

RETAIL  
ENERGY  
CODE

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# Central Switching Service

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**SCHEDULE 25**

**Central Switching Service Schedule**

Version: 1.1

Effective Date:

4 November 2022

<a href="#">Electricity Suppliers</a>	Mandatory
<a href="#">Gas Suppliers</a>	Mandatory
<a href="#">Distribution Network Operators</a>	Mandatory
<a href="#">Gas Transporters</a>	Mandatory
<a href="#">DCC</a>	Mandatory
<a href="#">Metering Equipment Manager</a>	Mandatory for <a href="#">CSS Users</a>
<a href="#">Non-Party REC Service User</a>	Mandatory for <a href="#">CSS Users</a>

*Change History*

Version Number	Implementation Date	Reason for Change
0.1	N/A	Initial draft for November 2020 publication
0.2	N/A	Draft for Spring 2021 Switching Consultation
1.0	18 July 2022	Switching SCR Modification R0041
1.1	4 November 2022	R0036
1.2	23 February 2024	R0103
<a href="#">MHHS v0.1</a>	<a href="#">N/A</a>	<a href="#">MHHS required changes: Draft for industry consultation</a>
<a href="#">MHHS v0.2</a>	<a href="#">N/A</a>	<a href="#">Version uplifted following CCAG Approval</a>
<a href="#">MHHS v0.3</a>	<a href="#">N/A</a>	<a href="#">Mop up version – updated to include transition text</a>

**Commented [SJ1]:** [Mop Up Update](#) - to reflect approved CP R0103 in the baseline text. Changes not redlined as they are not MHHS drafting

## 1 Introduction

- 1.1. Organisations wishing to exchange [Market Messages](#) with the [Central Switching Service \(CSS\)](#) must first become a [CSS User](#) in accordance with the process in the [Qualification and Maintenance Schedule](#) and this [REC Schedule](#).
- 1.2. Becoming a [CSS User](#) is optional for [Metering Equipment Managers](#), [Data Aggregators](#), [Data Collectors](#), ~~[Data Aggregators](#)~~, ~~[Data Collectors](#)~~, [Meter Asset Providers](#) and [Shippers](#), as they only receive [Market Messages](#) from the [CSS Provider](#).
- 1.3. Once an organisation has become a [CSS User](#), all rights and obligations set out in this [REC Schedule](#) shall apply until such time as the organisation ceases to be a [CSS User](#) in accordance with Paragraph 8.
- 1.4. [CSS Users](#) are categorised as follows:
  - (a) [Energy Suppliers](#);
  - (b) [Electricity Retail Data Agents](#);
  - (c) the [Gas Retail Data Agent](#);
  - (d) [Metering Equipment Managers](#);
  - (e) ~~[Data Aggregators](#)~~ ~~[Data Aggregators](#)~~ ~~Not used~~;
  - (f) ~~[Data Collectors](#)~~ ~~[Data Collectors](#)~~ ~~Not used~~;
  - (g) [Meter Asset Providers](#);
  - (h) [Shippers](#);
  - (i) [CSS Interface Providers](#);
  - (j) the [Electricity Enquiry Service Provider](#);
  - (k) the [Gas Enquiry Service Provider](#);
  - (l) the [Code Manager](#);

**Commented [AW2]:** References to DC and DA removed in line with MHHS Design

**Commented [SJ3R2]:** [Mop Up Update](#) - re-instated reference to DA and DC for the transition period

**Commented [AW4]:** References to DC and DA removed in line with MHHS Design

**Commented [SJ5R4]:** [Mop Up Update](#) - re-instated reference to DA and DC for the transition period

(m) the [Smart Meter Data Service Provider](#); and

(n) the [Enduring Change of Supplier Service Provider](#).

1.5. A [Market Participant](#) and / or [Switching Data Service Provider](#) may appoint a [CSS Interface Provider](#) to exchange [Market Messages](#) on behalf of the [Market Participant/Switching Data Service Provider](#). Where this is the case, dual-responsibility for compliance shall apply as follows:

(a) the [Market Participant / Switching Data Service Provider](#) shall remain responsible for compliance with all of its obligations as such under this [Code](#) (and shall remain liable for the acts and omissions of its appointed [CSS Interface Provider](#)); and

(b) in addition, the [CSS Interface Provider](#) shall be directly liable and accountable for complying with its obligations as a [CSS User](#).

