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MP104 ‘Security Improvements’

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP104 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We understand the issue that has been raised and the concerns of the SSC and believe that the solution proposed addresses these. On Page 4 of the Modification Report under 'Reporting usage of XML wrappers not using XML User Role Signing Private Keys' it states that the monthly reports will be manually transferred to the DCC's SharePoint, however given previous experience with this process we question whether these reports should be automatically transferred.	This report will only be shared with eh Security Sub-Committee and for a limited time only (between December 2021, when reporting begins and June 2022 when the validation mechanism is implemented). For that reason it does not seem sensible to add extra costs of automation.
SSEN	Network Party	Yes	We agree that to validate and ensure compliance with the SEC, the DCC needs to be able to validate the use of correct keys being used to sign XML format Service Requests and Pre-Signed Commands.	
ENWL	Network Party	Yes	We have no objection to the change in principle, as it improves the overall security of the smart meter ecosystem.	

Question 2: Will there be any impact on your organisation to implement MP104?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We don't believe that there will be any direct impact to us unless we are not compliant with the SEC and would therefore appear on the report and have our Service Requests or Signed Pre-Commands rejected. However we note that a new DUIS version will be designated and we will therefore be required to uplift our systems at some point.	
SSEN	Network Party	Yes	As our adapter does not currently use this proposed functionality, we will need to design, create and implement the functionality to use the new key and accept the new alerts introduced as part of this modification.	
ENWL	Network Party	Yes	Changes will be required to our Smart Service Gateway (SSG).	

Question 3: Will your organisation incur any costs in implementing MP104?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	There will be costs incurred as a result of a DUIS uplift however there will not be any standalone costs for the modification.	
SSEN	Network Party	Yes	At the time of writing, we have not confirmed the costs that will be incurred as part of this Modification.	
ENWL	Network Party	Yes	This shouldn't be a big change but needs review and estimation from our third party provider in order to make any necessary changes to the SSG functionality.	

Question 4: Do you believe that MP104 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We believe that this modification better facilitates SEC Objectives (a) and (f) for the reasons provided in the modification report. We also believe that this modification better facilitates Sec Objective (g) by facilitating efficient administration of this code.	
SSEN	Network Party	Yes	We agree that this Modification will better facilitate SEC Objective (f) as the modification will improve the security of data and systems of the SEC	
ENWL	Network Party	-	-	

Question 5: Noting the costs and benefits of this modification, do you believe MP104 should be approved?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We agree that this modification should be approved as it addresses a valid issue that has been raised and the costs appear reasonable.	
SSEN	Network Party	Yes	As the current solution cannot validate compliance, We agree that this modification should be approved.	
ENWL	Network Party	Yes	-	

Question 6: How long from the point of approval would your organisation need to implement MP104?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We do not require any specific lead time for this modification. This is because we are not required to take any immediate action as a result of this modification.	
SSEN	Network Party	Yes	We are currently unsure of potential timeframes for implementation, however if the standard minimum of twelve months lead time from the point of approval is followed, this will allow enough time for activities required for implementation.	
ENWL	Network Party	-	-	

Question 7: Do you agree with the proposed implementation approach?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We support the proposal to implement this alongside the ECoS release to avoid two DUIS uplifts in one year.	
SSEN	Network Party	Yes	As noted in the previous question, we agree with the proposed implementation approach.	
ENWL	Network Party	No	Should there perhaps be a longer grace period for making any necessary changes to the DCC systems	The DCC have confirmed in the Impact Assessment that June 2022 is their preferred release date.

Question 8: Do you agree that the legal text will deliver MP104?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No	In Section A the addition reads 'XML User Role Signing Key' however we believe this should be 'XML User Role Signing Private Key' as this is the term that is used throughout SEC Appendix AD. In SEC Appendix AD in Section 3.3.1 the text 'A separate User Role Signing Private Key must be used per User Id in use for each User' has been removed. We feel that this obligation should still be included so that it is clearly states that each User ID must have its own Key, however we believe it would now need to read 'A separate XML User Role Signing Private Key must be used per User Id in use for each User'. We also note that the wording to make it clear that the XML User Role Signing Private Key must be different to that used to sign the GBCS Payload has been removed and we wonder if there is benefit in leaving this in for clarity.	The Proposer, the Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair, the Department of Business Energy and Industrial Strategy (BEIS) and the DCC agreed to these changes.
SSEN	Network Party	Yes	We agree that the proposed legal text delivers the necessary changes required to deliver this modification.	
ENWL	Network Party	-	-	

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP104 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No	We do not feel that there is any direct impact to the consumer	
SSEN	Network Party	Yes	This modification will ensure the correct keys are used at all times which supports the Security Controls Framework and protects customers.	
ENWL	Network Party	-	-	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	-	
SSEN	Network Party	n/a	
ENWL	Network Party	Should there perhaps be a longer grace period for making any necessary changes to the DCC systems	