure) provisions when they are first incorporated into the SEC.

13 Testing (SEC 4A & January 2015 Consultation)

Summary of Issue under Consideration

Testing of systems by third party providers (SEC 4A)

We sought views on whether the SEC should be amended to enable third parties who wish to provide services or systems to prospective Users to undertake testing 'in their own right' to demonstrate that their systems would meet the requirements that the User faces under the SEC when undertaking entry process tests. This would allow these companies to test their system prior to a Party seeking to use it when undertaking User Entry Process Testing and SMKI and Repository Entry Process Testing. It would also enable the Party to rely on proof obtained previously that the system had met the requirements of those tests and possibly enable additional Parties who are using the same system to rely on part or all of that system's previous test results, obviating the need to repeat the same tests when undertaking UEPT or SREPT. Recognising that providing for companies to undertake these tests should support competition and market entry, we proposed amending the User System Tests requirements, which are provided to enable Parties to test interoperability of User systems.

Access to remote testing services for non-SEC Parties (SEC 4A)

We noted that, based on our understanding of the remote service provision being offered by DCC, it was possible that access to a remote test facility would only be available via a DCC Gateway Connection, which in turn is only open to SEC Parties, and that therefore any Testing Participant wishing to access the remote test service would need to become a SEC Party to establish a DCC Gateway Connection. We sought views on the extent to which this requirement might impact on prospective users of the remote test service.

Informal Testing (January 2015)

The DCC proposed offering an 'informal testing service' in its consultation on changes to the DCC plan and Implementation Milestones¹¹. The SEC does not currently refer to this informal testing service.

We proposed in the Consultation that provisions should be introduced to the SEC to require the DCC to take 'reasonable steps' to provide informal testing (both pre-User Integration Testing and GIT for Industry (GFI)). We proposed that the DCC would be able to define the scope of the informal testing service and that it and test participants would be bound by a SEC requirement to follow good industry practice when undertaking informal testing, but the DCC would set out any detailed requirements outside the SEC for parties wishing to utilise the service.

¹¹ http://www.smartdcc.co.uk/media/22083/dcc_conclusions_on_dcc_re-plan_consultation.pdf

Government Consideration of Issue

Testing of systems by third party providers

101. Of the 10 responses to this question, 8 agreed, or agreed with caveats to the proposals in this area.
102. DCC supported the proposals, on the condition that they can review the results of previous tests and can request that additional testing should be undertaken before the organisation can be deemed to have passed its UEPT and SREPT. It also noted that it should be able to understand the relationship between any shared service provider and any SEC Party on whose behalf it would be engaging with DCC. The SEC drafting provides for evidence of meeting test requirements to be provided and the relevant subsidiary documents will set out exit criteria for successful completion of such tests. However the service provider would be a SEC Party and the Government does not consider that the DCC should be privy to the relationship between it and the parties to whom it is providing services.
103. The vast majority of suppliers supported the proposals. One large supplier, along with two network parties did not support the proposal for DCC to smear the costs of this testing across SEC Parties.
104. We maintain the view that providing for companies to undertake these tests should support competition and market entry because it supports the development of alternative ways of utilising systems that interface with the DCC. Given the broad support of respondents in response to this question, we will incorporate the proposed changes to H14 of the SEC, to make it more explicit that this test service provides for those companies to do this, as set out in our November consultation. We expect the End-to-End and Enduring Test Approach Documents which the DCC produces to set out how Parties can apply to undertake these tests.
105. Whilst some respondents noted their disagreement to the proposed smearing of costs associated with these tests, we do not propose amending our approach, which is consistent with the SEC charging provisions for other testing services, including UEPT.

Access to remote testing services for non-SEC Parties

106. Eleven respondents provided comments on the issue of whether, for the purposes of undertaking remote testing against DCC systems, Testing Participants must have established a DCC Gateway connection and therefore be a SEC Party.
107. Most respondents were either neutral regarding the issue of what arrangements would be most appropriate, or supported the principle that those wishing to test with the DCC should be able to access a DCC Gateway connection and become a SEC Party.
108. The DCC noted three options for how a remote testing service could be provided from a technical perspective. These included one where each Testing Participant would need to develop or acquire testing software to generate Service Requests for which they must use a DCC Gateway Connection in order to test remotely (considered by DCC as the default position). As an alternative, DCC suggested that they may be able to offer a limited service user emulator for testing participants wishing to test devices. Finally, DCC noted that it could provide a hosted or distributed testing solution to enable Testing Participants to generate service requests (either via a DCC Gateway Connection or an alternative means of connection). DCC stated that the first option would be the preferred one for all test participants.