1.6. This [REC Schedule](#) describes the process that organisations shall follow when applying to become a [CSS User](#).

## 2 Becoming a [CSS User](#)

2.1. An application to become a [CSS User](#) will be initiated in accordance with the [Qualification and Maintenance Schedule](#) and shall include:

(a) for an organisation that is not eligible to become a [Party](#) to this [Code](#), entry into an [Access Agreement](#);

(b) undergoing an [Information Security and Data Protection Assessment](#);

(c) becoming a [Switching Portal User](#) in accordance with the [Switching Service Management Schedule](#) ;

(d) establishing the required public and private keys to enable secure messaging in accordance with Paragraph 3;

(e) establishing the required webhooks to enable the [CSS](#) to route messages to the correct recipient in accordance with Paragraph 5; and

(f) completing [CSS Testing](#) to demonstrate that messages can be exchanged with

the [CSS Provider](#) in accordance with Paragraph 6.

2.2. The [Code Manager](#) shall only approve an application from an organisation applying to become a [CSS User](#) if, at the date of its completed application:

- (a) in the case of admission as an [Energy Supplier](#) or [Metering Equipment Manager](#), that the applicant has been [Qualified](#) in accordance with the [Qualification and Maintenance Schedule](#);
- (b) in the case of admission as an [Electricity Retail Data Agent](#), that the relevant [Distribution Network Operator](#) that is responsible for the provision of the [Electricity Retail Data Service](#) has been [Qualified](#) in accordance with the [Qualification and Maintenance Schedule](#); and
- (c) in the case of admission as a ~~Data Aggregator, Data Collector, Data Aggregator, Data Collector~~ [Meter Asset Provider](#) or [Shipper](#), that the applicant has an associated [Energy Company](#) and [Market Participant Role](#) recorded within [CSS](#) based on the gas and/or electricity [Market Participant Data](#) provided by the [GRDA](#) or the [BSCCo](#).

**Commented [AW6]:** References to DC and DA removed in line with MHHS Design

**Commented [SJ7R6]:** [Mop Up Update](#) - re-instated reference to DA and DC for the transition period

2.3. For clarity, a single entity is assigned to each of the following roles (and therefore this [REC Schedule](#) does not deal with new applications to those roles): [Gas Retail Data Agent](#), [Electricity Enquiry Service Provider](#), [Gas Enquiry Service Provider](#), [Code Manager](#) and [Smart Meter Data Service Provider](#). These entities will have obtained certificates and completed testing prior to the [CSS Go-Live Date](#) under the [Transition Schedule](#).

2.4. The [Enduring Change of Supplier Service Provider](#) will not obtain certificates or complete testing prior to the [CSS Go-Live Date](#). Prior to receiving data from the [CSS Provider](#) in accordance with the [Registration Services Schedule](#) and [RMP Lifecycle Schedule](#), the [Enduring Change of Supplier Service Provider](#) shall provide written confirmation to the [Code Manager](#) that all appropriate testing required under the [SEC](#) has been completed and systems and processes are in place to securely manage data provided by the [CSS Provider](#).

