

## SMKI PMA Sub-Committee

### Terms of Reference Version 1.8

#### 1. Purpose

The principal duty of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) is to manage the requirements for the SMKI and to provide governance and change control for the relevant SEC content and artefacts. Establishing the SMKI PMA enables the SEC Panel to work together with key industry and other delivery partners to deliver SEC duties in relation to SMKI management and assurance of the DCC operation of SMKI services.

#### 2. SEC-Prescribed Functions of the SMKI PMA

The prescribed functions of the SMKI PMA are set out in SEC Section L1.17 to L1.19 and include:

L1.17:

- a) to approve the Device CPS and Organisation CPS, and the IKI CPS, and any changes to those documents, in accordance with Sections L9;
- b) to propose variations to the SMKI SEC Documents, as further described in Section L1.19;
- c) to periodically review (including where directed to do so by the Panel) the effectiveness of the SMKI Document Set (including to evaluate whether the SMKI Document Set remains consistent with the SEC Objectives), and report to the Panel on the outcome of such review (such report to include any recommendations for action that the SMKI PMA considers appropriate);
- d) as soon as reasonably practicable following the incorporation of each of the following documents into this Code, its re-incorporation, or its modification in accordance with section 88 of the Energy Act 2008, to review that document in accordance with paragraph (c) above:
  - i. the SMKI Compliance Policy;
  - ii. the SMKI RAPP;
  - iii. the Device Certificate Policy;
  - iv. the Organisation Certificate Policy;
  - v. the IKI Certificate Policy
  - vi. the SMKI Recovery Procedure,

and (where the SMKI PMA considers it appropriate to do so) submit one or more Modification Proposals in respects of these documents (which Modification Proposals shall, notwithstanding Section X2.3(a), (b) and (c), be subject to Section D (modification Process) as varied by Section X2.3(d));

- e) to periodically review the effectiveness of the DCCKI Document Set and to:
  - (i) notify DCC where it considers that changes should be made to the DCCKI Document Set in order to ensure that DCC meets its obligations under Section G (Security) (such notification to include any recommendation for action that the SMKI PMA considers appropriate); and

- (ii) copy any such notification to the Security Sub-Committee and, except to the extent that it is appropriate to redact information for security purposes, to other SEC Parties;
- f) as soon as reasonably practicable following the incorporation of each of the following documents into this Code, its re-incorporation, or its modification in accordance with section 88 of the Energy Act 2008, to review that document in accordance with paragraph (e) above:
  - (i) the DCCKI RAPP;
  - (ii) the DCCKI Certificate Policy;
- g) to review the DCCKI CPS, and any amendments proposed to be made to it by the DCC, in accordance with Section L13 (DCC Key Infrastructure);
- h) as part of its review of the SMKI Compliance Policy pursuant to paragraph (d) above, to consider whether SMKI Participants which are subject to assurance assessments pursuant to the SMKI Compliance Policy should be liable to meet the costs (or a proportion of the costs) of undertaking such assessments, and (where the SMKI PMA considers it appropriate to do so) submit one or more Modification Proposals as referred to in paragraph (d) above;
- i) in relation to any incident in which a Relevant Private Key is (or is suspected of being) Compromised, to decide, in accordance with the SMKI Recovery Key Guidance, whether or not to require the use of the Recovery Private Key or Contingency Private Key (including the Symmetric Key);
- j) to exercise the functions allocated to it under the Recovery Procedure, and in particular to exercise the power to nominate Parties for such purposes (and in accordance with such procedures) as are set out in the Recovery Procedure;
- k) to provide the Panel, the Change Board and Working Groups with support and advice in respect of Modification Proposals that provide for variations to the SMKI SEC Documents;
- l) to provide assurance in accordance with Section L2 (SMKI Assurance);
- m) to provide the Panel with support and advice in respect of Disputes for which the Panel is required to make a determination, insofar as such Disputes relate to the SMKI Document Set;
- n) to provide the Panel and Sub-Committees with general advice and support with respect to SMKI Services and SMKI Repository Service;
- o) to exercise such functions as are allocated to it under, and to comply with all the applicable requirements of, the SMKI Document Set in accordance with Section L9.1; and
- p) to perform any other duties expressly ascribed to the SMKI PMA elsewhere in this Code.

