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DP073 ‘Alteration of SMKI Repository information and documentation’

Problem statement – version 0.2

About this document

This document provides a summary of this Draft Proposal, including the issue or problem identified, the impacts this is having, and the context of this issue within the Smart Energy Code (SEC).

Proposer

This Draft Proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure Policy Management Authority.

What is the issue or problem identified?

Altering of information within the SMKI Repository

SMKI PMA

The principal duty of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) is to manage the requirements for the SMKI and to provide governance and change control for the SMKI Document Set and relevant SEC content and artefacts. This includes ensuring that the appropriate governance and decision-making is applied to any proposals to alter, change, amend, modify, delete or replace any information or documentation held in the SMKI Repository.

SMKI Repository

The SMKI Repository is a System for storing and making available documents and information relating to SMKI. 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.

Due to alternative interpretation of the SEC by the DCC, there has been information in the SMKI Organisation and Device Certificates (stored in the SMKI Repository) altered without SMKI PMA governance or approval.

How does this issue relate to the SEC?

SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' 5 places obligations on the SMKI PMA to lodge, or to require the DCC to lodge, modified information or documents in the SMKI Repository. Section L3.22(b) places obligation on the DCC to 'subsequently maintain' its Certificates within the SMKI Repository. This introduces ambiguity into Section L as the DCC interpreted Section L3.22(b) to mean that they are not required to gain SMKI PMA approval for altering this information. BEIS has advised that under the SEC, the DCC is not intended to make any changes to the SMKI Repository, and that the DCC should be considered a 'person' within the meaning of SEC Sections L5.5 and L5.6:

"L5.5 The DCC shall ensure that the SMKI Repository may be accessed for the purpose of viewing and/or obtaining a copy of any document or information stored on it by:

- (a) any Party or RDP which reasonably requires such access in accordance, or for any purpose associated, with the Code;*
- (b) the Panel (or the Code Administrator acting on its behalf); and*
- (c) the SMKI PMA (or the Code Administrator acting on its behalf).*

L5.6 The DCC shall ensure that no person may access documents or information in the SMKI Repository other than in accordance with Section L5.5."

What is the impact this is having?

What are the impacts of doing nothing?

The Proposer believes that the current ambiguity within SEC Section L, allowing for the interpretation for the DCC to delete or amend information or documents within the SMKI Repository without SMKI PMA approval, means that there is no governance to the information being deleted or altered. The SMKI PMA takes into account the impacts for Eligible Subscribers, Relying Parties, SMKI Document Set, and the DCC for any proposal to delete, alter, change, amend, modify or replace any information or documents contained in the SMKI Repository. Without this consideration there may be an unreliability in the integrity of the information held in the SMKI Repository for Eligible Subscribers and Relying Parties who are reliant on the information and documentation it contains.

The information and documentation the SMKI Repository contains is used for creating, sending receiving or processing communication sent to and from a Device. Therefore, the lack of regulation and governance of changes to this information and documentation could have potential to disrupt communications and introduce security concerns.

What are the views of the industry?

Views of the DCC

The DCC's initial views of this Draft Proposal are that this will not likely be technology impacting. However, there is potential that it will have drafting changes to the SEC Technical Specifications.

Views of SEC Parties

We did not receive any comments from SEC Parties.

Views of Panel Sub-Committees

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.

Views of the Change Sub-Committee

The views of the Change Sub-Committee will be sought at the meeting on 28 May 2019.