



# Consultation

on changes to the Pre-Go  
Live ECoS Transition and  
Migration Approach  
Document (ETMAD)

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# 1. Introduction

## 1.1. Purpose of this consultation

1. This consultation seeks stakeholder views on proposed changes to the existing version of the Enduring Change of Supplier (ECoS) Transition and Migration Approach Document (ETMAD) (version 2.0) or Smart Energy Code (SEC) Appendix AS, to be designated ahead of ECoS Go Live.
2. The initial version of the ETMAD was introduced into the SEC on 25 October 2021, at the time when the SEC main body changes required for ECoS also came into effect. The primary purpose of this initial version of the ETMAD is essentially to undo the ECoS related main body SEC changes until the ECoS Migration commences.
3. DCC recently consulted on the Go Live ETMAD which will define DCC and Supplier Party rights and obligations during the ECoS Migration Period. This consultation closed on 18 January 2023 and DCC published its conclusions document on 28 March 2023<sup>1</sup>.
4. As part of the ECoS Go Live preparation activities, DCC has identified the possible need for a pre ECoS Go Live change to the ETMAD to enable ECoS Certificates to be provided to the ECoS Party. This will allow the ECoS Party to request production ECoS Certificates and for these to be subsequently provided to the Communications Service Providers (CSPs) prior to ECoS Go Live. This will enable the manufacturing process to commence for Communications Hubs to be used for the initial install and commission pilot exercise post ECoS Go Live. This proposed change would be applied to the existing version of the ETMAD and does not impact the drafting or designation of the Go Live ETMAD referenced in paragraph 3 above.
5. The install and commission pilot for Communications Hubs is being held to provide DCC Operations with the confidence that will enable them to approve the introduction of ECoS key material into the enduring Communications Hub manufacturing process for large scale manufacture. Based on lessons learnt from previous changes to Communications Hub manufacture, a pilot is required to ensure quality is maintained.
6. This consultation overview document summarises and seeks stakeholder feedback on the proposed changes to the existing ETMAD (version 2.0) which will be designated as soon as reasonably practicable following the consultation conclusion.
7. The closing date for this consultation is Tuesday 25 April 2023.

## 1.2. Background and context

8. The ECoS arrangements are changes to the process that DCC follows when a consumer changes Supplier and the new Supplier seeks to take over control of the Smart Meter and other Devices in the consumer premises.
9. When a gas or electricity consumer with a Smart Meter switches Supplier, the security information held on the Smart Meter needs to be changed so that it relates to the new Supplier and not the old one. The processes that are currently in place for managing the change of security information held on Smart Meters are referred to as the Transitional Change of Supplier (TCoS) processes and they are administered by part of the DCC Systems known as the “Change of Supplier Party” (CoS Party).

<sup>1</sup> <https://www.smartdcc.co.uk/consultations/conclusions-on-the-go-live-etmad-emrr-and-emehra-and-consultation-on-the-re-designation-date-of-sec-subsiary-documents/>

10. As their name suggests, the existing TCoS processes were intended to be temporary. Changes to replace the existing TCoS arrangements with the enduring solution are already underway with the implementation of the ECoS arrangements due to take effect on 29 June 2023 (ECoS Go Live).

#### Development of SEC provisions

11. The introduction of the ECoS arrangements requires changes to the SEC main body as well as to several SEC Subsidiary Documents. The Department published a consultation document on changes to the SEC main body required for the ECoS arrangements on 1 April 2021. The Department response to its consultation was published on 15 June 2021<sup>2</sup>. The SEC main body changes and the initial version of the ETMAD came into effect on 25 October 2021. The effect of the initial version of ETMAD was primarily to suspend these main body SEC changes prior to ECoS Live.
12. Additionally, in early 2022, DCC concluded a consultation on the SEC Subsidiary Document changes required for the ECoS arrangements. This covered changes to a number of SEC Appendices including the Service Request Processing Document, Threshold Anomaly Detection Procedures, DCC User Interface Specification, DCC User Interface Services Schedule and the Inventory Enrolment and Decommission Procedures. This consultation ran from 24 September 2021 to 5 November 2021 and DCC published its conclusions document on 9 February 2022<sup>3</sup>.
13. Finally and as mentioned above DCC recently issued a consultation on the 'Go Live' version of the ETMAD that will be re-designated to take effect at the commencement of the ECoS Migration. The 'Go Live' ETMAD will be used to control the process of transition and migration to the new ECoS arrangements and will:
- a) cease the suspension of the ECoS main body changes that have been introduced into the SEC;
  - b) set out the arrangements whereby CoS Update Security Credentials Service Requests (SRV 6.23) are processed differently by DCC depending on whether the target Device holds Device Security Credentials that are ECoS related or TCoS related;
  - c) introduce the ECoS Migration Reporting Regime and ECoS Migration Error Handling and Retry Approach documents, including details of the ongoing maintenance requirements; and
  - d) deal with other migration related matters.
14. The re-designation of SEC Subsidiary Documents to support the new ECoS arrangements (including the Go Live ETMAD) is due to take place at the new ECoS Service Live Date of 29 June 2023, which marks the point at which TCoS to ECoS migration can legally commence.

## 2. Summary of Changes

15. As outlined above, DCC is issuing this consultation document to support the approval of changes to the existing ETMAD (version 2.0), to be introduced ahead of ECoS Go Live. The main reason for amending the ETMAD is to facilitate the provision of ECoS Certificates to the CSPs prior to ECoS Go Live.

