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MP198 ‘Further Changes from the Review of the SMKI and DCCKI Document Set’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP198 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We believe that the solution should resolve the issue identified in the Modification Report.	-

Question 2: Do you agree that the legal text will deliver MP198?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	Whilst we agree with the proposed Legal Text we question if where stated on page 16 <u>'after a Contingency event as described in Section 6, all supply chain Devices will still be able to be commissioned and used by being updated to the new Root in a future Recovery Event to restore the Contingency capability'</u> Contingency is a defined term and if it is we believe a definition should be provided. We are unable to find Section 5.2.2 as mentioned in Section 5.2 Execution of Recovery Procedure – next step after 5.2.1 We question if in 5.2.4 the next step should be 5.2.4a as this step states making public key available and this would be missed? Also we question if 5.2.4a <i>'Where directed by the SMKI PMA, the DCC shall conduct relevant Key Generation Ceremonies in accordance with the Organisation CP and Organisation CPS, in order to generate the following: a new Contingency Key Pair'</i> Is a duplicate of 5.2.4 Obligation (a)? We also question if in 5.2.4a Where directed by the SMKI PMA, the DCC shall conduct relevant Key Generation Ceremonies in accordance with the Organisation CP and	Thank you for your comments. SECAS will raise your comments with the Proposer and SEC Lawyer.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			Organisation CPS, in order to generate the following: <i>new Contingency Symmetric Key</i> . Is a duplicate of 5.2.4(b)	

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We agree with the proposed implementation approach.	-

Question 4: Will there be any impact on your organisation to implement MP198?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We believe our organisation will be impacted by the raising of the limit on records per file as stated in the modification report.	-

Question 5: Will your organisation incur any costs in implementing MP198?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	No costs	No comment.	-

Question 6: How long from the point of approval would your organisation need to implement MP198?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	N/A	No comment.	-

Question 7: Do you believe that MP198 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We believe that this modification will better facilitate General SEC Objectives (a) and (f).	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP198 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	No	We don't believe there will be any impact to consumers.	-

Question 9: Noting the costs and benefits of this modification, do you believe MP198 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	No comment.	-

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
National Grid Electricity Distribution	Network Party	No comment.	-