

Smart Metering Implementation Programme

Consultation on New Smart Energy Code Content (Stage 4)

25 August 2014

Contents

1	Executive Summary	3
1.1	Introduction and background	3
1.2	New Smart Energy Code Content (Stage 4)	3
1.3	Completing DCC Solution Design	3
1.4	Areas of Particular Concern	4
1.5	Prioritising SEC4 conclusions.....	5
1.6	Next steps	5
2	DCC's consultation response	6
2.1	Communications Hubs	6
2.2	Security Governance and Assurance and Privacy	15
2.3	Security Requirements	17
2.4	Further SMKI Requirements.....	19
2.5	DCC Services	21
2.6	Registration Data	33
2.7	Explicit charges for certain other enabling services	35
2.8	Confidentiality	36
2.9	SEC consequential changes: Alignment to DCC and Supply Licences.....	37
2.10	Miscellaneous changes to SEC.....	37
2.11	PART B: Communications Hubs Charging	40
2.12	PART C: Using the SMKI Service	43
2.13	PART D: Enrolment and Adoption of SMETS1 meters	44
2.14	PART E: DCC User to non-user churn	46
3	Further comments on SEC legal drafting	48
3.1	Demand Management.....	48
3.2	Provision of Parse and Correlate Software.....	50
3.3	Forecasting for Communications Hubs charging	50
3.4	K5- Determining Fixed Charges during UITMR	51
3.5	Communications Hubs formula for the Enduring Phase	51
3.6	SMKI and Repository Testing.....	52
	Annex A: DCC's suggested amendments to section L10.....	53
	Annex B: Question 30 – further detailed comments.....	56
	Annex C: Question 35 – further detailed comments.....	60
	Annex D: Question 36 – further detailed comments.....	62
	Annex E: Question 66 – further detailed comments	65

1 Executive Summary

1.1 Introduction and background

Smart DCC Ltd (DCC) was granted the Smart Meter Communication Licence and acceded to the Smart Energy Code (SEC) on 23 September 2013.

DCC provides the shared communications infrastructure allowing energy suppliers, network operators and other authorised users to operate Smart Meters. Smart Meters 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.

The SEC is an industry code which came into force under the 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. The content in the SEC is being added to and amended in stages.

1.2 New Smart Energy Code Content (Stage 4)

The Department of Energy & Climate Change (DECC) issued 'A Consultation on New Smart Energy Code Content (Stage 4)' on 30 June 2014¹ and invited responses from interested parties by 25 August 2014. We refer to this consultation as "SEC4" throughout this document.

In responding to this consultation, DCC is motivated by delivering its Interim General Objective to achieve "...full, timely, efficient, economical and secure Completion of Implementation."

Section 2 of this document sets out DCC's response to the questions set out in the consultation document.

We have also made some additional points in Section 3 that have emerged in relation to existing SEC drafting as Solution Design has developed.

1.3 Completing DCC Solution Design

In order to deliver the Interim General Objective, DCC must adopt a coherent and stable set of requirements and capture them in Service Provider contracts in order to finalise the DCC Solution Design. This is scheduled for completion by 28th November 2014 in accordance with the Joint Industry Plan. Many system components are now being built and the impact of change on costs and timeline are beginning to escalate.

In general, it is in the interests of reducing cost and delay in the programme, to avoid as far as possible any change that impacts on the DCC Solution and Service Provider contracts.

¹ Accessible here: <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-4>

Once DCC Solution Design is complete, it will not be possible to incorporate changes to requirements without disruption to DCC development, even if the requirements originate in SEC updates. Disruption brings a potential impact on cost and timelines. While large changes have the greatest impact, a number of minor changes can also impact DCC's ability to deliver the programme to schedule.

DECC's consultation conclusions (even this October) will come too late to incorporate in the completed DCC Solution Design. Therefore, in order to maintain momentum towards the Interim General Objective, we must use our own judgement now about what the outcomes of the consultation will be and incorporate these into the DCC Solution and Service Provider contracts.

In general we have made these judgements as follows:

- Where we **agree** with the drafting and approach, we assume that the proposed drafting reflects the final requirements. We are incorporating these into the DCC Solution and Service Provider contracts.
- Where we **disagree** with the drafting and approach, we are not incorporating the requirements in the DCC Solution and Service Provider contracts.

We recognise that there is a risk that not all these judgements will accord with the actual outcome of the consultation. Such cases will be assessed on a case by case basis once consultation conclusions are reached. It is likely that changes at this point will have cost and timeline impacts.

1.4 Areas of Particular Concern

There are some areas of the proposed drafting that bring particular concern and we are keen to work with DECC and the industry as appropriate to resolve these areas as soon as possible. Examples of these areas of concern are:

- Cancellation of Communications Hubs orders²;
- Provision of Communications Hubs for testing³;
- The general approach and legal drafting in relation to the DCC User Gateway Services Schedule (including processing of service requests)⁴;
- The operation of SMETS2 meters which are opted out in light of the conclusions on SMKI⁵;
- DCC user to non-user churn⁶; and

² This is discussed in A6 in Section 2.1.

³ This is discussed in A14 in Section 2.1.

⁴ This is discussed in A30 and A35 in Section 2.5.

⁵ This is discussed in A61 in Section 2.12.

⁶ This is discussed in A66 in Section 2.14.

- Demand Management⁷.

1.5 Prioritising SEC4 conclusions

We understand that there are likely to be two sets of conclusions in relation to this consultation. Our current understanding is that the first set of conclusions would be published in late October 2014 (4a), with the second and final set following in mid-January 2015 (4b). We understand that SEC4 text will be designated in December 2014 and March 2015, respectively.

We welcome this approach to prioritising conclusions.

As outlined above, the conclusions will come too late to influence DCC Solution design. However, the prioritisation of conclusions between 4a and 4b is important as there are key obligations that need to be in place on both DCC and other Parties in order for the programme to progress on time.

DCC hopes to work with DECC to understand and influence the proposed allocation of topics between 4a and 4b.

1.6 Next steps

We look forward to continuing to work with DECC and all of our stakeholders to build a fit for purpose regulatory framework within which the benefits of Smart Metering can be realised.

⁷ This is discussed in Section 3.1.

2 DCC's consultation response

This section sets out DCC's consultation response. We have answered questions 1 to 66 (including Q15a) and have provided additional observations on the SEC drafting.

2.1 Communications Hubs

Communications Hubs

Q1	Do you agree with the requirement for the DCC to consult SEC Parties on future tranches of Communications Hubs procurement?
A1	<p>DCC agrees, in principle, that other Parties should be consulted on changes to DCC Services. A SEC Modification Process already exists to allow changes to be formally reviewed by all SEC Parties and, as such, DCC believes that this process should be used to introduce any new Communications Hub Device Models (including any future HAN (Home Area Network) variants that provide enhanced HAN coverage).</p> <p>DCC suggests that paragraph F4.10 should clarify that any change to a Device Model should be subject to full impact assessment through the SEC Modification Process. This is because modifications to Communications Hub design have the potential to change overall CSP Solution Design and can have an impact on the wider SMWAN Service and coverage performance. Under this process, any additional requirements identified by other SEC Parties could be properly managed.</p> <p>DCC also notes that Contract Changes would need to be raised against both of the regional Communications Service Providers' contracts to introduce new design requirements for Communications Hubs, either via this process or through changes to GB Companion Specification (GBCS), Communications Hubs Technical Specifications (CHTS) or Intimate Communications Hub Interface Specification (ICHIS).</p> <p>Finally, DCC believes that further clarity should also be provided regarding the definition of when SEC Parties should be consulted, in particular:</p> <ol style="list-style-type: none"> a) It should be noted that Communications Hub Device Models have not been procured in tranches as suggested by the Consultation text – the initial tranche relates only to the asset finance arrangements put in place for the first 15% of anticipated total Communications Hubs; and b) Further definition on what defines a 'new Device Model' should be provided i.e. <ol style="list-style-type: none"> i. Does manufacturing variation of an existing model beyond a stated point qualify as a new model and if so who determines the point at which a device has become materially different from its specification – the SEC definition refers to specific firmware revision, this is not a practical constraint – DCC assumes that a new Device Model will be reflected by a material change to the Communications Hub Detailed Specification (CHDS). Otherwise very minor amendments including potentially urgent firmware changes, would be subject to delay if we had to

	<p>conduct a consultation for each one.</p> <p>ii. It is assumed that CSPs may change a Communications Hub manufacturer without consulting all Parties as long as the device produced by the new manufacturer matches the Communications Hub Detailed Specification (CHDS) previously agreed.</p>
Q2	Do you agree with the proposed approach to allow SEC Parties (which will include MOPs) to forecast, order, take delivery and return uninstalled Communications Hubs?
A2	<p>DCC broadly agrees that SEC Parties that are not Energy Suppliers should be able to submit Forecasts and Orders for Communications Hubs, and be responsible for managing the logistics for the return of Communications Hubs to DCC.</p> <p>This position can be largely supported within the scope of the CSP contracts, provided that the current legal drafting for paragraph F5 which requires the Party that is submitting an Order to be the same as the Party that has submitted the associated Forecast is retained and that such a Party is responsible for paying the applicable Explicit Charges as set out in K7.5. There may be, however, some impact to existing DCC solution assumptions as a result of this addition to the SEC, for example the number of users requiring access to the CSP Communications Hub Order Management Systems.</p> <p>DCC also considers further clarity is required regarding the obligation for SEC Parties to inform DCC of Communications Hub Returns. The current DCC solution provides for a DUGIS Service Request for this purpose which requires any SEC Parties wishing to Return Communications Hubs (prior to installation) to have the capability to submit such Service Requests.</p> <p>This may have cost and minor time implications.</p>
Q3	Do you agree with the proposed approach and legal drafting in relation to the development of the Communications Hub Support Materials?
A3	<p>DCC broadly agrees with the principle, set out in X7.3, for DCC to develop and consult on the Communications Hubs Support Materials and their subsequent incorporation into SEC as a Subsidiary Document.</p> <p>However, due to the requirement to base these Support Materials upon final Solution Designs (dependant on final versions of GBCS), it is unlikely that the formal consultation and subsequent regulatory submission process would be complete in time to support the initial Communications Hub Forecast (as required in the proposed wording in paragraph X7.3).</p> <p>SEC Parties seeking to receive Communications Hub Deliveries in time to support ILO (by December 2015) must submit initial Forecasts by 23 January 2015. Therefore, DCC considers that a specific exception should be made to allow an interim process to be put in place which will require SEC Parties to submit Forecasts according to these dates.</p>
Q4	Do you agree with the proposed approach and legal drafting in relation to forecasting of Communications Hubs?

A4	<p>DCC broadly agrees with the approach to Forecasting for Communications Hubs, however the following clarifications need to be made:</p> <ul style="list-style-type: none"> a) F5.12 mandates that where a Communications Hub Forecast is not submitted by a Party, previous monthly Forecasts would be reset to zero. The proposed drafting in F5.9 suggests that Parties may vary their monthly Forecasts. Where a monthly, non-zero volume had previously been submitted as part of a Forecast in any month less than 10 months prior to the start of the associated Delivery Month, this would immediately make a Party non-compliant. DCC suggests that this is amended so that where a Forecast is not submitted by a Party - any previously submitted valid Forecast Volume for a month will remain unchanged. In this scenario, only volumes forecast to be zero for the relevant months would be assumed to be zero; b) DCC also requires that clarity is provided within the SEC as to who should be the “Supplier of Last Resort” in the event that a SEC Party that is not an Energy Supplier submits a Forecast and then subsequently ceases to be a valid SEC Party. DCC also requires the ability to levy an explicit charge (to be added to K7.5) where a Party fails to submit an Order and according to F5.13 DCC places a minimum-quantity Order for Communications Hubs, but a SEC Party is unable or unwilling to agree a Delivery Date and Delivery Location; and c) F5.7 (c) should be amended to clarify that a delivery location should be to a mainland Great Britain location; deliveries to non-mainland are outside the scope of the CSP Contracts.
Q5	<p>Do you agree that forecasts that are submitted from the tenth month before a delivery month should include the numbers of Device Models to be delivered in that month in each region, and these should be subject to the specified tolerance thresholds outlined below.</p>
A5	<p>DCC broadly agrees with the specified tolerance thresholds set out in the SEC4 consultation document as they are aligned with the thresholds set out in Schedule 11 of the CSP Contracts. However, a distinction should be made between forecasting Communications Hub variants between ‘HAN Variants’ and ‘WAN variants’ when referring to Device Model forecasting requirements, since:</p> <ul style="list-style-type: none"> a) No HAN Variants are yet defined for Communications Hubs and any change in Ordering and Forecasting obligations should be introduced once policy, technical standards and other regulation has been established through the SEC Modification Process; and b) Establishing WAN variant volumes requires both full access to the Coverage Database and SSI functionality and premises location data. Prior to this being available an interim solution will be required. c) It remains to be seen whether, following introduction of different HAN Variant Communications Hubs, 10-month forecasts of these Device Models would be required to support an efficient supply chain, since this may be dependent on SEC obligations in place at the time regarding such variants. d) For WAN Variant Communications Hubs, establishing Device Model volumes requires both full access to the Coverage Database and SSI

	<p>functionality and premises location data – both of which will not be available for initial Forecasts submitted under X3.3. Therefore, if retained, it should be clarified that the obligation to provide specific Device Model in Communications Hub Forecasts should not be introduced until these dependencies are met.</p>
Q6	<p>Do you agree with the proposed approach and legal drafting in relation to ordering of Communications Hubs?</p>
A6	<p>DCC does not agree with the proposed approach and legal drafting in relation to the ordering Communications Hubs with the following observations:</p> <ul style="list-style-type: none"> a) Section F5.19 which relates to cancellation of Orders appears to negate the obligation for Parties to submit valid Forecasts. The legal drafting provides no clarity to the nature of the Explicit Charges that may be incurred. This will result in a contract change and revised pricing to be determined as there is no mechanism for this in the CSP Contracts. In exceptional circumstances, DCC considers that a process for cancellation of an individual Order Delivery or Consignment should be considered but that Parties should otherwise be obliged to receive Orders that they have placed. Where such exceptional circumstances exist, procedures for re-arranging delivery will also be set out in the Communications Hubs Support Materials CHSM; b) DCC also notes that a process for the logistics and charging mechanism for unwanted Communications Hubs already exists in both the SEC and CSP contracts, in the form of No-Fault Returns. DCC expects that any CSP Contract Change implemented to include an ability for Communications Hub Orders to be cancelled, without constraint (save for an Explicit Charge), at short notice, will lead to an increase in overall Communications Hub charges in addition to the introduction of an Explicit Charge mechanism for the cancelled Orders. CSPs have indicated that such an increase in charges would be attributable to the fixed cost of providing a returns and stock management solution that would have to be put in place to provide the capability to manage large-scale Order cancellations, even if this capability is not widely used. In order to effectively include a mechanism for cancelling Orders within the Support materials DCC would require DECC to conclude on this requirement significantly earlier than October 2014; c) Furthermore, cancellation with only 24 hours' notice presents further challenges to the processes currently defined in the CSP Contracts and drafts of the CHSM. Advanced Shipping Notification (ASN) files are provided to Users no less than 48 hours before Delivery and at this point associated pre-installation notification updates are also made to the Smart Meter Inventory. Reversing these changes and revoking ASNs will also incur additional, unnecessary cost ; d) Section F5.20 – F5.22, which relates to the CH Ordering System (CHOS), does not appear to explicitly require DCC to provide access to the CHOS via alternative means, other than the SSI, (as indicated by the consultation footnote on page 21). Provision of information from the Coverage Database will not be available from an interface other than either the SSI or DUGIS. It should therefore be noted, also in the wider context of provision of Services to non-DCC Users, that any

	<p>requirement to provide access to either the Communications Hub Ordering System (or OMS in CSP Contracts) or the Coverage Database except via the SSI or DUGIS would require a CSP Contract Change to add this new requirement. This could have cost and time implications;</p> <p>e) DCC also notes that F5.7 (f) suggests a one-to-one relationship between CH Orders and Auxiliary (aerial) Orders, whereas the current Support Materials mandate separate orders for additional Auxiliary Equipment. DCC expects to provide Service Users with the flexibility to manage Auxiliary Equipment stock separately. This flexibility is expected to be required to support those SEC Parties who wish to maintain additional aerial stock and / or replace lost or damaged Auxiliary equipment without having to order more Communications Hubs; and</p> <p>f) The requirement to make the Communications Hub Ordering System available “at all times” according to F5.21 should be subject to the reasonable limits set out in the CSP Contracts for System availability and Business Continuity and Disaster Recovery.</p>
Q7	Do you agree with the proposed approach and legal drafting in relation to delivery and handover of Communications Hubs?
A7	DCC agrees with the proposed approach and legal drafting.
Q8	Do you agree with the proposed approach and legal drafting in relation to installation and maintenance of Communications Hubs?
A8	<p>DCC broadly agrees with the proposed approach and legal drafting with the following observations:</p> <p>a) The scope of F7.7(c) is too broad and includes unnecessary obligations for CSPs to be fully compliant with a range of requirements specific to Energy Suppliers that are not in scope for the current CSP Contracts. A change may result in time and cost implications. DCC should only be required to comply with those requirements which are relevant to their specific undertaking;</p> <p>b) Consultation with SEC Parties has indicated a strong desire from Industry to not allow DCC or CSP personnel to attend Consumer Premises without being accompanied by Energy Supplier representatives; and</p> <p>c) Further obligations should be placed on SEC Parties to allow for DCC to conduct reasonable audits of their compliance with the processes set out in the Communications Hub Support Materials so that CSPs can be confident that installation and maintenance activity is being carried out effectively.</p>
Q9	Do you agree with the proposed approach and legal drafting in relation to removal and returns of Communications Hubs?
A9	<p>DCC broadly agrees with the proposed approach and legal drafting with the following observations;</p> <p>a) Section F8.14 should clarify that Communications Hubs are only to be</p>