The SMKI PMA are also prescribed by the SEC to produce, review and maintain the SMKI Recovery Key Guidance Document as per Section L10.13:

L10.13 The SMKI PMA shall:

- (a) develop the SMKI Recovery Key Guidance, and for that purpose:
  - (i) consult with the DCC, the Security Sub-Committee, the Parties, the Secretary of State and the Authority; and
  - (ii) have regard to the views of each person consulted by it prior to determining the content of the document;

(b) periodically review the SMKI Recovery Key Guidance, and in particular carry out a review whenever (and to the extent to which) it may be required to do so by the Panel or the Authority;

(c) where, following any review, it proposes to amend the SMKI Recovery Key Guidance:

(i) consult the DCC, the Security Sub-Committee, the Parties and the Authority in relation to the proposed amendments; and

(ii) have regard to the views of each person consulted by it prior to making any amendments to the document; and

(d) publish the SMKI Recovery Key Guidance, as initially determined by it and on each amendment made to that document from time to time.

L1.18:

The SMKI PMA shall establish a process whereby the Code Administrator monitors Modification Proposals with a view to identifying (and bringing to the SMKI PMA's attention) those proposals that are likely to affect the SMKI SEC Documents. The Code Administrator shall comply with such process.

L1.19 notwithstanding Section D1.3 (Persons Entitled to Submit Modification Proposals):

- a) the SMKI PMA shall be entitled to submit Modification Proposals in respect of the SMKI SEC Documents where there SMKI PMA considers it appropriate to do so; and
- b) any SMKI PMA Member shall be entitled to submit Modification Proposals in respect of the SMKI SEC Documents where he or she considers it appropriate to do so (where the SMKI PMA has voted not to do so).

The SMKI PMA role in change control is considered further in other parts of the SEC:

- Section L requires that the SMKI PMA establishes a process whereby the Code Administrator monitors Modification Proposals with a view to identifying (and bringing to the SMKI PMA's attention) those proposals that are likely to affect the SMKI. The Code Administrator shall comply with such process; and
- The SMKI PMA interaction with (Modification) Working Groups is set out in new provisions under SEC Section D:
  - D6.3 has been modified to clarify that Working Groups should not duplicate the experience and expertise available via the SMKI PMA;
  - D6.8(g) has been added and requires Working Groups to seek the SMKI PMA's views of the impact of a Modification Proposal would have on the DCC Systems and Smart Metering Systems. The SMKI PMA input must be obtained for any Modification Proposal that varies the Technical Specifications; and where the SMKI PMA indicates it wishes to express a view; and
  - D7.3(j) has been modified to include a summary of any views provided by the SMKI PMA in the Modification Report.

The SMKI PMA are also required to provide a recommendation to the Panel on whether to approve, or otherwise, the SMKI and Repository Testing (SRT) Approach Document, as and when the Panel consult with the SMKI PMA.

### 3. The SMKI PMA Role in Relation to the SMKI Repository

The SMKI PMA are responsible for lodging documentation within the SMKI Repository as set out in SEC L5.7 – L5.10:

L5.7 The SMKI PMA shall lodge each of the following documents in the SMKI Repository promptly upon the SMKI Repository Service first becoming available or (if later) the incorporation of that document into the Code:

- (a) the Device Certificate Policy;
- (b) the Organisation Certificate Policy; and
- (c) the IKI Certificate Policy; and
- (d) the SMKI Compliance Policy.

L5.8 The SMKI PMA shall lodge in the SMKI Repository the modified version of each document referred to in Section L5.7 promptly upon any modification being made to that document in accordance with the Code.

L5.9 The SMKI PMA may require the DCC to lodge in the SMKI Repository such other documents or information as it may from time to time direct.

L5.10 Subject to Section L5.3, the SMKI PMA may lodge in the SMKI Repository such other documents or information as it may from time to time consider appropriate.

### 4. Additional Functions of the SMKI PMA

The specification and operation of the SMKI will be set out in the SMKI SEC Document Set. This is a portfolio of SEC Subsidiary Documents defined in the SEC including:

- a. the following SEC Subsidiary Documents:
  - i. the Device Certificate Policy;
  - ii. the Organisation Certificate Policy;
  - iii. the IKI Certificate Policy
  - iv. the SMKI Compliance Policy;
  - v. the SMKI RAPP;
  - vi. the SMKI Recovery Procedure;
  - vii. the SMKI Interface Design Specification;
  - viii. the SMKI Code of Connection;
  - ix. the SMKI Repository Interface Design Specification;
  - x. the SMKI Repository Code of Connection;
  - xi. the SMKI and Repository Test Scenarios Document;
- b. the provisions of Sections L1 to L12; and
- c. every other provision of the Code which relates to the provision or the use of the SMKI Services or the SMKI Repository Service or to any matters directly arising from or affecting the provision or the use of those services.