<sup>2</sup> <https://smartenergycodecompany.co.uk/latest-news/beis-consultation-response-on-changes-to-the-sec-for-the-ecos-and-certain-security-provisions-and-direction-to-re-designate-the-smki-interface-design-specification/>

<sup>3</sup> <https://www.smartdcc.co.uk/consultations/conclusions-on-the-sec-subsiary-document-changes-required-for-the-enduring-change-of-supplier-ecos-arrangements-and-consultation-on-date-for-re-designation-of-certain-documents/>

16. Whilst provisions relating to the ECoS arrangements were introduced into the SEC on 25 October 2021, these were effectively switched off by the designation of the ETMAD at the same time. This means that where the SEC references the CoS Party, this only relates to the existing TCoS Party and its systems and processes.
17. Specifically, SEC Section L3.18 sets out the rules relating to the provision of Organisation Certificates and limits the provision of transitionalCoS Certificates to the CoS Party. This in effect, prevents the ECoS Party obtaining production Certificates ahead of ECoS Go Live, which in turn prevents these from being provided to the CSPs to support the manufacturing process.
18. Rather than waiting until ECoS Go Live, to support the Communication Hub install and commission pilot, DCC is proposing that the ETMAD be updated to include temporary amendments to Clause L3.18 enabling transitionalCoS Certificates to be provided to the ECoS Party. This will allow the ECoS Party to request production ECoS Certificates and for these to be provided to the CSPs. Provision of the ECoS Certificates to the CSPs in advance of ECoS Go Live will allow a limited number of Communications Hubs to be manufactured for use in the install and commission pilot exercise. This will demonstrate ECoS Party functionality in the live environment, ahead of the bulk manufacture of Communications Hubs for the wider population.
19. Additional controls will be included in the process to recognise that this approach means production certificates are being made available ahead of the final approval that the new ECoS arrangements are fit for purpose. This includes approval by the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) that the transitionalCoS Certificate can be issued to the ECoS Party, taking into account views of the Security Sub-Committee. It is proposed that this condition is included in the revised ETMAD drafting.
20. Without this change to the ETMAD, the production ECoS Certificates will not be provided to the CSPs until post ECoS Go Live, which may delay the start of the install and commission pilot exercise and the wider rollout of Communications Hubs with ECoS Certificates.
21. In addition to the main change detailed above, DCC has also identified:
  - a typographical error in Clause 3.1 and added bullet reference '(c)' to reflect the existing Clause in SEC Section G; and
  - an error in the existing ETMAD (version 2.0) where the recent changes to Clause L3.18 and Annex A to SEC Section L have not been updated within the ETMAD:
    - a. 'xmlsign' was added in version 11.0 of SEC Section L on 29 November 2020 by [MP115 'Changes to the NCSC Good Practice Guides'](#).
    - b. 'cssprovider' was added in version 15.0 of SEC Section L on 18 July 2022 by [MP200 'Faster Switching consequential changes to the SEC'](#).
22. To address this error and mitigate any further changes, we have proposed changes to the ETMAD to explicitly show which row is being excluded from the tables in Section L (i.e. the row relating to the coSPartyXmlSign certificate) as a result of the ETMAD rather than including the full tables within the ETMAD itself.
23. Draft changes to the existing ETMAD (version 2.0) have been included as Attachment 1.

### 3. Next Steps

24. Following the closure of this consultation, DCC will consider respondents' views, and subject to the consultation responses received, submit to the Department the Pre-Go Live ETMAD (version 3.0) that it considers suitable for approval, including why DCC considers the draft to be fit for

purpose; copies of the consultation responses received; and any areas of disagreement that arose during the consultation process that have not been resolved.

25. Following the Department's approval, these documents will become effective following re-designation by the Secretary of State and will continue to be effective until the 'Go Live' ETMAD is designated as outlined in Section G of the SEC (clause G11.6).
26. In order to expedite the re-designation of the ETMAD, DCC is also seeking views on behalf of the Department on the proposed dates for re-designation of the ETMAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

## 4. Questions for Respondents

27. DCC would like stakeholders' views on the following consultation questions:

<b>Q1</b>	Do you agree with the proposed changes to the existing ETMAD (version 2.0)? Please indicate any areas of disagreement and the reasons for them.
<b>Q2</b>	Do you agree with the proposed re-designation date of 8 May 2023 for the Pre-Go Live ETMAD (or, if necessary, as soon as reasonably practicable within one month thereafter?)
<b>Q3</b>	Do you have any further comments to make regarding the Pre-Go Live ETMAD?

## 5. How to Respond

28. Please provide responses by 16:00 on Tuesday 25 April 2023 to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).
29. Consultation responses may be published on our website [www.smartdcc.co.uk](http://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 to us if you could explain to us why you regard the information you have provided as confidential.
30. Please note that responses in their entirety (including any text marked as confidential) may be made available to the Department and the Gas and Electricity Markets Authority (the Authority).
31. Information provided to the Department 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 2018 and the Environmental Regulations 2004). If the Department 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.
32. If you have any questions about the consultation documents, please contact DCC via [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).

## Appendix A – ETMAD Draft Direction Text

33. This attachment contains the text that the Department plans to use for direction of changes to the ETMAD.

### ETMAD Draft Direction Text

34. This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).
35. Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.
36. Pursuant to Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DD MM YYYY], the ECoS Transition and Migration Approach Document (ETMAD) previously designated and incorporated into the SEC as Appendix AS is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.
37. For the avoidance of doubt such re-designation of the ECoS Transition and Migration Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).
38. This direction is also being notified to the SEC Administrator.