### 3 Process for Establishing Public and Private Keys

- 3.1. Each applicant wishing to become a [CSS User](#), shall obtain from the [CSS Certificate Authority](#), the following digital certificates, to be used for the exchange of [Market Messages](#) via the [CSS](#):
- (a) Transport Layer Security (TLS) Certificates to secure either end of the network connection, ensuring the transfer of [Market Messages](#) across the communication channel is via a secure encrypted channel. A [TLS Certificate](#) shall not be required by a [Market Participant](#) if they are using a [CSS Interface Provider](#) to communicate with the [CSS](#) on their behalf as set out in Paragraph 3.3; and
  - (b) For [CSS Users](#), excluding [CSS Interface Providers](#), [Message Signing Certificates](#) for each [Market Participant Identifier](#), to authenticate individual [Market Messages](#) sent across the communication channel through the application of a digital signature.
- 3.2. These certificates will be digitally signed by the [CSS Certificate Authority](#) to bind certificate owners with their public keys.
- 3.3. A single [TLS Certificate](#) can be used by a [CSS Interface Provider](#) to send and receive [Market Messages](#) on behalf of multiple [Market Participants/Switching Data Service Providers](#) on whose behalf the [CSS Interface Provider](#) acts. A [CSS User](#) which relies on a [CSS Interface Provider](#) will not obtain a separate [TLS Certificate](#), but will have its own [Message Signing Certificate](#) (which could be obtained by an employee of the [CSS Interface Provider](#) acting as the [Technical Contact](#)).
- 3.4. It is the responsibility of each [CSS User](#) (or an organisation applying to become a [CSS User](#)) in possession of [TLS Certificates](#) and / or [Message Signing Certificates](#) to ensure they comply with the obligations in Paragraph 8.1.
- 3.5. The process detailed in this Paragraph 3 can only be initiated following confirmation by the [Code Manager](#) to the [CSS Certificate Authority](#) that the applicant has become a [Party](#) or signed an [Access Agreement](#) and successfully completed the [Information Security and Data Protection Assessment](#) in accordance with the [Qualification and Maintenance Schedule](#). An applicant must successfully complete testing before it can apply for production certificates.

- 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:

Ref	When	Action	From	To	Interface	Means
3.8.1	Following confirmation from the <a href="#">Code Manager</a> that <a href="#">CSS User</a> onboarding can commence and prior to initiation of external <a href="#">CSS Testing</a> .	Submit details of <a href="#">Nominating Officer</a> (NO) and signed validation form.	Lead Contact (details provided by <a href="#">Code Manager</a> )	<a href="#">CSS Certificate Authority</a>	Officer Nomination <a href="#">Switching Service Request</a>	<a href="#">Switching Portal</a>
3.8.2	Following receipt of the <a href="#">Nominating Officer</a> details in 3.8.1.	Validate the <a href="#">Nominating Officer</a> request and schedule call with <a href="#">Nominating Officer</a> to validate and verify identification and proof of address documents.	<a href="#">CSS Certificate Authority</a>	<a href="#">Nominating Officer</a>	Not defined	Not defined
3.8.3	Following 3.8.2 where the <a href="#">Nominating Officer</a> is rejected.	Contact the applicant to discuss the reason for the rejection.	<a href="#">CSS Certificate Authority</a>	Lead Contact	Not defined	<a href="#">Switching Portal</a>
3.8.4	Following 3.8.2 where the <a href="#">Nominating Officer</a> is accepted.	Add <a href="#">Nominating Officer</a> to the relevant account and update the applicant.	<a href="#">CSS Certificate Authority</a>	Lead Contact	Not defined	<a href="#">Switching Portal</a>
3.8.5	At any time following 3.8.4	Submit details of <a href="#">Senior Responsible Officer</a> (SRO) and signed employment validation form.	<a href="#">Nominating Officer</a>	<a href="#">CSS Certificate Authority</a>	Officer Nomination <a href="#">Switching Service</a>	<a href="#">Switching Portal</a>

