

Meeting SECPMA_21_0803, 8th March 2016

11:30 – 15:00

Gemserv, 8 Fenchurch Place, London, EC3M 4AJ

SMKI PMA Minutes

Attendees:

Category	SMKI PMA Members
SMKI PMA Chair	Gordon Hextall
Large Suppliers	Fabien Cavenne
	Geoff Huckerby
Networks	Sara Neal
Small Supplier	Rob Kinson
Security Sub-Committee (SSC) Representative	Michael Constable
Technical Sub-Committee (TSC) Representative	Julian Hughes

Non-Voting Members:

Category	Attendees
SEC Panel Chair	Peter Davies (Part)
DCC	Marc Avery
	Paul Evans
	Phillip Twiddy (Part)
	Andrew Barraclough (Part)
Ofgem (the Authority)	Nigel Nash
DECC (Representative)	Joe Howard
SMKI PMA Secretary	Joe Davenport
SECAS	Alys Garrett (Part)
	James Simmonds

Apologies:

Category	Attendees
SMKI Specialist	Darren Calam

1. Minutes of SMKI PMA Meeting 20_0902

There were no suggested amendments to the draft minutes and the SMKI PMA agreed the minutes as written.

2. Actions Outstanding

SECPMA 19/06 – This action has been combined with SECPMA 20/09.

This action was marked as **CLOSED**.

SECPMA 20/01 – SECAS received two responses from SMKI PMA Members to the Infrastructure Key Infrastructure (IKI) Certification Practice Statement (CPS) and compiled these for the DCC.

This action was marked as **CLOSED**.

SECPMA 20/02 – The DCC confirmed that all Key Custodians were made aware of the 'Go/No Go decision' for the Contingency Private Key Ceremony being held on the 22nd February 2016.

This action was marked as **CLOSED**.

SECPMA 20/03 – After the previous SMKI PMA Meeting (9th February 2016), the SMKI PMA Chair wrote to the SEC Panel Chair to confirm the SMKI PMA agreed that the proposed changes fulfil the purpose to align the Service Provider contracts with the obligations set out in the Code, and that the SMKI PMA had no specific comments on the detail of the proposed changes to the Service Provider contracts.

This action was marked as **CLOSED**.

SECPMA 20/04 – The DCC had undertaken root cause analysis on the '*SMKI 53 Test Scenario*'¹.

This action was marked as **CLOSED**.

SECPMA 20/05 - After the previous meeting (9th February 2016), the SMKI PMA Chair wrote to the SEC Panel Chair to confirm that the SMKI PMA were in agreement that the SEC Panel should approve the latest version of the SMKI and Repository Testing Approach Document (SRT Approach Document).

This action was marked as **CLOSED**.

SECPMA 20/06 – The DCC confirmed that as the root cause analysis for *SMKI 53 Test Scenario* had been successful, releasing access to the Excel Spreadsheet Test Scenarios had not been required, nor sought by SMKI PMA Members.

This action was marked as **CLOSED**.

SECPMA 20/07 – The DCC had produced a timeline, following discussion with DECC and SECAS, to clarify how the completion of SMKI and Repository Testing (SRT) 2b would be achieved. A joint SMKI PMA and Testing Advisory Group (TAG) meeting was held on 29th February 2016 to discuss SRT.

This action was marked as **CLOSED**.

SECPMA 20/08 – An update for this action is provided in Section 8 of these minutes.

This action was marked as **CLOSED**.

SECPMA 20/09 – An update for this action is provided in Section 7 of these minutes.

This action was marked as **CLOSED**.

¹ SMKI 53 Test Scenario – Recovery from Compromise of Contingency Private Symmetric Key following the process outlined in the SMKI Recovery Procedure.

SECPMA 20/10 – The DCC and SECAS confirmed that a meeting would be held to discuss the production of SMKI Senior Responsible Officer (SRO) and Authorised Responsible Officer (ARO) guidance, as well as wider SMKI-Service guidance, following the March 2016 SMKI PMA meeting.

