

# Conclusions

On the consultation of the  
delivery plan for SMKI  
Service Continuity

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# 1. Introduction and Context

1. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single, secure, digital network. DCC supports the roll-out and operation of second generation (SMETS2) smart meters, as well as the migration and operation of existing first generation (SMETS1) meters onto our network.

## 1.1. Background

2. DCC provides services that enable Smart Metering systems to be installed and operated in premises across Great Britain. The Public Key Infrastructure (PKI) estate underpins the security of this infrastructure. The following sit under this umbrella:
  - The Smart Meter Key Infrastructure (SMKI) and Infrastructure Key Infrastructure (IKI) services currently provided under the Trusted Service Provider (TSP) contract with British Telecom (BT).
  - The DCC Key Infrastructure (DCCKI) is a further PKI service intrinsic to the Smart Meter programme. DCCKI is currently hosted within the Data Services Provider (DSP) and supports certificate signing and communications encryption across the gateway and to end devices. NB DCCKI is not within the scope of the PKI-Enduring (PKI-E) programme.
  - There are also PKIs that support SMETS1. These are also out of scope of the PKI-E programme.
3. The TSP contract, which provides the SMKI and IKI services, will expire in March 2025 (with an option to extend an additional year to March 2026). To avoid any potential compromise to the security of the DCC network, DCC is exploring options for the implementation of a replacement SMKI and IKI solution that, at a minimum, provides the services currently offered by the TSP contract. This is to ensure that there is service continuity after the TSP contract expires.

# 2. Consultation Questions & Responses

## 2.1. Questions

4. On 28 July 2023, DCC issued a consultation on its delivery plan for continuity of the SMKI Service beyond the expiry of the current contract. The consultation set out 10 questions as set out in Table 1.

Q1	Is there anything further that you would like us to consider within our planning activities? Please provide any details.
Q2	Do you agree with the proposed LC13B plan? Are there any milestones that you consider should be included that are not? Please provide a rationale for your views.
Q3	We would welcome any early views on transition and decommissioning from our Stakeholders. Please provide as much detail as possible.
Q4	We would welcome comments on DCC's lessons learned. Are there any we have not listed, or lessons in the list which should be discounted?
Q5	Do you agree with DCC's assessment of interaction with other programmes. Are there any interdependencies that DCC has not identified, or incorrectly identified? Please provide a rationale for your views.
Q6	Do you agree with our assessment of dependencies for the re-procurement of the TSP Service? Are there any which are not included but should have been?
Q7	Do you agree with our assumptions for the re-procurement of the TSP Service? Are there any which are not included but should have been?

Q8	Do you agree with our assessment of risks associated with the re-procurement of the TSP Service? Are there any which are not included but should have been?
Q9	Do you support DCC's proposals for engagement with stakeholders during the delivery of the plan? If not, please tell us why.
Q10	Are there any changes that DCC users would like to see included within the scope of the procurement?

Table 1

## 2.2. Responses

5. DCC received a total of six written responses from:
  - One Large Supplier
  - One Electricity Network
  - One joint response from two Other SEC Parties
  - Two governance bodies
  - One Service Provider

## 3. Analysis of Responses

6. DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response.
7. DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:
  - an overview of the responses on the topic; and
  - where appropriate a DCC response.

### 3.1. Question 1

8. DCC sought views on the activities planned over the course of programme asking: "Is there anything further that you would like us to consider within our planning activities? Please provide any details."

#### Respondent View

9. DCC received six responses to this question.
10. One respondent noted lessons learnt from both the Enduring Change of Supplier (ECoS) programme and Modification Proposal MP168<sup>1</sup> and highlighted the importance of Device manufacturer engagement during the programme. They added that engagement should be tailored to each individual manufacturer. They repeated this point at question 3 (lessons learned) as well.

<sup>1</sup> <https://smartenergycodecompany.co.uk/modifications/cpl-security-improvements/>