	<p>reconditioned if it is economically efficient to do so. This is because there are limits in the regional CSP Contracts (as set out in Schedule 11) on the amount of costs that can be recovered by CSPs for returned Communications Hubs;</p> <p>b) DCC disagrees with the position set out within the Consultation Document (paragraphs 87 and 88) that SEC Parties should be explicitly given the right to return over-ordered Communications Hubs with provision to cancel Orders included within the SEC (as detailed above). DCC suggests the most cost efficient supply chain for Communications Hubs will be achieved if SEC Parties bear the cost and risk of managing their own Communications Hub and Smart Meter equipment stock levels on a monthly basis. This is because if the risk is managed centrally by CSPs then costs will be magnified as they do not control smart meter roll out and central stock volumes will be much greater;</p> <p>c) Section F8.6 that covers the time limit for SEC Parties to return Communications hubs is misaligned with the charging model in which Communications Hub charging for returns takes effect from the point at which DCC is notified of removal. To remove ambiguity, DCC suggest that this drafting (and the drafting of the CSP Contracts) is updated to reflect a consistent position and that SEC Parties are required to return Hubs to the DCC within 90 days of notification of removal;</p> <p>d) Paragraph 94 of the consultation document contains a table summarising Communications Hubs Returns Categories. Category 7 (Reason for Return DCC Fault) states that Communications Hubs deliveries are to be rejected within “within five working days”. Section F6.7 confirms this period as “five days” which is consistent with the CSP contracts and which DCC considers to be correct.</p> <p>e) Paragraph 89 anticipates that the CSP Order Management System (OMS) will hold information on Communication Hub returns. The OMS may be used by SEC Parties to raise Returns Material Authorisation (RMA) requests, but subsequent records of returns will be maintained in the DCC Service Management System in accordance with CSP Contracts. The RMA process provides an authorisation code to allow DCC to track the validity of return consignments of Communications Hubs; and</p> <p>f) Paragraph 89, Section K, does not include a mechanism to charge forwarding costs to DCC where CH has been delivered to wrong CSP. This is also discussed in our response to question 45.</p>
Q10	Do you agree that there should be an obligation for the first installing supplier in a dual fuel premises to take all reasonable steps to install a communications Hubs that would work with both the smart meter that it is installing and the smart meter of the other fuel type?
A10	DCC broadly agrees with the proposed approach and legal drafting with the observation that DCC supports the intent to minimise the number of Communications Hubs that need to be removed to support subsequent meter installations. Suppliers are best placed to comment on the suitability of placing an obligation on them to achieve this objective.

Q11	Do you agree with the Governments proposals in relation to the processes to determine the reasons for early return of Communications Hubs?
A11	<p>DCC broadly agrees with the proposed approach and legal drafting subject to the following observations:</p> <ul style="list-style-type: none"> a) The additional designation of the CH Fault Diagnosis as a SEC Subsidiary Document (SEC Section A) is not reflected in the list of associated Subsidiary Documents on page 15 of the consultation text. It should also be noted that formal consultation on the associated Fault Diagnosis has not previously been planned or incorporated into the scope of CSP Contracts. As a result, this may lead to an increase in cost and time. SEC Parties will, through the existing mechanisms referenced in paragraphs F9.7-F9.13, have the capability to challenge the fault analysis approach through F9.14. If this process is itself subject to consultation and agreement, the scope for objecting to the final DCC fault analysis should be reduced to only those cases where it can be demonstrated that the agreed CH Fault Diagnosis process has not been carried out; b) If the definition of the CH Fault Diagnosis as a SEC Subsidiary Document is retained then additional clarity should be provided as to the date at which this document should be incorporated into SEC, according to X7.3. DCC believes that this document would need be developed in line with the associated Communications Hub Support Materials timescales; c) F8.17 requires that Parties notify the DCC of loss or destruction via the Communications Hub Ordering System. It should be noted that this capability will not be supported by the CSP Order Management System. Loss or Destruction must be notified by DUGIS Service Request; and d) DCC notes that the table provided in Paragraph 33 of the Consultation Document does not accurately reflect the legal drafting or the CSP Contracts. In particular: <ul style="list-style-type: none"> a. Categories 4 and 5 will not be identified until post-return analysis; b. 'free of charge' replacement does not reflect the principles in the legal drafting; and c. 'Mesh replacement' is not adequately defined.
Q12	Do you agree with the proposed approach and legal drafting in relation to the transitional requirements for Communications Hubs forecasts and orders?
A12	DCC agrees with the proposed approach and legal drafting with the observation that X3.3(b) should read 'Communications Hub Order' rather than 'Communications Order'.
Q13	Do you agree with our proposed changes to the DCC licence to require the DCC to offer services to non-SEC Parties where required to do so under the SEC?

A13	<p>DCC recognises the intent of this approach and, if implemented, agrees with the proposed changes to Condition 17 in the DCC Licence.</p> <p>However we have the following observations in relation to related provisions in the SEC:</p> <ul style="list-style-type: none"> (a) Whilst we support the intent of the proposal, we have some concerns about the practicality of it. The bilateral specimen agreement makes reference to (and thereby incorporates) many Sections of the SEC. We consider that if these parties would still have to review the SEC and therefore the legal review burden is not much less than if they were to become SEC Parties. There is no significant cost savings in going down the bilateral agreement route over becoming a SEC Party; (b) We suggest the addition of an obligation for the SEC Panel to verify any requests from non-SEC Parties. We consider this is required in order to manage any vexatious requests; (c) DCC notes that managing a significant number of additional contracts (that can vary between parties) has not been factored in to DCC's resource model; (d) DCC has concerns about the security implications of parties connecting 'unknown' equipment to the test environments (e.g. potential for malware to be inadvertently introduced to the environment). We intend to address this by specifying entry criteria in the End to End Test Approach document with the specific intention of ensuring that all equipment to be connected to the test environments will not pose a risk to those environments or any other systems connected to them. We would prefer this to be explicitly stated in the SEC/bilateral agreements as appropriate; and (e) From a Test and Assurance perspective DCC agrees with the proposals to enable test participants other than SEC Parties to access the DCC test services and consider that this will support the achievement of ILO. However, we also consider that access to the test environments should only be provided to device manufacturers and parties who wish to act on behalf of suppliers for the purpose of testing devices and systems. The DCC will define the criteria that must be met by this category of test participant prior to the commencement of testing, including security requirements that must be met. We would like the legal drafting to reflect this. This may be addressed by the obligation on the SEC Panel we have proposed in (b) above.
Q14	<p>Do you agree with the proposed approach and legal drafting in relation to the provision of Communications Hubs for testing?</p>
A14	<p>We would like to note that no commercial mechanisms exist in the CSP Contracts to allow DCC to meet all of the requirements and associated liabilities set out in F10. We are considering the impact on the contracts and will, subject to agreement of the points below, implement the necessary changes.</p> <p>DCC supports the approach and general intent to provide Communications Hubs to support testing activities, and for the training of installation engineers. With respect to the use of Test Communications Hubs, we consider that a Remote Test lab will be required and that the DCC will provide the Remote</p>

Test Service for this purpose. Hence DCC is of the view that the provision of Test Communications Hubs cannot be articulated separately from the provision of Remote Testing and Testing Services described in Section 12.5 of the Consultation Document. We are also concerned that no obligation is placed on SEC / non-SEC Parties to have established a Remote Testing capability in order to use a Test Communications Hub. This requirement should be included in the SEC.

F10.3 allows DCC to provide early prototype versions of the Communications Hubs if it chooses to do so. We do not agree with this principle. We consider that the use of Prototype Communications Hubs may result in Users testing against Devices which have not been fully validated by the CSPs. It will also introduce the potential for testing to be undertaken against different versions of the Prototype Communication Hubs by individual test participants and will require the establishment of a complex, and possibly costly, configuration and release management mechanism. Furthermore, these prototypes could vary significantly from the fully functional Communications Hubs. We therefore propose that F10.3 should be removed.

We consider that the Test Communications Hubs should be protocol certified, or as a minimum fully functional, and that this requirement should be included within the SEC.

The DCC will need to set out the manner in which Test Communications Hubs can be used, including any restrictions. These requirements will be included in the relevant Test Approach Document and/or on the DCC Website.

F10.6 states that Parties will be able to order Test Communications Hubs via the Communications Hub Ordering System. However, this system will not be available at the earliest point at which Test Communications Hubs could be ordered. An alternative ordering process will therefore be required and the manner in which this can be accessed will be published on the DCC Website. F10.6 should include this requirement. DCC understands from discussion with DECC that, for example, email supported by a suitable validation process would be accepted as a “reasonable means” for this purpose.

F10.2(c) states that “Test Communication Hubs shall not be (or be capable of being) Commissioned”. Communications Hubs will have limited value if they cannot communicate on the CSP network. F10.2 (c) should be deleted.

F10.8 (b) implies that the lead time for Test Communication Hubs will be 2 months (“...DCC shall have no obligation to deliver Test Communications Hubs earlier than the date two months after the date on which the Test Communications Hubs were ordered”). We do not currently understand the volumes of the Test Communications Hubs that will be required, or the lead times for providing these Devices. We are therefore concerned that this obligation could place an unreasonable constraint on the DCC and that it is inconsistent with the Service Provider contracts. F10.8 (b) should therefore be modified to place a reasonable endeavours requirement on the DCC.

Finally, as these hubs are functionally the same as Communications Hubs, DCC considers that the defined term ‘Test Communications Hubs’ is confusing and that ‘Communications Hubs for Testing’ is a more appropriate term.

2.2 Security Governance and Assurance and Privacy

Security Governance and Assurance and Privacy

Q15	Do you agree with the legal drafting in relation to Security Governance?
A15	<p>DCC broadly agrees with the legal drafting in Section G7, relating to Security Governance and the establishment of the Security Sub-Committee, however, Section G7 does not define any qualifications or capabilities of the members.</p> <p>It is assumed that each member will be expected to hold a suitable qualification or background in information security (and will also be assessed by the SEC Panel). We suggest this is explicitly stated in Section G7.</p>
Q15a	<p>Do you agree with the Governments proposals in relation to Security Assurance? In particular on:</p> <ul style="list-style-type: none"> the proposal for the SEC Panel to procure a central CIO on an initial basis; the proposal for Users to meet the costs of security assessments that are undertaken at their organisation; the proposal for Users to meet the costs of security assessments that are undertaken at their organisation; the proposal for a three year rolling cycle of security assessments to be used to provide assurance on Users; the process for identifying and managing non-compliance; and the assessment arrangements proposed for DCC.
A15a	<p>DCC broadly agrees with the proposal approach subject to the following observations:</p> <ol style="list-style-type: none"> DCC does not agree that the CHECK qualification is relevant to the proposed activities for the User Independent Security Assurance Service Provider as referenced to G8.5 (a); DCC suggest that a reference is made in G8.6(a) to CESG Certified Professional scheme in order to qualify for those roles already defined; DCC considers that there may be ambiguity in relation to the Independence Requirement in G8.7. DCC proposes the addition of a definition for 'corporate assurance services' to make it clear that this does not include any assurance of security controls, risk assessments (including under G5.16), etc.; DCC need to receive the necessary budget/Explicit Charge related information from SEC Panel for a regulatory year prior to DCC setting the Charging Statement for that year. DCC proposes that an obligation is required on SEC Panel to provide this information to DCC prior to the end of November in the preceding regulatory year; and DCC considers that the Independent Security Assurance Service Provider should be defined as the "User Independent Security Assurance Service Provider" to avoid potential confusion with the DCC Independent Security Assurance Service Provider;

	<p>e) In G8.21, it should be stated that the DCC should receive a copy of the User Security Assessment Report for the purposes of sharing with DSP to allow them to meet their contractual obligations. This will prevent the need for DSP to conduct their own user assessment directly which would have an uneconomical impact upon Users resource;</p> <p>f) DCC remain of the opinion that Large Suppliers should be mandated to be ISO27001 certified due to the inherent risk of having a significant number of registered Devices;</p> <p>g) DCC broadly agrees with the proposal for the DCC Independent Security Assessment Arrangements. However:</p> <ul style="list-style-type: none"> i) G9.3(b)(ii) states that the DCC Independent Security Assessment Service Provider should carry out SOC2 assessments "on any material change to the DCC Total System". The SEC should clarify what is meant by "material" in this context. Involving the DCC Independent Assurance Service Provider in each change would be costly and given that DCC have other change-related obligations such as risk assessment, impact assessment and testing, we also question the additional value of this assessment. DCC considers that appropriate oversight is in place through the provisions of G9.3(c) by way of the Security Sub-Committee (through the SEC Panel). The Security Sub-Committee would be aware of any such significant changes and could therefore invoke the assessment at any time; and ii) DCC agrees with the provision for an appropriate escalation process for any event in which the DCC has been found in breach of our security obligations however we disagree with the current drafting for the following reasons: <ul style="list-style-type: none"> • The current definition of 'Event of Default' (M8.1) explicitly excludes the DCC from its application and are therefore not applicable • No other obligations on the DCC within SEC have such a referral to an 'Event of Default'. <p>DCC suggest that a series of obligations which replicate the existing DCC license conditions for Independent Assurance services from a Competent Independent Organisation (License Annex 2, Part B 2A.2 (e), (f) and (g)) would be more suitable and adequate.</p>
Q16	Do you agree with our proposed approach and legal text for SEC in relation to Privacy Assessments?
A16	<p>DCC broadly agrees with the proposed approach and legal text in relation to Privacy Assessments, subject to the following observations:</p> <ul style="list-style-type: none"> a) by initially mandating the joining the two activities of security assessment and privacy auditing, DCC has concerns that the privacy auditor will inherit the skill/qualification constraints of the security assessor which may conflict with the intent of efficiency; and b) there is no defined qualification for the Independent Privacy Auditor which would be useful in the context of the point above.

Q17	Do you agree with the specific proposals for undertaking random sample compliance assessments?
A17	DCC agrees with the proposal in relation to undertaking random sample compliance assessments.
Q18	Do you agree with the proposal for Users to meet the costs of the privacy assessments that are undertaken at their organisation?
A18	DCC agrees with the proposal for Users to meet the costs of the privacy assessments subject to the observation that DCC need to receive the necessary budget/explicit charge related information from SEC Panel for a regulatory year prior to DCC setting the Charging Statement for that year. DCC propose that an obligation is required on SEC Panel to provide this information to DCC prior to the end of November in the preceding regulatory year.
Q19	What are your views on potential future changes to the SEC to provide for reporting the results of privacy assurance assessments bodies such as Ofgem, DECC, ICO and Parties generally?
A19	DCC agree with the principle of reporting such information to appropriate bodies which would provide consumer and other stakeholder confidence.
Q20	Do you agree that the proposed legal drafting reflects the position reached in the SMETS2 consultation response, that Users should be required obtain consent and to verify the identity of the energy consumer from whom they have obtained the consent prior to pairing a CAD?
A20	DCC considers that prospective users are best placed to comment on the suitability of the proposed legal drafting.

