

Consultation on the proposed changes to the SEC Subsidiary Documents that define DCC's service for SMETS1 devices

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1. Introduction and Context

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers are installing first generation smart devices (known as SMETS1 devices) in consumers' premises. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers and intends to offer the ability for SMETS1 consumers to maintain their smart services following a decision to switch Suppliers. The next generation of smart meters (known as SMETS2 meters) will be operated via the DCC's national network from the outset and allow smart switching between suppliers as standard.

In recent months, DCC has engaged with its customers to develop and refine the design of the SMETS1 Service, and has used this design to inform the drafting of the SEC subsidiary documents (SSDs). The proposed amendments to the SSDs will, in conjunction with any consequential amendments to the main sections of the SEC, define the requirements for the SMETS1 services that Users can access. These proposed amendments have been developed so that they are independent of the integration path that is chosen for Enrolment and Adoption.

DCC has adopted a phased approach to the drafting of SSDs, splitting the design content into two consultation tranches based on their relative priority for enabling DCC customers to prepare to operate eligible SMETS1 devices through the DCC SMETS1 Service.

This consultation invites stakeholders to provide comments and feedback on the first tranche of SSDs which contain the most critical customer-facing and customer-impacting content. Tranche one is comprised of the following documents:

- Service Request Processing Document (SRPD);
- DCC User Interface Specification (DUIS);
- Message Mapping Catalogue (MMC);
- Inventory Enrolment and Withdrawal Procedure (IEWP);
- Organisation Certificate Policy (OCP);
- SMKI Interface Design Specification (SMKI IDS);
- CPL Requirements Document (CPL); and
- SMETS 1 Supporting Requirements (S1SR) (a new SSD documenting the requirements in relation to SMETS1 Devices).

Following this consultation, the respective SSDs will be updated in light of the comments received. They will then be proposed for baselining under the governance of the Technical Business Design Group (TBDG) in the first quarter of 2018. Pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC, it is the intention that the documents would be designated (for new SSDs) or re-designated (for existing SSDs) by the Secretary of State, and incorporated into the Smart Energy Code (SEC) as either schedules or appendices. DCC expects these will be incorporated alongside changes to the main body SEC that will also be required to support DCC's provision of Services in relation to SMETS1 Devices, which are being developed by BEIS.

In respect of the second tranche of user impacting SEC regulatory documents to be consulted upon, DCC has provisionally identified that SMETS1 specific amendments will be required to the following documents:

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- Device Certificate Policy (DCP);
 - Incident Management Policy (IMP);
 - Self-Service Interface Design Specification (SSI DS);
 - Common Test Scenarios Document (CTSD);
 - Enduring Testing Approach Document (ETAD); and
 - Any consequential changes being identified and arising from this consultation.

New SMETS1 specific SSDs may also be required. The timings for consulting on new SSDS or amendments to these (and potentially other SSDs) will be confirmed by DCC in due course but is likely to be in Q1 2018.

DCC (in liaison with its customers and BEIS) is also developing further documentation that will seek to set out testing (through a SEC Variance Testing Approach Document, SVTAD), as well as transition and migration arrangements (through a Transition and Migration Approach Document, TMAD), and intends to consult on these arrangements in November 2017 (SVTAD) and February 2018 (TMAD).

2. Working Assumptions, Development and Stakeholder Engagement

In order to provide stakeholders with sufficient time to contribute to the proposed modifications, early versions of each of these documents have been presented to, and discussed by the Enrolment and Adoption TBDG sub-group¹. The feedback received from sub-group meetings has been reviewed by DCC, and incorporated within the drafting of these documents where appropriate.

The security-related SSDs have also been reviewed by the Security Sub-committee (SSC) and the SMKI Policy Management Authority (SMKI PMA). Comments and feedback in these areas have been taken into consideration and are covered in more detail in Section 4 below.

