# **Working Group Meeting 1**

SECMP0058 'Ensuring correct Network Operator Certificates are placed on Electricity Smart Meters'



### What is the issue?

- The Proposer has identified that in approximately 10% of cases, the incorrect Network Operator SMKI Certificate is placed on the meter, preventing the true Network Operator from communicating with the Smart Meter.
- This creates manual effort for the Organisation whose Certificate is on the meter to issue an Update Certificate Command. Significant effort also goes into communicating, logging, tracking and resolving these issues.
- With multiple Network Operators and Supplier Parties, there will be a significant amount of effort required to track and manage the issues to resolution if the underlying issue is not resolved before installation volumes increase.

### What is the proposed solution?

- The proposed solution is only applicable for Electricity Smart Meters
- The proposed solution places an obligation on the DCC to validate the command that the Supplier Party issues to the meter to place the Network Operator Certificate on the meter against the first two digits of the MPAN core.
- Where the DCC knows which MPAN is assigned to the meter, they can verify that the Certificate being placed in the Network Operator slot is for the Network Operator associated with that MPAN. Should the MPAN be unknown, DCC systems can revert to default functionality and trust that the Supplier Party is updating to the correct Certificate.

### **Update on SECMP0058**

- The Panel reviewed the Initial Modification Report at their meeting on the 12<sup>th</sup> October and agreed that SECMP0063 should be progressed;
  - as a Path 3: Self-Governance Modification Proposal; and
  - through the Refinement Process for ten months, which will include at least two Working Group meetings, an industry consultation and have the Draft Modification Report presented to Panel in August 2019.
- Though the Panel agreed to the proposed 10 month Refinement Process, they asked the Working Group to consider solutions that could be implemented sooner as the issue needs resolving now.
- The Panel also asked the Working Group to consider two additional Terms of Reference questions

#### **Working Group Consideration of**

Root cause of the issue Proposed solution Alternative solutions Solutions for Gas Smart Meters

### What is the solution to the root cause?

- Why are Supplier Parties attempting to place invalid Network Operator Certificates on their meters?
- Is the proposed solution of obligating DCC to validate MPAN numbers against Certificates the most suitable way to resolving this issue, or are there any alternative solutions?
- Is there a solution that could address the problem with Gas Smart Meters as well as Electricity Smart Meters?

#### **Terms of Reference Questions**

### **Terms of Reference questions**

- Q1: Is the method of validating MPAN numbers against Network Operator Certificates the only solution to this issue?
- The Working Group should consider whether the proposed solution of validating Network Operator certificates against MPANs is the only possible solution to resolving this issue, or whether there are alternative options that do not impact DCC.

### **Terms of Reference question**

- Q2: Does this modification prevent Supplier Parties from attempting to use invalid Network Operator Certificates on Smart Meters?
- The Panel advised that it would still be possible for Supplier Parties to attempt to use invalid Network Operator Certificates on Electricity Smart Meters. Supplier Parties would receive an error code and therefore be aware that they attempting to use an invalid Certificate, but this may not stop them from attempting to use an invalid Certificate in the first instance.

### **Terms of Reference question**

- Q3: Is there a solution that will resolve the issue with Gas Smart Meters as well as Electricity Smart Meters?
- The Panel noted that the proposed solution only seeks to resolve part of the issue and asked the Working Group to consider if there is a solution that would resolve the issue for Gas Smart Meters as well as Electricity Smart Meters.

#### **Working Group Consideration of**

Draft legal text Implementation Approach Benefits and Drawbacks Views against Objectives

### **Proposed Draft Legal Text**

- The Enrolment Procedures (SEC Appendix AC) should be adjusted to make clear that DCC will validate the Network Operator Certificate to be installed by the Supplier against the MPAN.
- DUIS (SEC Appendix AD) should be adjusted to make clear that an error code will be sent to the Supplier where the Network Operator Certificate to be installed by the Supplier does not match with the MPAN value.

#### **Proposed Draft Legal Text**

• The following section of DUIS (3.8.66.3) would be modified:

Response Code	Response Code Description
E061501	The combination of User Role,Remote Party Role and Device Type is incorrect
E061504	The Remote Party New Prepayment Top Up Floor Seq Number data item is not applicable to the Request
E061505	The Certificate Type is not applicable to the Device Type
E061506	Future Dating / Remote Party Role mismatch - The Remote Party Role is not Supplier
E061507	The Certificate Type is not applicable to the Remote Party Role
Exxxxx	Certificate Party / MPAN mismatch – The Certificate Party is not correct for the MPAN

#### Implementation

- With the modification being a Path 3 Self-Governance proposal SECAS recommends an implementation of:
  - 5<sup>th</sup> November 2020 as part of the November 2020 SEC Release, if the decision to approve is received by the September 2019 Change Board meeting or.

#### **SECMP0058 Benefits and Drawbacks**

### **Benefits and drawbacks**

• The Working Group is asked to consider the benefits case for SECMP0063.

- A notable benefit has already been established in the IMR whereby the numbers of Electricity Smart Meters with invalid Network Operator Certificates should decrease.
- The Working Group are asked to consider whether there are any drawbacks in the proposed solution.

### **Views against SEC Objectives**

- The Proposer believes that this Modification Proposal better facilitates General SEC Objectives (a), (f) and (g) by:
- a) Without this change Smart Metering Systems will not be operating correctly, and nor will it be efficient given the increased workload to fix issues. Additionally, it has become clear that there is a chance that Gas Transporter Certificates could be placed on Electricity Smart Metering Equipment. This could lead to the situation whereby the Smart Meter would need to be replaced, which is not an efficient operation of Smart Meters.
- f) This will improve the protection of data and security of systems, as in the current situation more Organisations have access to Smart Meters which are not associated with them.
- g) This also facilitates the compliance with this code by Suppliers as <u>SEC Appendix AC</u> 5.2(a) requires the Responsible Supplier to ensure that the Device Security Credentials are those of the appropriate Network Operator

### **General SEC Objectives**

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain;
- (b) enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence;
- (c) facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems;
- (d) facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy;

### **General SEC Objectives**

- (e) facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy;
- (f) ensure the protection of Data and the security of Data and Systems in the operation of this Code;
- (g) facilitate the efficient and transparent administration and implementation of this Code; and
- (h) facilitate the establishment and operation of the Alt HAN Arrangements.

### **Working Group Consideration of**

**Consultation Questions** 

### **Consultation Questions**

 The Working Group are asked to consider whether there are any additional questions they wish to ask the industry as part of the Working Group Consultation.

## **Next Steps**



1. Hold a second Working Group meeting (if necessary)

2. Request a DCC Preliminary Assessment