2.3 Security Requirements

Security Requirement	
Q21	Do you agree with the proposed updates to the Security Requirements and the associated legal drafting?
A21	<p>DCC broadly agrees with the proposed updates and legal drafting, subject to the following observations:</p> <ul style="list-style-type: none"> a) in relation to SMWAN protection we note the following issues in relation to the updating of the definition for Compromised in Section A1: <ul style="list-style-type: none"> (i) DCC suggests that the new clause (f) which introduces 'process' should be consolidated into the existing clause (a) due to the common purpose of the two clauses; (ii) It is observed that there is a conflict between the 'best endeavours' aspect of G2.9 (which covers availability via the definition of 'Compromised') and the more concise obligations

within the Performance Measures section (H13.1) related to all services;

- (iii) Furthermore, as a result of the introduction of 'process' to the definition of Compromised (clause (f)), the best endeavours caveat in G2.9 introduces ambiguity around which processes would be covered by this;

Shared service providers (G5.25 - G5.28)

- b) G5.27 describes the need for the Security Sub-Committee to be notified of 'name and contact details' with respect to the employed Shared Resources. DCC considers that this information alone is not enough even if there were commonalities as it does not confirm aggregation of services. DCC suggests that more information (e.g. which services are being provided) would offer greater benefit;
- c) DCC recognises the need to provide minimal barriers to market entry by offering low-cost access to DCC services. DCC also understands that large energy suppliers might wish to maintain a single point of access to DCC services. The current proposals suggest the creation of a Shared Service that has an inward connection towards the DCC User Gateway Interface, SSI and SMKI and onward connections to the user workstations. Where the User System that connects to the DCC User Gateway is located at corporate premises and subject to the constraints of ISO27001, there should be no security issues. However, where the user connections traverse public networks it will be necessary to provide suitable security to ensure the integrity of the SMKI. This will require further investigation and analysis that we anticipate will be undertaken as part of the Independent Security Assurance Assessments;

Anomaly Detection

- d) It is not clear why the definition of Anomaly Detection Threshold in Section A1 includes maximum or minimum values in respect of DCC ((b) (ii)) but not for a User. It is assumed that Users have the ability to specify their own values. The same applies to the updated definition of Threshold Anomaly Detection in Section A1;
- e) G6.1 describes the concepts of Users and DCC communicating securely. DCC understand that:
 - i) Thresholds are essentially the User's forecasts which are NOT deemed sensitive (although DCC recognises the aggregation of such information may be sensitive); and
 - ii) Alerting a user of quarantined activity is not sensitive;
- f) Because of the above, DCC propose that the following changes are applied:
 - (i) G6.1 (a) – Remove the word 'securely';
 - (ii) G6.1 (b) – Replace the paragraph with "the DCC shall be able to notify each User when a communication relating to that User has breached the thresholds set by DCC; and" (NOTE: This removes the word 'securely' and makes it sufficiently generic to allow for both ALERT and QUARANTINE actions);
 - (iii) G6.1 (c) – Replace this paragraph with "each such User shall be able request and validate the appropriate release or delete action to be taken on the DCC Systems for any quarantined

	<p>communication” (NOTE: the previous proposed draft did not cater for the release activity; only delete); and</p> <p>(iv) G6.2 – Remove the quoted word ‘securely’;</p> <p>g) It is also noted that the following sections attempt to replicate those section G requirements for non-Users and also introduce the ‘secure’ concept which we also feel is unnecessary and therefore suggest that reference to ‘securely’ or ‘secure’ be removed:</p> <p>(i) X8.3 (j) (i), (ii) & (iii); and</p> <p>(ii) X8.4.</p>
Q22	Do you agree that we should also include in the SEC obligations on the DCC and Users which limit the future dating of commands to 30 days?
A22	DCC agrees that this additional control is reasonable. DCC is assuming that this obligation is included within DECC’s conclusions. As a result, DCC will need to implement this change with the DSP urgently in order update this functionality in line with implementation timescales (subject to the complexity of implementation). Early conclusion on this drafting would be welcomed. If DECC are likely to conclude otherwise, DCC would require visibility in early September to avoid costs being incurred with the DSP unnecessarily.

2.4 Further SMKI Requirements

Further SMKI Requirements

Q23	Do you agree with the proposed approach and legal drafting in relation to which parties are eligible to subscribe for specific Organisation Certificates?
A23	<p>DCC does not agree with the proposed approach and legal drafting for the following reasons:</p> <p>a) DCC consider with respect to the Remote Party Roles Codes (RPRC) and Devices set out in Section L3.7 that the establishment of the eligibility of parties to subscribe for Device Certificates should be an obligation placed solely on the Subscriber. DCC will be unable to verify the Device type in a Certificate Signing Request (CSR) based on the existing drafting of Appendix A of the Code and will therefore be unable enforce the type of device certificates applied;</p> <p>b) In relation to the SMI Status of Devices with any other party CSRs as set out in Section L3.7, DCC consider this to be the sole obligation of the Subscriber, on the basis that DCC does not hold this information. If DCC is required to support the checks on eligibility in relation to SMI Status of Devices , an additional two-way integration would be required between the Trusted Service Provider (TSP) and the Smart Metering Inventory provided by the DSP. This is not currently part of the DCC design. The TSP has classified this potential change as high impact and as such would significantly impact the SMKI cost and timeline. The DSP delivery would also be impacted; and</p> <p>c) DCC is not currently implementing the proposed approach. If this approach is maintained within the conclusions, DCC will need to</p>

	impact assess the change to its solution. Early conclusion on this drafting would therefore be welcomed.
Q24	Do you agree with the proposed approach and legal drafting in relation to the Organisation Certificates the DCC must subscribe for in order to support installation of Devices?
A24	DCC agrees with the proposed approach and legal drafting with the observation that we would typically expect the drafting in L3.11, which refers to Interface Testing, to be within Section X (Transition).
Q25	Do you agree with the proposed approach and legal drafting in relation to the date on which the DCC must start providing live certificates, in particular the proposal to turn off the DCC's response time obligations until the Stage 2 Assurance Report (see section 6.6) has been produced?
A25	DCC agrees with the proposed approach and legal drafting. DCC considers this to be the most economic and efficient way to ensure the early availability of Live SMKI Certificates and is consistent with discussions between DCC, DECC and SEC Parties (through our Service User Forums).
Q26	Do you agree with the proposed approach for all Network Parties to have established SMKI Organisation certificates?
A26	DCC agrees with the proposed approach, with the observation that Suppliers will be obliged to place a certificate for the correct Network Party on the Device within seven days of commissioning. It is the responsibility of the Network Party to segment its estates with the appropriate device certificates once it has network connectivity. DCC considers that this should be clarified in the legal text.
Q27	Do you agree with the proposed approach for Non-User Suppliers to have established SMKI Organisation certificates?
A27	DCC agrees with the proposed approach and legal drafting.
Q28	Do you agree with the proposed approach and legal drafting in relation to specific SMKI Organisation Certificates placed on specific Devices?
A28	DCC agrees with the proposed approach and legal drafting.
Q29	Do you agree with our proposal to require DCC to provide Test Certificates to Test Participants (who, in the case of non-SEC parties, will have to be bound by an agreement entered into with the DCC) only for the purposes of Test Services and testing pursuant to Section T of the SEC, and to not require DCC to provide a Test Repository? Please provide a rationale for your view.
A29	DCC broadly agrees with proposed approach subject to the following observations: <ul style="list-style-type: none"> a) DCC considers that the obligation to provide Test Certificates applies to Testing During Transition (Section T) and enduring Testing Services (Section H14) and the drafting should be amended

accordingly;

- b) DCC agrees with the proposal for DCC to provide Test Certificates to Test Participants for the purposes of Test Services as stated in Section H. DCC understand that the policy includes provision of Test Certificates to device manufacturers;
- c) DCC intends to provide a Test Repository to facilitate the end to end testing of DCC systems, and to provide an 'as live' service in order to comply with the assurance framework of the Independent SMKI Assurance Provider; and
- d) It is not clear, in the SEC, that the policy includes provision of Test Certificates to device manufacturers – DCC suggests this is clarified in the legal drafting.

2.5 DCC Services

DCC Services

Q30 Do you agree with the proposed approach and legal drafting in relation to the DCC UGSS?

A30 DCC does not agree with the proposed approach and legal drafting in relation to the DCC User Gateway Services Schedule (DCC UGSS). We therefore recommend an alternative approach for consideration.

DCC has identified four key issues which are set out in the subsequent sections. These issues are as follows:

- The presentation of the DCC UGSS in the SEC (and other general queries)
- Target Response Times (TRTs) in relation to Service Request 6.23 "Update Security Credentials (CoS)"⁸
- Definitions of "Import Supplier" and "Export Supplier" in relation to H1.5;
- GBCS message size and the subsequent impact on TRTs for On-Demand Service Requests within the SEC.

Presentation of the DCC UGSS in the SEC (and other general queries)

The previous format of the DCC UGSS tables has been in place since the SEC2 conclusions in January 2014⁹, having been amended following the SEC2 consultation in October 2013¹⁰.

⁸ This is set out in "Appendix E – DCC UGSS" in the proposed SEC.

⁹ Set out in Annex 3 to "Government response to the consultation on New Smart Energy Code content (Stage 2)" 30 Jan 2014, accessible here:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/276173/government_response_to_the_consultation_on_new_sec2_content.pdf

¹⁰ Set out in Annex 5 to "A Consultation on New Smart Energy Code Content (Stage 2)", 17 Oct 2013.

The changes between the 'consultation' and 'conclusion' versions included:

- the removal of the "Critical Service Request" column from Table 5.1 in the consultation document
- a reduction in the total number of tables from four to three (by removing the Table 5.4: List of Smart Meter Alerts).

There were no further changes as part of SEC3.

SEC4 now proposes further changes to the format and content of the DCC UGSS tables beyond the SEC2 concluded position.

Changes include:

- the removal of "Description" to be replaced with "Service Name"
- the removal of "Future dated" and "On Demand" columns (and therefore removal of differentiated TRTs)
- the merging of two tables into one
- general changes in wording.

DCC is keen to further understand the intent that underpins the proposed changes to the DCC UGSS.

DCC is concerned that the proposed version of the DCC UGSS is not consistent with the DCC User Gateway Interface Specification¹¹ (DUGIS) documentation, which is currently being developed by DCC and will be further consulted upon with Users.

Additionally, DCC considers that the proposed legal drafting in SEC4 is ambiguous and requires more detailed definitions to fully capture the extent of information required for DCC User Gateway Services. We also consider that, the proposed table formats are, in some cases, misleading.

As a consequence there are now significant alignment issues between the SEC4 legal drafting and the DUGIS documentation. These issues are discussed in more detail in Annex B.

Changes to the DCC UGSS

The proposed changes to the DCC UGSS (in particular the removal of data columns and definitions) are likely to result in confusion for Users, since the service definitions contained within DUGIS have been developed based on the previous DCC UGSS contained within SEC2.

In the proposed DCC UGSS, it is now difficult to ascertain which services are Future-Dated Services and which are On-Demand Services. The overall Services definition also places more emphasis on On-Demand Services and less on Future-Dated Services. This is inconsistent with discussions held between DCC and prospective Users through DCC's Design Forums and was consulted on in January/February 2014 in the DUGIS documentation.

The shift in emphasis toward On-Demand Services will have an impact on DCC

¹¹ This is a DCC document, the latest version of which is available to Service Users via the SharePoint space.

Demand Management. DCC and its Service Providers currently have no expectation that Services that currently have a TRT of 30 seconds will be predominantly consumed in an on-demand manner.

The Future-Dated Service attributes have been presented in a way that introduces ambiguity and may set an expectation with Users that more Service Requests should be issued on-demand rather than being scheduled. This is not reflected in the DCC service design or the contracted solution proposals from Service Providers which included assumptions about the percentage split between On-Demand Service Requests and scheduled Future-Dated Service Requests.

Incorporation of DCC UGSS into DUGIS

DCC recognises the importance of having a simple and clear view of the Services available to Users and setting expectations around Service Response Times.

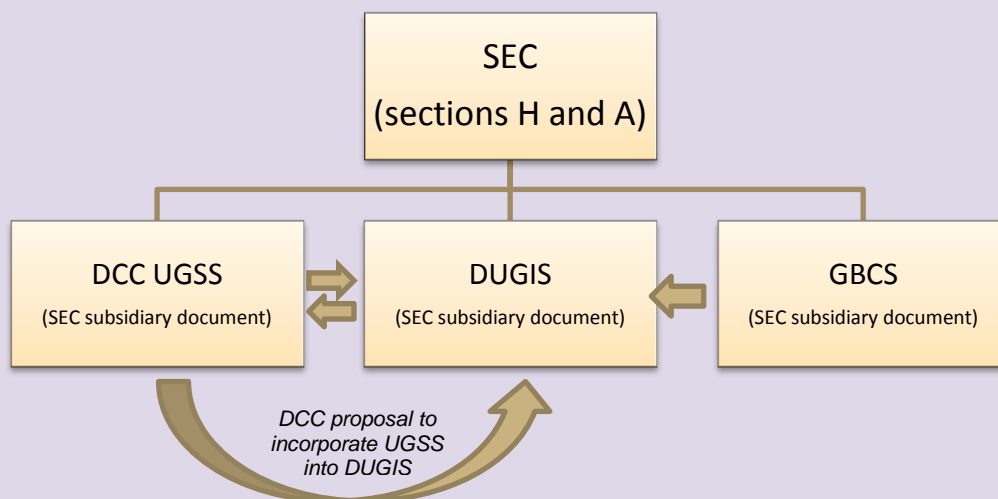
DCC suggests that the DCC UGSS is amended to reference the DUGIS service request definitions¹² and that the definitions as specified in DUGIS (and any future versions of it) become the master set of definitions for the DCC UGSS.

DUGIS will become a SEC Subsidiary Document and therefore controlled through the Modification process. Inclusion of the service request definitions would avoid the need for duplication between the two documents.

There is already a precedent for the DCC UGSS to reference out to DUGIS¹³.

DCC intends to proceed on the basis that this recommendation will be accepted by DECC. DCC will work closely with DECC on this area prior to the consultation on DUGIS.

DCC's proposed approach to document structure and interrelationships is set out in the figure below:



This approach would leave a 'shell' DCC UGSS, with full details including SR Descriptions within DUGIS.

¹² As defined in the Service Request Matrix in Section 9.9 in the draft DUGIS document issued in February 2014

¹³ Footnote 1 - Appendix E – DCC User Gateway Services Schedule

Target Response Times in relation to Service Request 6.23 “Update Security Credentials (CoS)”

DCC does not agree with the proposal for a 30 second response time for Service Request 6.23 “Update Security Credentials (CoS)”.

We note that the requirements for this service have changed between the SEC2 consultation and conclusions, through the SEC3 process and have been clarified further in the SEC4 definitions.

DCC propose a 35 second TRT for On-Demand Service Requests of 6.23

The On-Demand Service Requests of 6.23 results in more DSP processing than other On-Demand Service Requests with a 30 second TRT.

On-Demand Service Requests of 6.23 involves interaction between two separate parts of the DSP solution (the Access Control Broker and the CoS Party). SEC4 requires the CoS Party to be treated in a separate security domain from the Access Control Broker. As a result, this increases the number of internal data transfers and validation steps that the DSP must perform within this DCC Service, thus increasing the processing time required to fulfil the Service Request.

DCC recommends that this change in requirements is reflected within the TRT. Without this change, DCC risks not meeting TRTs as a result of requirement changes to SEC which have not been reflected in performance measures.

DCC proposes that for an On-Demand Update Security Credentials (CoS) Service Request, the TRT should be increased to 35 seconds. DCC considers that the additional 5 seconds will allow the DSP an appropriate duration to process these Service Requests to reflect the additional CoS party interactions. This is equivalent to the standard 5 second TRT that the DSP has for normal on-demand transactions.

DCC solution design continues on the basis that this proposal for a 35 second TRT for On-Demand Service Requests of 6.23 will be implemented. If this proposal is not accepted then, an impact assessment will need to be conducted in order to determine any additional costs that will need to be incurred in order to meet the more restrictive TRT.

DCC proposal for a 60 minute TRT for Future-Dated Service Requests of 6.23

Footnote 2 in Appendix E states:

“For Future-Dated Services, the TRT shall be 30 seconds for an Update Security Credentials (COS) Service Request and shall be 24 hours for any other Service Request”.

We note that in the previous version of the SEC, this TRT was set to 24 hours.

The proposed SEC4 drafting has reduced this significantly. We note that this proposal was not discussed in the main consultation document.

This change will impact the DCC service design as it does not reflect the solution that was procured from the DSP. Implementing this proposal will require a change request to be raised and impact assessed, which may impact on programme timescales and/or costs.

DCC understands that this change is likely to have been made in response to User objection to a 24 hour TRT. DCC assumes that the objection relates to the need to know earlier that the Future-Dated CoS command has executed on the

Device, so that Users can carry out further actions as part of the CoS process in a timely fashion.

Whilst DCC understands the need for a different TRT for this scenario, we do not consider that a 30 second TRT is appropriate. Implementation of this approach would have a significant impact on service over the DCC networks at 00:00 (Electricity) and 06:00 (Gas) if all Users future-date this Service Request for the same execution time on the Device.

DCC proposes that the TRT for a Future-Dated Update Security Credentials (COS) Service Request is increased to 60 minutes. We consider that this would reduce significant peaks in demand across the DCC network, and would allow demand load to be spread across the DSP and CSPs' solutions.

Maintaining a 30 second TRT will have two potential results:

- it will increase the cost of the DCC solution as the changes required to accommodate the newly created demand spike will have to be impact assessed
- DCC will have to attempt to place restrictions/obligations on when Users can future date these commands in order to spread the load at source.

This scenario was discussed with Users at a DCC hosted Design Forum on Demand Management on 15 May 2014.