11. One respondent welcomed the thorough planning for the continuity for the SMKI service. They requested a corresponding RAG report for the Plan on a Page to ensure that these milestones are met. They repeated this point at question 3 (lessons learned) as well.
12. One respondent raised concern with what it deemed was a high-level plan and requested more detail around the DCC's planned activities and intended outcomes. They considered the work required from DCC, noting that the current TSP contract expires in less than three years. They recommended that all the requirements and steps are drawn out and a risk assessment undertaken on their completion within the timeframes. They also acknowledged that greater detail has been presented to the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) and requested that DCC make this more visible to provide greater assurance to the Panel and to Users. The respondent also encouraged DCC to review the wider needs and requirements and consolidate these into a single place before initiating individual procurement activities. They expressed concern with the time left to complete the procurement before the current contract ends and that such considerations might be missed, resulting in otherwise avoidable issues arising at a later stage.
13. One respondent acknowledged the reference to the SECAS-led workshops to discuss the wider Certificate Strategy. They noted that it is critical to have a comprehensive, effective and agreed Certificate Strategy to ensure clarity of requirements in the procurement. They emphasised its importance given the likelihood of the Certificate Strategy requiring significant SEC Modifications that need to be factored into the plan.
14. One respondent suggested the following sub-elements for consideration in the plan:
  - Contracting Plan
  - Security Testing
  - Process Enablement
  - Business Continuity and Disaster Recovery (BCDR)
  - System Integration
  - Roadmap of competing change
15. One respondent raised a concern in relation to the proposed milestones for UIT. Considering that the UIT window runs over the December 2025 Christmas period, they noted issues may arise in being able to secure technical resources when three-week vacation absences are common. They added that DCC should ensure coordination with other UIT windows so that they do not clash.

### **DCC Response**

16. DCC welcomes feedback on its proposed milestones, and the views of respondents on their achievability. Although the plan is ambitious, DCC has based it on solid assumptions and experience with the TSP Tactical programme. We can confirm that we will ensure the plan is subject to strong industry monitoring, through the Implementation Managers Forum (IMF) and will report on progress towards milestones and highlight risks as soon as they are identified.
17. Regarding the link drawn to MP168, whilst the IKI Service is in scope of this programme, we are expecting there to be minimal impact on Users. However, we recognise there could be some changes to the user interface. During transition we will communicate any impacts or changes to all Users. We will also note any lessons learnt as a result of the recently implemented MP168. In regard to the examples noted in the response, DCC is not planning to make any changes to the SMKI Repository. The primary risk worth noting, is that changing the signing service could impose a stricter implementation which may impact manufacturers. This will be investigated within User Integration Testing (UIT).

18. DCC is fully committed to working with wider industry including Device manufactures. DCC has encouraged manufacturer involvement in UIT at the Security Sub-Committee (SSC) Commercial Product Assurance (CPA) Issue Resolution Sub-Group (SCIRS) and we welcome assistance from other forums representing meter manufacturers in engaging their members.
19. DCC notes the request for a RAG report to ensure we are meeting the planned milestones. However, once DCC and the Department agree on which milestones are to be added to the Joint Industry Plan (JIP), DCC will report progress against those milestones to the IMF. In addition, DCC will provide updates throughout the course of the programme to the SMKI PMA, Security Sub-Committee (SSC), Operations Group (OPSG) and other industry forums as and when is required.
20. DCC welcomes feedback on its proposed milestones and the views of respondents on their achievability. Considering feedback, we have updated the milestone descriptions for the Outline Business Case and Full Business Case to explicitly show that they will be shared with the SEC Panel as well as the Department. We have also added four new milestones to the plan as follows which provide more detail around the security aspects of the plan:
  - Scope of the Competent Independent Organisation (CIO) assessment confirmed with the SSC and SMKI PMA – 31 Jan 2024
  - Interim CIO report submitted to the SSC (following the end of the Design phase) – 9 Apr 2025
  - Confirmation of changes to the Certification Practice Statements agreed with the SMKI PMA – 31 Mar 2025
  - CIO report and remediation plan submitted to the SMKI PMA and SSC – 24 Nov 2025
21. The 'Live Service Criteria: Go-live submission' milestone has also been changed from 2 January 2026 to 30 January 2026. This will allow the Panel to take the full UIT window into consideration. Consequently, we have also moved the 'Live Service Criteria: Go-live decision' milestone from 6 February 2026 to 12 February 2026 to give the Department more time to consider the Panel's go live recommendation.
22. Descriptions for each of the three control points have also been updated to note that we will review our customer engagement plan and share any changes with industry at each of these points. More detail regarding our customer engagement plan can be found in our response to question 9.
23. We recognise the importance of industry input on the business needs and requirements. The business needs were shared with the SMKI PMA and the SSC in January 2023 to which they received no adverse comments. The final requirements will be shared with the SMKI PMA and the SSC in November 2023. In addition, DCC has also shared monthly updates on the programme with each of the SEC Chairs, including our engagement plan.
24. Whilst we agree with the importance of the certificate strategy and are committed to completing it, we consider it not in the scope of the PKI-E programme. However, the elements of the strategy which require change to the current TSP architecture (namely, the capability to sign certificates with a lifetime different from the standard 10 years and to resign certificates with the same public/private key pairs) have been identified, along with the related SEC changes. These are being translated into detail-level requirements and will be mandatory for any solution selected at the end of the procurement process. We do not believe that these requirements will impact the timelines we have submitted in the plan.
25. DCC welcomes the additional sub-elements raised for consideration in the plan. Regarding these points, DCC can confirm:
  - Contracting Plan: DCC will raise a Change Request with all of its Service Providers to impact assess the preferred solution options following completion of the Invitation to Tender (ITT).