109. In considering the relative benefits of each option, DCC noted that this would be dependent on the level of demand for remote testing of devices in the absence of supporting User systems.
110. Ultimately, our aim is to ensure that there are no barriers to the development of a broad and competitive market for smart metering devices, and that testing participants who wish to test devices against the DCC system are able to do so, remotely if they wish. Where demand exists, we would support the provision of other solutions beyond the first option proposed by the DCC – including the establishment of a limited service user emulator – and we would encourage DCC and industry to continue to consider the demand, viability and merits of developing an alternative in light of the DCC re-plan, the availability of GFI and the cost-effectiveness of any alternative option against the costs of establishing a DCC Gateway Connection. We will support this process through our continued engagement with DCC and industry. We do not intend to make any amendments to the SEC at this time, but will consider making further changes to the SEC to reflect any ongoing discussions between DCC and industry.

Informal Testing

111. There was broad support for the provision of informal testing. Most respondents considered that the introduction of informal testing could help to mitigate risks to delivery costs and schedules introduced by the DCC re-plan and that the service should be made available as soon as is possible.
112. While most respondents agreed with the proposed strength of obligations on the DCC to offer informal testing (i.e. a reasonable steps obligation), there were less consistent responses on how the DCC should set the detailed rules for the service. Many parties felt the proposals were pragmatic but others suggested that a more formalised and consultative approach was needed to ensure that the DCC did not create unnecessary barriers to entry into informal testing and that it provided a service that was sufficient in scope (for example, many parties felt that informal testing should cover all service requests and GBCS messages).
113. There were also several comments that the DCC should develop the detailed rules through the Testing Design and Execution Group (TDEG) and should set out these rules in the Guide for Test Participants.
114. We are aware that the DCC has held several TDEG meetings with parties to seek to agree the scope of informal testing and is endeavouring to meet User expectations without compromising its ability to support the formal test phases. The DCC is developing the scope and rules for informal testing and we believe that this approach strikes the right balance between developing the informal testing service and its other delivery commitments and that further strengthening of the obligations is not necessary.
115. A number of respondents queried whether the DCC would be required to provide informal testing services on an enduring basis. H14 of the SEC already provides for DCC to offer Device and User System testing on an enduring basis. During informal testing this will be offered in a much more limited form. To that end, the intention is that the transitional variations described in the letter of direction will cease to apply once enduring testing commences.
116. Several detailed comments were received on the content of the direction letter. Several parties noted that the ETAD was unlikely to be available in time to support informal testing. We acknowledge that the ETAD need not necessarily be used in the way

envisaged in the consultation and so the revised drafting below provides the DCC with the flexibility to determine where these rules are set out.

117. The DCC also noted that informal testing was not envisaged to provide an early test environment for the Self Service Interface. We agree that this was not the intention of informal testing and so have amended the direction letter to make this clear. There were also queries from respondents on whether Section M needed to be dis-applied, however, we concluded that no amendments were needed with regards to these matters in the direction letter. For liabilities parties will use the informal testing services at their own risk, and liability for physical damage (including data loss) only accrues to the extent that such physical damage occurs as a result of a party not behaving in accordance with good industry practice. As is required in the Smart Energy Code, we will shortly be consulting on the date when these informal testing provisions are activated.

Summary of Government Conclusion

Testing of systems by third party providers

We will incorporate proposed drafting changes into the SEC which enable third-party providers to undertake tests equivalent to User Entry Process Tests and SMKI and Repository Entry Process Tests. The costs of undertaking these tests will be smeared among SEC Parties.

Access to remote testing services for non-SEC Parties

We would encourage DCC and industry to continue to consider the viability and merits of, and demand for, developing an alternative mechanism by which remote device testing can be undertaken without having to rely on a User System or to establish a DCC Gateway Connection. We will not introduce SEC amendments at this stage to support such alternatives but will support this process through our continued engagement with DCC and industry.