General Data Protection Regulation (GDPR) principles are currently being taken into consideration to ensure that the appropriate controls are in place to handle the use of personal data under the SMETS1 Services solution; DCC is engaging to that effect with its users separately. Under current assumptions no changes to these SSDs are anticipated.

3. High-level Summary of Proposed Modifications to SEC Subsidiary Documents

An overview of the proposed modifications to the first tranche of SSDs, along with a summary of the proposed changes to Sections A, F, G and L of the SEC has been set out in the sections below.

¹ The TBDG Enrolment and Adoption sub-group was created by TBDG to provide a working level forum through which BEIS can work together with DCC and key industry and other delivery partners to support the development and timely delivery of a DCC Service for SMETS 1.

3.1 Proposed SEC Subsidiary Document changes - Overview

3.1.1 Service Request Processing Document (SRPD)

Key areas of change in respect of SRPD are as follows:

Areas of change	Rationale for change	Key affected section of the SSD
Obligations of Users: Suspended Devices and Firmware	Reflect DCC's obligation to process UTRN requests in relation to devices that are suspended.	2.1 c
Alignment of DCC processing of Critical SMETS1SRs with that in place for non-critical SRs	Reflect the proposed SMETS1 message processing pattern to validate SRs against SMI, Registration Data and User eligibility	6.1 (c) and (f)
DCC to deploy anti-replay	Reflect the deployment of anti-replay in the S1SP in the absence of SMETS1 device capability	6.1 (m)
DCC to deploy future dating	Reflect the deployment of future dating within DCC systems, in the absence of SMETS1 device capability	6.5 (b), (c) and (d)
Threshold Anomaly Detection	Reflect the differentiated arrangements in respect of processing quarantined communications for SMETS1 Service Requests	12.2A
DCC to Threshold Anomaly Detection and Sequenced Service for counter-signed Service Requests	Reflect the proposed SMETS1 security model	14
Specific S1SP countersigned SR processing obligations	Reflect the proposed SMETS1 security model	16
DCC to apply Threshold Anomaly Detection to Top-Up SRs	Reflect the UTRN generation solution proposed for SMETS1 devices	16.2
DCC to countersign SMETS1 Service Responses and Alerts	Reflect the proposed SMETS1 security model	17

Q1

Do you have any comments on the proposed changes to SRPD? Please provide a rationale for your views.

3.1.2 DCC User Interface Specification (DUIS)

Key areas of change in respect of DUIS are as follows:

Areas of change	Rationale for change	Key affected section of the SSD
'SMETS1 Applicability' column added to SR Matrix	Reflect SMETS1 device capability	1.4.1; Table 17
Additional DCC access control checks	Validation that SR and Command Variant are applicable to SMETS1 devices and provide anti-replay check	1.4.3
DCC to deploy future dating	Reflect the deployment of future dating within DCC systems, in the absence of SMETS1 device capability	1.4.4
Clarification of how to interpret SRVs in general relating to SMETS1 devices	Reflect SMETS1 device limitations and processing patterns	1.4.5
Additional DCC validation required for SMETS1 devices	Reflect SMETS1 device capability	1.4.6
Data	Reflect that the processing of data SMETS1 Responses differs from SMETS 2	1.4.8
Additional S1SP access control checks	Reflect the proposed SMETS1 security model	1.4.9
SMETS1 Responses and SMETS1 Alerts schema definitions	Proposed mechanism to communicate SMETS1-specific responses and alerts to Users	1.4.11
SMKI certificate held by S1SP not device	Reflect SMETS1 device capability	1.4.12
New service response error codes (E60-E63)	Reflect S1SP processing for SMETS1 devices	3.5.10

Areas of change	Rationale for change	Key affected section of the SSD
Applicability of existing or new DCC Alert codes (N55-N57)	Reflect SMETS1 device capability and S1SP processing for SMETS1 devices	3.6.3.4; 3.9.1

Q2	Do you have any comments on the proposed changes to DUIS? Please provide a rationale for your views.
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3.1.3 Message Mapping Catalogue (MMC)