DCC is keen to work with DECC and Users to develop a solution that meets the needs of all parties.

Demand Management

DCC's comments in relation to Demand Management are set out in Section 3.1 of this document.

The issue highlighted relating to the TRT for Future-Dated Service Requests of 6.23 is just one small example of demand scenarios that may have a substantive impact on DCC service performance.

DCC considers that additional SEC obligations on Users are required to assist with managing demand for DCC User Gateway Services.

DCC would welcome further discussion with DECC and Users to resolve these issues.

Definitions of "Import Supplier" and "Export Supplier" in relation to H1.5

DCC disagrees with the additional words that have been added to clause H1.5:

"...save that a Party may use the same identification number when acting in the User Roles of 'Import Supplier', 'Export Supplier' and 'Gas Supplier'."

DCC is concerned that this change has wider impacts on the DCC service design that may not have been considered when it was suggested.

DCC recognises that the change has been made in an attempt to reduce the number of User IDs that a Supplier Party may require.

However, DCC considers that this is a fundamental change compared to the earlier version of SEC, which stated that all User Roles were separate, a position against which design and build of the DCC service has been conducted.

Access Control rules for DCC Service Requests and the Self Service Interface

(SSI) are based on the previous SEC position which required each Party/User Role combination to have a unique and separate User ID.

The proposed SEC4 drafting now allows the User Roles of 'Import Supplier', 'Export Supplier' and 'Gas Supplier' to use the same User ID. Our initial high-level impact assessment suggests that this proposed approach would lead to additional costs and would impact delivery timescales.

DCC also has concerns regarding the definition of "Import Supplier" and "Export Supplier" in relation to the proposed changes to H1.5. DCC understand that an Export Supplier may also be an Import Supplier if there is no Import Supplier on site. Under the proposal, this status would not be identified by the User Role contained within the User ID. If this revised wording remains then the DCC would also need to impact assess this change in requirement against the existing service design. This may result in additional cost and rework of the design which could have a subsequent impact upon delivery timescales.

GBCS message size and its impact upon TRTs for On-Demand Service Requests within the SEC

As part of the paper-based proving exercises to prove the GBCS use cases, DCC highlighted to DECC concerns regarding increases in the message size for commands defined in the GBCS¹⁴ when compared to the original estimates made by DECC.

Changes in message size have the potential to affect DCC service performance, reliability and costs because original estimates were used:

- as assumptions for the DSP and CSP procurements
- to set the TRTs for Service Requests within the SEC.

The TRTs were established prior to award of the Smart Meter Communication Licence and procurement of the Service Providers and have remained unchanged over time¹⁵. DCC is concerned that the TRTs have not been reviewed and changed (as appropriate) as a result of the development of the GBCS.

DCC is of the opinion that at review of TRTs is required now that GBCS is reaching a level of stability.

Following further impact assessment of version 0.8 of the GBCS, DCC can confirm that the increase in messages sizes across the list of commands defined in the GBCS will have a detrimental effect on the DCC and its Service Providers' ability to deliver DCC Services against the TRTs for a subset of On-Demand Service Requests.

DCC considers that the definition of the associated commands within version 0.8 of the GBCS are not compatible with the desired policy position of having a single on-demand TRT of 30 seconds applicable for all Service Requests.

The sizes of the GBCS commands resulting from each Service Request are not equal. As a result there is a notable message size differential between the

¹⁴ Including wrappers, headers, payload specifics and security specifics

¹⁵ With the exception of SR 6.23 for which the TRT has been reduced in SEC4.

	<p>smallest and largest GBCS command created by the DCC through the transform function and this variability is not reflected within the defined TRTs (see footnotes for examples¹⁶).</p> <p>DCC recommends that a review of the feasibility and applicability of the 30 second on-demand TRT for each Service Request is undertaken in relation to the definition of the associated commands documented in version 0.8. DCC considers that this review should be led by DECC, working with DCC and Parties to agree a workable model.</p> <p>DCC is of the view that SEC4 and version 0.8 of the GBCS are misaligned in this regard and are not compatible in this area. It is the opinion of the DCC that it is not possible, given the size of some of the GBCS commands relating to a selection of Service Requests, to successfully send and execute an On-Demand Service Request to a specified Device and return a response within the 30 second TRT on a consistent basis with the solution that has been procured.</p> <p>DCC considers that there are conceptually two options:</p> <ol style="list-style-type: none"> 1) change the requirements on the CSPs' networks to operate with larger message sizes to allow them to deliver to existing TRTs 2) change the TRS to reflect the procured networks. <p>Option 1 above would require detailed review, unquantified but significant further investment and significant time implications. DCC considers that Option 2 has the least impact on the programme and is therefore aligned with the Interim General Objective</p> <p>DCC would welcome discussion of alternative approaches to TRTs for Service Requests issued on an on-demand basis. One such option is for a more sophisticated TRT model that links to a performance profile which covers a range of message sizes.</p>
Q31	Do you agree with the proposed approach to centrally procure a EUI-64 Registry Entry?
A31	DCC broadly agrees with the proposed approach of centrally procuring a EUI-

¹⁶ Service Request 1.1, Update Import Tariff and Price. There is variability in the complexity of Tariffs that can be set on a Device and the more complex the Tariff the largest the number of configurations that need to be passed within the command. For the simplest of Tariff structures the DCC has estimated that the message size of this GBCS command for use case ECS01a Set Tariff and Price on ESME will be in the region of 400 bytes and for the most complicated of Tariff structures as defined by SMETS this is estimated to increase to anywhere up to 19,000 bytes. We estimate that an average domestic 2 rate Economy 7 Tariff with no additional specific tariff additions would be in the region of 900-1000 bytes. There is a material difference on Target Response Times for the DCC validating, transforming, delivering, execution and returning responses for 400 bytes of data and 19,000 bytes of data.

Service Request 4.8 – Read Profile Data. There is variability in the date ranges that Users can request to collect from a device within the Service Request and this is passed through to the GBCS command. The larger the date range requested the larger the response is that is generated by the Device from the command. For the full 13 month worth of Profile Data Request the DCC has estimated that the message size of this GBCS command will be in the region of 230,000 bytes. This can be reduced to in the region of 18,000 bytes for a month of Profile data requested and again further to the region of 700 bytes for a day of 48 time periods of profile data which is the minimum expected request. There is a material difference on Target Response Times for the DCC validating, transforming, delivering, execution and returning responses for 700 bytes of data and 230,000 bytes of data.

	<p>64 Registry Entry subject to the following observations:</p> <ul style="list-style-type: none"> a) DCC will apply to the SEC Panel for its organisational EUI-64 IDs and will continue to procure EUI-64 IDs for Communications Hubs separately; b) DCC does not agree with the proposed drafting in Section H1.5 which allows Users to use the same identifier in the Role of Import Supplier, Export Supplier and Gas Supplier. This would represent a change to the DCC design that is not currently planned. The DCC's existing design reflects the position in the SEC3 response that each combination of User and User Role has a separate identifier. This impacts the DCC solutions access control rules and internal data model design. If this clause remains as described in SEC4 proposals then the DCC would have to impact assess this change against the DCC solution design to determine impacts to delivery timescales and cost; and c) B2.9(b) requires the SEC Panel to notify the DCC of User IDs issued to Parties. H1.5 also requires the User to notify the DCC of its User ID(s). DCC would like to propose that either the SEC Panel or the User should notify the DCC and not both. DCC's preference would be for the SEC Panel to notify the DCC. <p>Please also see our response to Question 30.</p>
Q32	Do you agree with the intention to create a 'Party ID', enabling access to the Self Service Interface at a Party level?
A32	<p>DCC broadly agrees with the intention to create a 'Party ID' subject to the need for DCC to be able to understand the relationship between SEC Parties within a corporate group.</p> <p>SMETS 1 charging will in the future require a SMETS 1 supplier which established a foundation communications contract to continue paying the SMETS 1 communications charges where these are greater than SMETS1 communications charges. DCC recognise the need to mitigate the ability for a corporate group with multiple Parties from churning a meter from one of their Parties to another to avoid paying this increased cost. This will require DCC to be able to formally identify a corporate group. DCC considers that:</p> <ul style="list-style-type: none"> a) SEC Panel are best placed to confirm which Parties are within a single corporate group; and b) It is more economic and efficient to agree this process now whilst DCC are finalising data structures, as a this information is also useful for DCC's billing solution and it avoids the need for re-work in the future.
Q33	Do you agree that the proposed legal drafting accurately reflects the process by which the DCC will provide a connection the DCC User Gateway?
A33	<p>DCC disagrees with the proposed approach and legal drafting with respect to DCC User Gateway Connection ordering process for the following reasons:</p> <ul style="list-style-type: none"> a) DCC considers that H3.14 would benefit from the addition of the following at the end of the clause "...and will be required to undertake the relevant connectivity test as required in the User Entry Process Tests"; b) DCC notes that Section H3 does not support a shared service model

where a party offering a shared network connection to other parties who are not SEC Parties. This could be implemented as another 'Other Enabling Service' that can be ordered by non-SEC Parties (Question 13 relates);

- c) DCC proposes that H3.8(a) is amended to require DCC to provide reasonable information to Parties when they request a connection. The information required by Parties to order the connection will be contained within an order form. Including the order form in the Code of Connection will mean that changes to the order form will always require a Modification which would be unnecessarily onerous in handling minor changes;
- d) H3.8(b) states "in any event, [28] days...following the request". DCC proposes amending this to "or such longer as is reasonable in the circumstances." Whilst in most cases the connection will be provided within 28 days, DCC (through the DSP and their contracted supply chain) cannot guarantee that in any event a Low-Volume connection option will be provided within 28 days. Where no telephone lines exist, there is ultimately a dependency on BT Openreach which is responsible for the first mile connection and we are bound by its standard terms;
- e) In relation to H3.9(b):
 - i) DCC will only be able to provide an estimate of both the Charges and date from which the connection will be made available. This is as aligned with the DSP's contracted solution; and
 - ii) This states that DCC must confirm within 14 days (or such longer period...). DCC's solution (through the DSP and their contracted supply chain) provides confirmation within 28 days. This is due to the liaison needed between the different service providers involved in this process and their lead times. DCC suggest amending the legal text to state 28 days.
- f) In relation to H3.10(a), DCC proposes that the Code of Connection contains the minimum contract term for both the Low-Volume and High-Volume options (the current drafting states that the Code of Connection only contains this information for the Low-Volume option);
- g) H3.10(d) states that DCC may limit a Party's use of the connection where the Party fails to comply with the Code of Connection. DCC proposes that H3.10(d) is amended to relieve DCC of its obligation to meet its TRTs (and therefore some Code Performance Measures) where a Party's non-compliance of the Code of Connection causes the DCC to breach its SLAs. Similar relief is included in H3.49;
- h) H3.13 suggests that a Party may notify DCC of other Parties sharing the network connection. DCC proposes that H3.13 should be amended to say "The Party shall notify the DCC of other Parties sharing the network connection." Without this notification DCC has no way of managing this access. DCC also proposes that additional legal text is added to enable DCC, where a Party is not the Party that ordered the connection, to refuse that Party access to a connection where the Party has not notified DCC of the Party's right to use the connection. As drafted, H3.13 also has an unnecessary 'the' following the second set of parentheses;
- i) DCC considers that H3.14 would benefit from the addition of the

	<p>following at the end of the clause "...and will be required to undertake the relevant connectivity test as required in the User Entry Process Tests";</p> <p>j) In relation to H3.17, DCC proposes that there should be no difference in the way disputes on Low-Volume and High-Volume connections are handled. DCC proposes that all disputes should be referred to the Panel in the first instance in accordance with H3.17(a);</p> <p>k) Comments on Section A Definitions:</p> <ul style="list-style-type: none"> i) DCC User Gateway Bandwidth Option should also make clear that a backup option is available in addition to the Low and High options; ii) Section H3, generally needs to reflect that a backup option is available to order; and <p>l) DCC also notes that paragraph 233 within the consultation document describes 10Mb and 100Mb connections. We believe that this may be misleading to interested parties and recommend that no specific values for bandwidth are stated. This is because the connection speed will depend on individual User requirements and physical network capacity. DCC agree with the approach taken in the legal drafting which avoids the specific reference to connection speed.</p>
Q34	Do you agree that the drafting meets the needs of both DCC and its Users in establishing, maintaining and terminating connections? Please provide a rationale for your views and include any supporting evidence.
A34	DCC broadly agrees with the proposed approach and legal drafting subject to the observation that H3.16 implies that there are different codes of connection for different DCC users Gateway Bandwidth options, which is not the case. DCC propose the clause be amended to state that each User shall, when using a DCC User Gateway Connection (subject to the changes proposed in response to Q33), comply with the DCC User Gateway Code of Connection.
Q35	Do you agree with the proposed approach and legal drafting in relation to Processing Service Requests?
A35	<p>DCC disagrees with the proposed approach and the legal drafting in this area, specifically:</p> <ul style="list-style-type: none"> a) DCC considers that some of the proposed additions in this section are worded in a way that implies a particular solution and limits the flexibility of the DCC to deliver a solution to its Users. This imposes unnecessary constraints which may drive increased costs and alterations to implementation timescales as changes would need to be made to the existing service design. DCC recommends that the SEC defines obligations relating to outcomes rather than how these outcomes are achieved. We consider that the solution design should determine the way in which the outcomes are achieved; b) Some of the new obligations in SEC4 conflict with existing design principles discussed and agreed with Users at Design Forums since October 2013; c) Implementing some of the proposed approaches would be difficult

	<p>technically to deliver and would incur additional cost and impact delivery timescales; and</p> <p>d) More detailed comments in relation to this question, are set out in Annex C.</p>
Q36	Do you agree with the proposed changes to the approach and legal drafting in relation to Smart Metering Inventory and Enrolment Services?
A36	<p>DCC disagrees with the proposed approach and the legal drafting in this area, subject to the following observations.</p> <p>a) DCC has some concerns regarding the number of changes that have been made in this section that have either been introduced as new obligations or amendments to existing obligations. Both types of change will have an impact on the proposed DCC solution design and will result in change requests being raised and their impacts assessed. This could lead to increased solution costs and an impact on delivery timescales. The current DCC solution design does not align fully with the proposed legal drafting in several areas; and</p> <p>b) DCC suggest that DECC clarifies the position as per the specific points for consideration set out in Annex D. The DCC Solution Design will continue without incorporating these drafting amendments as is until these are clarified and depending on the outcome an impact assessment may be required to adjust the design to meet the clarifications provided.</p> <p>Specific points for consideration are set out in Annex D.</p>
Q37	Do you agree with the proposed approach and legal drafting in relation to Problem Management?
A37	<p>DCC broadly agrees with the proposed approach and legal drafting with respect to Problem Management subject to the following observations:</p> <p>a) DCC recognises that these changes will require the Incident Management Policy to be updated and re-consulted upon, which we intend to do in October 2014. This will be prior to the conclusion of this consultation. Any changes to the consulted text may invalidate the DCC consultation and should be avoided; and</p> <p>b) DCC are obliged under H8.1(a) to be ITIL compliant. In accordance with this the DCC requests that for Problem Management the term 'resolve' is replaced with 'close' and the term 'resolution' is replaced with 'closure' to reflect ITIL definitions. These terms are used in H9.1(d), H9.1(g), H9.2 and H9.9.</p>
Q38	Do you agree with the proposed approach and legal drafting in facilitating provision of a service to consumers to allow them to find out which Users have accessed consumption data from their meters?
A38	DCC agrees with the proposed approach and legal drafting.
Q39	Do you agree with the proposed approach of not requiring any User to offer a transparency service to consumers at this stage?

A39	DCC has no comment on this question.
Q40	Do you agree with the proposal to provide for a date in the SEC when any assessment of whether a supplier is large/ small for testing purposes is made? If not, please provide evidence for why this approach would not work and what alternatives should be used.
A40	<p>DCC broadly agrees with the proposal to provide for a date in the SEC when any assessment of whether a supplier is large / small for testing purposes is made subject to the following observations:</p> <ul style="list-style-type: none"> a) DCC understands that only suppliers who meet the Large Supplier criteria within the date specified will be ready to participate in Interface Testing phase. DCC needs this to be clarified in the legal drafting. It is the supplier's responsibility to identify whether they fall into the criteria of a Large Supplier Category and to notify DCC on the date that is specified within the SEC as DCC does not have access to all the data required to confirm those suppliers who are on the borderline between Large and Small Suppliers. b) T3.15 requires that DCC determines whether or not the Large Supplier Party is ready to commence testing, and these Large Supplier Parties must comply with the requirements of the User Entry Process Testing. The SEC currently provides a 6 month period within which these activities can be undertaken prior to the commencement of UEPT at the start of Interface Testing. The deadline for Suppliers notifying the DCC that they are a Large Suppliers is therefore the end of December 2014. DCC would welcome the early conclusion of this question to facilitate the achievement of this deadline.