Informal Testing

We consider that the strength of obligations on the DCC to provide informal testing are appropriate and support the DCC's activity through TDEG to involve stakeholders in the development of the detailed rules for the service. The Government has made a number of minor amendments to the direction letter to reflect comments received during the consultation which will be issued shortly.

Supporting changes to H14

We are also activating several minor alterations to the legal drafting in H14 to ensure that the SEC text is consistent and reflects our policy conclusions in this area. These are described in the table below.

Summary of Changes to the Consultation Legal Drafting

SEC Section	Content
H14	<ul style="list-style-type: none"> • Incorporated proposed text in H14.20, H14.29, H14.31 and H14.32 relating to testing of systems by third party providers, as set out in our January consultation document • Incorporated proposed changes to H14.7 to require Testing Participants who are not SEC Parties to enter into a bilateral agreement with the DCC to receive testing services.
Schedule 7 of the SEC	<ul style="list-style-type: none"> • This is the specimen Enabling Services agreement referred to in H14.7 which will form the bilateral contract between DCC and non-SEC Party Testing Participants.
Direction letter activating requirements for informal testing	<ul style="list-style-type: none"> • Amendments to drafting in paragraph 4b of the Direction Letter to remove a reference to the Self-Service Interface. • Amendments to drafting in paragraph 4d of the Direction Letter to remove a reference to the Enduring Test Approach Document;

14 Changes to when Communications Hubs can be ordered and associated forecasts are required to be submitted (January 2015 Consultation)

Summary of Issue under Consideration

We confirmed in the January consultation that once a planned date for DCC live operations has been set ('DCC Live'), the Secretary of State will consult on the designation of a new Initial Delivery Date for communications hubs and the date for the entry into force of Section F5 of the SEC which sets out regulation for the forecasting and ordering of communications hubs. We also stated that it was our intention that the Delivery Date will be approximately one month prior to 'DCC live'. We confirmed that the new Initial Delivery Date would be designated and F5 would be in force reasonably in advance of when Parties will be required to submit their first forecasts for communications hubs.

We also pointed out that there was scope for forecasting arrangements to be standardised between the first and subsequent forecasts such that a forecast will always be submitted during the month ending 10 months in advance of the relevant delivery month; this change could be made under Section X3.3 of the SEC, which allows the Secretary of State to direct this change on designating the date from which Section F5 is to have effect.

The following question was asked in this area:

- **Changes to when Communications Hubs can be ordered (Jan 2015 Consultation):** question 6 sought views on whether the duration of the period between the submission of the first forecasts of communications hub orders by SEC Parties and the first delivery should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month

Government Consideration of Issue

118. There was strong support from respondents for the Government's proposal that the length of the period between the submission of the first forecasts of communications hub orders by SEC Parties and the first delivery should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month. One small supplier remarked that a 6 month period would be more appropriate. However the Government was not consulting on whether the overall lead time should be shortened, rather whether the lead time for the first forecast should align with that of subsequent forecasts. The Government concludes that the initial forecast should be provided 10 months in advance of the initial delivery month.

Next Steps

Following the recent announcement that 1 April 2016 would be the earliest date at which DCC Live would commence¹², the Government will shortly consult separately with SEC Parties, the SEC Panel and Ofgem on proposed timings for the activation of regulation in the SEC related to the submission of Communications Hub forecasts and orders by SEC Parties to the DCC. The timings for F5 of the SEC coming into force, the specification of the Initial Delivery Date for communications hubs and the 10 month lead time for submission of the first communications hub forecast are set out in that consultation. Subject to the outcome of its consultation, the Government intends to confirm these dates at the end of April 2015, and introduce them into regulation through a letter of designation shortly thereafter.

¹² DCC re-plan: Secretary of State Direction:

www.smartdcc.co.uk/media/22078/dcc_replan_-_sofs_direction_v1_0_-_final.pdf

15 Minor consequential change to Electricity and Gas Supply Licences (January 2015 Consultation)

Summary of Issue under Consideration

We sought views on a consequential change to the definitions of 'Relevant Electricity Meter' and 'Relevant Gas Meter' in the electricity and gas supply licence conditions relating to 'Roll-out Reporting, Setting and Achieving Annual Milestones, and Provision of Information to the Authority' (condition 44 of the electricity supply licence and 38 of the gas supply licence). This change is required to correct an unintentional effect of previous changes made on 21 March 2014 which aimed to clarify the provisions for the installation of advanced meters under the exception to the roll-out obligation. These previous changes had the effect of limiting the scope of these licence conditions, which meant that the information requirements ceased to apply to those current transformer meters, advanced meters and large gas meters that had been installed under the exceptions to the roll-out obligation. This was not the intention.

