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<b>Paper Reference:</b>	<b>CSC_03_2805_04</b>
<b>Action:</b>	<b>For Decision</b>

## DP073 Draft Proposal decision

### 1. Purpose

This paper provides a summary of our assessment of [DP073 'Alteration of SMKI Repository information and documentation'](#), taking into account industry views and views of the Panel Sub-Committees on the problem this Draft Proposal has identified. We are asking the Change Sub-Committee (CSC) to agree that the issue identified under this Draft Proposal is clearly understood and that it is ready to progress to a Modification Proposal.

### 2. What is the issue?

[DP073 'Alteration of SMKI Repository information and documentation'](#) has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA).

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.

The problem statement containing the information provided by the Proposer and updated by SECAS during our initial investigations can be found in Appendix A.

### 3. Comments on the issue

No comments were received from Parties in relation to this Draft Proposal.

The Operations Group, the Security Sub-Committee (SSC), and the Technical Architecture Business Architecture Sub-Committee (TABASC) were advised of this Draft Proposal. No comments were received from any of these groups.

The DCC did enquire as to specifics of previous cases of when they have altered information, however the information discussed by the SMIKI PMA is confidential. The Proposer is privately discussing this with the DCC.

#### 4. Next steps

During investigation of this Draft Proposal we and the Proposer have agreed that there is a solution which we both feel resolves the issue; please see the proposed legal text in Appendix B. We welcome any comments from the CSC before this is presented to Panel. We recommend that the Modification Proposal should proceed straight to the Report Phase.

#### 5. Recommendations

The Change Sub-Committee are requested to:

- **AGREE** that the issue identified under DP073 is clearly defined and understood;
- **RECOMMEND** to the Panel that this Draft Proposal should be converted to a Modification Proposal; and
- **RECOMMEND** to the Panel that the Modification Proposal should proceed to the Report Phase.

**Jordan Crase**

**SECAS Team**

**20 May 2019**

#### Attachments

- **Appendix A:** DP073 problem statement
- **Appendix B:** DP073 draft legal text