Data Communications Company

# SMETS1: Conclusion on the SMETS1 Cryptographic Key Management Policy and Changes to the S1SR

DCC Conclusions and Report to Secretary of State

**Date: 29 November 2021**
**Classification: DCC Public**

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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 installed 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.

SEC Section L of the Smart Energy Code (SEC) sets out the arrangements that govern the Smart Metering Key Infrastructure (SMKI) which underpins the security of smart-meter related communications. In order to provide governance of the SMKI documentation and gain assurance of the DCC operation of the SMKI Services, the SMKI Policy Management Authority (SMKI PMA) was established under the SEC and serves as a Sub-Committee of the SEC Panel.

Section L14.7 requires DCC to develop a SMETS1 Cryptographic Key Management Policy. Pursuant to this requirement, DCC developed a SMETS1 Cryptographic Key Management Policy, which it shared with the SMKI PMA. The SMKI PMA reviewed the content of the document and provided comments which DCC addressed. The SMKI PMA were satisfied with the content of the document[1].

# 2. Consultation

Pursuant to Section L14.8 of the SEC, on 22 October 2021, DCC consulted on a draft SMETS1 Cryptographic Key Management Policy for DLMS Devices (Policy). In this consultation, DCC sought views on the proposed Policy and a change to the SMETS1 Supporting Requirements (S1SR) document to remove a requirement to rotate keys. The consultation closed on 19 November 2021.

This document considers responses to this consultation consistent with the regulatory requirements in Section L14.8 of the SEC which provides for the Document Development Process.

DCC also sought views on behalf of BEIS on the proposed date for designation of the SMETS1 Cryptographic Key Management Policy for DLMS Devices and the proposed S1SR change as well as the draft direction which was presented in Attachment 1 of the consultation document.

DCC sought stakeholder views via the following questions:

| Number | Question |
|---|---|
| CKMP Q1 | Do you agree with the proposed approach to the rotation of symmetric keys? Please provide rationale for your reasoning. |
| CKMP Q2 | Do you have any comments on the proposed SMETS1 Cryptographic Key Management Policy for DLMS Devices? |

[1] https://smartenergycodecompany.co.uk/download/36824/

| | |
|---|---|
| CKMP Q3 | Do you have any comments on the proposed consequential change to the main body of the SEC within the scope of this consultation? |
| CKMP Q4 | Do you have any comments on the proposed drafting change to the SMETS1 Supporting Requirements document within the scope of this consultation? |
| CKMP Q5 | Do you have any comments on the draft direction included in Attachment 1 or on the proposed date of 10 December 2021 or as soon as reasonably practicable within one month thereafter for designation of the proposed SMETS1 Cryptographic Key Management Policy and the redesignation of the S1SR? |

**Table 1**

## 2.1. Respondents

In addition to the proposed SMETS1 Cryptographic Key Management Policy being approved by the SMKI PMA prior to consultation, the DCC received one response to the consultation. Following the consultation close, in the light of having received just one response, DCC gained additional assurance from four other Industry representatives that they had noted the proposed Policy and changes to the SEC and did not respond to the consultation as they had no comments.

## 2.2. Analysis of Responses

DCC has undertaken an analysis of the feedback provided by the respondent regarding the Policy and proposed S1SR changes which is presented within this section document.

The respondent did not object to the content of the consultations or the proposed redesignation dates.

The respondent did not provide any further comment on the consultation proposals.

The respondent did not propose a change to the SMETS1 Cryptographic Key Management Policy for DLMS Devices.

The respondent had no comments on the proposed change to the S1SR.

# 3. Summary of Changes to the SMETS1 Cryptographic Key Management Policy for DLMS Devices

DCC is not proposing any changes to the Policy or the S1SR as a result of the responses received. DCC has further engaged with the SMKI PMA on the content of this policy, and they have indicated that they are satisfied with the content. DCC is of the view that the content of the SMETS1 Cryptographic Key Management Policy for DLMS Devices and S1SR is fit for purpose.

# 4. Conclusions

DCC has had significant engagement with Industry in the development of the Policy through its interaction with the SMKI PMA and consultation process. DCC is accordingly confident that Industry is satisfied with the content of the Policy and is that it can recommend that BEIS designates the Policy as a new Appendix to the SEC. DCC is of the opinion that the version of the Policy, which will be submitted to the Secretary of State reflects the requirements set out in Section L14 of the SEC.

DCC is of the opinion that the Policy is fit for purpose in that it meets the requirements set out in Section L14 of the SEC by clearly and unambiguously setting out parties' rights and obligations.

DCC has undertaken engagement with industry on the proposed S1SR change which sets out the parties rights and obligations.

DCC is of the opinion that it has had appropriate consultation with industry regarding the content of the Policy and S1SR. It is accordingly DCC's view that it has met its SEC obligation set out in Section L14 of the SEC.

# 5. Next Steps

DCC will submit the updated version of SMETS1 Cryptographic Key Management Policy for DLMS Devices and the S1SR to the Secretary of State on 29 November 2021.

DCC anticipates that the Secretary of State will designate the SMETS1 Cryptographic Key Management Policy for DLMS Devices and re-designate S1SR into the SEC using the powers set out in Section X of the SEC on or shortly after 10 December 2021.

# 6. Attachments

- Attachment 1 – SMETS1 Cryptographic Key Management Policy for DLMS Devices
- Attachment 2 – SEC Appendix AM - SMETS1 Supporting Requirements v11.1
- Attachment 3 –Section A – Definitions and Interpretation