

SMKI PMA Chair
Gemserv Limited
10 Fenchurch Street
London, EC3M 3BE

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

25th August 2014

Dear Sir,

Re: SMKI PMA's response to DECC's consultation on New Smart Energy Code Content (Stage 4) URN 14D/227

We welcome the opportunity to respond to DECC's consultation on stage four of the Smart Energy Code (SEC) and its accompanying draft legal text. The Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) was established by the SEC Panel in July 2014 in preparation for the designation of SEC Stage 3.

The SMKI PMA and the Panel note the new obligations and requirements in SEC 3 associated with the SMKI arrangements, including certificate policies, eligible subscribers and other minor changes. We also note further obligations for SMKI flagged in SEC 4.

In response to the consultation, we would like to raise an issue that according to Section L5.1 (j) and (k) of the SEC all versions of the Certificate Revocation List (CRL) and Authority Revocation List (ARL) must be stored in the SMKI Repository. The SMKI PMA believes this is unnecessary and could potentially lead to storage issues. Only the current version of the CRL and ARL would need to be stored in the SMKI Repository. This could be incorporated into SEC 4 without the need to raise a modification.

A second issue is that the SMKI PMA recognises that there is a need for separate Public Key Infrastructure (PKI) arrangements to be established by DCC covering Transport Layer Security (TLS) for DCC Gateway Communications and the security of information exchange with the SMKI Registration Authorities (RAs), currently referred to as "DCC KI" and "Infrastructure KI" respectively.

The SMKI PMA believes that it would be most economic and practicable for these two PKIs to be subject to the aegis of the SMKI PMA and its associated Assurance processes. We therefore propose that the SEC should include the following:

- The scope of the SMKI PMA should be extended to cover any additional PKIs used by DCC in its interactions with Parties under the Code.
- The Compliance and Assurance arrangements should be similarly extended
- The Certificate Policies (CPs) for the new PKIs will, we assume, be dealt with in currently envisaged or additional Code Subsidiary Documents. The SMKI PMA should have a role in approving these documents prior to their taking effect under the SEC (i.e. either prior to or after their designation, but in either case before they are effective).
- The CPSs for these PKIs should be submitted to the SMKI PMA for approval (although, as with SMKI, we assume that these will not form part of the SEC).
- It is not currently clear where the Subscriber and Relying Party Agreements for these PKIs will sit under the contractual framework, but we assume that these will also be likely to form SEC subsidiary documents. We recommend that this also be taken into account in the SEC4 conclusions.

This could also apply to any further PKIs applied by the DCC which are subject to SMKI PMA governance. In this way, if there are any further as yet undefined enhancements or extensions to the PKI service, they would be automatically brought under the governance of the SMKI PMA without the need for a modification.

We welcome the opportunity to discuss these issues further and continue our engagement with DECC on the content of the SEC and its further development and to support the transition of governance from TPMAG to the SMKI PMA. If you would like to discuss this response, please contact

... the first instance on

Yours faithfully,