- Security Testing: as noted above, three new milestones have been added to the plan in relation to the CIO reports. Penetration testing will also be carried out and this will inform any LSC decision. The scope of the penetration testing will be agreed with SSC and the CIO.
  - Process Enablement: DCC is expecting no changes to existing user processes. This will be validated as we move through design.
  - BCDR: DCC will ensure BCDR arrangements are in place in line with the current requirements and we will carry out BCDR testing in line with our obligations set out in SEC Section H10.
  - System Integration: DCC has included milestones for SIT commence and SIT exit.
  - Roadmap of competing change: DCC set out in its consultation the anticipated DCC programmes and industry changes that may occur during the timeline of this plan. These included Communications Hubs and Network (CH&N), Data Service Provider (DSP) re-procurement, Market-wide Half-Hourly Settlement (MHHS) as well as scheduled SEC Releases.
26. We acknowledge that the eight-week UIT window runs over the Christmas period and that it will effectively leave roughly a six-week window for participants. We consider this UIT window to be sufficient and note that it is based on previous experience on the TSP-Tactical programme. However, to give customers confidence we have decided to utilise Control Point 3 in the plan to review, following engagement with customers, whether the eight-week window is still sufficient time for test participants and have updated the milestone table accordingly. We will engage customers on the testing approach through testing forums.

### 3.2. Question 2

27. DCC sought views on the proposed milestones to be included in the Joint Industry Plan asking: "Do you agree with the proposed LC13B plan? Are there any milestones that you consider should be included that are not? Please provide a rationale for your views."

#### Respondent View

28. DCC received six responses to this question.
29. Three respondents acknowledged the proposed milestones and considered them to be achievable. They noted the milestones are thorough and provide significant coverage for both tender and implementation, with no obvious milestone omissions.
30. One respondent highlighted the eight-week UIT window runs over the Christmas period. Considering this they suggested that it runs over a longer period of at least 12 weeks with a check point to see if further time is required. As rationale they noted that Energy Suppliers will need to test the service in parallel to ensure end-to-end capabilities with the Certificate Signing Request (CSR) process. The respondent added that if, as in the case of Enduring Change of Supplier (ECoS), there are manufacturer related certificate issues, it may take time to amend and prepare for a re-test.
31. One respondent agreed that the breakdown of stages and placing of control points at key milestones seems prudent. The respondent (a governing body) requested that it be kept informed of progress against this plan and of any delays or slippages (this point was also repeated at question 3 below). They also requested assurance that the key steps arising from the requirements from the SEC Programme Assurance Policy are included on the plan.

## DCC Response

32. The current timeline and testing approach are based upon the approach taken for TSP Tactical. DCC will seek opportunities to extend UIT where possible, without impacting the overall timeline. However, we note that just adding time and contingency to the UIT window will not necessarily ensure the most effective UIT engagement. Therefore, we will ensure participation by implementing a robust engagement plan that is communicated to all those on our nominated contacts list as well as any SMKI specific contacts. The test approach will be defined and agreed with customers through testing forums. As noted in response to question 1 above, Control Point 3 has been updated to include a review of the UIT timeline following engagement with customers.
33. As part of the Programme Assurance Policy, DCC provide monthly updates on programme progress and upcoming engagement to the Panel for all programmes, including PKI-E. DCC will continue to provide Panel with those updates to ensure Panel can continue to track progress against the plan. Once the milestones are baselined, DCC will also provide regular updates on progress towards the milestones submitted for monitoring at the IMF monthly meetings.

### 3.3. Question 3

34. DCC sought views on the lessons learnt it had considered when developing the plan asking: "We would welcome comments on DCC's lessons learnt. Are there any we have not listed, or lessons in the list which should be discounted?"