We proposed a consequential change to correct the unintended effects of the changes made in March 2014 by amending the definition of the terms 'Relevant Electricity Meter' and 'Relevant Gas Meter' in the respective licence conditions in order to revert to the original position by encompassing all current transformer meters, advanced meters and large gas meters that have been installed under the exceptions to the roll-out obligation.

Legal drafting on the proposed changes was provided alongside the consultation.

The following question was posed:

- Q7 asked sought views on the consequential changes we proposed to the electricity and gas supply licence conditions on information requirements by Ofgem for monitoring and evaluation.

Government Consideration of Issue

119. A substantial majority of respondents agreed with our proposed consequential changes to the electricity and gas supply licence conditions. Only one respondent, a small energy supplier, disagreed, commenting that it would result in an additional reporting burden. We do not consider that the change will result in an additional burden on Parties. It will correct the consequences of a previous change which had unintentionally limited the scope of licence conditions and therefore reinstates the original policy intent.

Summary of Government Conclusion

The definitions of 'Relevant Electricity Meter' and 'Relevant Gas Meter' in the electricity and gas supply licence conditions relating to 'Roll-out Reporting, Setting and Achieving Annual

Milestones, and Provision of Information to the Authority' (condition 44 of the electricity supply licence and 38 of the gas supply licence) will be amended such that information requests by the Authority could apply to current transformer meters, advanced meters and large gas meters that have been installed under the exceptions to the roll-out obligation.

Summary of Changes to the Gas and Electricity Supply Licence Conditions	Content
Gas Supply Licence Condition 38.17	The definitions of the terms 'Relevant Gas Meter' in the licence conditions have been amended to refer to all exceptions in the relevant roll-out licence condition so that the term 'Annual Milestone' reverts to including the number of advanced meters, current transformer meters and large gas meters that have been installed under the exceptions to the roll-out obligation.
Electricity Supply Licence Condition 44.17	The definitions of the terms 'Relevant Electricity Meter' in the licence conditions have been amended to refer to all exceptions in the relevant roll-out licence condition so that the term 'Annual Milestone' reverts to including the number of advanced meters, current transformer meters and large gas meters that have been installed under the exceptions to the roll-out obligation.

16 Glossary

This section provides a glossary of the principal terms used in this document.

A complete set of definitions and interpretations of terms used in the SEC can be found in Section A of that document.

The definitions in this glossary are not intended to be legally precise, but instead to assist in understanding the consultation document.

Alert

A message from a Device or from DCC and sent as a DCC Alert or a Device Alert to a DCC User across the DCC User Interface.

Command

A message sent by the DCC to a Device over the SM WAN (or to a DCC User over the User Interface to be executed locally) in order to instruct the Device to carry out an action.

Commissioned

A Device status recorded in the Smart Metering Inventory. The steps a Device must go through to be Commissioned vary by Device type, but essentially this status is achieved when: the Device has been added to the Smart Metering Inventory; it has been demonstrated that DCC can communicate with it (and vice versa) over the SM WAN; and its relationship with either the Communications Hub Function or a Smart Meter has been established.

Communications Hub

A device which complies with the requirements of CHTS and which contains two, logically separate Devices; the Communications Hub Function and the Gas Proxy Function.

Communications Hub Function

A Device forming part of each Smart Metering System which sends and receives communications to and from the DCC over the SM WAN, and to and from Devices over the HAN.

Communications Hub Technical Specifications (CHTS)

A document (which is to form part of the SEC) which sets out the minimum physical, functional, interface and data requirements that will apply to a Communications Hub.

Communications Service Provider (CSP)

Bodies awarded a contract to be a DCC Service Provider of communications services to DCC as part of DCC's Relevant Services Capability. Arqiva Limited and Telefónica UK Limited have been appointed to provide these services.

Core Communication Services

The services associated with processing a specific set of Service Requests set out in the DCC User Interface Services Schedule in a manner that involves communication via the SM WAN, but excluding the Enrolment Services.