Key areas of change in respect of MMC are as follows:

Areas of change	Rationale for change	Key affected section of the SSD
New Alert Code definition	Acknowledgement that GBCS does not apply to SMETS1 devices	1.3
The SMETS2 Service Response structure does not apply,	Reflect SMETS1 device capability	1.4
References to GBCS do not apply	Reflect SMETS1 device capability	1.4
An Error element shall be added to accommodate SMETS1 Alert or SMETS1 Response	Reflect S1SP processing for SMETS1 devices	1.4
Response and Alert data will not be encrypted	Reflect SMETS1 device capability	1.4

Q3	Do you have any comments on the proposed changes to MMC? Please provide a rationale for your views.
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3.1.4 Inventory, Enrolment and Withdrawal Procedure (IEWP)

For the avoidance of doubt, the scope of this consultation is limited to introducing the changes to IEWP which are required to support the enduring SMETS1 arrangements as opposed to the requirements that will be needed to support enrolment during transition and migration. Arrangements for the latter will be consulted upon separately by DCC in Q1, 2018.

Key areas of change are in respect of IEWP are:

Areas of change	Rationale for change	Key affected section of the SSD
User obliged to notify DCC regarding issues with SMI data	Effective enrolment and ongoing operation of SMETS1 devices is dependent on an accurate inventory	2.11
Pre-commissioning obligations specific to SMETS1 devices	Clarity on the minimum information requirements to be provided to DCC by Users to support the enrolment of SMETS1 devices	3.4
Pre-commissioning obligations specific to SMETS1 devices	Reflect users' obligations to comply with the required configuration pre-requisites for operating a SMETS1 Device before attempting to communicate with the Device via the DCC	3.6
Post-commissioning obligations specific to SMETS1 devices	Obligations on suppliers to support SMETS1 device enrolment i.e. to update device security credentials, or any information required by DCC to be able to exchange communications with the Device	6
Removal of SMETS1 Communications Hub	Obligation on suppliers to update the SMI status of a Communications Hub upon removal	10

Q4	Do you have any comments on the proposed changes to IEWP? Please provide a rationale for your views.
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3.1.5 Organisation Certificate Policy (OCP)

The changes being proposed to OCP at this time have been developed in parallel to security architecture. These do not prejudice any views formed by SMKI PMA or SSC's on the security architecture at a later point in the development process, and may therefore be subject to ongoing review.

Key areas of change in respect of the SMKI OCP are as follows:

Areas of change	Rationale for change	Key affected section of the SSD
Introduce new definition – 'Entity Identifier'	To expand the scope of Organisation's Certificate Subject's unique identifier by removing compliance to GBCS	Annex A

Areas of change	Rationale for change	Key affected section of the SSD
Common requirements applicable to OCA Certificates and Organisation Certificates	Removal of GBCS compliance for valid authorisation of OCA Certificates and Organisation Certificates within SMKI	Annex B
OCA Certificate and Organisation Certificate Profiles	Removal of references to GBCS for details of valid Remote Party Role codes	Annex B

Q5	Do you have any comments on the proposed changes to OCP? Please provide a rationale for your views.
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3.1.6 SMKI Interface Design Specification (SMKI IDS)

The change being proposed to IDS at this time have been developed in parallel to security architecture. These do not prejudice any views formed by SMKI PMA or SSC's on the security architecture at a later point in the development process, and may therefore be subject to ongoing review.

