

Meeting SECPMA_27_1309

13th September 2016, 10:00 – 15:00

Etc. Venues, 1st Floor, 8 Fenchurch Place, London, EC3M 4AJ

SMKI PMA Minutes

Attendees:

Category	SMKI PMA Members
SMKI PMA Chair	Gordon Hextall (GH)
Large Suppliers	Geoff Huckerby (GHu)
Large Suppliers	Fabien Cavenne (FC)
Technical Architecture and Business Architecture Sub-Committee (TABASC) Representative	Julian Hughes (JH)
Networks	Sara Neal (SN)

Non-Voting Members:

Category	Attendees
BEIS (Representative)	Daryl Flack (DF)
BEIS (Representative)	Richard Haigh (RH) - (Part)
SMKI Specialist	Darren Calam (DC)
DCC	Marc Avery (MA)
	Andrew Barraclough (AB) - (Part)
TSP (DCC)	David Shapland (DS) - (Teleconference - Part)
SMKI PMA Secretary (SECAS)	Joe Davenport (JD)

Apologies:

Category	Attendees
Ofgem (The Authority)	Gwen Cruise
Security Sub-Committee (SSC) Representative	Michael Constable

Introductions and Apologies

The SMKI PMA Chair introduced Richard Haigh of BEIS and Andy Barraclough of the DCC who were attending for specific agenda items. The DCC requested an AOB item which they raised in relation to the storage of personal data and the SMKI Chair also proposed an AOB item on the SMKI PMA's ability to meet the obligations in SEC L2.14.

1. Minutes of SMKI PMA Meeting 27_1309

BEIS had requested an amendment to the August 2016 draft minutes which also led to the inclusion of two additional actions which are included within Section 2 of these minutes (Action SECPMA 26/10 and Action SECPMA 26/11).

The Chair confirmed that since the last meeting of the SMKI PMA in August 2016, the Strategic Assurance 16 Steering Group (SA 16) had no comments on the SMKI PMA Terms of Reference (ToR). However, it was noted that the classification of secure documentation had included references to SSC, and as a result, this would be amended to SMKI PMA by SECAS.

ACTION SECPMA 27/01: SECAS will amend the classification ratings in the SMKI PMA ToR to read SMKI PMA 'Green/Amber/Red' rather than SSC 'Green/Amber/Red'.

2. Actions Outstanding

It had been noted prior to the September 2016 meeting that the actions associated with the DCC/TSP (SECPMA 26/04 to 26/07) would be deferred until the October 2016 SMKI PMA meeting.

SECAS provided the SMKI PMA with an update on the remaining actions outstanding from previous SMKI PMA meetings. The following section sets out items of discussion held during the September 2016 meeting, specifically:

Action Reference	Update
SECPMA 23/04	The DCC was scheduled to provide the Stage 2 Assurance Report to the SMKI PMA. The DCC had provided 3 documents which had been shared through Egress, and confirmed a Remediation Action Plan would be provided to the SMKI PMA prior to the October 2016 SMKI PMA meeting. This action was marked as CLOSED .
SECPMA 25/01	The DCC confirmed that costing information from the DSP is still to be received in order to determine the costs associated with running the Recovery Events for 'Methods 2 and 3', as set out in the SMKI Recovery Procedure. This action was marked as ONGOING .
SECPMA 26/01	The DCC confirmed that the limit on the number of Device Certificates that can be submitted per file was for 100,000 (Devices), noting that this was specified in the SMKI Interface Design Specification document. SMKI PMA Members noted that in a situation where 4,000,000 Devices were compromised; SMKI Users would have to sign 40 files which could be taxing or unmanageable. After conversations surrounding the file signing capability, SMKI PMA members determined that it would be pragmatic to leave the figure at