Correlate

A check, to be carried out by DCC Users, to ensure that the Pre-Command created by DCC after transforming a Critical Service Request is substantively identical to the original Service Request.

CoS Party

A separate part of the DCC, responsible for signing critical Commands to update a Supplier's Security Credentials on a Device following the submission of a 'CoS Update Security Credentials' Service Request by an incoming Supplier to the DCC.

Data and Communications Company (DCC)

The holder of the Smart Meter communication licence, Smart DCC Ltd.

Data Service Provider (DSP)

The company awarded a contract to be a DCC Service Provider of data services to DCC as part of DCC's Relevant Services Capability. CGI IT UK Limited has been appointed to provide these services.

DCC Licence

The licence awarded under section 7AB of the Gas Act 1986, and the licence awarded under section 5 of the Electricity Act, each currently authorising Smart DCC Ltd to undertake the activity of providing a Smart Meter communication service.

DCC Service Providers

Companies or persons from whom DCC procures Relevant Services Capability; principally the DSP and the CSPs.

DCC Systems

The systems used by the DCC and its DCC Service Providers in relation to the Services and / or the SEC, including the SM WAN but excluding the Communications Hub Functions.

DCC Total System

All DCC Systems and Communications Hub Functions within the control of DCC.

DCC User

A SEC Party who has completed the User Entry Processes and is therefore able to use DCC's Services in a particular User Role.

DCC User Interface

The communications interface designed to allow appropriate Smart Metering communications to be sent between DCC Users and the DCC.

DCC User Interface Services Schedule

The SEC Subsidiary Document summarising the services available to Users across the User Interface and specifying a number of other matters such as eligibility to receive those services.

Device

One of the following: (a) an Electricity Smart Meter; (b) a Gas Smart Meter; (c) a Communications Hub Function; (d) a Gas Proxy Function; (e) a Pre-Payment Interface Device; (f) a HAN Controlled Auxiliary Load Control; or (g) any Type 2 Device (e.g. IHD).

Distribution Network Operators (DNOs)

Holders of electricity Distribution Licences.

Elective Communications Services

The services associated with processing of Service Requests that are (or are to be) defined in a Bilateral Agreement (rather than the DCC User Gateway Services Schedule) in a manner that involves communication via the SM WAN (provided that such Service Requests must relate solely to the Supply of Energy or its use).

Electricity Smart Meter

A Device meeting the requirements placed on Electricity Smart Metering Equipment in the SMETS.

Eligible User

A DCC User who, acting in a particular User Role, is eligible to receive particular DCC Services, including in relation to a particular Device.

End-to-End Smart Metering System

Any DCC System, Smart Metering System, User System or RDP System.

Enrolled

The status of a Smart Metering System when the Devices which form part of it have all been Commissioned.

Enrolment Services

Services associated with the processing of Service Requests that are involved in the commissioning of Devices in the Smart Metering Inventory, and establishing their inter-relationships, and which ultimately result in the Enrolment of Smart Metering Systems ready for communication via DCC over the SM WAN.

Foundation stage

The period prior to the start of the mass roll-out stage.

Gas Proxy Function

The functionality in the Communications Hub specific to its operation as a data store of the gas meter's operational data.

Gas Smart Meter

A Device meeting the requirements placed on Gas Smart Metering Equipment in the SMETS.

GB Companion Specification (GBCS)

A document setting out amongst other things, the detailed arrangements for communications between the DCC and Devices and the behaviour required of Devices in processing such communications.

Hand Held Terminal (HHT)

A HAN-connected Device used by authorised personnel for meter installation and maintenance purposes.

Home Area Network (HAN)

The means by which communication between Devices forming part of Smart Metering System takes place within a premises.

Initial Live Operations

To realise the benefits as currently planned in the IA, we are expecting key programme participants to have the following minimum set of operational capabilities to support Initial Live Operations (ILO) in December 2015:

- The DCC will have built and tested its data and communication systems for SMETS 2 equipment and be operationally ready (e.g. service desk, call centres, logistics) to serve its users – principally energy suppliers and network companies.
- All of the large energy suppliers will be capable and ready to use the DCC services, start installing SMETS 2 smart meters and offer basic services to both credit and pre-payment customers.
- Gas and electricity distribution network operators will be capable and ready to support the installation of smart meters. Electricity DNO's will also be capable and ready to use the DCC service to improve network management by receiving and responding to alarms and alerts.