Business Continuity and Disaster Recovery (BCDR)

DCC broadly agrees with the proposed approach and legal drafting in relation to Business Continuity and Disaster Recovery (BCDR), subject to the following observations:

- (a) In relation to H10.3 and H10.4, the proposed legal text describes testing and outcomes against BCDR procedures. DCC proposes that the text reflects that testing and outcomes should be against BCDR plans and supporting procedures;
- (b) In relation to H10.5, DCC requests that the text refers DCC declaring a disaster and not significant disruptions since the RTO times quoted reflect disasters in the underlying SP contracts and associated BCDR plans;
- (c) Note in SP contracts a Disaster is defined as "means the occurrence of one or more events which, either separately or cumulatively, result in a Service Disruption which exceeds the relevant thresholds set out in the Business Continuity Plan (as referred to in paragraph 2.4 of Part B of Schedule 8.6 (Business Continuity and Disaster Recovery Plan)". Potentially it might be useful to define a Disaster in SEC;
- (d) With reference to Section M3. DCC notes that the wording on the loss of relief for Force Majeure where DCC has failed to follow its BCDR procedures and

offers the following observations:

- i) DCC suggests that M3.3 is amended to allow for relief where DCC follows BCDR procedures or has clearly justified why BCDR procedures have not been followed. DCC considers that the current drafting may dis-incentivise parties from taking the best approach in a BCDR situation. For example, where DCC is required to restore a service and/or resilience and in doing so the best approach would be to act outside what the procedures detail, the proposed legal text would cause DCC to be in breach of M3.3;
- ii) DCC suggests that the definition of Services FM in A1 extended to include the following text “(f) any event or circumstance which is beyond the reasonable control of the DCC or the DCC Service Provider, but only to the extent such event or circumstance (or its consequences could not have been prevented or avoided in accordance with Good Industry Practice).” We consider this would allow the provision of sufficient relief in the event of a disaster due to circumstances outside of the DCC/ DCC Service Providers’ reasonable control; and
- iii) for clarity and consistency DCC suggests the addition of the following drafting after M3.9, which is equivalent to M3.2 on Force Majeure – “The DCC may claim relief from Liability for non-performance of its obligations in respect of the Services to the extent this is due to Force Majeure. To the extent that performance of the DCC’s obligations is unaffected by the Force Majeure, the provisions of this Code and any Bilateral Agreement will continue to apply.”

2.6 Registration Data

Registration Data

Q41	Do you agree with the proposed approach and legal drafting in relation to registration data text alignment?
A41	<p>DCC broadly agrees with the proposed approach and legal drafting in E2 subject to the following observations:</p> <ul style="list-style-type: none"> a) DCC proposes an amendment to E2.1 (i) as an objection cannot be ‘withdrawn’. DCC proposes that the drafting should be: “details of whether an objection has been received regarding a change to the person to be Registered in respect of the Metering Point, and whether that objection has been removed or upheld (at the date on which the Registration Data is provided)”; and b) DCC also proposes the addition of a new clause (j): “details of whether a Metering Point registration has been withdrawn (at the date on which the Registration Data is provided).” <p>The proposed changes are in line with the discussions held between DCC and the Registration Service Providers in developing the Electricity Registration Data Interface Specification.</p>

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?
A42	<p>DCC disagrees with the proposed approach and legal drafting.</p> <p>Smart Energy GB (formerly CDB) has the ability under the Gas and Electricity licences to obtain this data directly from the suppliers. We understand that because DCC receives this information from Registration Data Providers in order to invoice Parties, it is thought to be the easier route for DCC to provide it onwards to another party.</p> <p>This data, when combined, is highly sensitive market share information and as such it is treated with the utmost care by DCC with limited staff having access only where there is a genuine business need. We are concerned about the security risk of DCC being under an obligation to provide this data to another party. This will require the introduction of additional controls and procedures that are not currently in place for existing DCC services in order to protect this data. The cost of these additional controls would need to be borne by Parties and ultimately the consumer.</p> <p>DCC considers a more cost effective solution is for:</p> <ol style="list-style-type: none"> a) The costs of Smart Energy GB be defined as Pass-Through Costs within the DCC Licence b) For the costs related to Smart Energy GB to be treated in a similar manner to the costs incurred by SECCo within the SEC through provisions including: <ol style="list-style-type: none"> i) Smart Energy GB provide DCC with a budget for the year in advance of DCC setting the Charging Statement each year (through an obligation on Suppliers) ii) The introduction of a few Fixed Charge within Section K for 'Fixed CDB Charges', which could apply to Charging Groups 1, 2 and 3 only. <p>DCC recognises that this approach could not be concluded upon in time for RY2015/16, and believes the alternative is for Smart Energy GB to identify an alternative mechanism with the Suppliers.</p>
Q43	Do you agree with the proposed approach to RDP/DCC connections and the associated legal drafting?
A43	<p>The DCC broadly agrees with the proposed approach and legal drafting subject to the following observations:</p> <ol style="list-style-type: none"> a) DCC disagrees with the approach of having the RDP Interface Equipment obligations (E3.3 to E3.11) in section E3. A common network infrastructure is used to deliver all of the DCC services. As such, obligations around the equipment and the connections apply to all Parties and RDPs using the DCC services. Therefore, DCC considers that the drafting is combined with the appropriate clauses in H3.33 to H3.42; and b) The legal drafting does not currently take into consideration that an RDP may choose to share a connection with a User. This scenario

	would occur where a Network Party who is a User is also a Registration Data Provider (in accordance with the definition of Registration Data Providers). DCC considers that this needs to be amended.
Q44	Do you agree that Network Parties using the same RDP should be jointly and severally liable for failure of that RDP to comply with provisions relating to the RDP's use of the connection provided to it by the DCC?
A44	The DCC agrees with the approach and the legal drafting. However, liability also needs to be considered in light of the potential scenario of a Network Party sharing a connection with an RDP, as outlined in part (b) of our response to Question 43 above.

2.7 Explicit charges for certain other enabling services

SEC consequential changes: Alignment to DCC and Supply Licences

Q45	Do you agree with the proposed approach and legal drafting in relation to provision of Explicit Charges for Certain Other Enabling Services?
A45	<p>DCC broadly agrees with the proposed approach and legal drafting in relation to provision of Explicit charges subject to the following observations:</p> <ul style="list-style-type: none"> a) DCC understands that the Government requires that relevant parties are provided with access to a remote testing environment during the End-to-End stage and the Enduring Test phase with the intention that this is used for the purpose of testing the interoperability of devices and back office systems; b) We agree that this enabling service should be provided with an explicit charge on the basis that: <ul style="list-style-type: none"> i) this test service is optional and test participants can use the test labs that are provided by DCC, the costs of which are socialised; ii) this approach is consistent with the Government's proposed method for charging for the provision of Communication Hubs for Testing which we assume will be used in conjunction with the remote test service; and iii) It is probable that this test service will not be required by all test participants and the costs of providing the service are likely to vary depending upon the volume of testing that is undertaken by each participant. It would therefore appear appropriate to apply an explicit charge to those parties who wish to use the service. We are also mindful that a high level of remote service use, possibly over a significant length of time, could result in an increase in the socialised cost that could be unreasonable for Small Suppliers to bear. c) With regard to the provision of test consultancy services, we understand that the Government expects DCC to define a standard level of test support that will be provided during the End to End test stage and Enduring Test phase and that this will be set out and consulted upon within the relevant Test Approach documents and the

	<p>costs socialised. On this basis we agree that any additional test support over and above this standard level of service should form an explicit charge.</p> <p>d) DCC would like it to be clarified that the End-to-End and Enduring Test Approach documents will be used to define the process, and also to clarify the manner in which the Enabling Services described in H14.31 will be delivered. We note that the End-to-End Test Approach document is not a SEC subsidiary document. We will include this in the Transitional Approach Document, unless DECC clarifies otherwise.</p> <p>e) DCC agrees with the proposed charging mechanism on the basis that non-SEC Parties will be under the same payment obligations as SEC Parties.</p> <p>Please also see our response to Questions 13 and 46.</p>
Q46	Do you agree with broadening the scope of DCC Licence Condition 20 to include the Other Enabling Services which attract an explicit charge?
A46	DCC broadly agrees with broadening the scope of DCC Licence Condition 20 to include the Other Enabling Services subject to our response to Question 13.

2.8 Confidentiality

Confidentiality	
Q47	Do you agree with the proposed amendments to the legal drafting which introduce a new controlled category of DCC data, set out guidelines for types of data which may be marked as confidential or controlled and limit liability for breach of the latter category?
A47	DCC broadly agrees with the proposed approach and legal drafting however DCC propose that the 'DCC Controlled' and 'DCC Confidential' are introduced as defined terms. This would provide clarity to parties when in receipt of a marked document, avoid confusion with the existing term 'Confidential Information' and align with the existing DCC classification scheme.
Q48	Do you agree that liability for disclosure of controlled information should be limited to £1 million per event (or series of events) for direct losses?
A48	DCC agrees that the liability for disclosure of "controlled" marked information should be limited to £1 million.
Q49	Do you think that SEC Parties other than the DCC may have a need to mark data 'controlled'? If so, please outline what, if any, parameters ought to apply?
A49	DCC has no view on this question.
Q50	Do you agree that liabilities if these controls are breached should be limited to £1 million (excluding consequential losses)?

A50	Should other SEC Parties be obliged to mark information data 'controlled' and subject to the parameters proposed, DCC broadly agrees with a £1 million limitation of liability.
-----	---

2.9 SEC consequential changes: Alignment to DCC and Supply Licences

SEC consequential changes: Alignment to DCC and Supply Licences

Q51	Do you agree with the proposed approach and legal drafting in relation to the consequential changes to align the SEC with the proposed changes to the DCC and Supply Licences?
A51	DCC agrees with the proposed approach and legal drafting in relation to the consequential changes to align the SEC with the Supply Licences.

2.10 Miscellaneous changes to SEC

Miscellaneous changes to SEC

Q52	Do you agree with the proposed approach and legal drafting in relation to the invoicing threshold?
A52	DCC broadly agrees with the proposed approach and legal drafting with respect to invoicing thresholds subject to the following observations: <ul style="list-style-type: none"> a) DCC proposes that the minimum limit should be £20+VAT as opposed to (£25). This adjustment will ensure the thresholds are in line with any future VAT rate changes; and b) DCC proposes a yearly adjustment should be made in line with inflation (RPI) to avoid the need to make future Modifications.
Q53	Do you agree with the proposed approach and legal drafting in relation to the credit cover threshold?
A53	DCC broadly agrees with the proposed approach and legal drafting with respect to credit cover thresholds subject to the proposal that a yearly adjustment should be made in line with inflation (RPI) to avoid the need to make future Modifications.
Q54	Do you agree with the proposed approach and legal drafting in relation to scope for an explicit charge related to Services within the DCC UGSS of zero?
A54	DCC broadly agrees with the proposed approach and legal drafting that introduces scope for DCC to set the explicit charge for Services within the DCC UGSS at zero. However, as the cost will be recovered via the fixed charge per meter, DCC proposes the addition of drafting to provide clarity that where these costs are not recovered through Explicit Charges, the costs will

	still be recovered by their inclusion within the fixed charge per meter for all five Charging Groups.
Q55	Do you agree with the proposed amendment to the definition of 'Mandated Smart Metering System'? Views would be welcome whether this change has a material impact.
A55	<p>DCC broadly agrees with the proposed amendment to the definition of Mandated Smart Metering System subject to the following observations:</p> <ul style="list-style-type: none"> a) As a traded MPAN may also be de-energised, DCC considers that the definition needs to confirm whether the Traded but de-energised MPANs are chargeable. b) Without any data, DCC cannot estimate the material impact of this change. DCC would need to know the split between Registered and Traded MPANs in the data it currently receives to take a view. c) Whilst this amendment will reduce the number of meters that DCC charges against, DCC will also need to increase the fixed costs per meter accordingly so whilst there will be individual winners and losers at Party level, DCC is largely unaffected. d) The timing of this change is important to DCC as we have already set the charging statement for RY2014/15 and the costs per meter for each Charging Groups have already been set. DCC propose that any changes are effective from the start of a Regulatory Year. For this to take effect from RY2015/16, this drafting will need to be concluded and effective with enough time to allow RDPs to provide the required data to DCC to allow us to set the Charging Statement for RY2015/16. In practice this would mean RDPs providing us with data by the end of November 2014 to allow us to submit our Charging Statement to the Authority by the end of December in line with our Licence obligations. If these timescales are not achievable, this change may need to be effective from RY2016/17. The alternative is that DCC has a risk of under recovery due to an unknown reduction in the meter numbers. e) Paragraph 320 in the consultation document indicates that DCC can rely on the transition arrangements in Section X with relation to Registration Data until September 2015. Paragraph 324 states that further consultation would be required to amend this date further. DCC proposes that the SEC drafting is amended to ensure these transitional arrangements are in place until DCC go-live. This would adjust the date to allow for the already agreed change to the date of ILO to December 2015, but it would also future proof the provision to mitigate any unforeseen future change to ILO. This could be achieved by amending X2.4(b) to link the variation to E2.2 to ILO rather than a specific date. If DECC need to consult further to implement this change we would support this.
Q56	Do you agree with the proposed approach and legal drafting regarding power outage alerts?

A56	<p>DCC broadly agrees with the approach and the legal drafting subject to the following observations:</p> <ul style="list-style-type: none"> a) DCC may not forward power outage alerts in all circumstances (though the current wording may allow for this, it would benefit from clarification). CSP power outage notification solutions work in different ways, and not all alerts will be capable of being forwarded for outages affecting greater than 50 premises); and b) Energy Suppliers may choose to opt out from receiving Power Outage alerts, though current drafting obligates DCC to forward all alerts.
Q57	<p>Do you agree with the proposed approach and legal drafting in relation to the testing of shared systems?</p>
A57	<p>DCC broadly agrees with the proposed policy approach and legal drafting. However, we believe that the legal drafting requires clarification and that potential risks associated with the provision of shared services should be addressed. As such, this agreement is subject to the following observations:</p> <ul style="list-style-type: none"> a) We do not believe that it is possible for one Party to place reliance on the testing that is undertaken by another Party in all circumstances. Some specific tests (for example SMKI related tests) will need to be undertaken by all Parties regardless of whether or not they have been previously proven by a specific Party on the shared system. We therefore consider that H14.20 should be modified to address this concern; b) H14.20 states “Where Systems have been proven to meet the requirements of this Code”. However as set out in H14.14(a), User Entry Process Tests will not test the User System, only the transmission and receipt of communications; c) We understand that it is the responsibility of each Party using a shared system to establish commercial contracts with the shared service provider to address any operational and security risks associated with the use of the service. We also understand that it is the responsibility of the Party to determine if it can place reliance on the testing that has been undertaken by the shared service provider and that use of a shared service does not relieve the Party of its SEC obligations. We consider that the SEC requires further clarity in this regard; d) We consider that it is important that DCC is notified when a Party ceases use of a shared service and connects to the DCC via a different means. In this instance we believe that the Party must undertake UEPT in its own right, and we would like this to be clarified in the SEC; e) All functions offered by the shared system will need to be tested before use. As the portfolio of features/functions grows, automated regression test scripts will need to be developed for each additional feature/function. Furthermore, with each roll-out of the shared system to another Party, regression testing will need to be executed to provide confidence that the DCC performance and security requirements have been maintained, and to provide a level of confidence in the integration connectivity to the new Party’s systems. We consider this requirement should be clarified in the SEC;

	<p>f) If the shared system is changed in a manner that impacts on the interface to DCC then the shared service provider needs to give due consideration to regression testing of those changes, i.e. re-running the applicable User Entry Process Tests. This should be reflected in Section H14. We consider that this requirement for regression testing should apply to all user systems; and</p> <p>g) We would like to make the observation that H1.6 prevents a shared service provider from undertaking UEPT in its own right prior to offering service to a supplier, electricity distributor or gas transporter. We consider that this is contrary to the Second Enduring General Objective part (a).</p>
Q58	Do you consider the costs of remote access to the test SMWAN should be socialised across all Users or charged directly to those test participants who use the service? Please provide an explanation for your answer.
A58	<p>DCC agrees with the proposed approach and legal drafting.</p> <p>DCC consider that Option 1 (socialising the costs of providing remote access to the SMWAN across all Users) could be perceived as detrimental to small suppliers and therefore Users will not be required to test remotely as they will be able to use physical test labs, the costs of which will be socialised. In addition forecasting potential usage in order to contribute to setting DCC budgets (and therefore Charging Statements) would add further complexity to DCC.</p>