#### Respondent View

35. DCC received six responses to this question.
36. None of the respondents disagreed with the lessons learnt highlighted by DCC.
37. One respondent repeated their view that tailored engagement will be required for manufactures.
38. Another respondent repeated their suggestion of a risk report to give industry awareness of the impact of the implementation falling behind the milestones.
39. One respondent expressed support for the contingency built into the plan, noting it would mitigate the likelihood of delays as the programme progresses. However, they noted the plan appears to be high level and they again requested regular reporting of progress to the SEC Panel. They also agreed with applying lessons learnt around the clarity of requirements and the timing of testing. They noted DCC's application of these lessons learnt to the development of Modification Proposals and the delivery of SEC Releases, which they considered to be among the DCC's most successfully delivered programmes of work to date. The respondent also sought assurance on the following areas:
- that there is enough time allowed to complete the detailed activities required for each step;
  - that DCC is applying lessons learnt from previous programmes, including ensuring the portability of any solution and in managing obsolescence; and
  - confirmation that DCC is intending for this to be a full competitive procurement in line with its Licence requirements.
40. One respondent noted that DCC requires SMKI PMA approval for certain SEC governance decisions. The SMKI PMA has SEC obligations to take advice from the SSC and will require assurance from a CIO appointed in accordance with the DCC Licence. They highlighted one lesson learnt is to ensure Live Service Criteria are clearly articulated with adequate evidence provided to support the determination of the go-live process.



41. One respondent suggested that DCC testing with real meters should be mentioned in the list of lessons learned and should be deemed essential.

### **DCC Response**

42. DCC recognises the importance of manufacturer engagement and as noted above, we will implement a robust engagement to ensure this takes place.
43. Regarding the suggested “risk report”, DCC notes that once the milestones are to be added to the JIP, DCC will report progress against those milestones to the IMF. In addition, DCC will provide updates throughout the course of the programme to the relevant Sub-Committees and other industry forums as and when is required.
44. As noted above, we believe the level of detail in this plan is suitable given the current stage of the programme. The milestones are based on previous experience with the TSP Tactical programme. In addition, as noted in our consultation, DCC's current contract also provides for a period of termination assistance beyond the end date of the contract. Should it be required, this period of termination assistance can be used to complete transition at any point in 2026. We will provide more detail to the relevant industry forums as and when it arises and at the relevant milestones once they are agreed. We will continue to provide monthly updates on programme progress and upcoming engagement to the Panel for PKI-E in accordance with the Programme Assurance Policy.
45. We can also confirm that portability is being considered as an option with the ability to transfer between service providers more easily if required to so, by avoiding service provider specific solutions. However, this will require industry approval of the cost benefit analysis of any such option(s). Regarding the procurement approach, we can confirm that this will be a full competitive procurement in line with our Licence requirements.
46. We can confirm we will engage the CIO to provide independent security assurance of the solution and this is documented in the plan. As noted in response to question 1 above, we have added four new milestones to the plan, three of which relate to the CIO's roles in the process.
47. Live Service Criteria are governed by the Department rather than DCC, however it is expected that security assurance will form part of Live Service Criteria as it has done for past DCC programmes. We will also take note of lessons learnt from previous programmes where we have undergone the Live Service Criteria process and ensure any evidence is clearly articulated when submitting it to the Panel and Panel Sub-Committees.
48. DCC appreciates the importance of testing with real meters. We will share more information on our test approach through testing forums.

### **3.4. Question 4**

49. DCC sought views on transition and decommissioning asking: “We would welcome any early views on transition and decommissioning from our Stakeholders. Please provide as much detail as possible.”.

### **Respondent View**

50. DCC received five responses to this question.
51. Two respondents referred to the transfer of any key material under the programme. One of these respondents highlighted the experience gained from the ECoS programme in moving key material but noted the low-level detail will rely on the eventual chosen service provider. They also

welcomed a 'moving key material approach' if it were adopted. They noted the ECoS key transfer as an example, which whilst proven is still subject to further contractual negotiations. Considering this, the respondent suggested that prior to the final appointment of the service provider, such items are clearly defined in the contracts. The other respondent noted that the transfer of any remaining, in-use or old key information to the new provider is essential, so that metering assets are not stranded.

52. Two respondents welcomed the engagement DCC has carried out with industry allowing for industry views and feedback, noting the SECAS-led workshops with the SMKI PMA and SSC. One of these respondents noted there were points raised in the SECAS-led workshops that the DCC will need to report back on as soon as possible. They urged DCC to continue the engagement with the SMKI PMA and the SSC throughout this programme to keep these groups informed of progress and to provide a sounding board for the DCC's thinking.
53. One respondent highlighted a lesson learnt from previous transitions to not underestimate the impact for Users or Devices. They noted the TSP re-platforming which was not expected to impact Users or Devices but did affect Device manufactures. They added there is a dependency on User testing and to recognise that some aspects of SMKI cannot be tested ahead of go-live and to therefore plan for post-live proving activities.