In-Home Display (IHD)

An electronic Device, linked to a Smart Meter, which provides information on a consumer's energy consumption and ambient feedback.

Mass roll-out stage

The period between the date at which the DCC starts providing Core Communications Services and the fulfilment of the roll-out obligation as specified in the roll-out licence conditions.

MPAN

The Meter Point Administration Number, being a unique reference number for each metering point on the electricity distribution network and allocated under the Master Registration Agreement (defined in Section A of the SEC).

MPRN

The Meter Point Reference Number, being a unique reference number for each metering point on the gas distribution network and allocated under the Uniform Network Codes (defined in Section A of the SEC).

MPxN

A collective reference to the MPAN and MPRN.

Network Operators

A collective term for holders of electricity distribution licences and gas transportation licences.

Outage Detection

The ability for an electricity supply interruption to be identified and communicated to the SM WAN.

Parse

The conversion of Service Responses and Alerts received from the DCC over the DCC User Interface into a more user-friendly format.

Parse and Correlate Software

Software to be provided by the DCC which enables the carrying out of the Parse and Correlate activities.

Party (SEC Party)

A person that has acceded to the SEC Framework Agreement.

Pre-Command

A message generated as part of the processes of converting of Service Requests into Commands, i.e. after Transformation by DCC. For Critical Service Requests, Pre-Commands

are returned to the DCC User for correlation and signing after DCC has transformed the Service Request.

RDP System

The systems used by, or on behalf of a Network Operator for the collection storage, back-up, processing, or communication of Registration Data (defined in Section A of the SEC) prior to being sent to DCC.

Registration Data Provider (RDP)

A person nominated by a Network Operator to provide Registration Data to DCC under the SEC.

Release Management

The process adopted for planning, scheduling and controlling the build, test and deployment of releases of IT updates procedures and processes.

Relevant Services Capability

The internal and external resources which the DCC relies upon in order to provide services as part of its Mandatory Business.

SEC Panel

A Panel of persons drawn from the energy industry and consumer organisations who oversee governance of the Smart Energy Code, subject to the regulatory oversight of Ofgem.

SECAS

The company appointed and contracted to SECCo to carry out the functions of the Code administrator and the Code Secretariat - Gemserv.

SECCo

A company established under the SEC, owned by SEC Parties and which acts as a contracting body for the SEC Panel.

SEC Subsidiary Documents

Documents that are referenced by and forming part of the SEC, and thus subject to the SEC modifications Process.

Service Request

A communication to the DCC over the DCC User Interface (and in a form set out in the DCC User Interface Specification) that requests one of the Services identified in the User Interface Services Schedule (or, in future an Elective Communications Service).

Service Response

A message sent from DCC to a DCC User over the User Interface (and in a form set out in the User Interface Specification) in response to a Service Request.

Services

This refers to the services provided or that will be provided by the DCC pursuant to the requirements in the SEC (including the bilateral agreements).

Smart Energy Code (SEC)

The Code designated by the Secretary of State pursuant to Condition 22 of the DCC Licence and setting out, amongst other things, the contractual arrangements by which DCC provides services to DCC Users as part of its Authorised Business (defined in the DCC Licence).

Smart Meter

A Gas Smart Meter or an Electricity Smart Meter.

Smart Metering Equipment Technical Specifications (SMETS)

A specification (which is to form part of the SEC) of the minimum technical requirements of Smart Metering equipment (other than Communications Hubs which are separately dealt with in CHTS).

Smart Metering Inventory

An inventory of Devices which comprise Smart Metering Systems which are (or are to be) Enrolled with DCC. The Smart Metering Inventory also holds information about Devices and their inter-relationships.

Smart Metering System (SMS)

A particular collection of Commissioned Devices installed in a premises:

- a Gas SMS comprises a Communications Hub Function, a Gas Smart Meter, a Gas Proxy Device and any additional Type 1 Devices (as defined in the SEC); and
- an Electricity SMS comprises a Communications Hub Function, an Electricity Smart Meter and any additional Type 1 Devices.

Smart Metering Wide Area Network (SM WAN)

The network that is used for two way communication between Communications Hub Functions and the DCC.

