R0103 – CENTRAL PROVISION OF DCC TECHNICAL CONTACTS FOR REQUESTING TEST CERTIFICATES

V1.0 for REC Party and CSS User impact assessment – 22 June 2023

Proposed legal text changes in red

Schedule 25 – Central Switching Service
3.6. Each CSS User (or applicant to become a CSS User) shall provide to the CSS Certificate Authority details of a Nominating Officer who can appoint individuals responsible for managing security certificates on behalf of their organisation. The Nominating Officer shall appoint a single Senior Responsible Officer with responsibility for all activities relating to CSS security certificates on behalf of the CSS User. The Senior Responsible Officer may at any time nominate individuals to become Appointed Responsible Officers or Technical Contacts. The Nominating Officer may at any time appoint a new Senior Responsible Officer by raising a Switching Service Request. 3.7. The roles of Senior Responsible Officer, Appointed Responsible Officer and Technical Contact are further described in Appendix 1. Appendix 1 also describes the process by which the CSS Certificate Authority shall validate nominations for the roles of Senior Responsible Officer, Appointed Responsible Officer and Technical Contact. The Switching Operator may also appoint Technical Contacts for a CSS User, as described in Paragraph 3.9. 3.8. Each applicant to become a CSS User shall request TLS Certificates and Message Signing Certificates in accordance with the process set out below, which covers the provision of test security certificates for testing and additionally the provision of production security certificates for enduring use: [interface table] 3.9. The Switching Operator may appoint one or more Technical Contact(s) for any CSS User, for the sole purpose of requesting test security certificates for connecting to the CSS test environments which emulate that CSS User during testing. The Switching Operator is responsible for maintaining the Technical Contacts registered for this purpose and for ensuring that the appropriate controls are in place to prevent any other actions being taken by the Switching Operator-appointed Technical Contacts. The Switching Operator shall be liable for the acts and omissions of each Technical Contact appointed for a CSS User by the Switching Operator, and shall ensure that such Technical Contacts only request test security certificates. 3.10 As set out in Appendix 2, each CSS User's Senior Responsible Officer has the right to remove a Technical Contact appointed for that CSS User. This shall include the right to remove one or more of the Technical Contacts appointed for that CSS User by the

Switching Operator, but without prejudice to the ability of the Switching Operator to thereafter appoint another Technical Contact for testing purposes.
8.1. Each CSS User shall: (a)… (b) … (c) ensure that each Senior Responsible Officer, Appointed Responsible Officer and Technical Contact it appoints complies with the obligations expressed to be placed on him or her, and shall be liable for any failure by such Senior Responsible Officer, Appointed Responsible Officer and Technical Contact to so comply (provided that a CSS User is not responsible for Technical Contacts appointed by the Switching Operator for testing purposes); …
Appendix 1 **1 Senior Responsible Officer** 1.2 The Senior Responsible Officer is ultimately responsible, on behalf of the organisation, for all activities associated with the management of CSS security certificates (except for those requested by Technical Contacts nominated by the Switching Operator for testing purposes), including: (a) appointment of an Approved Responsible Officer; (b) appointment of a Technical Contact (except for those appointed by the Switching Operator for testing purposes); (c) ensuring the appointment of an Appointed Responsible Officer is validated in accordance with paragraph 4 of this Appendix 1; (d) ensuring the Appointed Responsible Officer and Technical Contact agree to the terms of usage as defined in Paragraph 3.4 of this REC Schedule; (e) if an employee of a CSS Interface Provider is appointed as the Technical Contact for the Market Participant, ensuring that the CSS User has appropriate security controls in place with the CSS Interface Provider for the management of security credentials; (f) ensuring they are aware of certificate activities such as Certificate Signing Requests where the Senior Responsible Officer is not directly engaged in the process; (g) issuing requests for revocation certificates to the CSS Certificate Authority; and (h) establishing effective communication between the Senior Responsible Officer, Appointed Responsible Officer and Technical Contact to ensure their awareness of certificate activities and that duplicate requests for certificates are not being submitted to the Switching Operator. …
Appendix 1 **3 Technical Contact**

3.1 The Technical Contact is an individual who has the technical knowledge and capability to create Certificate Signing Requests and address all technical matters associated with the certificates on behalf of the organisation.
3.2 Where a named Technical Contact is not provided (or, if the only Technical Contact is one appointed by the Switching Operator for testing purposes), then the Senior Responsible Officer will perform the Technical Contact role.
3.3 A CSS User's Technical Contact does not need to be an employee of the CSS User.
3.4 It is not a requirement for the appointment of the Technical Contact that his / her employment by the appointing organisation is validated. This is because a Technical Contact may be an employee of a different organisation such as a service provider. In this case it is expected that there will be a commercial agreement between the employer of the Technical Contact and the CSS User. It is the responsibility of the CSS User (via its Senior Responsible Officer) to ensure that there is effective communication between the Senior Responsible Officer, Appointed Responsible Officer and Technical Contact.
3.5 For clarity, Technical Contacts appointed for a CSS User by the Switching Operator for testing purposes do not represent the CSS User and will not address technical matters on behalf of the CSS User.

Appendix 2
Roles Privilege Table

Privilege	Lead/ Backup Contact	Nom. Officer	SRO	ARO	Tech Contact*
Submit a request to appoint the Nominating Officer (with letter signed by Nom. Officer)	x				
…	…	…	…	…	…

* This includes Technical Contacts appointed for a CSS User by the Switching Operator for testing purposes, but only in respect of testing certificates.