Key area of change in respect of SMKI IDS relate to:

Areas of change	Rationale for change	Key affected section of the SSD
Information to be contained within Organisation CSR	To accommodate a new Remote Party Role to allow the DCC to act in the capacity as a SMETS1 Service Provider	Appendix F

Q6	Do you have any comments on the proposed changes to SMKI IDS? Please provide a rationale for your views.
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3.1.7 CPL Requirements Document (CPL)

Key areas of change in respect of the CPL Requirements document are as follows:

Areas of change	Rationale for change	Key affected section of the SSD
Certified Products List Contents	Extend the scope of the CPL contents for SMETS1 Device Models	2.1

Areas of change	Rationale for change	Key affected section of the SSD
Addition of Device Models	Reflect additional validation arrangements for adding SMETS1 Device Models to the CPL	3.2;3.3
Association of Hashes with Device Models on the CPL	Extend the criteria for associating a Hash with SMETS1 Device Models on the CPL	4.3c
Removal of Device Models	Specify the criteria by which the Panel can remove and reinstate SMETS1 Device Models from the CPL	6.2

Q7

Do you have any comments on the proposed changes to CPL? Please provide a rationale for your views.

3.1.8 SMETS1 Supporting Requirements Document (S1SR)

The S1SR document introduces a new SSD that seeks to set out the supporting requirements and communications, which specifically relate to SMETS1 Devices. It seeks to set out the following key areas:

Areas of change	Rationale for change
Device IDs	Definition for SMETS 1 (where SEC otherwise refers to GBCS)
User IDs	Reflect the use of User IDs in specific Service Requests
Originator Counters	Definition for SMETS 1 (where SEC otherwise refers to GBCS)
Related Identifiers and Counters	Definition for SMETS 1 (where SEC otherwise refers to GBCS)
Supplementary Party Details	Definition for SMETS 1 (where SEC otherwise refers to GBCS)
Event logging and alerting	Definition for SMETS 1 (where SEC otherwise refers to GBCS)
SMETS 1 Message Codes	Definition for SMETS 1 (where SEC otherwise refers to GBCS)

Areas of change	Rationale for change
Configuration pre-requisites for operating a SMETS1 Device through the DCC	Reflects the pre-requisites required to support the recording of a Device's details in DDC systems
Remote Party Role	Reflect the use of Remote Party Role Code in a Certificate or a Certificate Signing Request
SMETS1 Data Items	To accommodate the variances in populating specific Service Requests/Responses by either a User and/or an S1SP
Processing of SMETS1 Service Requests	To accommodate variations for processing specific Service Requests
Replay	Reflect arrangements for ensuring that Service Requests are not a Replay
OTA Header and Manufacturer Image	Reflect arrangements for digitally signing OTA headers and manufacturer images
S1SP recording of notified details	To reflect the requirements on the S1SP to update the details it holds in relation to the target Device upon authentication of Service Requests

Q8

Do you have any comments on the proposed changes to S1SR? Please provide a rationale for your views.

3.2 Proposed consequential changes to main body section of the SEC

This section summarises proposed changes to the main body sections of the SEC, which have been identified as being required to support the proposed amendments to the SSDs which are subject to this consultation.

A draft version of Section A that includes the additional definitions, thus far identified for SMETS1 Services, has been included for reference within this consultation to provide the necessary context and definitions in respect of the amendments being proposed to the SSDs. In addition, a summary is provided of the proposed areas of change to sections F, G and L of the SEC.

It should be noted that the proposed changes to the main body sections of the SEC identify only those changes that arise directly from the SSD changes that have been identified so far and are considered to be necessary to support the changes in the relevant SSDs. It is anticipated that further amendments to these and other Sections will be identified.

BEIS will be consulting more widely on all the main body changes at a future date, including those identified below. For the avoidance of doubt, please note that this section does not

invite users to comment on areas of potential main body SEC changes, but is instead presented to provide the necessary background and context to the consultation on the SSDs.

3.2.1 Section A – Definitions and Interpretation

The following new definitions and amendments to existing definitions will be proposed to Section A of the SEC.