This action was marked as **CLOSED**.

SECPMA 20/11 – SECAS confirmed that a new standing agenda item (*Modifications Update*) would be discussed at all future SMKI PMA meetings.

This action was marked as **CLOSED**.

SECPMA 20/12 – The DCC confirmed that a number of minor amendments were required to both the DCCKI PMA Functions Terms of Reference (ToR) and DCCKI PMA Functions February 2016 Minutes, and that these would be circulated following the March 2016 SMKI PMA meeting.

This action was marked as **CLOSED**.

SECPMA 20/13 – An update for this action is provided in Section 10 of these minutes.

This action was marked as **CLOSED**.

3. **SECPMA_21_0803_CONF03 – IKI Certification Practice Statement (CPS)**

The DCC presented the SMKI PMA with an amended IKI CPS, which had been amended to include two comments received by the SMKI PMA as per Action *SECPMA 20/01*². No further comments were raised at the March 2016 meeting by SMKI PMA Members.

The SMKI PMA **APPROVED** the IKI CPS.

4. **SECPMA_21_0803_04 - SRT Update**

For the purpose of agenda item 4 – SRT Update, TAG Members³ were invited to join this agenda item by teleconference to discuss both the SRT Approach Document, which had been amended to remove SRT Part 3⁴ Exit Criteria from the SRT Approach Document, and to discuss the SRT Completion Report.

The DCC presented the SMKI PMA and TAG with an amended SRT Approach Document for information, which outlined that SRT Part 3 Exit Criteria had been removed from the SRT Approach Document as per DECC's February 2016 SEC Consultation. The DCC informed the SMKI PMA and TAG that the amended SRT Approach Document would be submitted for approval at the SEC Panel teleconference, which was to be held on the same day following the SMKI PMA meeting.

The DCC presented the SMKI PMA and TAG with the SRT Completion Report, in order to facilitate discussion on whether both groups agreed that the DCC had completed the requirements set out within both SRT Part 2b, and the SRT Approach Document, in order for the DCC to successfully exit SMKI and Repository Testing. Both the SMKI PMA and TAG were informed that the SRT Completion Report would be submitted for approval at the SEC Panel teleconference, which was held on the same day following the SMKI PMA meeting.

The content of the discussions, associated actions, and outcome of this agenda item can be found in the letter appended to these minutes (*Appendix B – SMKI PMA and TAG Briefing Note*).

² SECAS to compile responses on the IKI CPS and provide these to the DCC by 19th February 2016.

³ The TAG Members that attended this agenda item have been appended to these minutes (*Appendix A – TAG Member Attendance*).

⁴ The Part 3 SRT Exit Criteria have been removed from the SRT Exit Criteria, to align with DECC's proposal for introduction of Additional SRT Testing. Part 3 SRT Exit Criteria will apply to the Additional SRT Testing, as per DECC's February 2016 SEC Consultation.

5. SECPMA_21_0803_05 – SMKI PMA Terms of Reference (ToR)

SECAS presented the amended SMKI PMA Terms of Reference (ToR) to the SMKI PMA for decision. SECAS informed the SMKI PMA that the ToR had been aligned with the latest version of the SEC.

The SMKI PMA **AGREED** to the amendments made to the SMKI PMA ToR. SECAS noted that these would now be issued to the Strategic Assurance 16 Steering Group (SA 16 SG) for comment, and following comment(s), submitted to the April 2016 SEC Panel meeting for **APPROVAL**.

6. SECPMA_21_0803_06 – Draft SMKI PMA Work Package – April to June 2016

SECAS presented the SMKI PMA with the draft work package for the first quarter of the 2016 / 2017 financial year. Prior to asking the SECCo Board for approval, it was agreed each Sub-Committee would have visibility of the relevant work package for comment and recommendation. The work package sets out the estimated activities and resource requirements that would be undertaken throughout the quarter in support of the SMKI PMA. SECAS noted that the work package set out a prudent provision for the quarter rather than a target.