2.11 PART B: Communications Hubs Charging

Communications Hub Charging

Q59	Do you agree with the proposed legal drafting in relation to Communications Hub Asset and Maintenance Charges?
A59	<p>DCC broadly agrees with the proposed legal drafting in relation to Communications Hub Asset and Maintenance Charges subject to the following observations:</p> <p>a) With respect to the Stock Level Explicit Charge - Pre installation:</p> <ol style="list-style-type: none"> In order for DCC to meet the First Relevant Policy Objective, DCC will need to set a single uniform 'blended rate' across all three regions. This will apply to all Communications Hubs as DCC will be unable to distinguish whether a Communications Hub is ultimately bound for a Domestic premises or a Non-domestic premises until after it has been installed and commissioned. DCC considers that it would add clarity for Users and potential users if it were stated explicitly within the Charging Methodology; and For Registered Supplier Agents, the drafting results in them ceasing to pay any Communications Hub charges once the Communications Hub is commissioned. This may benefit from being explicitly clarified for the benefit of current and potential

	<p>Registered Supplier Agents.</p> <p>b) With respect to Fixed Communications Hub Charge – Post Installation (FCH rate):</p> <ul style="list-style-type: none"> i) Within the CSP contracts, maintenance costs are significantly lower than asset costs. As a result, DCC specifically supports these costs being recovered through a single Monthly Fixed Charge; ii) Paragraph 352 within the consultation document states that the Monthly Communications Hub Charge would apply until the Communications Hub has been returned to the DCC or the asset cost has been paid off. However, according to the legal drafting in K6A the asset cost would continue to be socialised across all Enrolled Smart Metering Systems. DCC supports the legal drafting as: <ul style="list-style-type: none"> ▪ It supports part (a) of the Second (soon to be Third) Relevant Policy Objective as this approach would avoid there being any differential costs incurred between a customer with a recently installed Communications Hub or one installed, for example, 9 years previously. This is particularly relevant when a Supplier takes responsibility for a Communications Hub upon churn; and ▪ This approach is simpler to implement by DCC, thus reflecting part (d) of the Second (soon to be Third) Relevant Policy Objective. This also reflects the enduring billing solution that DCC is currently implementing. <p>c) With respect to both a) and b) above, it should be noted that as both rates are dependent on a number of volatile variables, DCC will build in a level of prudence in accordance with Licence Condition 36.5 to ensure DCC recovers sufficient funds to cover monthly payment obligations. DCC envisages that the level of prudence will reduce as the installed base of Communications Hubs grows over time;</p> <p>d) With respect to HAN Variant charges:</p> <ul style="list-style-type: none"> i) For the same reasons as we have outlined for a) i) above, DCC will need to set a single uniform 'blended rate' across all three regions. Again DCC considers that it would add clarity for Users and potential users if were stated explicitly within the Charging Methodology; and ii) Whilst DCC agrees with the text in principle, we also recognise that the methodology may need to be reviewed upon the introduction of any future HAN technologies when further information on both cost and operational process becomes available.
Q60	Do you agree with the proposed legal drafting on Communications Hubs Charging following removal and/or return?
A60	DCC broadly agrees with the proposed legal drafting on Communications Hubs Charging following removal and/or return, subject to the following observations:

- a) With respect to the explicit 'Early Termination Charge' for any faults/returns where DCC needs to recover the remaining asset cost from suppliers:
 - i) In order for DCC to meet the First Relevant Policy Objective, DCC will need to set an Early Termination Rate that is a 'blended rate' across all three regions set at the start of each regulatory year. This same rate would apply for all communications hubs regardless of whether a communications Hub was installed in a Domestic or Non-domestic premises as the cost of implementing the systems to identify where the Communications Hub had been installed would be disproportionate to the difference in cost. DCC considers this approach to be aligned with the Second (soon to be Third) Relevant Policy Objective. DCC considers that it would add clarity for Users and potential users if this was stated explicitly within the Charging Methodology; and
 - ii) It should be noted that this rate would be based upon actual fault volumes (not applicable in the initial year) coupled with forecasted spread of faults across 12 months and as a result the rate will need to incorporate a reasonable level of prudence in accordance with Licence Condition 36.5 to ensure DCC recovers sufficient funds to cover monthly payment obligations. DCC envisages that the level of prudence will reduce as the installed base of Communications Hubs grows over time and past performance provides an improved indication of future fault rates;
- b) With respect to the recondition fee, DCC will need to set this rate at the start of each Regulatory Year and the points listed under a) above equally apply;
- c) With respect to Category 1 – Non-Domestic Opt out (as per the table in paragraph 94 of the consultation document), DCC proposes that the early termination charge is socialised across the non-domestic suppliers according to the proportion of non-domestic meters enrolled in the DCC (i.e. non-domestic market share). This will be achieved by factoring the cost into the non-domestic Fixed Rates set at the start of each regulatory year. DCC considers that it would add clarity for Non-domestic Suppliers if this was stated explicitly within the Charging Methodology;
- d) With respect to Category 2 – Split-fuel premises (ref paragraph 94), DCC proposes that the Early Termination Charge is smeared across the domestic suppliers according to the proportion of domestic meters enrolled in the DCC (i.e. domestic market share). This cost will be factored into the domestic Fixed Rates set at the start of each regulatory year. DCC considers that it would add clarity for Non-domestic Suppliers if this was stated explicitly within the Charging Methodology. DCC proposes that the same principle should be applied for Non-domestic Early Termination Charges by Region;
- e) With respect to Category 4 - Type fault (ref paragraph 94), DCC notes the potential limited materiality of the payment to suppliers. As a result it may be administratively onerous to apportion it across the suppliers. DCC proposes that a simpler approach is to accumulate the amount

	payable to all Suppliers and to net this off against the Charging rates set for the subsequent year;
	f) With respect to Category 7 – DCC Fault (ref paragraph 94), the consultation document suggests that the Communications Hub will be replaced free of charge. DCC would like to clarify that the Stock level charges will only be refunded from the point at which a fault is recorded by the Party with DCC. This aligns to the Service Providers' contracts;
	g) The Charging Methodology currently refers to Charges. DCC believes that the drafting could be improved by reference to Charging Rates (being the per unit amount of charge that is applied to give the Charges in aggregate); and
	h) K7.5(o) currently refers to "CH Supplier Responsibility" rather than "CH User Responsibility".

2.12 PART C: Using the SMKI Service

Using the SMKI Service

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?
A61	<p>DCC are already building the facility for non-users to obtain SMKI Certificates, and to place these in the SMKI Repository to support the proposed approach. Any change to this position in conclusions would need to be impact assessed by DCC for both time and cost impact.</p> <p>DCC considers that the following points are not clear in the legal drafting:</p> <ul style="list-style-type: none"> a) Whether opted-out devices remain within the scope of the SMKI Recovery Procedure. DCC's current assumption is that opted-out devices are within the scope of SMKI Recovery and our Service Providers are building to this assumption. Otherwise opted-out devices would continue to operate with potentially compromised certificates; and b) we assume that the responsibility for the replacement of expired certificates on opted-out devices is the same as the responsibilities for DCC-controlled devices i.e. the Supplier has the responsibility. If this is not the case, alternate processes for the replacement of expired certificates will need to be defined.
Q62	Do you agree with the proposed legal text with respect to the DCC's, Subscriber and Relying Party obligations and associated liabilities?
A62	<p>DCC broadly agrees with the proposed legal text subject to the following observations:</p> <ul style="list-style-type: none"> a) L11.1 sets out the obligations for Eligible Subscribers to issue CSRs under the Organisation Certificate Policy (CP) Appendix B. The

- Organisation CP shows that in section 4.6 that the renewal of certificates using existing keys is prohibited. DCC considers that this conflict needs to be resolved;
- b) Section 4.7.1 A & B the CP does not support the Certificate Re-key, however the legal drafting describes certificate Re-Key in Section 4.7.1 C. DCC propose that as result of the above text, Section 4.7.1.a should state that the Policy does not support Certificate Rollover and new keys must be established (i.e. re-key). The same amendment applies to point Section 4.7.1. b;
 - c) L11.6 require clarification on the obligations relating to the compromise of Private Keys relating to Organisation Certificates in respect of point b, and would appreciate;
 - d) L12.1 should refer to the Organisation Certificate Policy;
 - e) L12.3 should include an obligation on Relying Parties to check the digital signature and validate the certificate chain;
 - f) L12.5 should preclude recovery scenarios;
 - g) As Certificates cannot be compromised as they are private keys that can be compromised. We propose L12.5 should read as follows: "No Relying Party may rely on an Organisation Certificate or OCA Certificate where it suspects that the private key relating to a Certificate has been Compromised, unless the private key and its associated certificate are used for the purposes of the Recovery Procedures as set out in the Code";
 - h) With reference to L12.6, the phrase 'reasonable endeavours' should be included in this clause; and
 - i) We also include comments on L10 in Annex A in order to clarify understanding of the DCC obligations for Recovery, following a detailed review of the Recovery Procedures document with DECC.

2.13 PART D: Enrolment and Adoption of SMETS1 meters

Enrolment and Adoption of SMETS1 meters

Q63	Do you agree with proposed legal text in relation to the Initial Enrolment Project for SMETS1 meters installed during Foundation?
A63	<p>DCC broadly agrees with the proposed approach and legal drafting subject to the following observations:</p> <ul style="list-style-type: none"> a) DCC wishes to re-iterate our concern that the work to deliver an Initial Enrolment Project will significantly impact our ability to achieve the ILO milestone of December 2015, should the project be initiated during 2014 or 2015. We understand that the Secretary of State will consider this impact prior to initiating the process that is set out in Section N, and that subsequent enrolment projects will not commence prior to enrolment of meters through the initial project; b) DCC considers that it will likely be necessary to transfer communications contracts to DCC in a phased manner in order to

- maintain communications to meters during the enrolment process (including during testing). We would like the definition of Adoption in N1.1 to enable this phased transfer of contracts;
- c) DCC considers that the term Minimum SMETS1 Meters at the end of N2.2 should be replaced by the term Minimum SMETS1 Service;
 - d) DCC agrees that a Party should be entitled to raise a dispute if it considers that a meter is not SMETS1 compliant. However, we would like to note that socialised costs may be incurred if we are directed to either remove meters from the Initial Enrolment Project Feasibility Report (IEPFR) following a dispute, or if we are required to cease communication with meters post enrolment. We would like the Government to consider whether DCC should be directed to cease work on the IEPFR in such a circumstance, pending resolution of the dispute;
 - e) DCC considers that clause N2.9 should refer to Section H14 (Testing Services) in addition to Section T ('Testing During Transition'). We also consider that whilst 'sunset' provisions for Section T have been discussed, it will be necessary for Section T to remain in force for the provisions in N2.9 to have effect;
 - f) DCC agrees that it should provide a SMETS1 Eligible Products List. However we understand that this will be published prior to the point of enrolment and would like to note that DCC may be required to remove devices from this list if, at the point of enrolment, a meter type is non-compliant. This circumstance could arise if an upgrade plan fails or if a dispute is raised against a meter. Whilst N2.16 allows DCC to amend the list, our preference is that the list should only include meter types that have been enrolled in DCC. This will provide a greater degree of certainty to Parties that a meter type is capable of enrolment;
 - g) N3.6(d) requires DCC to set out Adoption Criteria in the invitation to Supplier Parties. We assume that we are not required to consult on these criteria and that we may use all, some or none of the criteria upon which the Government has previously consulted. It would be useful for the Government to confirm this assumption within the SEC;
 - h) N4.3 requires DCC to include the costs of enrolment within the IEPFR. We understand that these costs are limited to those incurred by the DCC in enrolling and adopting meters and will not include any direct costs incurred by suppliers prior to the point of enrolment. We also understand that we will not be required to perform a value for money assessment, we would welcome confirmation of this assumption;
 - i) DCC is concerned that N4.4(m) will require DCC to publish information that is commercially confidential to individual Supplier Parties. We would like to propose that estimates of the premiums that may be charged are provided directly to each individual Supplier Party, but that Supplier Party names are redacted from the IEPFR. We also consider that N4.10(b) regarding the redaction of information should likewise apply to N4.5 and N4.8 which require DCC to produce and circulate reports which will contain commercially sensitive information. This approach should apply generally across the board,

	<p>as applicable, to minimise the likelihood of identifiable information being shared;</p> <p>j) DCC intends to meet the obligations set out in N4.5 and N5.4 via a public consultation and would like the Government to confirm that this is acceptable; and</p> <p>k) Appendix F sets out the minimum communications services for SMETS1 meters. DCC considers that the provision of different services to different types of SMETS1 meters will increase the technical complexity and cost of the enrolment and adoption process. We therefore propose that one level of service is provided to all SMETS1 meters.</p>
Q64	Does the contents list for the Initial Enrolment Project Feasibility Report (para 406) cover the required issues for the DCC to address? Are there any additional areas which you consider the DCC should be specifically required to include?
A64	DCC agrees with the legal drafting that is set out in N4.4 and considers that N4.4(n) will enable us to include additional content in the Initial Enrolment Project Feasibility Report, if necessary.
Q65	Do you agree with the proposed legal text in relation to charging arrangements for the ongoing communications costs of Foundation Meters enrolled in the DCC?
A65	DCC understands that it will be required to develop the legal text associated with the charging principles as part of the Initial Enrolment Code Amendments. We understand the rationale behind this decision and agree that the legal text reflects the policy intent.

2.14 PART E: DCC User to non-user churn

Provision supporting non-standard operations

Q66	Do you agree with the proposed approach and legal drafting in relation to User supplier to Non-User supplier churn?
A66	<p>DCC broadly agrees with the proposed approach and legal drafting, subject to the following observations:</p> <p>a) DCC proposes that for reasons of clarity the “Non-Gateway Interface” should be renamed the “Basic Interface” and that the “non-users” should be renamed “Basic Interface Users”;</p> <p>b) DCC is of the opinion that there are opportunities to improve the transaction volume threshold mechanism and remove the quarantine process. These are outlined in Annex E and would require relevant updates to Sections O2, O3 and X8. DCC would welcome the opportunity to discuss these areas at the earliest opportunity;</p> <p>c) Paragraph 422 of the consultation document refers to a cost of £100k for the Non-gateway Interface. DCC notes that a range of costs were</p>

provided to DECC and the final figure will be subject to a full impact assessment; and

- d) X.8.5 states that “The DCC shall develop and consult on the Non-Gateway Interface Specification so that the document is available in an appropriate form by such date as will reasonably enable the Non-Gateway Interface Specification to be incorporated into this Code three months in advance of System Integration Testing...”. To meet this obligation, DCC will require an early conclusion on the legal drafting regarding Non-Gateway Communications.

3 Further comments on SEC legal drafting

3.1 Demand Management

Managing Demand for User Gateway Services (sections H3.43 to H3.49 inclusive)

DCC suggests the SEC is amended to improve Demand Management for its Users.

There has been extensive discussion between DCC and Service Users on Demand Management. This has been mainly via the DCC User Gateway Service User design fora. It has also been escalated to TBDG on at least two separate occasions in the last six months. The recommendation from the latest design forum was that DCC should propose a change to SEC to support its Service Delivery.

H3.43 in SEC4 obliges Users to provide DCC with a forecast of the number of Service Requests that the User will send in each of the 8 months following the end of the month in which such forecast is provided. That forecast should contain a breakdown of the total number of Service Requests by reference to each Service listed in the DCC UGSS and the category of Service (i.e. Future-Dated, On-Demand or Scheduled).

DCC is concerned that this forecast of demand will provide a view of aggregated demand across the month, this concerns us because it does not provide a meaningful indication of how each User expects to use that demand across the month, and more crucially across each day. This approach makes it very complex to effectively manage future capacity.

This would require us to build to a theoretical 'peak' demand that may not materialise; the risk of this approach is an unnecessary increase in costs to Users.

DCC suggests additional obligations are included in the SEC, which require each User to submit a more granular demand forecast, setting out at which times within each day they would require DCC Services. We propose this obligation sits alongside the existing obligation to provide a forecast of the number of Service Requests that the User will send each month as per H3.43 (SEC2 H3.38).

We consider that this would broadly require each User to complete a standard template form similar to the one included in the current draft Code of Connection (and set out in Table 3.1, below). This table would require a percentage of demand expected to be used during a normal day. The template would be the "projected operating demand profiles". This would contain three time periods; Peak, Off-Peak (morning) and Off-Peak (evening) as these are the three distinct time windows that the DCC solution uses for Demand Management purposes.

Table 3.1: Example template table 'projected operating demand profile'

	Off Peak (morning)		Peak	Off Peak (evening)
Mode of Operation	00:00 – 06:00	06:00 - 08:00	08:00 - 20:00	20:00 – 00:00
On-Demand	5%		90%	5%
Future-Dated (Request)	5%		60%	35%
DCC-Only	5%		60%	35%
DSP Scheduled	80%	10%	5%	5%

Meter Scheduled	80%	10%	5%	5%
Future-Dated (Execution Response)	80%	10%	5%	5%

(percentages are indicative only)

We suggest that similar monitoring and TRT relief obligations (as are in operation in the rest of the SEC) should be applied to these new projected operating demand profiles to ensure that Users keep broadly within the levels they have forecast.

Introducing this additional obligation would enable DCC to aggregate all Users' demand forecasts and projected operating demand profiles to gain a better view of how Users intend to use DCC Services, and allows DCC to manage capacity effectively. We consider that this approach would be more cost effective in the short, medium and long term.