					<a href="#">Request</a>	
3.8.6	Following receipt of the <a href="#">Senior Responsible Officer</a> details in 3.8.5.	Validate the <a href="#">Senior Responsible Officer</a> request.	<a href="#">CSS Certificate Authority</a>		Internal process	N/A
3.8.7	Following 3.8.6 where the <a href="#">Senior Responsible Officer</a> is rejected.	Contact the applicant to discuss the reason for the rejection.	<a href="#">CSS Certificate Authority</a>	<a href="#">Nominating Officer</a>	Not defined	<a href="#">Switching Portal</a>
3.8.8	Following 3.8.6 where the <a href="#">Senior Responsible Officer</a> is accepted.	Add <a href="#">Senior Responsible Officer</a> to the relevant account and update the applicant.	<a href="#">CSS Certificate Authority</a>	<a href="#">Nominating Officer</a>	Not defined	<a href="#">Switching Portal</a>
3.8.9	Following 3.8.8 where a separate <a href="#">Appointed Responsible Officer (ARO)</a> and / or <a href="#">Technical Contact (TC)</a> is required.	Submit details of <a href="#">Appointed Responsible Officer</a> and / or <a href="#">Technical Contact</a> and signed employment validation form where required.	<a href="#">Senior Responsible Officer</a>	<a href="#">CSS Certificate Authority</a>	Officer Nomination <a href="#">Switching Service Request</a>	<a href="#">Switching Portal</a>
3.8.10	Following receipt of the <a href="#">Appointed Responsible Officer</a> and / or <a href="#">Technical Contact</a> details in 3.8.9.	Validate the <a href="#">Appointed Responsible Officer</a> / <a href="#">Technical Contact</a> request.	<a href="#">CSS Certificate Authority</a>		Internal process	N/A
3.8.11	Following 3.8.10 where the <a href="#">Appointed Responsible Officer</a> and / or <a href="#">Technical Contact</a> is rejected.	Contact the applicant to discuss the reason for the rejection.	<a href="#">CSS Certificate Authority</a>	<a href="#">Senior Responsible Officer</a>	Not defined	<a href="#">Switching Portal</a>
3.8.12	Following 3.8.10 where the <a href="#">Appointed</a>	Add <a href="#">Appointed Responsible Officer</a> / <a href="#">Technical Contact</a> to the relevant	<a href="#">CSS Certificate Authority</a>	<a href="#">Senior Responsible</a>	Not defined	<a href="#">Switching Portal</a>

	<a href="#">Responsible Officer</a> and / or <a href="#">Technical Contact</a> is accepted.	account and update the applicant.		<a href="#">Officer</a>		
3.8.13	At any time following 3.8.12.	Submit the <a href="#">Certificate Signing Request</a> for test certificates.	Applicant ( <a href="#">SRO</a> , <a href="#">ARO</a> or <a href="#">TC</a> )	<a href="#">CSS Certificate Authority</a>	<a href="#">Certificate Signing Request</a>	<a href="#">Switching Portal</a>
3.8.14	Following receipt of the <a href="#">Certificate Signing Request</a> in 3.8.13.	Validate the request confirming that the request relates to an organisation that has been approved for <a href="#">CSS User</a> onboarding by the <a href="#">Code Manager</a> .	<a href="#">CSS Certificate Authority</a>		Internal process	N/A
3.8.15	Following 3.8.14 where the <a href="#">Certificate Signing Request</a> is rejected.	Contact the applicant to discuss the reason for the rejection.	<a href="#">CSS Certificate Authority</a>	Applicant ( <a href="#">SRO</a> , <a href="#">ARO</a> or <a href="#">TC</a> )	Not defined	<a href="#">Switching Portal</a>
3.8.16	Following receipt of a valid <a href="#">Certificate Signing Request</a> .	Sign certificate and issue signed certificate.	<a href="#">CSS Certificate Authority</a>	Applicant ( <a href="#">SRO</a> , <a href="#">ARO</a> or <a href="#">TC</a> )	Signed Certificate	<a href="#">Switching Portal</a>
3.8.17	Following receipt of the signed certificate in 3.8.16	Install security certificates and store details securely.	Applicant ( <a href="#">SRO</a> , <a href="#">ARO</a> or <a href="#">TC</a> )		Internal process	N/A
3.8.18	Following successful completion of external <a href="#">CSS Testing</a> or at any future point where new production certificates are required.	Submit the <a href="#">Certificate Signing Request</a> for production certificates.	Applicant ( <a href="#">SRO</a> , <a href="#">ARO</a> or <a href="#">TC</a> )	<a href="#">CSS Certificate Authority</a>	<a href="#">Certificate Signing Request</a>	<a href="#">Switching Portal</a>

3.8.19	Following receipt of the <a href="#">Certificate Signing Request</a> in 3.8.18.	Validate the request confirming that the request relates to an organisation that has successfully completed testing in accordance with Paragraph 7 and progress with 3.8.15 to 3.8.17.	<a href="#">CSS Certificate Authority</a>		Internal process	N/A
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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.

