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Action:	For Decision

DP073 Problem Statement

1. Purpose

Draft Proposal [DP073 'Alteration of SMKI Repository information and documentation'](#) was raised by the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) and has undergone the Development Stage. The Change Sub-Committee believe this Draft Proposal is ready to be converted to a Modification Proposal. This paper sets out our proposed approach for progressing this modification for the Panel's approval. We are recommending that this modification be progressed directly to the Report Phase and that the Panel approve the Modification Report, the implementation approach, and that MP073 is a Self-Governance Modification.

This paper provides a high-level summary of the key points. A copy of the problem statement submitted by the Proposer is provided in Appendix A, and the draft Modification Report in Appendix B.

2. Summary of the proposal

What is the issue?

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 have advised that it is not the intention under the SEC for the DCC to make any changes to information in the SMKI Repository without approval, 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.

What is the proposed solution?

The proposed solution seeks to remove the ambiguity from the SEC over who has authority over making changes, alterations, modifications, deletions or replacement of any information or

documentation contained in the SMKI Repository. The proposed legal text states that such matters must be expressly approved by the SMKI PMA.

3. Proposed progression

The Change Sub-Committee have agreed that this Draft Proposal is ready to be converted to a Modification Proposal. We believe that this modification should be progressed directly to the Report Phase as we and the Proposer have agreed that there is a solution which we both feel resolves the issue. Views have also been sought on this from the Change Sub-Committee. This proposed solution would not benefit from the Refinement Process or require any further input from SEC Parties.

Determination approach

We recommend that this proposal should be progressed as a Self-Governance Modification as the proposed solution does not meet any of the requirements in SEC Section D2.6 for needing an Authority determination.

Implementation approach

We recommend an implementation approach of:

- 7 November 2019 (November 2019 SEC Release) if a decision to approve is received by 24 October 2019; or
- 27 February 2020 (February 2020 SEC Release) if a decision to approve is received after 24 October 2019 but by 13 February 2020.

4. Recommendations

The Panel are requested to:

- **AGREE** that DP073 is ready to be converted to a Modification Proposal;
- **AGREE** that MP073 should be progressed to the Report Phase;
- **APPROVE** the Modification Report;
- **APPROVE** the implementation approach; and
- **AGREE** that MP073 should be progressed as a Self-Governance Modification.

Jordan Crase

SECAS Team

7 June 2019

Attachments:

- **Appendix A:** DP073 problem statement
- **Appendix B:** MP073 Modification Report
 - **Annex A:** legal text

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DP073 ‘Alteration of SMKI Repository information and documentation’

Problem statement – version 0.3

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 (SMKI) Policy Management Authority (PMA).

What is the issue or problem identified?

Altering of information within the SMKI Repository

SMKI PMA

The principal duty of the SMKI 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

No comments were received 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 (CSC) agreed that this Draft Proposal clearly outlines an issue that will need to be resolved. They recommend to the SEC Panel that this Draft Proposal is converted to a Modification Proposal and goes straight to Report Phase. CSC members requested that the Proposer review the legal text, as there may be some unnecessary content. The Proposer has considered the legal text, however believes it accurately reflects the proposal's intentions.

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MP073

‘Alteration of SMKI Repository information and documentation’

Modification Report

Version 0.1

About this document

This document is the Modification Report for [MP073 'Alteration of SMKI Repository information and documentation'](#). It provides detailed information on the background, issue, solution, costs, impacts and implementation approach. It also summarises the discussions that have been held and the conclusions reached with respect to this Modification Proposal.

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This document also has one annex:

- **Annex A** contains the redlined changes to the SEC required to deliver the proposed solution.

1. Summary

This proposal has arisen due to different parts of SEC Section L ‘Smart Metering Key Infrastructure and DCC Key Infrastructure’, regarding the Smart Metering Key Infrastructure (SMKI) Repository. This has resulted in information within the SMKI Repository being deleted by the Data Communication Company (DCC). The Department for Business, Energy and Industrial Strategy (BEIS) have confirmed that this is not the intent of SEC Section L.

Without appropriate governance and decision-making applied to any intentions to alter, change, amend, modify, delete or replace any information or documentation held in the SMKI Repository, there is a risk of unreliability in the integrity of the information held in the SMKI Repository for Eligible Subscribers and Relying Parties. This has the potential to disrupt communications and introduce security concerns.

The proposed solution within this modification will remove the described ambiguity within SEC Section L by requiring any alteration changes, or deletion of information or documentation in the SMKI Repository to have the express consent of the SMKI Policy Management Authority (PMA). The SMKI PMA take 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.

There will be no direct impact on Parties in implementing this modification, and costs will be limited to Smart Energy Code Administrator and Secretariat (SECAS) time an effort in updating the SEC. If approved, this modification is targeted for the November 2019 SEC Release.