### DCC Response

54. DCC welcomes the points made regarding the transfer of key material. However, we are not expecting to extract any key material. A principle of this programme is to move the hardware security modules (HSMs), replicating the same activity as occurred under the TSP tactical Programme. This does not involve extracting key material from existing Devices. As noted in response to question 1, we recognise the importance of the certificate strategy and are committed to completing it. While the strategy per se is not in the scope of the PKI-E programme, as specified in the answer to Question 1 (item 24), the requirements have been identified and will feed into the low-level requirements for any solution identified as optimal for the PKI-E Programme delivery.
55. The feedback provided via the SECAS-led workshops has been valuable to DCC and we acknowledge we need to follow-up on some points requiring clarity. We will continue to engage with the SMKI PMA and the SSC throughout the duration of the programme, especially given the impact this programme has on the security architecture.
56. We acknowledge the impact the TSP Tactical programme had for Users, Manufacturers and Devices. The lessons learnt will be incorporated into our approach to requirements development, and our stakeholder communications. DCC will continuously engage the SMKI PMA and the SSC to identify the aspects of the SMKI which cannot be tested ahead of go live.

## 3.5. Question 5

57. DCC sought views on the DCC's assessment of the programme's interaction with other change programmes asking: "Do you agree with our assessment of external change which could impact or be impacted by the re-procurement of the TSP Service? Are there areas that we have not considered?"

### Respondent View

58. DCC received six responses to this question.
59. The majority of respondents agreed with the DCC's assessment of the impact external change could have on the programme. One respondent sought clarity that the changes implemented by

MP168 had been considered. They also sought to understand what specifically is being done to ensure Device Manufacturers receive ongoing service continuity.

60. Regarding SEC Releases one respondent suggested that this programme should take priority over any SEC Modifications in the same period should there be any contention.
61. One respondent who agreed with the DCC's assessment encouraged it to provide more detail around the potential interactions and risks arising from each of these other programmes and the mitigations the DCC is taking. They also requested that each of these programmes acknowledges any overlap or dependencies with the SMKI Service Programme within its documentation for completeness.
62. One respondent flagged operational issues (noting that some were already acknowledged as risks in the consultation) to factor in addition to the programmes and SEC Releases highlighted by DCC. These included:
  - maintaining a stable Manufacturing Pack;
  - managing multiple Access Control Broker (ACB) Certificates;
  - certificate lifetimes; and
  - quantum computing.

### DCC Response

63. DCC can confirm that changes introduced by MP168 have been considered in the planning of the programme. Additionally, we will continue to monitor for any Modification Proposals, either in-flight or pending implementation for any cross-over or impact they may have on the programme.
64. DCC recognises the importance of ensuring the continuity of the SMKI Service. Regarding the suggestion that this programme should take priority over any proposed SEC Modifications, DCC will continuously assess any contention and consider any changes with the Department and industry.
65. We share respondents' views that we should continue to provide more detail around the potential interactions and risks arising from our other programmes and SEC Releases. DCC will continue to monitor the programme's delivery against other programme timelines, updating on interactions and seeking stakeholders' views as we go. We also recognise the importance of cross programme collaboration, and we will ensure the documentation of other programmes aligns with the assessment made under the PKI-E programme.
66. We welcome the additional operational aspects raised by one respondent in relation to the SMKI. DCC does not consider there to be any dependency with the aspects raised. However, we will continue to liaise with the SMKI PMA and SSC to ensure any changes impacting these aspects are considered in the future. See also response to Question 1, item 24 in relation to DCC's certificate strategy.
67. Recognising the variability inherent in portfolio management DCC will continue to review the impact of external changes on this programme on an ongoing basis. We will continue to monitor the programme's delivery against other programme timelines, updating on interactions and seeking stakeholders' views as we go.

### 3.6. Question 6

68. DCC sought views on the dependencies of the programme asking: “Do you agree with our assessment of dependencies for the re-procurement of the TSP Service? Are there any which are not included but should have been?”.

#### Respondent View

69. DCC received six responses to this question.
70. In relation to dependency D3, one respondent sought confirmation if sharing of critical artefacts includes sharing actual costs and if so, at which point in the plan they would be shared. They also noted lessons learnt from previous contract negotiations where commercial confidentiality is cited, has led to DCC users being stuck with costs and inefficiencies where users may have been able to provide advice, which may have led to cost avoidance.

Another respondent also raised a comment regarding dependency D3 and the links to the Programme Assurance Policy. They noted it requires DCC to share critical artifacts with Users as the programme develops to enable it to reach informed opinions about the value of the business needs. They added the associated remediation states DCC will work with the SEC Panel on implementing the Programme Assurance Policy and providing options analysis as the programme develops. They also requested that the activities and engagement required by the Programme Assurance Policy be explicitly specified in the timeline of milestones.