#### 4 Revocation of [CSS Certificates](#)

- 4.1. A certificate which has been issued by the [CSS Certificate Authority](#) shall be treated as valid for its stated purpose until such time as it is revoked in accordance with this Paragraph 4 or expires in accordance with Paragraph 5.
- 4.2. The [CSS Certificate Authority](#) shall revoke a [CSS User](#)'s certificate:
- (a) where requested by the [Senior Responsible Officer](#) or [Appointed Responsible Officer](#);
  - (b) where any information in the certificate is known or suspected to be inaccurate;
  - (c) on suspected or known compromise of the private keys associated with the certificate;
  - (d) on suspected or known compromise of the media holding the private keys associated with the certificate;
  - (e) on instruction from the [REC PAB](#) (via the [Code Manager](#)), where the [CSS User](#) fails to comply with its obligations under this [Code](#) and / or its [Access Agreement](#); or
  - (f) on instruction from the [Code Manager](#), where the [CSS User](#) ceases to be a [CSS User](#).
- 4.3. In addition, the [CSS Certificate Authority](#) may revoke a certificate in its sole discretion, to mitigate risk to the [Switching Arrangements](#). Where this occurs, a report will be provided to the [Code Manager](#) within five [Working Days](#).
- 4.4. Where certificates are revoked, the [CSS Certificate Authority](#) shall inform the relevant [Nominating Officer](#), [Senior Responsible Officer](#) and [Appointed Responsible Officer](#); and include the relevant details on the [Certificate Revocation List](#).
- 4.5. Where a [CSS User](#) who uses a [CSS Interface Provider](#) has their certificate revoked, the [CSS Certificate Authority](#) shall ensure that only the [Message Signing Certificate](#) for the [CSS User](#) is revoked.

## 5 Expiry of CSS Certificates

- 5.1. The expiration period for each certificate is as follows:
- (a) [TLS Certificates](#) will expire after 12 months; and
  - (b) [Message Signing Certificates](#) will expire after 24 months.
- 5.2. [CSS Users](#) may request new certificates in advance of the expiry date to replace existing certificates.
- 5.3. An expiry warning will be issued to the [Senior Responsible Officer](#), [Appointed Responsible Officer](#) and [Technical Contact](#) 90, 60, 30 and 1 day in advance of the certificate expiration date.

## 6 Process for Establishing Webhooks

- 6.1. The messaging functionality within the [CSS](#) is based on real-time events triggered by action within the [CSS](#), and these events are then pushed out to the relevant [CSS Users](#) who are subscribed to those events.
- 6.2. Prior to becoming a [CSS User](#), an applicant shall subscribe to the events relevant to its role. This process may be completed by a [CSS Interface Provider](#) acting on behalf of the organisation. Some event types are mandatory for certain roles where a [Market Participant](#) is required to send a [Market Message](#) in accordance with a [REC Schedule](#); therefore, an applicant must subscribe to all of these and failure to do so will result in an error response. A request will be validated by the [CSS Provider](#), making sure that it is eligible to be given access to the relevant event. Then a subscription key will be issued to the applicant and also stored within [CSS](#).

6.3. In order to establish webhooks and subscribe to the relevant events for testing and separately for production, applicants shall follow the process in the interface table below:

Ref	When	Action	From	To	Interface	Means
6.3.1	As required, following establishment of public and private keys.	Request details of the available event types and whether those event types have already been subscribed to.	Applicant	<a href="#">CSS Provider</a>	Retrieve Webhook Services	<a href="#">CSS API</a>
6.3.2	Following 6.3.1 where the message passes synchronous validation.	Provide details of the available event types.	<a href="#">CSS Provider</a>	Applicant	Available Webhook Services	<a href="#">CSS API</a>
6.3.3	Following receipt of the event details in 6.3.2.	Subscribe to the required event types.	Applicant	<a href="#">CSS Provider</a>	Webhook Subscription	<a href="#">CSS API</a>
6.3.4	Following 6.3.3 where the message passes synchronous validation.	Store details within the <a href="#">CSS</a> .	<a href="#">CSS Provider</a>		Internal Process	
6.3.5	At any time, following 6.3.4 if a change to subscriptions is required.	Update subscription to required event types.	Applicant	<a href="#">CSS Provider</a>	Webhook Subscription	<a href="#">CSS API</a>
6.3.6	Following 6.3.5 where the message passes synchronous validation	Store details within the <a href="#">CSS</a> .	<a href="#">CSS Provider</a>		Internal Process	