SMKI PMA Members queried the processes required if further resource was needed on SMKI PMA activities. It was advised that if it was a nominal increase, then it was likely the SEC Panel Chair would be informed at the first instance. If a significant increase was expected, then notification would be provided to the SECCo Board.

The SMKI PMA provided a recommendation of **APPROVAL** for the draft SMKI PMA work package to the SECCo Board.

7. SECPMA_21_0803_07 – SMKI Recovery Procedures Document

SECAS presented the criteria used for convening the SMKI PMA in the event of a Compromise (or suspected Compromise) leading to a Recovery Event. The paper provided a number of options and considerations on procedural steps that may be required in the event that the SMKI PMA decide whether or not the Recovery Private Key or Contingency Private Key (including the Contingency Symmetric Key) should be used.

SECAS advised that, after consideration, it was determined that the procedural document itself should not be confidential, however some of the information required as part of the process to be followed may be deemed confidential. The DCC highlighted the reference to '*receiving indication of compromise and notifying SECAS via encrypted message*' and noted that this had not been defined. The SMKI PMA were further informed that the Security Sub-Committee (SSC) were currently investigating methods for sharing and protecting data.

The SMKI PMA **NOTED** the paper, and **AGREED** to provide comments (if any) on the options set out in the SECPMA_21_0803_07 within 10 Working Days.

ACTION SECPMA 21/01: SMKI PMA Members to provide comments (if any) on the options set out for the SMKI Recovery Procedure within 10 working days.

8. SECPMA_21_0803_08 – SMKI, IKI and DCCKI Documentation Review Cycles

SECAS presented the SMKI PMA with a table of the documentation they have ownership and oversight of, and informed them of their requirements to review and provide recommendation on said documentation.

The TSC Representative advised the SMKI PMA that it would be efficient to review SMKI documentation in groups, to ensure process efficiencies and the consideration of relationships between the SMKI documentation. The TSC Representative noted the SMKI PMA must be clear on understanding the service these documents fulfil, the necessity of any potential changes to these documents, and whether future changes would also be required within SEC Section L and the Code itself, to ensure both SMKI documentation and the SEC remain fit for purposes.

The SMKI PMA discussed potential trigger points, which would warrant the review of SMKI documentation and the SEC. The DCC noted that if an Incident occurs and a weakness is identified within a specific SMKI Service, the DCC would gather information and submit this to the SMKI PMA. The SMKI PMA discussed the ways of tracking additional trigger points, such as changes to EU Policy and EU Standards, and agreed that further discussion may be required in order to ensure these trigger points are monitored.

The group agreed that currently, SMKI documentation was stable, and that the SMKI PMA group should establish a method of tracking trigger points prior to reviewing SMKI documentation.

The SMKI PMA **NOTED** the contents of the paper and **AGREED** that further clarity was required as to whom in the SMKI PMA should monitor SMKI change-related trigger points.

ACTION SECPMA 21/02: SECAS to investigate and confirm who is responsible for trigger points for the review of documentation.

9. SECPMA_21_0803_09 – Responsible Officer Guidance

The SMKI PMA were informed by SECAS and the DCC that both parties had discussed the creation of guidance material for the varying Senior Responsible Officer (SRO) and Authorised Responsible Officer (ARO) roles and responsibilities, which would be comprised of information found within the SMKI Registration Authority Policies and Procedures (RAPP) and other SEC documentation, as well as consideration on HR Requirements on SROs and AROs.

The discussions surrounding Responsible Officer guidance had previously been covered at the meeting of TPMAG. SECAS informed the group that discussions were ongoing with the DCC, and that draft guidance material would be presented at the next SMKI PMA meeting (12th April 2016).

The SMKI PMA **NOTED** the update provided on Responsible Officer guidance.

10. SECPMA_21_0803_10 – SMKI PMA Risk Register

SECAS presented a number of example risks for the SMKI PMA to consider prior to SECAS developing the SMKI PMA Risk Register.