Areas of change	Rationale for change
Countersigning (various)	Reflect the proposed SMETS1 security model
Device ID	Tie to EUI64as GBCS irrelevant for SMETS1 devices
Device Log	Reflect the new S1SP entity
Device Security Credentials	Reflect the proposed SMETS1 security model
S1SP/Relevant S1SP	Reflect the new DCC service provider
SMETS1 device definitions (various)	Differentiate the behaviour of SMETS1 devices
SMETS1 Service Request, SMETS1 Future Dated Critical Service Request, Stored SMETS1 Future Dated Critical Service Request, Response and Alert	Differentiate the capabilities and behaviour of SMETS1 devices and the S1SP
SMETS1 UTRN	Reflect the different behaviour for generating a UTRN for SMETS1 devices
SMETS1 Device Model (and SMETS2+ Device Model)	Reflects the meaning given to it in the updated CPL Requirements Document
SMETS1 Smart Metering System (SMETS1 SMS)	Introduces the concept of a Smart Metering System specific to SMETS1 Devices.
Unknown Remote Party (URP)	Broadens the scope of the definition to accommodate SMETS1
Message Code (new definition)	Accommodates the meaning it shall have in respect of SMETS1 Alert and SMETS1 Response

Areas of change	Rationale for change
UTC (Coordinated Universal Time) (new definition)	To reflect the UTC values which will require entering whilst populating any Timestamp field in a SMETS1 Alert or a SMETS1 Response.
Deployed Products List	Reflects the extended capability which the DCC will be developing in support of successfully processing SMETS1 Service Requests
Remote Party, Remote Party Role and Remote Party Role Code	Accommodate a new Remote Party/Role and Code to allow DCC to act in the capacity of a SMETS1 Service Provider
Equivalent Steps	Differentiate the capabilities and behaviour of SMETS1 devices
S1SP Alert (S1SP Alert Code)	Reflects alerts and codes associate with the S1SPs

3.2.2 Sections F (Smart Metering System Requirements), G (Security) and L (Smart Metering Key Infrastructure and Key Infrastructure and DCC Key Infrastructure)

In respect of **Section F** of the SEC, the specific key areas of change to support the SSDs are as follows:

Areas of change	Rationale for change
Assurance Certificates	Acknowledgment that Assurance Certificates are not required for SMETS1 Device Models
Publication	Reflect Parties' rights in challenging the Panel's decision on a SMETS1 Device Model in respect of the CPL
Deployed Products List	To Reflect the provisions of services in relation to SMETS1 device

Whilst reviewing the Threshold Anomaly Detection arrangements for relevant SMETS1 Service changes, it has been determined that no amendments are required to the Threshold Anomaly Detection Document (TADP) itself. Instead, due to the inherent differences in processing service requests targeted at SMETS1 devices, it has been proposed that the service request processes which comprise threshold anomaly detection are amended within the SRPD instead. Consequential changes, as a result, are therefore being proposed to Section G of the SEC. Key areas of change to **Section G** of the SEC to support the SSDs will be as follows:

Areas of change	Rationale for change
Threshold Anomaly Detection Procedures relating to the processing quarantined communications	Reflect the differentiated arrangements in respect of processing quarantined communications for SMETS1 Service Requests
Anomaly Detection Thresholds: Obligations on Users and on DCC	Differentiate rules for setting the Anomaly Detection Thresholds in respect of SMETS1 Service Requests

Q9	Do you agree that no changes are required to TADP?
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Finally, a consequential change will also be proposed to Section L of the SEC. In summary, the key change to **Section L** is as follows:

Areas of change	Rationale for change
Organisation Certificate	To accommodate a new Remote Party Role to allow the DCC to act in the capacity of a SMETS1 Service Provider.

4. Open Issues

During the development of these documents it has been acknowledged that a number of issues remain open and require additional work to be resolved. These are outlined below, and will be updated and incorporated into the relevant documents once clarity in these areas has been established in accordance to timescales set out in DCC's Delivery plan for SMETS1 Services. Relevant proposed amendments will be consulted upon by DCC.