## 7 Process for [CSS Testing](#)

- 7.1. The high-level arrangements for external [CSS Testing](#) are set out in the [Qualification and Maintenance Schedule](#). The [Switching Operator](#) shall develop and maintain a [CSS](#) testing procedure document, setting out the detailed external [CSS Testing](#) arrangements including, as a minimum, details regarding exit criteria, defect management and test data management.
- 7.2. External [CSS Testing](#) shall be initiated following confirmation from the [Code Manager](#) that external [CSS Testing](#) can commence, with details of any specific test scenarios to be applied, and provision of the required security certificates in accordance with the process in Paragraph 3.8.
- 7.3. Each applicant shall ensure the test [Systems](#) it plans to use for constructing [Market Messages](#), sending [Market Messages](#) and receiving responses over the [CSS](#) interface can detect any unauthorised software that has been installed or executed on them and any unauthorised attempt to install or execute software on them. If unauthorised software is detected or any attempt to install or execute unauthorised software, the installation or execution of that software shall be prevented; and where any such unauthorised software has been installed or executed, the applicants shall take remedial action.
- 7.4. Where a [Market Participant](#) or [Switching Data Service Provider](#) intends to use a [CSS Interface Provider](#), the [CSS Interface Provider](#) may undertake testing on behalf of the applicant, or the applicant can place reliance on the testing executed by the [CSS Interface Provider](#). The extent to which this is permissible will be determined by the [Code Manager](#) based on the overall business solution and the previously tested scenarios.
- 7.5. Before commencing external [CSS Testing](#) the applicant shall:
  - (a) produce relevant test artefacts and ensure these have been approved by the [Switching Operator](#) (which includes notification of intention to undertake testing, test readiness report, and a test plan incorporating the test schedule);
  - (b) provide confirmation to the [Switching Operator](#) that an appropriate level of resource is available to support the [CSS Testing](#) process;
  - (c) successfully complete connectivity testing to validate that the environment and test data are in place and that the applicant has implemented sufficient

technology to support synchronous messaging;

(d) ensure test data is in place and been verified; and

(e) all required test tooling is in place and is available for the applicant as needed.

7.6. Where the [Switching Operator](#) is not satisfied that the applicant has met the criteria set out in Paragraph 6.4 it may:

(a) prevent the applicant from undertaking external [CSS Testing](#) until such time as [Switching Operator](#) is satisfied that the applicant meets the criteria;

(b) provide provisional approval of the test readiness report (and approval to proceed) with an understanding that the outstanding documentation shall be provided before the start of testing, otherwise testing will not commence; or

(c) refer the matter to the [Code Manager](#). Where the [Code Manager](#) determines that the applicant has met the criteria, the [Switching Operator](#) shall schedule the start of testing as soon as reasonably practicable.

7.7. The [Switching Operator](#) shall make the test environments available and provide a test support service from 09:00 to 17:00 on each [Working Day](#). The test environment may be used for testing outside these hours but will be unsupported.

7.8. Following completion of external [CSS Testing](#), the applicant shall provide a test completion report to the [Switching Operator](#). The [Switching Operator](#) shall review test evidence and determine whether to approve the test completion report.

7.9. Within 10 [Working Days](#) of receipt of the test completion report, the [Switching Operator](#) shall provide test evidence to the [Code Manager](#) identifying whether the applicant has successfully completed testing. Where the [Switching Operator](#) considers that the applicant has not successfully completed testing, the applicant may appeal the decision to the [Code Manager](#).

7.10. Following successful completion of external [CSS Testing](#), the [Code Manager](#) shall inform the [CSS Certificate Authority](#) that the applicant is authorised to install production security certificates in accordance with Paragraph 3.8.

## 8 Undertakings by [CSS Users](#)

8.1. Each [CSS User](#) shall:

- (a) comply with the [CSS Certificate Policy](#) published on the [Switching Portal](#) by the [CSS Certificate Authority](#)<sup>1</sup>;

<sup>1</sup>The CSS Certificate Authority is obliged by this Code to ensure that the CSS Certificate Policy remains consistent with this Code. In the event of any inconsistency with this Code, the requirements of this Code shall prevail.