2. Background

What is the SMKI Repository?

The SMKI Repository is a system for storing and making available documents and information relating to SMKI. Information and documentation contained in the SMKI Repository is used for creating, sending receiving or processing communication sent to and from a Device. 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 without SMKI PMA approval. 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 SMKI PMA manages the requirements for the SMKI and provides 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.

What is the issue?

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. Section L3.22(b) places obligation on the DCC to 'subsequently maintain' its Certificates within the SMKI Repository. Due to misinterpretation of this 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. BEIS have confirmed that this is not the intent under the SEC, 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 are the impacts of doing nothing?

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

3. Solution

Proposed Solution

The proposed solution is to clarify, within SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure', that any changes, alterations, modifications, deletions or replacement of any information or documentation contained in the SMKI Repository must have the approval of the SMKI PMA.

Legal text

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
	Large Suppliers		Small Suppliers
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties		DCC

All SEC Parties will be affected by the implementation of this modification as any changes to the SMKI Repository would need to be approved by the SMKI PMA. However, SEC Parties are not expected to require any effort in implementing these changes.

DCC System

There are no impacts on the DCC Systems and there is no testing required as part of the implementation of this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure'

Other industry Codes

There are no impacts on other industry codes.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs associated with this modification.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There are no SEC Party costs expected to be incurred in implementing this modification.

6. Implementation approach

Recommended implementation approach

SECAS are recommending an implementation date of:

- **7 November 2019** (November 2020 SEC Release) if a decision to approve is received on or before 24 October 2019; or
- **27 February 2020** (February 2020 SEC Release) if a decision to approve is received after 24 October 2019 but on or before 13 February 2020.

The Proposer is seeking for this modification to be implemented as soon as possible, and the November 2019 SEC Release is the next practical SEC Release that this change can be included in.

7. Conclusions

Benefits and drawbacks

The Proposer has identified the following benefits and drawbacks in implementing this modification:

Benefits

- This change will clarify the intent of SEC Section L5.
- It will also mitigate potential security and communications risks which may arise from ungoverned alteration of the SMKI Repository.

Drawbacks

- The Proposer has not identified any drawbacks to this modification.

Proposer's rationale against the General SEC Objectives

Objective (a)¹

The Proposer believes that MP073 will better facilitate SEC Objective (a), by ensuring that Eligible Subscribers and Relying Parties can rely on the integrity of the information contained in the SMKI Repository which is required to support Smart Meter Installation and Change of Supplier.

Objective (c)²

The Proposer believes that MP073 will better facilitate SEC Objective (c), by allowing Energy Consumers' to manage their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems by ensuring that Smart Metering Services continue to operate through the efficient application of SMKI Services facilitated by the SMKI Repository.

Objective (d)³

The Proposer believes that MP073 will better facilitate SEC Objective (d), by effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy which is enabled by the use of SMKI Certificates and other information that is held in the SMKI Repository.

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain;

² Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems;

³ Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy;

Objective (f)⁴

The Proposer believes that MP073 will better facilitate SEC Objective (f), by ensuring the protection of Data and the security of Data and Systems in the operation of this Code by providing effective SMKI Services facilitated by the SMKI Repository.

Objective (g)⁵

The Proposer believes that MP073 will better facilitate SEC Objective (g), though efficient and transparent administration and implementation of this Code by providing clear guidance and effective governance for the DCC and for DCC Users who rely on information contained within the SMKI Repository.

Sub-Committee views

During the Development Stage of DP073, the Operations Group, the Security Sub-Committee (SSC) and the Technical Architecture Business Architecture Sub-Committee (TABASC) were advised of the Draft Proposal. No comments were received from any of these groups. The Change Sub-Committee (CSC) reviewed this proposal and agreed that the issue raised is clearly outlined and should be progressed as a Modification Proposal. However, there were some views that the legal text may need to be altered slightly. This has been discussed with the Proposer, and they believe the legal text adequately reflects their intentions.

⁴ Ensure the protection of data and the security of data and systems in the operation of the SEC;

⁵ Facilitate the efficient and transparent administration and implementation of the SEC.

Appendix 1: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
BEIS	Department for Business, Energy & Industrial Strategy
CSC	Change Sub-Committee
DCC	Data Communication Company
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI	Smart Meter Key Infrastructure
SMKI PMA	SMKI Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee



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MP073 ‘Alteration of SMKI Repository information and documentation’

Annex A

Legal text – version 0.1

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

These changes have been drafted against SEC Version 6.12.

Section L ‘Smart Metering Key Infrastructure and DCC Key Infrastructure’

Add Section L5.6A as follows:

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 except where L5.6A applies.

L5.6A Any changes, alterations, modifications, deletions or replacement of any information or documentation contained in the SMKI Repository must be expressly approved by the SMKI PMA.