Action Reference	Update
	<p>100,000 Devices per file. It was noted and considered that a SEC Modification Proposal could be raised at a later date if a change is necessary.</p> <p>This action was marked as CLOSED.</p>
SECPMA 26/02	<p>The DCC are of the understanding that if a recovery event was to be run for CSPs in regards to Communication Hubs then there would be a charge for the event.</p> <p>Members raised that this would be in breach of the CSP contract, and therefore could result in a financial penalty for the CSP rather than recovery from Parties. There may be contractual limitations on the value of the penalty and what could be claimed for. The DCC advised they would investigate who the responsible party would be for the cost.</p> <p>This action was marked as CLOSED.</p>
SECPMA 26/03	<p>To be discussed during the meeting but work is in progress and will be reported at a future SMKI PMA meeting.</p> <p>This action was marked as ONGOING.</p>
SECPMA 26/04	<p>To be discussed during the meeting but work is in progress and will be reported at a future SMKI PMA meeting.</p> <p>This action was marked as ONGOING.</p>
SECPMA 26/05	<p>This action was deferred at the request of the DCC/ Trusted Service Provider (TSP) until the October 2016 SMKI PMA meeting.</p> <p>This action was marked as ONGOING.</p>
SECPMA 26/06	<p>This action was deferred at the request of the DCC/TSP until the October 2016 SMKI PMA meeting.</p> <p>This action was marked as ONGOING.</p>
SECPMA 26/07	<p>This action was deferred at the request of the DCC/TSP until the October 2016 SMKI PMA meeting.</p> <p>This action was marked as ONGOING.</p>
SECPMA 26/08	<p>Documentation had been circulated to all SMKI Members prior to the September 2016 meeting.</p> <p>This action was marked as CLOSED.</p>
SECPMA 26/09	<p>A document outlining the Certificate Authority (CA) lifecycle was circulated and distributed to SMKI PMA members via Egress prior to the meeting. SMKI PMA Members agreed to review this document, and provide comments (if any).</p> <p>This action was marked as ONGOING.</p>

Action Reference	Update
SECPMA 26/10	The TSP updated the SMKI PMA with information in relation to the Backup and production Hardware Security Modules (HSMs) that met the terms of the Action. <i>Further detail is contained in the Confidential Minutes.</i> This action was marked as CLOSED .
SECPMA 26/11	This action related to the destruction of Key Material and was deferred at the request of the DCC/TSP until the October 2016 SMKI PMA meeting. This action was marked as ONGOING .

ACTION SECPMA 27/02: The DCC will provide a Stage 2 Assurance Remediation Action Plan to the SMKI PMA members prior to their October meeting.

ACTION SECPMA 27/03: The DCC will investigate who is responsible for any cost incurred whereby the CSP is in breach of its contractual obligations resulting in a recovery event for Comms Hubs.

ACTION SECPMA 27/04: *This action is recorded in full in the Confidential Minutes.*

3. Draft SMKI PMA Work Package October – December 2016

SECAS presented the SMKI PMA with a Work Package for October 2016 to December 2016. This SMKI PMA Draft Work Package set out the anticipated activities and associated resource requirements for the relevant quarter and had been presented to the SECCo Board for approval on 9th September 2016 (dependent on any comments made by the SMKI PMA Members). The SMKI PMA had no further comments on the latest Work Package for October 2016 to December 2016.

The SMKI PMA:

- **APPROVED** the October 2016 – December 2016 SMKI PMA Work Package.

4. SMKI Recovery Key Guidance Consultation Update

SECAS presented the SMKI PMA with an update on the ongoing work in relation to the SMKI Recovery Key Guidance document following its most recent consultation. The group were presented with the amended SMKI Recovery Key Guidance document, and collated response sheet produced by SECAS. The group reviewed the amendments made to the SMKI Recovery Key Guidance document as a result of the feedback received.

BEIS (RH) commented that the language in section 5.7 (ii) of the SMKI Recovery Key Guidance document, and which states that the 'volume of' meters should be amended to read 'number of'.