- (b) ensure all information submitted in support of a certificate application is true, accurate and that they hold such rights as necessary to any trademarks or other such information submitted during the application for a certificate;
- (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);
- (d) review the issued certificate to confirm the accuracy of the information contained within it before installation and first use;
- (e) ensure the [System](#) used for generating or obtaining a key pair is sufficiently secure to prevent any loss, disclosure, or unauthorised use of the private key;
- (f) keep confidential, any passwords, passphrases, PINs, private keys or other personal secrets used in obtaining authenticated access to certificates and [CSS Certificate Authority](#) facilities until it is securely destroyed or deleted. This does not prevent the [CSS User](#) sharing details with third party service providers, including [CSS Interface Providers](#);
- (g) make only true and accurate representations to the [CSS Certificate Authority](#) as to the information required to determine eligibility for a certificate and for information contained within the certificate; and
- (h) exclusively use the certificate for legal purposes and restricted to those authorised purposes detailed within this [REC Schedule](#).

8.2. Each [CSS User](#) shall:

- (a) retain all audit logs of basic user activities (e.g. logon, logoff, failed attempts) and security events for all information systems and services that interact with the [CSS](#), within legal constraints, for a minimum of 15 months with live data available for three months and archived data available for a further 12 months.
  - (b) have a logical network schematic of the information systems and services in scope that interact with the [CSS](#), and include:
    - (i) services and functionality; and
    - (ii) gateway / boundaries functionality;
  - (c) ensure that the edge routers and switches in the data centres are physically secured with direct access only being granted to staff who have a demonstrable and approved need for access; and
  - (d) use its own time source for time synchronisation with its organisation and that time does not need to be synchronised across organisational boundaries.
- 8.3. [CSS Users](#) must report to the [CSS Certificate Authority](#) (via the [Switching Portal](#)) any compromise or suspected compromise of the private keys associated with any of their certificates as soon as they become aware of such breach or suspected breach, providing the 'Certificate Distinguished Name' and the 'Certificate Serial Number' to enable certificates to be revoked.
- 8.4. Where a [CSS User](#) is relying on a certificate to authenticate another organisation named in the certificate, it shall ensure the [Certificate Revocation List](#) is checked to confirm that the relevant certificate has not been revoked.
- 8.5. [CSS Users](#) shall maintain their [CSS](#) subscriptions in relation to mandatory event types at all times. Where a [CSS User](#) attempts to delete a subscription in relation to a mandatory event type, the [CSS](#) will reject the request.
- 8.6. Each [CSS User](#) shall ensure that it carries out assessments that are designed to identify any vulnerability of its [Systems](#) prior to accessing any testing services using such [Systems](#) and on at least an annual basis.
- 8.7. Where a [CSS User](#) detects a material vulnerability that impacts the [Systems](#) that are part of the [Switching](#) process, the [CSS User](#) shall take reasonable steps to ensure that the cause of the vulnerability is rectified, or the potential impact of the vulnerability is mitigated, as soon as is reasonably practicable. The [CSS User](#) shall also promptly

notify the [Code Manager](#) and the [Switching Operator](#), of the steps being taken to rectify its cause or mitigate its potential impact on [CSS Systems](#) and the timescales for rectification.

- 8.8. [CSS Users](#) shall comply with ongoing assurance requirements in accordance with the [Qualification and Maintenance Schedule](#).
- 8.9. A [CSS User](#)'s breach of this Paragraph 7 shall constitute an [Event of Default](#) for the purposes of Clause 16 of the main body of this [Code](#).

## 9 Ceasing to be a [CSS User](#)

- 9.1. An organisation shall cease to be a [CSS User](#) where its [Access Agreement](#) is terminated (or ends in so far as applicable to the [CSS](#) arrangements); or it ceases to be a [Party](#) in accordance with the [Market Exit and Supplier of Last Resort Schedule](#).
- 9.2. Where an organisation ceases to be a [CSS User](#), the [Code Manager](#) shall notify the [CSS Certificate Authority](#) who will revoke the relevant security certificates.
- 9.3. Where a [CSS User](#) who uses a [CSS Interface Provider](#) ceases to be a [CSS User](#), the [CSS Certificate Authority](#) shall ensure that only the [Message Signing Certificate](#) for the [CSS User](#) is revoked.
- 9.4. Following removal of a [Market Participant Role](#) within the [Market Participant Data](#) provided by the [Code Manager](#) to the [CSS Provider](#) in accordance with the [Switching Data Management Schedule](#), the [CSS Provider](#) will remove associated webhooks.

