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14 February 2014

Dear Sir,

A Consultation on Smart Energy Code (Stage 3)

Thank you for giving Electricity North West the opportunity to respond to this consultation, please find our response to the consultation questions below;

Q1. Do you agree with our proposed approach and text for the SEC with respect to the Policy Management Authority? Please provide a rationale for your views.

We do not agree with the approach and text for the SEC in relation to establishing the Policy Management Authority. We believe this should be a function of the Technical Sub-Committee (TSC) proposed in SEC2. If this approach is taken then there could be a number of SEC sub committees all discussing similar issues without understanding the impact across the infrastructure.

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

We do not agree with the proposed approach, please see answer for question 1.

Q3. Do you agree with our proposed approach and text for the SEC with respect to provision of the SMKI Service? Please provide a rationale for your views.

We agree with the proposed approach and text for the SEC with regards to the provision of the SMKI Service as it sets out the obligations of the DCC to provide the SMKI Service and develop and maintain the SMKI Service Interface Design Specification and Code of Connection. It defines which parties are entitled to become Authorised subscribers and the requirements to carry out Repository Entry Process in order to become Authorised subscribers. The SMKI Service performance standards are set out in the SMKI Service demand Management which includes the submission of forecasts.

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

We agree with the proposed approach and text for the SEC with regards to the SMKI Assurance as this obligates the SMKI Policy Management Authority and all SMKI participants to comply with the SMKI Compliance Policy. It sets out the procedures to be followed if a party has a material breach and gives provision of suspending Services if the PMA believe there is a threat to the DCC or its systems.

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

We agree with the proposed approach and text for the SEC with regards to the Device Certificate Policy because it sets out the obligations of the SMKI Policy Management Authority, SMKI Participants and the DCC, to develop Registration Policies and Procedures document and production and approval of the Certification Practice Statements.

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

We agree with the proposed approach and text for the SEC with regards to the Organisation Certificate Policy as it defines how the DCC should operate in its role as Organisation Certification Authority and defines its obligations issuing the different hierarchies of Organisation Certificates and Organisation Certification Authority Certificates.

Q7. Do you agree with our proposed approach to parties using the SMKI service, including by Opted Out Non-Domestic Suppliers? Please give a rationale for your views.

We agree with the proposed approach to parties using the SMKI service including Opted-out Non-Domestic Suppliers to ensure there as little disruption to the Consumer.

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

We agree with the proposed approach for the SEC concerning Liabilities, Warranties and Indemnities as a consequence of a breach of the SEC, confidentiality and IPR.

Q9. Do you agree with our proposed approach and text for the SEC with respect to the SMKI Repository? Please provide a rationale for your views.

We do not agree with the proposed approach and text for the SEC with regards to the SMKI Repository because the following text is ambiguous with respect to the actual dates by which DCC are obliged to deliver two new critical DCC design documents. DCC service users will require the drafts in order to properly specify system requirements for their connections to DCC. If these are not provided promptly then this could pose a risk for the ability of service users to be ready for SIT and UIT test phases. Interface testing is not scheduled to commence until end Q1 2015 as per the SMIP Joint Industry L1 plan.

L6.6 The DCC shall develop drafts of the SMKI Repository Interface Design Specification and SMKI Repository Code of Connection:

(a) in accordance with the process set out at Part L6.7; and

(b) so that the drafts are available:

(i) by such a date as will facilitate the incorporation of each document into the Code [prior to the commencement of Interface Testing]; or

(ii) (which shall take precedence) [by such other date as may be specified by the Secretary of State].

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

We do not agree with the proposed approach and text for the SEC with regards to the SMKI Recovery Process as there is no detail on what this process will be and obligations are to be placed on parties. We believe this should all be completed as one exercise once the SMKI Trusted Service Provider has been appointed then all the relevant arrangements can be documented and agreed to become part of the SEC Subsidiary documents and the SEC legal text can be agreed.

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

We do not agree with the proposed approach and text for the SEC with regards to SMKI and Repository Testing as testing must reflect real world scenarios supporting multi party testing and interactions e.g. the installation, configuration, enrolment of Smart Meter device must be tested with DCC, CSP, MOP, Supplier and Network Operators to ensure the end to end processing is fit for purpose and meets the requirements of all parties.

Q12. Where appropriate, when do you consider your organisation will first need to obtain live Device and Organisation certificates to be placed on Devices ordered from manufacturers? This will help to determine when the SMKI Service and SMKI Repository should go Live. Please provide a rationale for your views.

We believe Live Organisational Certificates will be required for the RDP role to support commencement of live DCC operations.

Live Device Certificates will be required to support commencement of live DCC operations.

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

We agree that Larger Supplier Parties should be obliged under the SEC to be ready to participate in SMKI and Repository Testing and it is our understanding that Large Supplier Parties are already obliged to participate in SIT testing and testing of the SMKI infrastructure is a critical dependency in such testing.