The SMKI PMA will also be in receipt of the DCC's SIT execution reports and are expected to provide feedback on DCC testing progress to the SEC Panel.

## 5. SMKI PMA Powers in an Emergency

An important feature of the SMKI PMA role is being able to apply certain processes in the event of an emergency. When the SMKI PMA reasonably considers that an immediate threat or compromise to the security or integrity of the SMKI Service has occurred or is likely to occur, it can require the suspension of some or all of the DCC's SMKI Service, or instruct the DCC to suspend the rights of an SMKI Participant to use all or part of the DCC Services. It is important to note that this could include the suspension of any or all User Gateway services for a DCC User and that this power is subject to the normal appeal rights to Ofgem under the SEC but retrospectively.

## 6. Out of Scope

The role of the SMKI PMA does not include the following:

- a) Functions outside of those listed above unless otherwise directed by the Panel.
- b) Activities that do not contribute to achievement of SEC objectives.
- c) Setting policies that fall under the remit of the Panel or another Sub-Committee.
- d) Accessing the SMKI Repository for the purpose of viewing/obtaining a copy of any document or information stored on it without reasonable need in accordance with the SEC.

## 7. Proceedings of the SMKI PMA

### 7.1 Timetable and Frequency of Meetings

The SMKI PMA shall meet with such frequency determined by the Panel, or the SMKI PMA Chair (or their Alternate), in order to meet the functions of the SMKI PMA, but in any event no less than once a quarter.

Where necessary, exceptional SMKI PMA meetings may be convened to consider urgent issues. Exceptional meetings may be called at not less than 24 working hours' notice, and may take the form of a telephone or web-based conference as is appropriate. The SMKI PMA Chair (or their Alternate) may determine that only affected members are required to participate (in that case all members will be informed of exceptional meetings and the outcomes). Exceptional meetings will be considered quorate irrespective of whether all invited members are able to attend.

### 7.2 Quorum

No business shall be conducted by the SMKI PMA unless a quorum is present, quorum being half of all SMKI PMA members appointed at that time, one of whom must be the Chair (or their Alternate).

### 7.3 Meeting Notice & Papers

Each meeting shall be convened by the Secretariat. Except for the circumstances described in 7.1 a minimum of five Working Days' notice shall be provided (or such shorter notice as directed by the Panel, or the SMKI PMA Chair (or their Alternate)).

Notice of each meeting shall be accompanied by:

- Time, date and location of the meeting;
- Arrangements for those wishing to attend the meeting by means other than in person; and
- Agenda and supporting papers.

Confidential items of business may be uploaded and shared via secure electronic means.

## 7.4 SMKI PMA Chair

The SEC Panel shall approve the appointment of the SMKI PMA Chair in accordance with SEC Section L1.5 and shall review the appointment in three years from the date of appointment.

Selection of the SMKI PMA Chair shall be determined by the SEC Panel, providing the selection ensures that:

- a) the selection does not preclude the Panel Chair fulfilling this role;
- b) the candidate selected is regarded by the Panel as having suitable experience and expertise to discharge their duties as the SMKI PMA Chair; and
- c) the candidate has declared any relationships or shareholdings with individuals or organisations that might be perceived to create a conflict of interest and, in light of such declarations, the SEC Panel believes that the candidate will be able to act in a sufficiently independent manner in their role as the SMKI PMA Chair.

The SMKI PMA Chair shall not be entitled to vote unless there is a deadlock, in which case the SMKI PMA Chair has the casting vote.

## 7.5 Powers and Voting

In accordance with Section C6.9 each Member must first provide written confirmation to agree to serve on the Sub-Committee in accordance with the Code before exercising powers or voting.

## 7.6 Membership

The Panel shall invite applications from individuals to serve on the SMKI PMA in accordance with SEC Section L1. Those individuals shall be of suitable experience and qualifications required to fulfil the duties of the SMKI PMA.