Appendix 1 [Senior Responsible Officer](#) / [Appointed Responsible Officer](#) / [Technical Contact](#) Validation Procedures

1 [Senior Responsible Officer](#)

- 1.1 The [Senior Responsible Officer](#) is an executive or senior individual within the [CSS User](#) (or applicant) organisation who has the authority to make decisions for or on behalf of the organisation.
- 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 [Appointed 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](#).

1.3 It is a mandatory requirement that each [CSS User](#) (or applicant) seeking to obtain certificates appoints a [Senior Responsible Officer](#).

## **2 [Appointed Responsible Officer](#)**

2.1 The [Senior Responsible Officer](#) may at any time nominate an individual to become an [Appointed Responsible Officer](#). It is not mandatory to appoint an [Appointed Responsible Officer](#).

2.2 The [Appointed Responsible Officer](#) will have the key responsibilities of requesting certificates on behalf of the organisation. Broader responsibilities, as defined above for the [Senior Responsible Officer](#), are at the discretion of the organisation.

2.3 The level of seniority of each [CSS User](#)'s [Appointed Responsible Officer](#) is at the discretion of the [CSS User](#) or organisation applying to become a [CSS User](#).

2.4 The term or duration of time the [Appointed Responsible Officer](#) will serve in this capacity is at the discretion of the [Senior Responsible Officer](#).

2.5 The [Appointed Responsible Officer](#) should ensure the [Senior Responsible Officer](#) is aware of all activities relating to certificates. The method by which this is achieved is the responsibility of the organisation, not the [CSS Certificate Authority](#).

2.6 An [Appointed Responsible Officer](#), if appointed, must be validated in accordance with employment validation procedures detailed in Paragraph 4 of this 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.

**4 Employee Validation**

4.1 The requesting organisation must validate the [Senior Responsible Officer](#) and [Appointed Responsible Officer](#) (if one is appointed) and the [Technical Contact](#) (if he / she is an employee of their organisation).

4.2 The following list of roles (in order of priority) will be accepted by the [CSS Certificate Authority](#) to confirm employment:

- (a) any officer that is identified in Companies House as an officer of the requesting organisation;
- (b) the executive of human resources of the requesting organisation; or
- (c) the Chief Executive Officer, Chief Operating Officer or Chief Technical Officer of the requesting organisation.

4.3 The appropriate officer shall send the forms and confirmations required by the [CSS Certificate Authority](#) in accordance with the process defined in Paragraph 3.8 of this [REC Schedule](#).

4.4 Once a [CSS User](#) has received a letter of confirmation from the [CSS Certificate Authority](#), the [CSS User](#) can create its [Certificate Signing Requests](#).

**Appendix 2 Roles Privilege Table**

Privilege	Lead/ Backup Contact	Nom. Officer	SRO	ARO	Tech Contact*
Submit a request to appoint the <a href="#">Nominating Officer</a> (with letter signed by Nom. Officer)	x				



Submit a request to appoint/ replace the <a href="#">SRO</a> (with letter signed by Nom. Officer)	x				
Submit a request to appoint/ remove the <a href="#">ARO</a>			x		
Submit a request to appoint/ remove a <a href="#">Technical Contact</a>			x		
Submit a CSR ( <a href="#">Certificate Signing Request</a> )			x	x	x
Access certificate from the <a href="#">Switching Portal</a>			x	x	x
Access public certificates from the <a href="#">Switching Portal</a>			x	x	x
Submit a request with a CRR (Certificate Revocation Request)			x	x	
Get notified when certificates nearing expiry (90, 60, 30, 1 days)			x	x	x
Get notified whenever a change of <a href="#">SRO</a>		x			
Get notified whenever a change of <a href="#">ARO</a>			x		
Get notified whenever a change of <a href="#">Technical Contact</a>			x	x	
Get notified on lifecycle status change of CSR Service Request			x	x	x
Get notified on lifecycle status change of CRR Service Request		x	x	x	
Get notified when certificate available for download			x	x	x



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