#### DCC Response

71. Regarding the sharing of critical artifacts, DCC notes that we are following the HM Treasury Green Book process as well as Licence Condition 16.6 which require DCC to share any information relating to the programme, including costs with the Department. We can also confirm that we will be sharing copies of the Outline Business Case and Full Business Case with the SEC Panel in parallel with the Department. In addition, economic regulation of DCC is the responsibility of Ofgem whilst the Price Control mechanism forms part of DCC's financial incentive framework, ensuring any costs incurred by the DCC are economic and efficient.
72. DCC recognises the requirements of the Programme Assurance Policy and note the existing milestones already account for several of these requirements. These include milestones for sharing business needs, solution options and the transition approach with the Panel and the Sub-Committees, as well as a clear milestone for Panel consideration of the Live Service Criteria. We have also tweaked the milestone descriptions to make it explicitly clear that DCC will share the Outline Business Case and Full Business Case with the Panel as well as the Department. In addition, and as noted in response to question 1, four new milestones regarding the security aspects of the programme have been added to the plan.

### 3.7. Question 7

73. DCC sought views on the assumptions made by the programme asking: “Do you agree with our assumptions for the re-procurement of the TSP Service? Are there any which are not included but should have been?”.

#### Respondent View

74. DCC received six responses to this question.
75. Three respondents agreed with the assumptions highlighted in the consultation.

76. In relation to assumption A5, one respondent reiterated their view that not enough time had been given for UIT.
77. One respondent made the following considerations:
- A risk assessment would be required to validate assumption A4 which assumes no impact for Users and Devices.
  - In relation to assumption A5, sufficient time for design, build and test may be threatened depending on slippage elsewhere and on the proposed solutions.

### DCC Response

78. Regarding assumption A5 and the duration of UIT, as mentioned in response to question 2, DCC will seek opportunities to extend UIT where possible, without impacting the overall timeline. We will utilise Control Point 3 to review whether the current eight-week UIT window is sufficient time for test participants. However, we note just adding time and contingency to the UIT window will not necessarily ensure the most effective UIT engagement. Therefore, we will ensure participation by implementing a robust engagement plan.
79. Regarding the impact for Users and Devices, DCC can confirm that it will carry out a risk assessment to validate any impacts. DCC will carry out the risk assessment once the target architecture and related transition approach is defined at least at a high level.
80. DCC acknowledges that the design, build and test phases could be impacted should the other milestones in the plan slip. However, as mentioned in response to question 4, DCC's current contract provides for a period of termination assistance beyond the end date of the contract. Should it be required, this period of termination assistance can be used to complete transition at any point in 2026, providing additional contingency.

## 3.8. Question 8

81. DCC sought views its assessment of the risks associated with the programme asking: "Do you agree with our assessment of risks associated with the re-procurement of the TSP Service? Are there any which are not included but should have been?"

### Respondent View

82. DCC received six responses to this question.
83. Three respondents agreed with the risks noted, two of which had nothing to add. One respondent suggested an in-depth risk assessment could have been carried out against the plan. Another respondent noted it had raised risks in response to previous questions.
84. One respondent assumed a like for like replacement of its core functional capabilities as a result of the programme. It noted that this should be a foundation assumption and be supported by an associated risk.
85. One respondent highlighted an additional risk whereby a substantial number of end devices do not transition correctly to the new service.

### DCC Response

86. DCC can confirm that it will carry out an in-depth risk assessment against the plan which will be shared with the relevant Sub-Committees.
87. As noted by one respondent, DCC can confirm that the functional capabilities of Service Users will be like for like.
88. We welcome the additional risk highlighted by one respondent regarding devices and the transition to the new service. We consider that the Live Services Criteria will mitigate this risk. This is the go-live process governed by the Department before transition starts, with input from the Panel and the Panel Sub-Committees.

### 3.9. Question 9

89. DCC sought views on its engagement approach, asking: "Do you support DCC's proposals for engagement with stakeholders during the delivery of the plan? Please tell us why."

#### Respondent View

90. DCC received six responses to this question.
91. One respondent suggested that DCC also share updates to Device Manufacturers via Technical the Account Management (TAM) as part of its ongoing engagement.
92. One respondent repeated their previous response and sought assurance that DCC will be engaging with the SEC Panel and Users in line with the Programme Assurance Policy. Specifically, they requested that the plan be updated to explicitly reference the key engagement steps required by the Programme Assurance Policy. Additionally, they highlighted that DCC should carry out early User engagement to better understand the potential User impacts, noting that DCC had previously incorrectly assumed that there would be no User impacts. They also noted the lack of any reference to the National Cyber Security Centre (NCSC) in the engagement plan and requested clarification on DCC's intentions with engaging the NCSC through the programme.
93. One respondent noted the need for involvement of Sub-Committees, specifically the SMKI PMA and the SSC is acknowledged in DCC's engagement plan, as well as wider industry engagement.

