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DP074 ‘Clarity on Obtaining SMKI Device Certificates’

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 Security Sub-Committee (SSC) and Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA).

What is the issue or problem identified?

Obtaining SMKI Device Certificates

DCC Users must request SMKI Device Certificates for Devices that they wish to connect to the Smart Metering System to ensure the secure and efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. The SMKI PMA and 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 and an Agreed Interpretation of this process has been published on the SEC website:

"Where the DCC receives an application on the Authorised Subscriber application form wishing to be an Authorised Subscriber for SMKI Device Certificates, the Registration Authority shall determine, in accordance with the steps set out in Section 5.5 of the SMKI RAPP, whether there is reasonable evidence to suggest that it is necessary for the applicant organisation to become an Authorised Subscriber for Device Certificates in order for them to carry out business processes that will, or are likely to, lead to the installation of Devices in premises. In determining the evidence, the Registration Authority shall ensure that the applicant organisation has completed User Entry Process Tests and that Certificate Signing Requests (CSRs) will be submitted via a DCC Gateway Connection."

Unfortunately, this is not clearly reflected in the SEC and could cause ambiguity for DCC Users when requesting SMKI Device Certificates.

How does this issue relate to the SEC?

The Proposer expects this issue to impact the following SEC Appendices:

- SEC Appendix D 'SMKI Registration Authority Policies and Procedures' provides detailed procedures for Authorised Subscribers to obtain SMKI Organisation and Device Certificates. At present, Section 5 implies that Parties can use the SMKI Portal Interface Over the Internet (SPOTI) to submit Device CSRs without having completed UEPT and without using a DCC Gateway connection.
- SEC Appendix K 'SMKI and Repository Test Scenarios Document' explains the SMKI and Repository Test Scenarios and currently describes tests to submit Device CSRs via SPOTI.
- SEC Appendix M 'SMKI Interface Design Specification' explains the SMKI Interface Design Specification and currently describes an ability to submit batched or ad hoc Device CSRs "(via a DCC Gateway connection or via the Internet)".
- SEC Appendix N 'SMKI Code of Connection' explains the SMKI Code of Connection and currently describes an ability to submit batched and ad hoc Device CSRs via SPOTI.

What is the impact this is having?

What are the impacts of doing nothing?

SEC Parties may not have enough clarity regarding the process in order to obtain SMKI Device Certificates via the SPOTI. Parties could also be unclear as to what level of security or which stage in the User Entry Process they must be at in order to access the Device Certificates.

What are the views of the industry?

Views of the DCC

The DCC were supportive of this Draft Proposal.

Views of SEC Parties

No comments were received from SEC Parties.

Views of Panel Sub-Committees

The SSC and SMKI-PMA fully support changes to make this process less ambiguous for Users. The other Panel Sub-Committees had no comments on this Draft Proposal.

Views of the Change Sub-Committee

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