Supplier

The holder of a gas supply licence or an electricity supply licence.

Technical Architecture

The DCC Systems and the Smart Metering Systems together, including as documented in the Technical Specifications (defined in Section A of the SEC).

Transformation

The conversion, by DCC, of a Service Request into an associated Pre-Command - the format ultimately required in order for the Command to be executed by a Device.

User Role

One of a number of different capacities in which a User may (if appropriately authorised and having gone through the necessary User Entry Processes) act, including: Import Supplier; Export Supplier; Gas Supplier, Electricity Distributor, Gas Transporter or Other User.

User System

Any Systems (excluding any Devices) which are operated by or on behalf of a User and used in whole or in part for:

- constructing Service Requests;
- sending Service Requests over the DCC User Gateway;
- receiving, sending, storing, using or otherwise carrying out any processing in respect of any Pre-Command or Signed Pre-Command;
- receiving Service Responses or alerts over the DCC User Gateway;
- generating or receiving Data communicated by means of the Self-Service Interface
- communicating with the SMKI or Repository Services or other PKI Services; and

- and any other Systems from which the Systems used for the above are not Separated.

Annex A: Responses Received

Responses to the SEC 4 consultation were received from the following organisations:

Association of Meter Operators	Npower
British Gas	Ofgem
Brookfield Utilities UK	Opus Energy
Citizens Advice	Scottish Power
Competitive Networks Association	Scottish Power Energy Networks
DCC	SECAS
EDF Energy	Siemens
Energy Networks Association	Smart Energy GB
Energy UK	Smartest Energy
e-on	SMKI PMA
First Utility	SSE
Good Energy	TMA
Haven Power	UK Power Networks
ICOSS	Utilita
MServ	Utility Partnership Ltd
Information Commissioner	Wales and West Utilities
Labrador Ltd	Xoserve
Northern Powergrid	

Responses to the SEC 4 Part A additional SEC content consultation were received from the following organisations:

British Gas	Scottish Power
Citizens Advice	Siemens
DCC	SMDA
EDF Energy	Spark Energy
Electricity Northwest	SSE
e-on	UK Power Networks
Good Energy	Wales and West Utilities
Npower	Xoserve
Ofgem	

Responses to the January 2015 SEC consultation were received from the following organisations:

British Gas	Northern Powergrid
DCC	Scottish Power
EDF Energy	Siemens
e-on	SECAS
Good Energy	SSE
National Grid	UK Power Networks
Npower	Xoserve

Annex B: Consultation questions responded to in this document.

Relevant SEC 4 Consultation Questions

DCC User Gateway Services Schedule	
Q30	Do you agree with the proposed approach and legal drafting in relation to the DCC User Gateway Services Schedule? <i>Please see Chapter 3 for a summary of responses received and the relating Government response.</i>
Provision of Data for the Central Delivery Body	
Q42	Do you agree with the proposed approach and legal drafting in relation to provision of market share information to the CDB including Ofgem determining disputes between the CDB and the DCC? <i>Please see Chapter 4 for a summary of responses received and the relating Government response.</i>
Power Outage Alerts	
Q56	Do you agree with the proposed approach and legal drafting regarding power outage alerts? <i>Please see Chapter 5 for a summary of responses received and the relating Government response.</i>
Non-Domestic Supplier Opt Out	
Q61	Do you have any views on the operation of SMETS2 meters that are opted out of DCC services in light of: <ul style="list-style-type: none">• the conclusions on SMKI set out above; and• any other matters, including GBCS, that may affect two-way communications with an opted-out meter? <i>Please see Chapter 6 for a summary of responses received and the relating Government response.</i>
User Supplier to Non-User Supplier Churn	
Q66	Do you agree with the proposed approach and legal drafting in relation to User Supplier to Non-User Supplier churn?

Please see Chapter 7 for a summary of responses received and the relating Government response.