The group highlighted that it was unlikely to be a necessity on the SMKI PMA to have its own SMKI PMA Risk Register, as many of the associated risks are captured within the SEC Panel Risk Register (e.g. in relation to obligations on governance in relation to the Code).

The group determined that a record should be made when the SMKI PMA has a responsibility to ensure a risk is mitigated or resolved. The group noted their preferred approach, which was to wait until the group encounters a potential risk that requires tracking, or, where action(s) being taken forward are a risk to the Smart Metering Implementation Programme.

The SMKI PMA considered that best practice would be for the SMKI PMA to raise risks, and flag to the relevant governance bodies if the potential risks raised did not sit within the remit of the SMKI PMA.

The SMKI PMA discussed the concept of the SMKI PMA Risk Register and **NOTED** that it was not appropriate as of March 2016 for the SMKI PMA to have a Risk Register. SECAS shall monitor this matter for the foreseeable future and raise the concept of a SMKI PMA Risk Register when future risks are identified.

11. SECPMA_21_0803_11 – SMKI PMA Activity Planner

SECAS provided the SMKI PMA with an updated activity planner outlining the activities expected over the next three months. SECAS informed the group that it was now three months prior to the end of the 24 month term for one Large Supplier and the Small Supplier representatives. SECAS will therefore undertake the necessary steps to facilitate the nomination and voting processes.

The SMKI PMA **NOTED** the Activity Planner.

12. SECPMA_21_0803_12 – DCC Update

The SMKI PMA **NOTED** that there was no additional information to be updated from the DCC for March 2016 (above and beyond what was provided at the March 2016 TPMAG meeting).

13. SECPMA_21_0803_13 – DCCKI PMA Functions Update

The SMKI PMA **NOTED** that the DCCKI PMA Functions Terms of Reference (ToR) would be amended to include 'Functions' after all mentions of the DCCKI PMA. The ToR and February 2016 minutes would be circulated after the meeting.

14. SECPMA_21_0803_14 – DECC Update

The SMKI PMA **NOTED** that there was no additional information to be updated from DECC for March 2016 (above and beyond what was provided at the March 2016 TPMAG meeting).

15. Any Other Business

There were no further business matters and the SMKI PMA Chair closed the meeting.

16. Next Meeting

The next meeting will be held on 12th April 2016.

Appendix A – TAG Member Attendance

TAG Members Present for Agenda Item 4:

Category	TAG Members
Chair (SECAS)	Jill Ashby
SECAS	Malcolm Rowley
DECC	Ian Brown (Teleconference)
British Gas	Will Leacock (Teleconference)
Npower	Terry Jefferson (Teleconference)
SSE	Martin Hanley (Teleconference)
ENA	Walter Hood (Teleconference)
Scottish Power	Andrew Campbell (Teleconference)
Eon	Gavin Gallimore (Teleconference)
EDF	Martin Bell (Teleconference)

Appendix B – SMKI PMA and TAG Briefing Note

Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and Testing Advisory Group (TAG) Joint Meeting Item

8th March 2016

Gemserv, 8 Fenchurch Place, London, EC3M 4AJ

Briefing Note

Joint SMKI PMA and TAG Discussion – SRT Approach Document and Completion Report – SECPMA_21_0803_04 (For Recommendation)

On 8th March 2016, the SMKI PMA and TAG Sub-Committees held a joint meeting to discuss the Approach Document and DCC's completion report for SMKI and Repository Testing (SRT) and whether the exit criteria have been met for SRT Parts 1a, 1b and 2b. The SEC Panel Chair was also in attendance.