The SMKI PMA noted the importance in Section 5.8 of the SMKI Recovery Key Guidance document to highlight the value of the Consumer to avoid any potential reputational damage. The SMKI Specialist noted that the proposed SMKI Recovery Key Guidance desktop exercise would help to further establish and identify additional processes that may be required to protect Consumers.

The SMKI PMA reviewed the compiled Excel Spreadsheet response document to determine that all comments submitted as part of the consultation had been sufficiently addressed by SECAS. The SMKI PMA queried the health and safety responsibilities of the SMKI Recovery Key Guidance document. It was noted it may be possible to include a reference to the Health and Safety Act, however, this would need to be done with a good understanding of the Act itself rather than being a reference in passing to fulfil a request from a respondent.

The DCC (MA) queried whether the SMKI PMA was the correct forum to determining the welfare of Consumers. It was noted that, in the event of a SMKI Recovery Event, the SMKI PMA would be determining and protecting the continuation of supply, rather than the termination of it (which may have a detrimental impact on Consumers). The SMKI PMA noted it would be the responsibility of Suppliers affected as a result of a SMKI Recovery Event to protect the supply to those it has deemed vulnerable and, where necessary, provide this information to the SMKI PMA in order to assist in the decision making processes required as part of the SMKI Recovery Key Guidance. An amendment will be made to clarify that where weighting is applied, priority will be given to consumer impact.

In section 5.6 of the SMKI Recovery Key Guidance document, it was noted that sub-sections (i) and (ii) should be combined into one single sub-section. SMKI PMA Members agreed with this proposed change.

The SMKI PMA:

- **NOTED** that comments from respondents had been sufficiently addressed; and,
- **APPROVED** the SMKI Recovery Key Guidance document for publication on the SEC Website, subject to the necessary amendments being made post-September 2016 SMKI PMA meeting.

ACTION SECPMA 27/05: The SMKI PMA Chair confirmed that all references to 'volume of' would be amended to read 'number of' prior to the SMKI Recovery Key Guidance being published on the SEC Website.

ACTION SECPMA 27/06: The SMKI PMA Chair confirmed that section 5.8 of the SMKI Recovery Key Guidance would be amended so that the mention of 'Where a weighting is applied' gives further priority to Consumers.

ACTION SECPMA 27/07: Section 5.6 (i) and (ii) of the SMKI Recovery Key Guidance would be combined into one sub-section clause within the document.

5. SEC Modification Proposal – Expanding SMKI PMA Membership

The group were presented with a draft Modification Proposal that sought to amend the current membership structure of the SMKI PMA to that similar of the Security Sub Committee (SSC). It also sought to remove the Affiliate restriction that denies the Alternative of a SMKI PMA Member being employed by the same organisation, as set out in SEC Section L1.12 (c).

The SMKI PMA Chair informed the group that this draft Modification Proposal had been produced as a result of the SMKI PMA's August 2016 meeting, whereby the group encountered an issue of becoming quorate. The purpose is to increase the membership to reduce the risk of a lack of quorum for meetings, including meetings to consider whether to approve Recovery. It was noted that the SMKI PMA now has an operational role in decision making that had not been anticipated when the original SEC was drafted.

The SMKI PMA discussed the draft Modification Proposal, noting their concerns that it is difficult for new members to acquire the detailed knowledge required to be effective; the existing difficulty in obtaining additional Members for the SMKI PMA; and the size increase to the group itself. The group further noted the challenge in filling the Small Supplier seat that is currently vacant on the SMKI PMA. SECAS agreed to continue investigating how to best engage the Small Supplier SEC Parties.

The SMKI PMA agreed it was sensible to include an Electricity Network Operator Representative on the SMKI PMA as well as the existing Gas Network Operator Representative, highlighting the role(s) involved in (possible) SMKI Recovery Events. It was agreed that one additional Large Supplier

representative (making a total of three Large Supplier representatives) would help to mitigate the risks to the quorum. It was also agreed to recommend that the SMKI Specialist becomes a Voting Member on the SMKI PMA.