Members shall act independently, not as a delegate, and without undue regard to the interests, of any Related Person and will act in a manner designed to facilitate the performance by the Panel of its duties under the SEC.

Members may propose another natural person to act as their Alternate. The alternate, once approved, may attend the SMKI PMA and must act in the capacity as alternate to discharge the member's duties.

## 7.7 Term of Office

The SMKI PMA Chair will review membership of the Sub-Committee on a two-yearly basis, inviting applications from individuals in accordance with SEC Section C6.7.

Initial appointments will be staggered so that expertise is not lost and the Government response outlined the following terms of office:

- Large Suppliers – 1 seat will initially be occupied for 12 months, with the other seat initially held for 24 months;
- Networks – the seat will initially be occupied for 12 months; and
- Small Suppliers - the seat will be held in line with enduring arrangements for 24 months.

## 7.8 Other Interested Parties

Other interested parties may be invited to attend, but not speak unless invited by the Chair, SMKI PMA meetings on an ad-hoc basis at the discretion of the Chair.

Both the Ofgem Representative and the BEIS/Government Representative are entitled to attend, but are not obliged to, as set out in section C5.13 of the SEC. In addition to the voting and non-voting attendees, the SMKI PMA Chair may invite additional attendees such as the appointed PKI legal advisor, an assurance body representative or a meter manufacturer representative to the meetings as well as any other expert who may be required to support SMKI PMA consideration of matters before it. Such attendees may not vote and shall only contribute to the matter for which they have been invited as set out in section C5.14 and C5.15 of the SEC.

### 7.9 Member Confirmation

Before a person may serve on the SMKI PMA, that person shall provide written confirmation to SECCo that:

- They agree to serve on the SMKI PMA in accordance with the SEC, including Section L1 and
- They will be available as reasonably required by the Sub-Committee to attend meetings and undertake work outside of the meetings as reasonably required.

### 7.10 Conflict of Interest

Given that members have a duty to act independently conflicts of interest should not regularly arise. Members shall have a duty to identify whether a decision presents a conflict of interest. In such cases the member shall absent themselves from the meeting for the purposes of that decision.

## 8. Deliverables

The SMKI PMA will be expected to provide recommendations to the SEC Panel regarding the duties listed.

The SMKI PMA will be expected to develop criteria to support their decision making.

## 9. Membership of the SMKI PMA

The table below sets the composition of the SMKI PMA. Members must have sufficient experience, qualification and expertise.

Voting Members	Non-Voting Representatives
<ul style="list-style-type: none"> <li>• SMKI PMA Chair (casting vote only)</li> <li>• 1 SMKI Specialist</li> <li>• 3 Large Suppliers</li> <li>• 1 Small Supplier</li> <li>• 1 Electricity Networks</li> <li>• 1 Gas Networks</li> <li>• 1 SEC Security Sub-Committee (SSC) Representative</li> <li>• 1 SEC Technical Architecture and Business Architecture Sub-Committee (TABASC) Representative</li> </ul>	<ul style="list-style-type: none"> <li>• DCC Representative</li> <li>• Ofgem Representative</li> <li>• BEIS Representative</li> </ul>

## 10. Confidentiality and Disclosure

In line with the Panel Information Policy, all information assets originating from the SMKI PMA shall be assigned a classification in accordance with the table below. Information sharing levels will be suggested by participants when providing information and determined by the Chair.