SRT Approach (SRTA) Document Update

The joint group were advised that prior to the recommendation of the completion report they would be required to review and recommend the latest version of the SRTA Document (v3.8) for the SEC Panel. The DCC provided some background to this item: SRTA version 3.5 was presented at the SMKI PMA held on the 9th February 2016 and a recommendation that it be approved went to the SEC Panel. SRTA v3.5 received Panel approval on 12th February 2016, and subsequently, consequential amendments have arisen in order to align the SRTA with the signalled outcomes of DECC's current consultation on the SEC⁵. Namely, in section 8.2 which sets out that the Secretary of State's letter of 18th December 2016⁶, contemplated additional periods for SRT, SIT and IT will be required due to the DCC's phased release timetable. DECC's Consultation brings this expectation into force though proposed new SEC text introduced in respect of such 'Additional Testing'. The effect of this for the SRTA⁷ is that references to SRT3 are to be removed from the scope to reflect the SRT testing applicable to Release 1.2 (R1.2). SRT3, will be reintroduced into an updated future version of the SRTA aligned to the scope for R1.3. SRT3 will then be tested against exit criteria relevant to that SRTA scope, which, when questioned, DCC clarified would include regression testing.

Whilst examining the SRTA other minor corrections were identified:

- Incorrect references to documents versions required amendment;
- A reference to RDPs meeting the Exit Criteria was a SIT not SRT element and should therefore be removed; and
- Minor typos.

⁵ <https://www.gov.uk/government/consultations/a-consultation-on-new-smart-energy-code-content-and-related-licence-amendments>

⁶ https://www.smartdcc.co.uk/media/346498/dcc_contingency_request_-_sofs_direction_v1.0.pdf

⁷ For the avoidance of doubt, this will also apply to the SITA and ITA, but these documents were not on the agenda of the joint meeting.

The DCC agreed to make the changes prior to presenting a version to the Panel, confirming this would make the SRTA at version 3.9 for the purposes of Panel approval.

It was also noted that the SEC contains an obligation that the DCC must consult on changes to the SRTA. The SMKI PMA and TAG members requested that the DCC issue a consultation on version 3.9 of the SRTA with an accompanying list of all the changes made since v3.5. This would enable SEC Panel to conditionally approve the SRTA subject to no material responses being received to the consultation.

TAG members highlighted that when issued for consultation; the wrapper should clarify that previously consulted content is not being re-opened and that if regression testing applies due to the Additional Testing, this too is explained.

Action JM_0803/01: DCC to address the updates to the SRTA in line with those identified above by SMKI PMA and TAG Members and produce an uplifted SRTA version (3.9) for the consideration at the ex-Committee SEC Panel meeting.

Action JM_0803/02: SRTA 3.9 will need to undergo a consultation on its changes since v3.5, it will be accompanied by a list of changes made to the document up until version 3.9.

The SMKI PMA considered the revised SMKI and Repository Testing (SRT) Approach Document v3.9, In accordance with SEC Section T5.8, and **RECOMMENDED** that the SEC Panel approve the revised version 3.9, subject to it being issued for consultation and no material revisions being identified in responses .

Action JM_0803/03: SECAS to issue an update for the SEC Panel ex-Committee meeting apprising them of the recommendations to conditionally approve the SRTA v3.9, subject to it undergoing consultation.

DCC's Report on meeting the SRT Exit Criteria [for SRTA v3.9]

The group then moved on to consideration of the DCC's completion report v1.1 for SRT. DCC confirmed that this version superseded version 1.0, issued on 4th March, and had been circulated the day before the joint meeting. Recognising that the Panel have yet to approve the updated SRT Approach Document (v3.9), the SMKI PMA and TAG considered the report from the DCC and its three supporting documents in light of the exit criteria that apply in version 3.9 of the SRTA.

The SMKI PMA Chair set out the requirements for the exit criteria being met, being:

- as prescribed in SEC Section T5; and
- the requirement in the Secretary of State's (SoS) letter of 18th December 2015 related to the *"...Apex contingency key's accuracy and integrity before Live SMKI certificates are issued (through Phase 2B of SMKI and Repository Testing ('SRT 2B'))"*.

The group went through the DCC's report and highlighted a number of revisions, which included references to the [now] incorrect version of the SRTA, repetitions and typos.

Action JM_0803/04: DCC tasked with amending references and errors and reissuing the DCC report prior to the Panel meeting to be held at 3pm on 8th March 2016.