Relevant SEC 4A Additional SEC Content Consultation Questions

Additional Public Key Infrastructures and SMKI-related changes	
Q1	<p>Do you agree with the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure?</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>
Q2	<p>Do you agree with the proposed approach and legal drafting in relation to DCC Key Infrastructure?</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>
Q3	<p>Do you agree with the proposed approach and legal drafting in relation to allowing the RDPs to become Authorised Subscribers for Organisation Certificates?</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>
Q4	<p>Do you agree with the proposed approach and legal drafting in relation to the checks the DCC must apply when deciding if a Subscriber is an Eligible Subscriber?</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>
Q5	<p>Do you agree with the proposed approach and legal drafting in relation to the size restrictions on number of fields in Device and Organisations Certificates?</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>
Security-Related requirements	
Q7	<p>Do you agree that the proposed changes are necessary and proportionate to protect DCC Systems?</p> <p><i>Please see Chapter 11 for a summary of responses received and the relating Government response.</i></p>
Q8	<p>Do you agree with the proposed changes to the post commissioning obligations and associated limitation of liabilities?</p> <p><i>Please see Chapter 11 for a summary of responses received and the relating Government response.</i></p>

Q9	<p>At what point should the Recovery Key on a meter be validated?</p> <p><i>Please see Chapter 11 for a summary of responses received and the relating Government response.</i></p>
Movement of some Technical Arrangements into Subsidiary Documents and Providing for Some SEC Milestones to be Turned into Dates	
Q10	<p>Do you agree with the proposal to move four sections of the SEC (H4, H5, H6 and O3) from the SEC into SEC subsidiary documents, and the proposed changes to the legal drafting accommodate this?</p> <p><i>Please see Chapter 9 for a summary of responses received and the relating Government response</i></p>

Jan 2015 SEC Consultation Questions

Notifying new commencement dates for SEC testing phases	
Q1	<p>Do you agree with our proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing? Please provide a rationale for your response.</p> <p><i>Please see Chapter 11 for a summary of responses received and the relating Government response</i></p>
Informal Testing	
Q2	<p>Do you agree with the proposed provisions for informal testing in the SEC? Please provide a rationale for your views.</p> <p>a) Whether you agree with the strength of the obligation on DCC to offer the service</p> <p>b) Whether you agree that DCC can determine the detailed rules to apply to use of the service and</p> <p><i>Please see Chapter 12 for a summary of responses received and the relating Government response</i></p>
Q3	<p>Do you agree with the proposed SEC amendments for informal testing as set out in the letter of direction? Please provide a rationale for your views</p> <p><i>Please see Chapter 12 for a summary of responses received and the relating Government response</i></p>
DCC Key Infrastructure Policy Management Authority (DCCKI PMA)	
Q4	<p>Do you agree with our proposals and legal text in relation to the DCCKI PMA Function? Please provide a rationale for your response.</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>

<p>Q5</p>	<p>Do you agree that, for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State? Please provide a rationale for your response.</p> <p><i>Please see Chapter 10 for a summary of responses received and the relating Government response.</i></p>
<p>Change to when Communications Hubs can be ordered</p>	
<p>Q6</p>	<p>Do you agree that the period for the submission of the first forecasts of communications hubs orders by SEC Parties should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month?</p> <p><i>Please see Chapter 13 for a summary of responses received and the relating Government response</i></p>
<p>Minor consequential changes to Electricity and Gas Supply Licences</p>	
<p>Q7</p>	<p>Do you agree with the consequential changes we are proposing to electricity and gas supply licence conditions on information requirements by Ofgem for monitoring and evaluation?</p> <p><i>Please see Chapter 14 for a summary of responses received and the relating Government response</i></p>

Annex C: SEC Legal Text

The associated SEC legal drafting will be published separately alongside this document.

Annex D: DCC Licence Text

The associated DCC Licence drafting will be published separately alongside this document.

Annex E: Supply Licences Text

The associated DCC Licence drafting will be published separately alongside this document.

The above documents can be found on the following webpages:

<https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-4>

<https://www.gov.uk/government/consultations/consultation-on-additional-smart-energy-code-sec-content>

<https://www.gov.uk/government/consultations/new-smart-energy-code-content-january-2015>

Annex F: User Interface Services Schedule (SEC Appendix E)

The latest version of the UISS is published separately alongside this document.

Annex G: Informal Testing Direction Letter

The final version of the Informal Testing Direction letter is published separately alongside this document (the document shows any changes made since consultation, shown in tracked changes).

© Crown copyright 2015
Department of Energy & Climate Change
3 Whitehall Place
London SW1A 2AW
www.gov.uk/decc
URN 15D/035