Classification	
RED	<p>Non-disclosable information and restricted to Panel/Sub-Committee Members/Working Group Members (including alternates). Participants must not disseminate the information outside of the governance group. RED information may only be discussed during a meeting where all participants present have signed a declaration form, stating their acceptance to abide by these Terms of Reference. RED information should not be discussed with anyone who is not a member of the governance group.</p> <p>Agenda items marked as RED will be discussed in a closed, confidential session and discussions will only be included in minutes marked as RED.</p> <p>Information classified as RED may be disclosed to the SEC Panel (or any other element of the SEC governance structure) but only following approval by the Sub-Committee in question. Any RED information discussed at Panel in this manner shall also be subject to the same non-disclosure provisions.</p> <p>Any documentation classified as RED shall be distributed using the agreed secure storage and distribution platform.</p>
AMBER	<p>Limited disclosure and restricted to Sub-Committee Members/Working Group Members, the SEC Panel and those who have a need to know in order to take action. Governance Members representing a Party Category may share the information with other organisations within that Party Category.</p> <p>Where information is deemed to be relevant to organisations who are not represented at a Governance meeting, the Chair may direct that SECAS provide this information to a wider group of SMIP stakeholders.</p> <p>Agenda items marked as AMBER will be discussed in a closed, confidential session and discussions will only be included in the confidential minutes.</p>
GREEN	<p>Information can be shared with other SEC Parties and SMIP stakeholders<sup>1</sup> at large, but not made publicly available. “Green” will be the default classification for any discussions unless otherwise notified.</p> <p>Agenda items marked as GREEN will be included in the non-confidential minutes.</p>
WHITE	<p>Information that is for public, unrestricted dissemination, publication, web-posting or broadcast. Any member may publish the information, subject to copyright.</p> <p>Agenda items marked as WHITE will be included in the non-confidential minutes.</p>

<sup>1</sup> For example: device manufacturers, smart metering network security, information assurance or Critical National Infrastructure (CNI) community.



As a SMKI PMA Member, each participant will be asked to undertake in writing to abide by the confidentiality and disclosure provisions in relation to each information sharing level as described above, by signing the Confidentiality and Disclosure Agreement at Appendix A to these Terms of Reference.

SMKI PMA Members who breach the rules of the confidentiality and disclosure provisions under any information sharing level may have their SSC membership ceased.

## 11. Secretariat

SECAS will provide the secretariat and code administration for the SMKI PMA. This includes but is not limited to:

- Prepare and maintain the SMKI PMA Member Pack (code of conduct and expenses policy);
- Timetable and organise the SMKI PMA meetings, including meeting rooms;
- Act as quality gatekeeper with the Chair for accepting papers;
- Circulate agendas and papers for consideration at a SMKI PMA meeting 5 Working Days in advance of that meeting date;
- Monitor the quorum prior to meetings to ensure that decision matters are not frustrated or deferred;
- Circulate minutes of the meeting five working days after the meeting for SMKI PMA's approval;
- Administer the circulation list for SMKI PMA papers and Minutes;
- Manage the SMKI PMA decisions, actions and risks log;
- Manage the SMKI PMA section of the SEC website;
- Configuration management of the suite of Technical Specification Documents under the remit of the SMKI PMA's management in accordance with the Panel Release Management Policy (including co-ordinating the SMKI PMA's input to the development of that Policy); and
- Support the operation of the SMKI PMA and the fulfilment of its duties through:
  - Co-ordination, and where directed by the SMKI PMA undertaking, all inputs, analyses, assessments and consultations required to support the SMKI PMA business;
  - Preparation of the draft SMKI PMA input to the Panel's annual report (July) SEC 2.3(h) for the SMKI PMA's approval; and
  - The co-ordination of the SMKI PMA's role in the SEC Modifications Process through the relevant Modification Lead(s) to ensure a holistic and efficient process exists between the SMKI PMA and the Change Board.

## 12. Review

The Terms of Reference, membership and operation of the SMKI PMA may be reviewed by the Chair at any time to ensure that they remain appropriate to reflect the duties and requirements of the SEC.

Amendments to these Terms of Reference will be approved solely by the SEC Panel.

## Appendix A– Confidentiality and Disclosure Agreement

I, the undersigned, have read and understood the Smart Metering Key Infrastructure Policy Management Authority Terms of Reference.

I understand that I am required to comply with the confidentiality and disclosure obligations in respect of each of the four information sharing levels (White, Green, Amber and Red), as set out in the Terms of Reference.

I understand that I must declare any conflict of interest that I have in writing to the SMKI PMA Chair whether it exists now or during my continued membership of the group, as soon as I become aware that such a conflict exists.

I understand that should I fail to abide by the information sharing levels confidentiality and disclosure obligations or conflict arrangements (as set out in the Smart Metering Key Infrastructure Policy Management Authority Terms of Reference) I may be excluded from the Smart Metering Key Infrastructure Policy Management Authority.

Having understood and accepted the above statements, I therefore agree to abide by the Terms of Reference in my engagement with this group.

Name:

SEC Party Category:

Primary/Alternative Participant (delete as appropriate)

Signature:

Date:

SMKI PMA Terms of Reference v2.0