Q14. Do you agree that it is sufficient for only one large Supplier to complete SMKI and repository testing for the SMKI Service and repository to have been proved? Please provide a rationale for your views.

We do not agree that it is sufficient for only one large Supplier to complete SMKI and Repository Testing for the SMKI Service and Repository to be proved, as critical aspect of the SMKI infrastructure is to ensure that the smart meter keys can be properly updated on a change of supplier event. This will require a minimum of two supplier parties to validate the meter credentials and access are updated correctly and any changes reflected back into the repository. It is also strongly recommended that a minimum of one electricity and one gas network operator is included in order to validate that change of supplier activities do not impact or compromise network operator access/configuration to the meters.

Q15. Do you agree that the SMKI entry processes should be aligned with the User Entry Process Testing in relation to the DCC User Gateway and Self Service Interface? Please provide a rationale for your views.

We agree that SMKI entry processes should be aligned with the User Entry Process Testing with regards to the DCC User Gateway and Self Service Interface because User Gateway processes are intimately dependent upon each SMKI processes so it makes sense to align entry criteria.

Q16. Do you agree with our proposed approach and text for the SEC with respect to the Location of System Controls? Please provide a rationale for your views.

We agree with the proposed approach and text with regards to the Location of System Controls as there is already an obligation on the DCC to locate the operations that control the supply of energy to premises and this is to be extended to DCC Users systems that control the supply of energy. The DCC will also have obligations to implement policies governing the management of Cryptographic Material and for it to meet a defined international standard.

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

We agree with the proposed approach and text for the SEC with regards to the obligations on the DCC regarding Cryptographic Material to meet the security obligations. However the SEC definition section G2.30 places obligations on DCC to comply with FIPS 140-2 Level 3. Does the same requirement extend to any party responsible for encryption/decryption/signing of commands and personal data i.e. does it apply to Suppliers and Network Operators also?

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

We believe that it is important for MOPS/MAMS to be able to access DCC services directly providing the appropriate role based access mechanisms are enforced and are distinct to the supplier roles (as MOP's would not require access to the full set of Supplier commands).

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

As there is no impact to Network Operators we have no comments.

Q20. Are there other options which should be considered for MOPs/MAMs to access DCC services? (Relates to supplier nominated agents)

As there is no impact to Network Operators we have no comments.

Q21. Do you agree with our proposed text for the SEC with respect to Test Phasing, consistent with our decisions on testing arrangements detailed in our recent consultation response? Please provide a rationale for your views.

We agree with the proposed text for the SEC with regards to Test Phasing as sets out Users provisions, requirements and arrangements through each of the testing phases.

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

We agree that the 'Enduring Testing' should be used to encompass both the 'End to End' and 'Enduring' Test stages as this defines clearly what testing is being undertaken. The removal of 'End to End testing' and 'User Integration Testing' may cause confusion initially but Enduring Testing can be defined to mean End to End and User Integration testing within the document.

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

We agree with the proposed approach to include Projected Operational Service Levels within the SEC because it provides a level of certainty of what can be achieved and changes will have to go through a formal modification process.

Q24. Do you agree with the need for an issue resolution process in testing? Does the proposed process meet that need? Please provide a rationale for your views.

We agree with the need for an issue resolution process in testing and the proposed process described will provide visibility of, and an escalation route for, issues.

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

We do not agree with the proposed text for the SEC with respect to Issue Resolution as the text states that the DCC Service Provider will determine the severity level and priority status of the Testing Issue. Clear priority and severity definitions should be agreed prior to commencement of testing phases and the DCC service providers should only be able to determine the severity and priority against the defined criteria.

Q26. Do you agree with our proposed text for the SEC with respect to Equipment Testing, and configuration of enrolled Smart Metering Systems? Please provide a rationale for your views.

We do not agree with the proposed text for the SEC with respect to Equipment Testing and configuration of enrolled Smart Metering Systems because currently drafted a Supplier Party failing to recertify equipment will result in smart meters being removed from DCC services which may then impact the ability of Network Operators to realise the customer and financial benefits expected of them by Ofgem. Network Operators are also charged on a fixed costs base of the number of MPANs in the distribution area on the expectation that the vast majority of MPANs will have a smart meter enrolled in DCC. There is no description of any penalties, compensation or fixed charge reductions in the event that large numbers of devices become expired from the DCC inventory.

Furthermore the text gives no clarity on which Supplier is responsible for recertifying the equipment and upon what date the recertification obligation falls. This could potentially lead to unresolved issues of responsibility where change of supplier activity occurs close to the recertification expiry date.

Recertification requirements should be mandated in a period of time prior to any expiry and removal from the DCC inventory with a clear line of escalation and reporting to higher authority where recertifications are not being undertaken as expected.

Yours sincerely