The SMKI PMA considered the draft Modification Proposal, and deemed that it should be progressed, notwithstanding that changes are made to the proposed membership requirements in light of discussions had at the September 2016 SMKI PMA meeting.

The SMKI PMA:

- **NOTED** the contents of the paper;
- **AGREED** the draft Modification Proposal should progress and be formally raised (subject to the proposal being adjusted to request one additional Large Supplier, one Electricity Network Operator, and to change the SMKI Specialist to a Voting Member position).

ACTION SECPMA 27/08: SECAS will hold internal discussions to find the best way to encourage Small Supplier interaction within the SMKI PMA, and how best to fill the Small Supplier seat on the SMKI PMA.

ACTION SECPMA 27/09: SECAS will amend the draft Modification Proposal in order to add a further Large Supplier Representative, an Electricity Network Operator, and a change that enables the SMKI Specialist to become a Voting Member position.

6. SEC Section L Language Query

SECAS advised the SMKI PMA that following the designation of SEC 4.14, a SEC Party queried a change in language within SEC Section L12.3. The group were informed that the SEC Party had noted that in all subsequent clauses, the references to “check the version” have been removed and replaced with “check cryptographic protection”, and queried whether the SEC drafting in L12.3 (a) (i) was correct, or whether “check the version of the Organisation CRL on the SMKI Repository” should have also been removed.

The SMKI Specialist advised there is an issue with the reference to the Great Britain Companion Specification (GBCS) as Devices do not undertake Certificate Revocation List (CRL) checks. In this instance, referencing GBBS is incorrect, and it would therefore be more appropriate to reference ‘*in accordance with IETF RFC 5280*’. The SMKI PMA agreed that SECAS should approach BEIS to query the policy intent behind this change in SEC Section L12.3.

The SMKI PMA:

- **NOTED** the contents of the paper;
- **AGREED** the Party Query should be raised with BEIS.

ACTION SECPMA 27/10: SECAS to approach BEIS in order to determine the initial policy intent and reasoning behind the change between SEC 4.13 and 4.14.

7. Stage 2 Assurance Report

The DCC advised that a technical issue was currently delaying the upload of necessary Initial Assurance Assessment documentation being uploaded to the SMKI Repository. The DCC advised good progress has been made on the seven minor non-compliances, and that a new Stage 2 Assurance Report would be submitted to the SMKI PMA at a later date.

It was noted that for Stage 1 Assurance Report, the SMKI PMA had received a 'Stage 1 Remediation Action Plan' and a report that had information redacted so that it could be circulated to all SEC Parties. The DCC agreed to review the documentation submitted thus far, and develop the necessary documentation to close off the Stage 2 Assurance Report.

The SMKI PMA determined that the status of the Stage 2 Assurance Report(s) should be set as 'approved with caveats' in line with clause 4.4 of Appendix C to the SEC. The SMKI PMA agreed that the DCC continue to provide SMKI Services but should a) provide a remediation plan and report against it for the minor non-compliances; and b) provide copies of the Stage 2 Assurance Report for publication to SEC Parties by the SMKI PMA (via SECAS).

The SMKI PMA:

- **NOTED** the contents of this update; and
- **APPROVED with Caveats** the Stage 2 Assurance Report.

ACTION SECPMA 27/11: The DCC will investigate the information it has submitted thus far to determine whether they meet the Stage 2 Assurance Report obligation. The DCC shall also develop a Stage 2 Assurance Report – Remediation Action Plan, and if necessary, develop an additional report with redacted information that can be circulated to all SEC Parties as per the SEC obligations.

8. DCC Release Strategy & CR Update

Due to the current consultations on future DCC Releases, and the possibility of further amendments to the Smart Metering Implementation Programme timeline, further updates would be provided at a future SMKI PMA meeting.

The SMKI PMA:

- **NOTED** the update provided on the DCC's Release Strategy and Change Request (CR) Update.

