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Paper Reference:	TABASC_42_1605_13
Action:	For Discussion

New Draft Proposals and Modification Proposals

1. Purpose

This paper provides a summary of the new Draft Proposals raised and the Draft Proposals that have converted to Modification Proposals in the last month. Copies of the draft or approved problem statements for each proposal are attached to this paper.

We seek any initial comments the Technical Architecture and Business Architecture Sub-Committee (TABASC) may have on these proposals at these stages in the framework, and agreement on which proposals they will want to provide further input on as they progress.

2. New Draft Proposals

This section lists the new Draft Proposals submitted in the last month and which have entered the Development Stage. At this point in the process, we are focused on assessing and clarifying the issue identified, the impacts this is having (including the impact of doing nothing), and the context of this issue within the SEC. Solutions will not be discussed until the Change Sub-Committee have agreed the problem statement has been fully defined.

We invite any views from the TABASC on the issue identified under each proposal, the impacts this may be having, and any areas the Proposer may need to consider further as part of developing their problem statement.

DP073 'Alteration of SMKI Repository information and documentation'

DP073 has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA). The Lead Analyst from SECAS is Jordan Crase.

The policy intent in respect of the SMKI Repository is that no information, document or other material that is placed in the SMKI Repository should be deleted, changed, altered, amended, modified or replaced in any way. This is to enable all Eligible Subscribers and Relying Parties to be reliant on the integrity of the information held in the SMKI Repository the content of which is described in SEC Section L5.1.

SEC Section L5 places obligations on the SMKI PMA to lodge, or to require the DCC to lodge, modified information or documents in the SMKI Repository. However, ambiguity within SEC Section L, due to different interpretations of Section L3.22, has led to the DCC deleting information in SMKI Organisation and Device Certificates without SMKI PMA governance or approval. BEIS has advised

that the DCC is not intended, under the SEC, to make any changes to information in the SMKI Repository and that the DCC is a 'person' within the meaning of SEC Section L5.5 and L5.6. The Proposer wishes to remove any ambiguity from the SEC drafting and ensure there are robust governance arrangements in place.

DP074 'Clarity on Obtaining SMKI Device Certificates'

DP074 has been raised by Gordon Hextall on behalf of the SMKI PMA. The Lead Analyst from SECAS is Ali Beard.

The SMKI PMA and the Security Sub-Committee (SSC) established a secure process for DCC Users who have completed the User Entry Process Tests (UEPT) to obtain SMKI Device Certificates from the DCC via a DCC Gateway connection. An Agreed Interpretation of this process has been published on the SEC website. Unfortunately, this is not clearly reflected in the SEC and could cause ambiguity for DCC Users when requesting SMKI Device Certificates.

DP075 'Third party metering service providers'

DP075 has been raised by Steve Mulinganie of Gazprom. The Lead Analyst from SECAS is Jordan Crase.

At present, there is no recognition within the SEC of Suppliers relationships with Meter Asset Managers (MAM) and Meter Asset Providers (MAP). In SEC Section G, under 'Manufacturers: Duty to Notify and Be Notified', if a User identifies a security vulnerability in a Smart Metering System that they are the Responsible Supplier for, they shall notify the manufacturer of the device, rectify or mitigate the vulnerability, and report the vulnerability and steps taken to the SSC (Sections G3.17 & G3.18). Reporting of security vulnerabilities to the SSC is also outlined in SEC Section G3.9. The Responsible Supplier for a Smart Metering System shall also make arrangements with the Device Manufacturer to be notified of security vulnerabilities that the manufacturer identifies (Section G3.20).

In many cases for non-domestic Suppliers, there is no formal relationship between the Supplier and the MAP, or the Supplier and the manufacturer, as is assumed in the [duty to notify guidance](#). In such cases the Supplier may have a formal contract with a MAM, or the with the end consumer who may have specified certain requirements.

3. Draft Proposals converted to Modification Proposals

This section summarises the Draft Proposals that were converted to Modification Proposals by the Panel at their last meeting and which have entered the Refinement Process. At this stage, the issue has been agreed and we have begun developing the business requirements for any solution with the Proposer and the DCC.

We invite any initial views and considerations from the TABASC to feed into the development and assessment of solutions to the issue. We also seek agreement with the TABASC as to which of these they will need to provide further input on, including commenting on the business requirements as they are developed.

No Draft Proposals have been converted to Modification Proposals in the last month.

4. Recommendations

The TABASC are requested to **PROVIDE** any views and comments on the proposals in this paper.

David Kemp

SECAS Team

9 May 2019

Attachments:

- **Appendix A:** DP073 draft problem statement
- **Appendix B:** DP074 draft problem statement
- **Appendix C:** DP075 draft problem statement