In addition, we suggest that H3.43 - H3.49 should need to be expanded to include Service Request Variants (as per the DCC DUGIS solution implementation) which exist at the lower level from Service Requests. This is discussed in more detail in Annex B.

Technical elements of Demand Management

DCC is concerned with the current level of controls that are in place to enable it to protect the overall system from excessive demand. This is particularly pertinent when aggregate demand is greater than planned. DCC recognises that H3.48 enables DCC to propose a Modification Proposal, however we consider that this is a reactive clause and can only be adopted once it is proved that aggregate demand cannot be satisfied. DCC suggests that H3.48 is amended to allow DCC to adopt a more proactive approach to managing demand, by allowing DCC to propose changes if it considers that there is a risk to fulfilling aggregate demand based on all relevant information that it has at its disposal. This would allow DCC to avoid demand management issues occurring that could have been prevented by proactive action by DCC.

DCC suggests that it should be able to implement ways of managing demand within its agreed capacity management model, and the aggregate capacity thresholds agreed with its Users. These thresholds will have been agreed in advance through the forecasting and capacity management processes so will be open and visible to all Users.

DCC is concerned that scenarios may occur during operational delivery whereby a single User (or collection of Users) exceed its demand forecasts by a significant margin and, in doing so, risk the service delivery for other DCC Users. To avoid this situation, DCC suggests that it should be able to impose a technical solution (for example the throttling of additional service requests at an agreed lower rate, or application of bandwidth restrictions to a lower agreed rate). We propose that this approach is used for any User or set of Users submitting Service Requests significantly above its monthly forecasts.

3.2 Provision of Parse and Correlate Software

Provision of Parse and Correlate Software

DCC can ensure that Parse and Correlate Software complies with the Java EE rules of compliance and deployment. However, DCC is unable to guarantee any User software deployed within the same system has complied to such rules.

DCC suggests that H11.4(a)(i) is amended to read "...provided in such a manner as not to be the cause of a material adverse effect..." instead of "...provided in such a manner as not to have a material adverse effect...".

3.3 Forecasting for Communications Hubs charging

Forecasting for Communications Hubs charging

DCC suggest it would be helpful to all Supplier Parties and Authorised Supplier Agents for SEC to include forecasting requirements to support DCC in setting rates for Communications Hubs Charges and Explicit Charges relating to Communications Hubs. DCC considers that forecasts for this purpose should be provided on a quarterly basis to reflect the quarterly refreshing of the Indicative Charging Statement and Indicative Budgets. This would benefit Parties as it will allow DCC to set the most accurate and up to date rates.

Suppliers would need to provide a quarterly forecast including the following components:

- a) CH forecast for rolling 36 months by each of the three regions including:
 - i) Order volumes
 - ii) CH install volumes
 - iii) CH stock level
 - iv) Faults/Removals
- b) Smart Meter forecast for 36 months by each of the three regions including:
 - i) Install volumes split by Domestic/Non-domestic
 - ii) Install volumes split by Charging Groups.

The exception is for setting the ICS in 2015 in which case DCC will require a final forecast from suppliers by the end of November. Whilst SEC provisions would be useful to this end, DCC recognises that timescales make this challenging to include.

DCC are basing the suggestions above on the assumption that all suppliers will have acceded to SEC by 2015, meaning that installation forecasts volumes are sufficient to deduce the aggregate enrolled meter and Communications Hub base.

3.4 K5- Determining Fixed Charges during UITMR

K5- Determining Fixed Charges during UITMR

Current legal drafting states that DCC must make an estimate of the Enrolled Smart Meter volumes at the beginning of the Regulatory Year to determine the Fixed rates for Non-Domestic regions. This will prove to be difficult to use as the denominator in the Algebra.

This is difficult because the Enrolled Smart Meters for Non-Domestic meters are starting from zero and there will then be a growing number in line with the rate of roll out within the Regulatory Year. This is particularly problematic in setting the rates for RY2015/16 as the roll out does not start until end of 2015 in which case DCC cannot estimate the volumes of Enrolled Smart Meters at the start of RY 2015/16.

However, for Domestic meters this is not an issue as DCC can estimate the Mandated Smart Meter volumes at the start of the Regulatory Year and it is those meters that will be converted into Smart Meters during the course of the year, so it is not a highly volatile variable.

DCC proposes that for setting Non-Domestic rates, the Charging Methodology adopts an average volumes calculation for volumes of Non-Domestic meters consistent with the average volumes calculation for the Communications Hub Fixed Charge formula in K6(a).

In the Enduring Phase the average calculation is not applicable as the majority of the premises will have enrolled meters and DCC will then be able to use an estimate of the volume of Non-Domestic Smart Meters.

3.5 Communications Hubs formula for the Enduring Phase

Communications Hubs for the Enduring Phase

DCC agrees with using the average volume of Smart Meters during the UITMR stage (April 2015 – 2020), however DCC considers the average volumes calculation will not be required in the Post UITMR phase (Enduring).

DCC proposes to maintain this statement for the UITMR phase and add the following for Post UITMR:

“During the post UITMR phase DCC will estimate the number of Smart Meters at the start of that Regulatory Year for setting charges”.

3.6 SMKI and Repository Testing

SMKI and Repository Testing

DCC has identified potential anomalies with Section T5 (SMKI and Repository Testing).

This is related to the SMKI and Repository Testing required during Systems Integration Testing and the SMKI and Repository Entry Process Tests required as part of User Entry Process Testing.

DCC will document any concerns and discuss these with DECC during the week commencing 25 August 2014.

Annex A: DCC's suggested amendments to section L10

L10 THE SMKI RECOVERY PROCEDURE

The SMKI Recovery Procedures for Certificates issued under the SMKI Organisation Certificate Policy

L10.1 For the purposes of this Section L10, the "**SMKI Recovery Procedure**" shall be a SEC Subsidiary Document of that name which sets out, in relation to any incident in which a Relevant Private Key is Compromised:

- (a) the mechanism by which Users may notify the DCC and the DCC may notify Users and the PMA that the Relevant Private Key has been Compromised;
- (b) procedures relating to:
 - (i) the establishment and re-generation of a Recovery Key Pair and Issue of an associated Recovery Certificate;
 - (ii) the establishment and re-generation of a Contingency Key Pair;
 - (iii) the establishment and re-generation of an Apex Symmetric Key to encrypt and decrypt the public key element of the Contingency ~~Public~~ Key;
 - (iv) the storage of the Recovery Private Key and Contingency Private Key;
 - (v) the use of the Recovery Private Key and Contingency Private Key (including the use of the Apex Symmetric Key); and
 - (vi) the distribution of new Root OCA Certificates and Organisation Certificates to Devices;
- (c) steps to be taken by the DCC, the Parties (or any of them, whether individually or by Party Category) and the SMKI PMA, including in particular in respect of:
 - (i) notification of the Compromise; and
 - (ii) the process for recovering from the Compromise (which may differ depending on the Relevant Private Key that has been Compromised, and the nature and extent of the Compromise and any adverse effect arising from it); and
- (d) arrangements for periodic testing of the operation of the matters described in paragraphs (a) to (c) and the associated technical solutions employed by the DCC.

Recovery Procedure: Obligations

L10.2 The DCC, each Party and the SMKI PMA shall comply (in so far as they apply to it) with any requirements set out in the SMKI Recovery Procedure.

L10.3 The DCC shall reimburse the reasonable costs of any Party associated with supporting the maintenance and use of the procedures and arrangements set out in the SMKI Recovery Procedure.

Recovery Procedure: Document Development

L10.4 The DCC shall develop a draft of the SMKI Recovery Procedure:

- (a) in accordance with the process set out at Section L10.5; and
- (b) so that the draft is available by no later than the date which falls six months prior to the commencement of Systems Integration Testing or such later date as may be specified by the Secretary of State.

L10.5 The process set out in this Section L10.5 for the development of a draft of the SMKI Recovery Procedure is that:

- (a) the DCC shall, in consultation with Users, the SMKI PMA and such other persons as it considers appropriate, produce a draft of the SMKI Recovery Procedure;
- (b) where a disagreement arises with any person who is consulted with regard to any proposal as to the content of the SMKI Recovery Procedure, the DCC shall endeavour to reach an agreed proposal with that person consistent with the purposes of the SMKI Recovery Procedure specified in Section L10.1;
- (c) the DCC shall send a draft of the SMKI Recovery Procedure to the Secretary of State as soon as is practicable after it is produced, and shall when doing so provide to the Secretary of State:
 - (i) a statement of the reasons why the DCC considers that draft to be fit for purpose; and
 - (ii) a summary of any disagreements that arose during consultation and that have not been resolved by reaching an agreed proposal; and
- (d) the DCC shall comply with any requirements in a direction given to it by the Secretary of State in relation to the draft of the SMKI Recovery Procedure, including in particular:
 - (i) any requirement to produce and submit to the Secretary of State a further draft of the document; and
 - (ii) any requirement as to the process to be followed by the DCC (and the time within which that process shall be completed) prior to submitting a further such draft.

Recovery Procedure: Definitions

L10.6 For the purposes of this Section L10:

- (a) a "**Relevant Private Key**" means a Private Key which is associated with a Public Key contained in:
 - (i) any Organisation Certificate or root OCA Certificate that is held on a Device comprising part of an Enrolled Smart Metering System; or
 - (ii) any OCA Certificate that was used as part of the process of Issuing any such Organisation Certificate or OCA Certificate;
- (b) a "**Recovery Key Pair**" means a Key Pair established by the DCC for the purposes of the replacement of Organisation Certificates on Devices after a Relevant Private Key has been Compromised, and:
 - (i) a "**Recovery Private Key**" means the Private Key which is the confidential part of that Key Pair; and
 - (ii) a "**Recovery Certificate**" means an Organisation Certificate Issued by the OCA and containing the Public Key which is part of the that Recovery Key Pair; and
- (c) a "**Contingency Key Pair**" means a Key Pair established by the DCC for the purposes of the replacement of Root OCA Certificates on Devices after a Relevant Private Key has been Compromised, and comprising:
 - (i) a "**Contingency Private Key**", being the Private Key which is the confidential part of that Key Pair; and
 - (ii) a "**Contingency Public Key**", being the Public Key which is part of that Key Pair and which is encrypted using the Apex Symmetric Key and stored in the WrappedApexContingencyKey field of the Root OCA Certificate (being the field identified as such in the Root OCA Certificate Profile at Annex B of the Organisation Certificate Policy).
- (d) an "Apex Symmetric Key" means a secret key established by the DCC for the purposes of encrypting the public key element of the Contingency Key Pair which is embedded in the Root OCA Certificates on Devices and, in the event of a compromise, decrypting the encrypted part of that public key element for the purposes of re-provisioning the Organisation Certificate trust chain.

Annex B: Question 30 – further detailed comments

In relation to DCC's response to question 30, we have set out some detailed comments in support of that response. These comments relate to detailed alignment issues between SEC4 wording and DUGIS.

- 1.1. The DCC UGSS is inconsistent with the evolving DUGIS design and the way in which GBCS definitions drive the way services are presented to Users. The DUGIS has, since 7 February 2014 (driven by GBCS v0.7 revision 6), started to refer to Service Request (SR) Variants¹⁷ which should be reflected in the DCC UGSS. This is important as each Service Request Variant under the main service request can have different User eligibility. SEC should reflect Service Request Variants and not just Service Requests to avoid misalignment within SEC itself as well as between DCC service design and SEC.
- 1.2. H3.43 requires Users to submit forecasts in line with the DCC UGSS. DCC expects this to include the granularity of Service Request Variant as per the DUGIS definition. Restricting this to just Service Request level will cause inconsistencies. DCC suggests that the DCC UGSS includes Service Request Variants or that SEC directly references the DUGIS as the master of the service schedule to avoid inconsistency.
- 1.3. The DCC UGSS has changed since the last version of SEC and DCC considers that the changes have materially affected the way services are described to Service Users. H3.23 of SEC4 states that the DCC UGSS defines which services are a) "On-Demand Services", b) "Future-Dated Services" and c) "Scheduled Services". It is our understanding, that this is not now the case, as we have been unable to identify a definition for which services are future datable. The table implies that most services are now offered on-demand by the use of the Target Response Time column indicating 30 seconds. Previous versions showed these as having On-Demand 30 seconds and Future-Dated 24 hours TRTs. This is absent from SEC4 and implies that all services are now On-Demand services which is not the case according to DUGIS definitions, where most of these Service Requests are also available as future-dated options.
- 1.4. Service Descriptions have been removed from the DCC UGSS. It is unclear as to where these are now located. SEC needs a reference to these definitions otherwise there is no definition of what SRx.x actually is or what it is intended to do. DCC suggests that DCC UGSS references DUGIS for this information or if this referencing of DUGIS by the UGSS is not implemented then the UGSS must be extended to include the Service Descriptions.
- 1.5. Footnote 1 in Appendix E references H3.17, however this refers to Connection Disputes. This should be amended so that it reads H3.23.

¹⁷ Service Request Variant is the splitting of a Service Request into a Variant of the original Service Request based upon either a) a separate GBCS use case being invoked or b) a GBCS Use Case being made available to a distinct set of User Roles to enforce DCC Access Control.

- 1.6. There are various inconsistencies in the names used for each Service Request between DUGIS and the DCC UGSS. We propose that the DUGIS Service Request definitions are referred to in the SEC including DCC UGSS. This is consistent with DCC's view that the DUGIS should become the master definition. This also avoids DCC unnecessarily incurring the cost of updating internal DSP design documentation, which we do not consider to be efficient. Examples of tables with inconsistent names are as follows:
- SR3.5 "Reset Privacy PIN" in SEC vs. "Manage Privacy PIN" in DUGIS
 - SR1.1 "Update Tariff" and SR1.2 "Update Price" in SEC. However, GBCS use case for SR1.1 actually updates tariff and price so SR1.1 should be "Set Tariff and Price" as per DUGIS.
- 1.7. Non-Device Services are known as DCC Only Services in DUGIS – we suggest that the same name is used in the SEC.
- 1.8. There is no recognition in the SEC of the difference between services that are Future-Dated on the Device (as defined by GBCS) and the services that are future datable within the DSP - this has changed between GBCS v0.7 and v0.8. These two scenarios have different behaviours and impacts on TRTs that need to be defined in the SEC. This also impacts the DSP solution as the execution time for Future-Dated Service Requests, which cannot be future-dated by GBCS commands by DCC, means earliest execution time and not actual execution time. This is a subtle but material difference as there is a timing issue on delivering the command to the Device that has latency. The DSP needs a trigger point to initiate the command to be sent to the specified Device and not to deliver the command to the Device earlier than this date, which would trigger the immediate execution of the command which would be earlier than the requested Date/Time specified by the User. Execution dates for Future-Dated on Device commands are easier as the Device guarantees the execution time for the command occurs at that time, this is because the command is held locally on the Device. DCC recommends that the definition of the Future-Dated Services in the SEC should state that the Service Request shall be executed and the associated Service Response will be delivered with 24 hours of the specified time and date of execution.
- 1.9. A number of Service Request names have changed between SEC2 and SEC4 (there were no changes as part of SEC3) e.g. SR 1.5 was "Adjust Meter Balance" which resulted in a corresponding change in DUGIS, however this has now changed to "Update Balance". SR3.5 was "Reset Customer PIN" and is now proposed to be "Reset Privacy PIN". We are keen to understand the reasons for these changes, which make it difficult to align with DUGIS. DCC suggests DUGIS sets out the Service Request Matrix definitions which SEC should then refer to. It also appears that SEC definitions have not been updated to align with the latest changes to the GBCS.
- 1.10. The proposed SEC drafting suggests a reduction in the services that Export Suppliers can now use. The latest SEC4 proposals remove the following services from use by the Export Supplier.
- (a) SR4.6 Retrieve Daily Read Log – this contains values for both the Active Import Register and the Active Export Registers. GBCS use cases exist to retrieve these separately but the Active Export

Registers need to be collected by the Export Supplier. SEC4 appears not to support this.