- Service levels and non-functional requirements for SMETS1 Services in general, have yet to be determined;
- The agreed position in respect of SMETS1 Elective Communication Services. An RFI has been issued by DCC to Suppliers to determine Suppliers' requirements in this area. Responses are currently being analysed by DCC and findings will be shared with industry in due course;
- Cohort specific constraints on Service Request sequencing (e.g. related to the Payment Mode of the Meter). Such constraints are not reflected in these drafts;
- The current drafting assumes that SMETS1 ESME has a single meter balance and SMETS1 GSME has two meter balances, in line with the SMETS1 specification;
- The error handling strategy procedure for SMETS1 Service Response codes generated by DCC has yet to be determined;
- A full enumeration of Device Security Credentials which is currently pending ongoing analysis and will be set out in the SMETS1 Supporting Requirements document;
- It should be noted that the namespace changes in the latest MMC V3.0 Schema (embedded in the MMC document) require some updates to the MMC document of a detailed technical nature. In the interim, the existing MMC V2.0 namespace usage has been retained within the text of the MMC document. The respective updates to reflect

the most recent MMC Schema will be applied to the MMC as part of the post consultation process/review;

- The proposed changes to SSDs have been developed in parallel to security architecture for time reasons; these do not constrain SMKI PMA or SSC's views on the security architecture at a later point, and may be subject to ongoing review; and
- Potential impact of requiring additional security arrangements in respect of SMETS1 device model to the CPL. Current drafting does not reflect this at this stage.

During the development of the SSDs, TBDG sub-group members have found it helpful to have copies of the high-level message sequence diagrams that underpin the proposed amendments to the SSDs. In the event that respondents have not previously been able to attend the TBDG sub-group meetings, but would find these useful, please note that these can be made available on request. For the avoidance of doubt, where discrepancies are found between the proposed amendments of the high-level message sequence diagrams and the SSDs, the requirements within the latter will take precedence.

5. Questions for consultation respondents

DCC is seeking views on the following questions regarding the proposed SMETS1 changes to the SEC Subsidiary Documents.

Consultation Questions	
Q1	Do you have any comments on the proposed changes to SRPD? Please provide a rationale for your views.
Q2	Do you have any comments on the proposed changes to DUIS? Please provide a rationale for your views.
Q3	Do you have any comments on the proposed changes to MMC? Please provide a rationale for your views.
Q4	Do you have any comments on the proposed changes to IEWP? Please provide a rationale for your views.
Q5	Do you have any comments on the proposed changes to OCP? Please provide a rationale for your views.
Q6	Do you have any comments on the proposed changes to SMKI IDS? Please provide a rationale for your views.
Q7	Do you have any comments on the proposed changes to CPL? Please provide a rationale for your views.
Q8	Do you have any comments on the proposed changes to S1SR? Please provide a rationale for your views.
Q9	Do you agree that no changes are required to TADP?

Q10

Do you have any other comments on the proposed changes to the SSDs? Are you aware of any others issues, relating to the SSDs that should be addressed and considered?

6. How to Respond

Please provide responses in the attached template by 12 December 2017 to DCC at contact@smartdcc.co.uk.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department of Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS [or the Authority], including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004). If BEIS [or the Authority] receive a request for disclosure of the information [we/they] will take full account of your explanation (to the extent provided to them), but [we/they] cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation documents, please contact contact@smartdcc.co.uk. If you have questions about our approach to consultations, please contact arno.vandeneinde@smartdcc.co.uk.

7. Attachments

- Attachment 1 – Service Request Processing Document (SRPD)
- Attachment 2– DCC User Interface Specification (DUIS)
- Attachment 3 – Message Mapping Catalogue (MMC)
- Attachment 4 – Inventory Enrolment and Withdrawal Procedure (IEWP)
- Attachment 5 – Organisation Certificate Policy (SMKI OCP)
- Attachment 6 – Organisation Certificate Policy (SMKI OCP)
- Attachment 7 – CPL Requirements Document (CPL)
- Attachment 8 – SMETS1 Supporting Requirements Document (SRD)
- Attachment 9 – Section A – Definitions and Interpretations