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<b>Paper Reference:</b>	<b>CSC_03_2805_06</b>
<b>Action:</b>	<b>For Decision</b>

## DP075 Draft Proposal decision

### 1. Purpose

This paper provides a summary of our assessment of [DP075 'Third party metering service providers'](#), 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?

[DP075 'Third party metering service providers'](#) has been raised by Steven Mulinganie of Gazprom.

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 Security Sub-Committee (G3.17 & G3.18). Reporting of security vulnerabilities to the Security Sub-Committee 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 (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.

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

Four comments were received in relation to this Draft Proposal. At this stage we have had feedback on this Draft Proposal from three Other SEC Parties and one Small Supplier:

- The Other SEC Parties do not see a need for a change to the SEC regarding this Draft Proposal, with views that this should already be covered in the Supply Licence Conditions.

- The Small Supplier believes that SEC Section G does not adequately reflect the practical reality of metering relationships, and therefore they support this Draft Proposal.

The collated comments and questions can be found in Appendix B.

The Security Sub-Committee (SSC), the Technical Architecture and Business Architecture Sub-Committee (TABASC), and the Operational Group was advised of this Draft Proposal. The SSC and the TABASC have very similar views and are opposed to this proposal. Due to the proximity of dates of when this Draft Proposal was raised and the last Operations Group meeting, members were requested to send in comments and were circulated a copy of the problem statement. We have not received any comments from them. The Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) will comment on this Draft Proposal on 21 May 2019, and we will update the CSC verbally of their comments.

#### 4. Next steps

During investigation of this Draft Proposal, it became clear that some SEC Parties believe there is an issue but other do not believe there is an issue as the Supply Licence Conditions legislate for this situation.

We recommend that if the Proposer wishes to proceed, this Draft Proposal be presented to Panel with a recommendation to progress to a Modification Proposal, that it should undergo the Refinement Procedure. We welcome any comments from the CSC before this is presented to the Panel.

#### 5. Recommendations

The Change Sub-Committee are requested to:

- **AGREE** that the issue identified under DP075 is clearly defined and understood;
- **RECOMMEND** to the Proposer that this Draft Proposal should not be converted to a Modification Proposal;
- **RECOMMEND** to the Panel that, if the Proposer decides to proceed, this Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMEND** to the Panel that any Modification Proposal should proceed to the Refinement Process.

Jordan Crase

SECAS Team

20 May 2019

#### Attachments

- **Appendix A:** DP075 problem statement
- **Appendix B:** DP075 industry comments