The group continued through the DCC's report and highlighted that table 5.7 indicated there were test cycles that had been deferred or not undertaken and requested clarification as to whether these tests would now be witnessed. The DCC informed that the tests had been through Business Acceptance Testing (BAT) where it was not possible to witness during Factory Acceptance Testing (FAT). Each of the tests had been tested once or more and passed one or more times.

The group were advised that SRT1a had passed on the 9th November 2015, with necessary workarounds agreed upon and applied. The work-off plans for the outstanding within-threshold defects were raised by the group and the DCC noted that fixes were delivered within the timescales and were going to be deployed on 31st March 2016. The DCC were of the view that the exit criteria for SRT had been satisfied, including the test completion report provided by the DSP (appended to the DCC's report for the group). SRT1b completed on the 19th February and the same approach had been applied as to SRT1a with two cycles of testing, the first of which was witnessed by the DCC. No work off plan was required as all tests passed and the DSP's completion report had been issued – also appended as above. The DCC were of the view that SRT1b also satisfied the exit criteria for SRT.

Turning to SRT2b, one of the main criterion for completion was the successful execution of the SMKI 53 scenario, the results of which were set out within the table in section 7 of DCC's report. Workaround plans had been discussed and approved by DCC's TAB (Test Assurance Board) who also accepted the DSP's completion report. The DCC were of the view that the final stage of replacing all certificates in a device had been completed using an actual meter, which had responded correctly to identify the replacement of those certificates. The meter manufacturer engineers also checked the meter and confirmed the certificates had been replaced. The group questioned the issues that remained, noting that the previous advice had been that the outcome was a 'binary' pass or fail. The DCC confirmed that the integrity of the Contingency Key was a binary outcome and the issues found and workarounds being investigated did not halt the completion of SMKI 53, nor disprove the replacement of Certificates on devices. Whilst the integrity and accuracy of the Apex Contingency Key had been satisfactorily tested on a single device, achieving industry confidence may require further tests that extend beyond the DCC's role.

The group also noted the confirmation that issues found with the General Block Transfer (GBT) was limited to only one manufacturer of a Communications Hub and one Communication Hub device rather than all Communication Hubs. The DCC also informed that the tests had been completed on an actual meter on both CSP regions. The DCC further confirmed that the data within the Apex Certificate had been shown to be correct and that it will replace the certificates, therefore the matter of extrapolating this to show it can be completed on other meters and devices is a matter for those responsible for the assurance certificates for those devices. It was further noted that the GBT issue with the Communications Hub device would fall to DCC's responsibility for assurance.

Following the presentation from the DCC and subsequent review and discussion, the group considered that:

- there is sufficient evidence to demonstrate that the relevant exit criteria described in the SRT Approach Document v3.9 have been met for all relevant stages of SRT (SRT1a, SRT1b and SRT2b); and
- the completion of these three stages of SRT does not provide assurance that the DCC is fully compliant with Section L of the SEC, noting that not all SEC provisions are active and:
 - this will be provided through further SRT testing that will continue during SIT (SRT2a); and
 - SRT3, and any regression testing, that is set to be executed as part of the testing for R1.3.

SMKI PMA and TAG members agreed that SRT2b testing has demonstrated the accuracy and integrity of the Apex Contingency Key as required in the clarification from by the Secretary of State. An additional DCC test has demonstrated that, following replacement of certificates using the Contingency Key, a further certificate can be updated on a device.

The SMKI PMA and TAG **RECOMMENDED** that the SEC Panel is now able to determine, pursuant to Section T5.19 of the SEC, that the exit criteria for SRT1a, 1b and 2b have been met and therefore

APPROVE the DCC's 'Completion of SMKI and Repository Testing (SRT) Report' (subject to the amendments identified in Action JM_0803/04).

This concluded the joint session and TAG Members left the SMKI PMA meeting, which continued with its other business.

Joe Davenport

SECAS

09 March 2016