9. SMKI Recovery Event Update

As per the ongoing action (**SECPMA 23/01**), further updates would be provided closer to the date at which the SMKI Recovery Event desktop exercise will occur. The group were informed that this is likely to occur between November 2016 and January 2017.

The SMKI PMA:

- **NOTED** the update.

10. SMKI OCA: Certificate Profiles in User Interface Testing (UIT)

The TSP provided an update on an issue currently being encountered within User Interface Testing (UIT). *This agenda item is recorded in full in the confidential minutes.*

The SMKI PMA:

- **NOTED** the update on the issue identified with SMKI OCA Certificate Profiles in UIT.

ACTION SECPMA 27/12: *This action is recorded in full in the confidential minutes.*

ACTION SECPMA 27/13: *This action is recorded in full in the confidential minutes.*

ACTION SECPMA 27/14: *This action is recorded in full in the confidential minutes.*

ACTION SECPMA 27/15: *This action is recorded in full in the confidential minutes.*

11. SMKI Operational Update

As per the agreement at the August 2016 SMKI PMA meeting, the DCC provided an update on their SMKI operational activities.

The DCC highlighted to the SMKI PMA that, as of yet, no Device Certificates for meters had yet been requested (as of the September 2016 SMKI PMA meeting). The DCC agreed they will continue to monitor this and provide future updates to the group.

The DCC informed the group that they were currently awaiting amendments by the TSP to the reporting structure before providing feedback on Infrastructure Key Infrastructure (IKI) Certificates.

The DCC informed the SMKI PMA that the issue with Certificate Revocation, which had been raised at the August 2016 SMKI PMA meeting, had now been successfully resolved. All procedures were followed and the group were informed that Certificates would now appear on the Certificate Revocation List (CRL).

The DCC raised a concern relating to the issue of Live Certificates and what this means to a Supplier in relation to a User System being deemed 'live', and therefore, an active SMKI User. The SMKI PMA Chair informed the group that this was due to be discussed at an SSC meeting.

The SMKI PMA:

- **NOTED** the content of the SMKI Operational update.

12. SMKI PMA Risk Register

SECAS presented the group with an update on the SMKI Risk Register. SECAS advised that a number of primary risks had been captured and recorded in the SMKI PMA Risk Register for discussion at this meeting.

The SMKI PMA provided the following feedback and suggestions:

- The group advised that a risk should be created in the event of the SMKI PMA being unable to mobilise, or hold an emergency meeting when determining, a SMKI Recovery Event;
- A decision or outcome made as part of a Recovery Event that has negative consequences;
- Potential challenges on how the SMKI PMA has operated and utilised the SMKI Recovery event;
- Failing to meet a quorum for important decision items at a SMKI PMA meeting (e.g. a SMKI Recovery Event which required the group use the SMKI Recovery Key Guidance); and
- SMKI PMA Members noted the focus within SMKI PMA Risk 2 needs to be broken up into separate risks. This is due to the group being unable to understand planned actions and mitigations as a result of the SMKI PMA risk being too broad.

The SMKI PMA were advised to contact SECAS with any further risks or comments following the September 2016 meeting. SMKI PMA Members noted that there may be risks associated with the suspension of SMKI Services, and the associated obligations on the SMKI PMA. The SMKI PMA Chair advised this would be covered in an AOB item of this meeting.

The SMKI PMA:

- **NOTED** the contents of the SMKI PMA Risk Register; and
- **AGREED** to provide further comments and risks to SECAS post-September 2016 SMKI PMA meeting.

13. SMKI PMA Activity Planner

SECAS provided the SMKI PMA with an updated activity planner outlining the activities expected over the next three months. It was noted that a reference to the publication of the SMKI Recovery Key Guidance document had been omitted in error and would be included prior to the October 2016 SMKI PMA meeting.

The SMKI PMA:

- **NOTED** the content of the Activity Planner.

14. Modifications Status Report

SECAS advised that, excluding the draft Modification Proposal on the structure of the SMKI PMA, there had been no work on any additional SEC Modifications that affected the SMKI PMA.