- (b) SR6.20 Set Device Configuration (MPxN) – there is a GBCS use case to set the Export MPxN on ESME so the Export Supplier needs to be eligible to use this service alongside the Import Supplier and Gas Supplier.
 - (c) SR8.3 Decommission Device, SR8.4 Update Inventory, SR8.11 Update HAN device Log, SR8.12 Restore HAN device Log, SR8.13 Update HHT Response, SR12.1 Request WAN Matrix – previously these services were available to Export Suppliers and DUGIS has reflected this. It is unclear why eligibility for the Export Supplier been removed.
- 1.11. SR4.13 Read Prepayment Configuration says eligibility for Import Supplier and Export Supplier but does not mention Gas Supplier. DCC recommends this needs adding otherwise Gas Suppliers will not have access to this Service.
 - 1.12. SR 6.4 Update Device Configuration (load limiting) - states eligibility for Gas Suppliers, however there is no load limiting for a Gas Meter, therefore a Gas Supplier should not be eligible for this service. DCC recommends that this service should be available to Import Suppliers only.
 - 1.13. SR 8.4 Update Inventory – previously, this service was available to Other Users and DUGIS has reflected this. It is unclear why eligibility for Other Users has been removed. DCC recommends that this service is available to Other Users as they may need to pre-notify CADs and make changes to the Inventory if these pre-notifications contain incorrect details. DCC considers that policy relating to CADs requires clarification.
 - 1.14. SR 4.18 is a new Service Request “Credit Mode Meter Balance”. It is the only SR to have a pre-condition. It is unclear as to why this service is only available in respect of Devices that are not operating in pre-payment mode, as the GBCS use case could be used in prepay mode. DCC recommends consistency in the use of pre-condition statements in SEC.
 - 1.15. SR 4.8 “Read Profile Data” - this has three SR Variants in DUGIS with different eligibility for each, which we consider should be reflected in the Monthly Service Metrics table. Some User Roles have access to more than one Variant, it is unclear how this is reflected in the description. As outlined above, the SR Variant concept should be applied to the SEC to avoid ambiguity as to how to interpret the rules/limits which refer to SRs.
 - 1.16. It is unclear as to whether all SRs or only a subset of them would be subject to Local Command Services. The approach to Local Command Services was concluded on as part of SEC2, however this conclusion does not appear to have been reflected in the SEC4 consultation. Non-Device Services or DCC-only services in DUGIS cannot be returned for local delivery. DCC suggests that this arrangement is also reflected in the SEC. Non-Device / DCC-only services include a Firmware SR (SR11.1 – “Update Firmware”) as there is no

local delivery option within the DCC solution for this service. DCC suggests that the SEC sets out, explicitly, which services are subject to Local Command Services.

- 1.17. H5.10 states that an Export Supplier can request Devices to be added to the Smart Metering Inventory (SMI), however this contradicts the DCC UGSS which states that SR 12.2 Device Pre-notification can only be sent by an Import Supplier, Gas Supplier and/or Registered Supplier Agent. We would welcome clarification on this.
- 1.18. H5.13 states that any User can request the addition of a Type 2 device to the SMI Inventory, however the DCC UGSS states that SR12.2 Device Pre-notification be sent only by an Import Supplier, Gas Supplier and/or Registered Supplier Agent. DCC would welcome clarification this.
- 1.19. DCC considers that the definition of the obligations on Users in respect to SR8.13 Return Local Command Response, should be strengthened. Currently SEC4 states that this applies only for SMI update impacts but DCC considers that this obligation should be wider. If Security credentials are updated locally then the DCC must be informed to allow the status of these credentials to be updated in the Public Key Repository. For this reason, DCC will require these responses to be sent via the SR8.13 mechanism. The next version of the DUGIS will set out the SR for which DCC would expect a SR8.13 response if commands are delivered to Devices locally. DCC suggests that these obligations are included in SEC4.

Annex C: Question 35 – further detailed comments

Specific points of disagreement in relation to Processing Service Requests are:

- 1.1. H4.9 - For CSPs, the "Update Firmware" Service Request is not used. Rather they are responsible for issuing an "Activate Firmware" command in accordance with GBCS. Firmware distribution for CHF/GPF by CSPs is not managed through the DSP. DCC recommends that the wording in this clause is updated to reflect this by removing the command name as this implies a solution that does not exist. The interface is not the same as for Users. We do not consider that DSP/CSP interaction should be outlined in the SEC.
- 1.2. H4.11 – As previously commented on by DCC during discussion with DECC, this clause implies a solution that is not in line with the proposed DCC service design. "Provide an acknowledgement and then...", some DCC services are delivered on a synchronous basis and as a result this acknowledgement is delivered at the same time as the response as part of the same transaction. The SEC does not really allow for this if strictly read and enforced. DCC feels that the drafting is too prescriptive, not allowing solution flexibility, and is not aligned to Solution Design.
- 1.3. H4.11 (i) – DCC is unclear why the exception clause has been added for Type 2 Devices. If this is for CADs then these will be from Other Users and this is already excluded. If this is for the IHD then DCC does want to check the Registered Supplier. This requires further clarification from DECC.
- 1.4. H4.20 – Clause a) DCC suggest that a "part iv)" should be added to the list to enable the MPxN to be sent to the CoS Party. Without this DCC will need all 50 million devices in the CoS Party database as well as the Registration Data. It is a key assumption in the DCC service design that the solution does not hold all Devices in the CoS Party database. DCC solution design continues on the assumption that this additional data item will be added to the SEC drafting. If this additional data item is not added then this will have a significant impact on DCCs service design affecting costs and delivery timescales.
- 1.5. H4.31 through to H4.35 – DCC is of the opinion that these clauses are solution clauses, not obligations and should be reconsidered. In the case of H4.31, DCC considers that the solution being proposed has challenges that would potentially cause additional changes for the Correlate software. DCC considers that it should have the freedom to decide how the DCC solution design meets the obligations laid out in SEC. DCC recommends exposing separate Service Requests to be received from Users for the Join Service Commands and create separate Pre-commands and Commands to Devices as appropriate based on their criticality and whether or not the User must digitally sign the Command to the Device based on GBCS definitions. DCC recommends that the SEC needs to obligate the outcomes required and not how these are achieved. The proposed drafting does not align with the DCC solution design, despite delivering the same outcome. DCC solution design continues on the assumption that this drafting will be updated to reflect the DCCs comments. If this does not occur then an impact assessment will be required to be conducted by the DCC and changes made to the existing solution design which may affect costs and delivery timescales.

- 1.6. H4.31 obliges the DCC to generate two Pre-commands, which implies that they need Correlating by the User. Only one of these Pre-commands generated (to the meter) must be digitally signed by the User and hence Correlated, the other command to the Pre-payment Interface uses the ACB certificates and so the User would not digitally sign this Pre-command. If they did, the signed Pre-command would not work on the Device. Current design of Parse and Correlate software only correlates Pre-commands which need checking and digitally signing. DCC believe that there is little value in returning a Pre-command to User when digital signing is not required. The DCC proposed solution to this issue (which has been discussed with Users) is to expose two separate Service Request Variants to the User via DUGIS for 8.7 Join Service. The first is critical and requires the User to digitally sign the resulting Pre-command. The second, which is non-critical, will require the DCC to generate a command using its own certificates. DCC will not return the Pre-command to Users for digital signing. This solution still allows Users to select the join they require and only Pre-commands that they must digitally sign which can be successfully correlated with the existing Correlate design rules. This solution also ensures that all Service Requests and Signed Pre-commands sent to the DCC have a single status value of Critical or Non Critical. Mixing these status values within a single Service Request or signed Pre-commands is confusing and breaks one of the DCC service design assumptions. Reworking this at this late stage in design would occur additional cost and impact delivery timescales.

H4.34 also adds a new obligation on the DCC to manage a business process and the state of Service Requests. This breaks a DCC service design principle that all Service Requests are atomic and will either succeed or fail in their own right. DCC recommends that it's Solution Design should be allowed to develop a workable solution with Users which meets SEC obligations without the SEC unduly imposing constraints upon that Design wherever possible.

- 1.7. H4.32(b) – DCC is unclear why this command is returned to the User via the DCC User Gateway. If this is intended for local delivery, this should be clearly explained so that the relevant use case is accurate. DCC recommends that this section is made clearer as this clause is ambiguous.
- 1.8. H4.38 – DCC is unclear as to what is meant by "...as close to the end of the specified execution date". The execution date and time is a defined value and this command is either sent as an execute on-demand or a future-dated request which is stored on the device for future-date execution. DCC recommends that can DECC clarify the intent of this clause to remove ambiguity.
- 1.9. H4.42 – DCC would prefer to align terms to DUGIS whereby the term "DCC Only" Service Requests is used rather than "Non Device" Service Requests. As per Question 30, this will ensure alignment between DCC service design documentation and SEC.

Annex D: Question 36 – further detailed comments

DCC disagrees with the proposals and the legal drafting in this area, including the volume of minor changes.

This Annex sets out some points of disagreement on the changes proposed in relation to the Smart Metering Inventory and Enrolment Services.

Changes in policy/design assumptions

- 1.1. H5.13 states that any User can request the addition of a Type 2 Device to the SMI Inventory, however we are unclear as to whether this is actually the case. DCC recognises that this will have been proposed to allow an Other User to add CADs but it is not clear if Network Operators for Electricity and Gas need also to have the ability to add CADs as well as IHDs. We are keen to understand if there is a use case for this, as the DCC design had assumed there was not – consistent with the SEC2 position. We note that this change was not discussed in the consultation document itself. DCC suggests that the SEC2 position is retained. Any changes would lead to design changes and potentially impact delivery timescales.
- 1.2. H5.13 changes a design assumption for the DCC that Type 2 Devices are not stored in the SMI. This has been agreed with Users as part of DCC Design Forums and subsequent consultations (including SSI and DUGIS) and the proposed drafting reverses that position. Exception was made in DCC design for IHD only to be stored in the SMI, not all Type 2 Devices. DCC disagrees with this drafting.
- 1.3. DCC disagrees with H5.24(a) as this doesn't reflect the DCC User Gateway implementation of the Commission Device Service Request or the way that GBCS commands have been developed from the protocols. There is no commission device GBCS use case defined and instead this consists of a set of separate use cases that need to be combined to achieve the SEC business process of Commissioning.

This is actually two Service Requests as the commission smart meter comprises two GBCS use cases so the responsible supplier will need to send in two Service Requests not one as is implied here. This needs to be reflected into Section H5 drafting. DCC recommends that the commissioning status update to the SMI occurs once the Set Time stage of the commissioning process has been successfully completed. Setting MPxN for display on the Devices is then a subsequent obligation for the responsible Supplier.

DCC solution design continues on the assumption that this SEC drafting will change and that the DCCs proposed solution is acceptable as discussed with Users during DCC Design Forums. If this drafting is not changed, then the DCC solution design will need to be impacted assessed to manage the changes required which will have an impact on cost and delivery timescales.

Issues of inconsistency

- 1.4. H5.10 states that the Export Supplier can request Devices to be added to the SMI, but the DCC UGSS states that Service Request 12.2 Device Pre-

notification can only be sent by Import Supplier, Gas Supplier and Registered Supplier Agent. This needs to be clarified.

- 1.5. H5.13 states that any User can request the addition of a Type 2 Device to the SMI, but the DCC UGSS states that Service Request 12.2 Device Pre notification can only be sent by Import Supplier, Gas Supplier and Registered Supplier Agent. This needs to be clarified.

DCC believes that an obligation has not been provided in SEC for which Party needs to send SR12.2 pre-notification for CADs (Type 2 Devices). These will need to be pre-notified in order for DCC to recognise the request to add them to the CHF Device Log so that CADs may be recognised by the HAN.

- 1.6. H5.17 – the table and line entry for WAN Provider says DCC WAN but this should be SM WAN to align with SEC definitions. DCC has more than one WAN so definition is important. A WAN between the Users and the DSP (DCC User Gateway) and a WAN between the DSP and the Communications Hub (the SM WAN).

Changes to the DSP requirement

- 1.7. DCC is processing a change to incorporate the change outlined in H5.8 below. The remaining three changes are not currently within DCC's change process.
- 1.8. H5.8 requires DCC to populate the SMI with Communications Hub information prior to delivery of the Communications Hub(s) to the Supplier Party
- As the ability to order Communications Hubs has been extended to Parties other than the Supplier (F5.2, F5.5) it is unclear what the rationale is for the singling out Communications Hubs sent to a Supplier Party. As SR12.2 (Device Pre notification) is no longer required for Communications Hubs, it is unclear how other Parties would notify DCC of Communications Hubs delivered to them.
 - Populating the SMI prior to delivery acceptance means that the SMI will include Communications Hubs that have been rejected by a Party post-delivery. It is unclear how DCC should treat the Communications Hubs that have been rejected but have already been populated in the SMI.
- 1.9. H5.11 – DCC is now required to check the Communications Hub Device Certificate has been lodged in the SMKI Repository prior to populating the SMI with the Communications Hub information.
- 1.10. H5.23 – additional validation step required before setting the SMI status of a Communications Hub to 'commissioned'
- 1.11. H5.33 – CSPs are required to update the "WAN Provider" certificate on the Communications Hub within 7 days of commissioning.

Ambiguity of new requirements

- 1.12. This section outlines ambiguities in a number of the new requirements introduced within the legal drafting.

- 1.13. H5.11. This states that DCC and Users must ensure Device certificates exist prior to loading Devices into the SMI. It does not say what the DCC should do if these Device Certificates do not exist. The assumption by DCC and the current design is to reject the SR12.2 Device pre notification but SEC4 does not state this explicitly so it is ambiguous. DCC recommends that the SEC needs to state what the expectation is on DCC by adding this new validation check and explicitly stating the outcomes expected and defining that any exceptions identified are raised with Users.
- 1.14. Clause H5.15 – This section needs to be expanded to cover more than just Inventory affecting updates. Potentially other command responses need to be passed back to the DCC, for example, where SMKI repository updates need to be referenced. There is still no definition of what Local Command Services are in relation to the UGSS, so gaining the scope of this clause is currently difficult. DCC requests greater definition of Local Command Services within the relevant SEC clauses.
- 1.15. H5.24 may be difficult to interpret for Users as it confuses Device Log updates and GBCS “join” commands. DCC recommends that the drafting should be amended to include a separate clause and reference GBCS “joins” to improve clarity.
- 1.16. There is no direct obligation setting out which Service Requests are available for local delivery. The suggestion implied is that all Service Requests are possible, but we do not agree with this. DCC only or (other non-device services) cannot be returned for local delivery but there is no reflection of this within the drafting. There is also no current solution for Firmware to be delivered to Devices locally. This creates ambiguity for Users and DCC.
- 1.17. H5.14 – This implies that a Service Request exists to correct the Device to MPxN relationship. This is not aligned with a current DCC design assumption whereby exposing this to all Users via a DUGIS Service Request is not considered to be appropriate as this can change the way Service Requests are processed for all Users.

The link of MPxN to CHF and other Devices is key to the DCC data model and changing it has a wider impact affecting service delivery if misused. The install and commissioning process is designed to set this and be maintained over time. DCC recommend that the wording is changed to ensure that there is a mechanism and process to change established MPxN to Device associations, but that this process should be left open as a service management request process and not restricted to a DUGIS Service Request, to which access cannot be controlled or easily monitored.

- 1.18. H5.34 – is the DCC required to keep track of Communication Hubs that have not had their device certificates regenerated or device credentials replaced?

Annex E: Question 66 – further detailed comments

This Annex outlines opportunities to improve the transaction volume threshold mechanism and to remove the quarantine process proposed for the Non-Gateway Interface. DCC would welcome the opportunity to discuss these areas at the earliest opportunity.

- 1.1. DCC considers that there is a need to manage churn to non-user suppliers. DCC proposes five interactions relating to the operation of the transaction volume threshold mechanism. They are:
 - (i) Notification by non-user to DCC that it has gained a DCC-enrolled Smart Meter and wishes to install its organisation certificate
 - (ii) confirmation by DCC to the non-user that the SMS Certificate has been replaced
 - (iii) notification from the non-user to DCC of the volume of messages it will be sending in the next time-interval
 - (iv) notification to the non-user by the DCC that it has quarantined one or more of the non-user's messages
 - (v) notification by the non-user that it wishes the DCC to process one or more of the quarantined messages.
- 1.2. DCC suggests that 'change of supplier' notifications are either validated and accepted or rejected and discarded. This avoids the complication of a quarantine process and makes it clear to the non-user what they have to do next.
- 1.3. DCC proposes that the meter notification (stage i) should carry at least the novating non-user organisation certificate, the non-user personnel registration details, the MPxN of the meter and a unique message identifier. The confirmation (stage ii) would contain a copy of the unique identifier and would indicate that the change has been made or would indicate why the change has not been made.
- 1.4. DCC proposes that the message volume notification (stage iii) should be a manual process and that DCC would undertake a test of reasonableness before assigning a message volume value to the non-user organisation.
- 1.5. DCC proposes that if the message volume is exceeded, the notification (stage i) shall be discarded and the confirmation (stage ii) shall indicate that the notification has been discarded because the agreed volume threshold has been exceeded.
- 1.6. If the non-user wishes to send notifications in excess of the predicted volume then it must contact DCC to set a new volume threshold and resend any notifications that have been discarded. Notifications (stage iv) and (stage v) and the quarantining process will not be required.
- 1.7. To simplify the non-user side of the interface, DCC proposes that the meter notification (stage i), confirmation (stage ii) and volume notification (stage (iii))

messages should be delivered using a secure e-mail interface (such as S/MIME or HTTPS Webmail). Messages to DCC will be encrypted using a Public Key. DCC considers that the confirmation messages to non-users from DCC will not require encryption. However, the security issues relating to proof of delivery and non-repudiation will require further consideration.