#### DCC Response

94. As noted in response to question 1, DCC is fully committed to working with wider industry including Device manufactures. We have already engaged manufactures at the SCIRS and we welcome assistance from other forums representing meter manufacturers in engaging their members.
95. As noted previously, DCC can confirm that we will be engaging with the SEC Panel and Users in line with the Programme Assurance Policy. We share respondents' views on the importance of early User engagement to identify any possible impacts as soon as possible. Once the plan is baselined, DCC will provide regular updates on progress towards the milestones submitted for monitoring at the IMF monthly meetings.
96. Since the consultation closed, DCC has shared details around the potential solution options with the SMKI PMA and the SSC in October 2023. We will continue to share monthly updates with both committees throughout the duration of the programme. We will also share the requirements for the Request For Proposal (RFP) with the Sub-Committees in November 2023 and continue to engage the OPSG, Testing Advisory Group (TAG) and the Technical Architecture and Business

Architecture Sub-Committee (TABASC) throughout the programme, as agreed with the respective Chairs. The Outline Business Case and Full Business Case will be shared with the SEC Panel on 2 November 2023 and 24 September 2024 respectively in accordance with the planned milestones.

97. DCC recognises the importance of the NCSC and their role in the security aspects of smart metering. We can confirm that we intend to engage the NCSC under this programme if this is identified as the appropriate action by the relevant stakeholder (SSC, SMKI PMA, the Department or NCSC themselves).

### 3.10. Question 10

98. DCC sought views on the scope of the procurement asking: “Are there any changes that DCC users would like to see included within the scope of the procurement?”.

#### Respondent View

99. DCC received two responses to this question.
100. Both respondents agreed with the current scope of the programme outlined in the consultation.
101. One of the respondents advised it would be cautious of extending the scope of the programme any further without strong reason. This would be to avoid the risk of any adverse impacts on the successful and timely delivery of the core activities of the programme. However, they requested that DCC consult the contract requirements register for the needs and wants from DCC Users that could be efficiently incorporated into the mandatory requirements of the programme. They noted that DCC has previously limited its mandatory requirements to those that are needed to comply with the SEC obligations but requested that key User needs to be considered as well.

#### DCC Response

102. DCC can confirm that the minimum scope of the Programme is to ensure continuity of the TSP Service beyond the current contract end-date. A solutions analysis will be presented to the relevant Sub-Committees and their feedback considered before submitting our Outline Business Case to the Department. Whilst we are not expecting any changes to the scope of the programme, any changes will be shared with industry before they are agreed and submitted to the Department.

## 4. Changes to the plan

103. As noted in response to the questions above, DCC has revised the plan considering feedback from the consultation responses. These changes include four new milestones as follows:
- Scope of the Competent Independent Organisation (CIO) assessment confirmed with the SSC and SMKI PMA – 31 Jan 2024
  - Interim CIO report submitted to the SSC (following the end of the Design phase) – 9 Apr 2025
  - Confirmation of changes to the Certification Practice Statements agreed with the SMKI PMA – 31 Mar 2025
  - CIO report and remediation plan submitted to the SMKI PMA and SSC – 24 Nov 2025
104. We have updated the descriptions at each of the three control points to note we will use these points to review our engagement plan and share any changes with industry. A further update has

been made to Control Point 3 to show that we will use this point to review, following engagement with customers, whether the current UIT window is sufficient time for test participants.

105. The 'Live Service Criteria: Go-live submission' milestone has also been amended. This was previously planned for 2 January 2026. However, to allow the Panel to take the full UIT window into consideration, we have pushed this back to 30 January 2026. Consequently, we have also moved the 'Live Service Criteria: Go-live decision' milestone from 6 February 2026 to 12 February 2026 to give the Department more time to consider the Panel's go live recommendation.
106. Lastly, the wording of several other milestone descriptions has been updated to provide greater clarity around the activities taking place at each these points.

## 5. Next Steps

107. On 5 October 2023, the Secretary of State approved the version of the delivery plan set out in Annex A of this document in accordance with Condition 13B of the DCC Licence. DCC will submit its proposed milestones to be added to the JIP in October 2023. Once the JIP milestones are approved DCC will be monitored against delivery of these milestones by the IMF.