The SMKI PMA:

- **NOTED** the Modification Status Report for September 2016.

15. DCC Update

The DCC advised that there was no further update from the DCC for September 2016.

The SMKI PMA:

- **NOTED** the DCC update for September 2016.

16. DCCKI PMA Functions Update

The DCC advised that they were currently reviewing the governance for the DCCKI PMA Functions of the User Interface (UI) when accessing the Self Service Interface (SSI), and that they would report the outcome of this reviewing exercise to the SMKI PMA in due course. The DCC advised that there were no further updates from the DCCKI PMA Functions for September 2016.

The SMKI PMA:

- **NOTED** the DCCKI PMA Functions update for September 2016.

17. BEIS Update

The DCC advised that there was no further update from BEIS for September 2016.

The SMKI PMA:

- **NOTED** the BEIS update for September 2016.

18. Any Other Business (A.O.B)

Emergency Suspension of SMKI Services

An AOB agenda item was raised and was linked to discussions held within agenda item 12 of the September 2016 SMKI PMA meeting.

The SMKI PMA discussed circumstances relating to the emergency suspension of SMKI Services, as set out in SEC Section L2.14. The DCC informed the group that the capability to suspend SMKI Services to single DCC Users was dependent on the situation (e.g. a Compromise to the SMKI Services). It was noted that this would only occur within extreme circumstances and it was unlikely

that the SMKI PMA would be the sole control point for this, however, it was agreed that further work was required to understand the input and role of the SMKI PMA in this instance. It was agreed that SECAS review the SMKI PMA ToR in order to ensure that they remain fit for purpose, and an appropriate process and platform is in place in the event that the SMKI PMA instruct the DCC to suspend SMKI Services.

Management of IKI Authorised Responsible Officer (ARO) Credentials

The DCC presented the SMKI PMA with their current methodology of managing IKI Authorised Responsible Officer (ARO) credentials, and in particular, the identification of IKI AROs no longer active in their role. It was noted that the SEC obliges the DCC to produce a monthly report for each SEC Party showing their ARO & SROs, and that the DCC is currently fulfilling this obligation. The DCC sought input from the group, and requested that the SMKI PMA confirm whether the current DCC process was sufficient, or, whether a SEC Modification should be raised to the SEC for the DCC to undertake further verification and governance.

The SMKI PMA advised they were content that the obligations of the SEC can remain as they are and the responsibility should remain on the User to inform the DCC that an SRO or ARO has left the company. It was advised that the DCC should confirm how, or if, organisations are being advised of their obligation to inform the DCC if an ARO or SRO leaves the company. It was requested to see if it was possible to have a classification for dormant accounts. the DCC advised this was not applicable as it currently only applies to those on the SSI Interface.

Personal Data Storage Consent

The DCC advised that on nominee forms for SMKI processes, there is now a statement of consent for the storage of personal identification information. This also informs nominees of how this information is stored securely and for how long. The DCC advised they are intending to approach 200 individuals who have previously been nominated before the statement was included on the forms and ask them to address this and agree to the storage of their personal information. The DCC advised that the storage is a requirement of the Stage 1 Assurance Report.

The SMKI PMA queried what would happen if AROs were to say no to the requirement or simply ignored the request. It was advised an agreement would go out that stated if the DCC does not hear back, then it is assumed permission has been given to store the information.

The SMKI PMA **AGREED** with this approach.

ACTION SECPMA 27/16: SECAS will review the SMKI PMA ToR to determine whether they have the necessary obligations captured and the correct processes in place to perform an emergency suspension of SMKI Services.

ACTION SECPMA 27/17: The DCC will review how SMKI Users are currently being notified of their obligation to inform the DCC when an ARO, or SRO, leaves a company. The DCC will also investigate enhancing its ARO and SRO forms to remind SMKI Users of their roles and obligations in these roles.

19. Next Meeting

The next meeting will be held on **11th October 2016**.