## Appendix A – Licence Condition 13B Milestone Table

#	Key Milestones	Description	Target Dates
1.	SEC Panel and Panel Sub-Committee engagement completed prior to Outline Business Case submission	SEC Panel and Panel Sub-Committee are updated and their views on business needs are captured and taken into account before submission of the Outline Business Case.	24 Oct 2023
2.	Outline Business Case Submission	All DCC Internal approvals complete. Outline Business Case issued to the Department and SEC Panel.	2 Nov 2023
3.	Department decision on non-Objection to Outline Business Case	Non-objection decision to the Outline Business Case made by the Department.	12 Dec 2023
4.	Control Point 1 (Outline Business Case)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to the Department. DCC will also review its engagement plan and share any changes with industry.	15 Dec 2023
5.	Proposed scope of regulatory change	DCC will confirm the high-level regulatory change anticipated at this stage.	15 Dec 2023
6.	ITT Pack Issued	Tender pack issued to bidders.	2 Jan 2024
7.	Scope of the CIO assessment confirmed	The scope of the CIO assessment is agreed with the SMKI PMA and SSC.	31 Jan 2024
8.	Tender Submissions	Deadline for tender submission.	12 Feb 2024
9.	Best and Final Offer (BAFO) Pack Issued	Vendor response evaluation complete and BAFO pack issued.	23 Apr 2024
10.	Transition approach confirmed	DCC will share with industry its draft approach to transition.	20 Aug 2024
11.	SEC Panel and Panel Sub-Committee engagement completed prior to Full Business Case submission	SEC Panel and Panel Sub-Committees are updated and their views on the solution options and transition approach are captured and considered before submission of the Full Business Case. SEC Panel and Panel Sub-Committee will be notified should the solution change at any point prior to this.	27 Aug 2024
12.	Full Business Case Submission	All DCC Internal approvals complete. Full Business Case issued to the Department and SEC Panel.	24 Sep 2024
13.	Department decision on non-Objection to Full Business Case	Non-objection decision to Full Business Case made by the Department.	1 Nov 2024

14.	Control Point 2 (Full Business Case)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to the Department. DCC will also review its engagement plan and share any changes with industry.	26 Nov 2024
15.	Contract Signature	Contract signed and awarded, vendor onboarding in progress. Detailed design phase initiated.	3 Dec 2024
16.	Design, Built, Test – Designs Complete	Detailed design complete and approved by the DCC Cross-Functional Design Authority (CFDA).	31 Mar 2025
17.	Transition Plan Complete	Detailed transition plan complete and approved by the DCC Cross-Functional Design Authority (CFDA).	31 Mar 2025
18.	Confirmation of regulatory change	Latest date by which DCC will issue a conclusions document (following a consultation document) on the proposed regulatory changes, including the SEC SMKI Subsidiary Documents, to reflect the requirements for the PKI-E programme.	31 Mar 2025
19.	Confirmation of changes to the Certification Practice Statements	Confirmation of changes to the Certification Practice Statements to be agreed with the SMKI PMA.	31 Mar 2025
20.	Control Point 3 (end of design)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to the Department. DCC will also review its engagement plan and share any changes with industry. Additionally, DCC will review whether the current eight-week UIT window is sufficient time for test participants.	31 Mar 2025
21.	Interim CIO report submitted	Following completion of the Design phase, an interim CIO report will be shared with the SSC.	9 Apr 2025
22.	Design, Build, Test – PIT commences	Start of PIT phase subject to earlier TAG approval of the Test Approach Documents and PIT entry criteria being met.	1 Jul 2025
23.	Design, Build, Test – PIT exit	All PIT Exit approvals in place.	15 Aug 2025
24.	Design, Build, Test – SIT Commences	Start of SIT phase after successful PIT Exit and SIT entry criteria met.	18 Aug 2025
25.	Design, Build, Test – SIT Exit	Internal approvals in place (Test Assurance, CRB) and completion report submitted to TAG.	14 Nov 2025
26.	Design, Build, Test – UIT Commences	UIT Window opens to enable customer testing to commence.	24 Nov 2025
27.	CIO report and remediation plan submitted	The first complete CIO report and remediation plan is submitted to the SMKI PMA and SSC.	24 Nov 2025
28.	Design, Built, Test – UIT Ends	UIT Window closes.	16 Jan 2026
29.	Live Service Criteria: Go-live submission	SEC Panel to consider the evidence submitted by DCC against live service criteria and make a recommendation to the Department.	30 Jan 2026

30.	Live Service Criteria: Go-live decision	Live Services Criteria decision by the Department.	12 Feb 2026
31.	Technical Go Live	New service goes live. This is infrastructure only prior to any transition activity.	12 Feb 2026
32.	Transition Start (by Certificate Authority)	Transition activity commences. This is expected to include migration of CAs from the old service to the new service. Details will be confirmed in the transition plan.	13 Feb 2026
33.	Transition Complete (full service is on new platform and live)	Transition activity is complete.	31 Mar 2026
34.	Original service decommissioning starts	Decommissioning of the old service components commences.	1 Apr 2026
35.	Original service decommissioning ends	Decommissioning of the old service components completes. Decommissioning report and audit trail provided.	30 Sep 2026