SEC
Smart Energy Code

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Smart Energy Code

MP074

‘Clarity on Obtaining SMKI Device Certificates’

Modification Report

Version v1.0

About this document

This document is the Modification Report for MP074 'Clarity on Obtaining SMKI Device Certificates'. 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

DCC Users must request Smart Metering Key Infrastructure (SMKI) Device Certificates for Devices that they wish to connect to the Smart Metering System. SEC Appendix D 'SMKI Registration Authority Policies and Procedures' provides detailed procedures for Authorised Subscribers to obtain SMKI Organisation and Device Certificates. The SMKI Policy Management Authority (PMA) and the Security Sub-Committee (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.

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

MP074 proposes to make changes to the SEC to ensure the process as agreed by the SMKI-PMA and the SSC is accurately reflected in the SEC. This change will impact all Parties, ensuring a secure and clear procedure is laid out for all Parties requesting Organisation and Device Certificates.

The central implementation costs will be limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort in implementing the changes to the SEC. If approved, this change is targeted for the November 2019 SEC Release.

2. Background

Obtaining Device Certificates

DCC Users must request SMKI Device Certificates for Devices that they wish to connect to the Smart Metering System. The SMKI PMA and the 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.

The SMKI PMA and the SSC's Agreed Interpretation is as follows:

"*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.*"

What is the issue?

The Agreed Interpretation is not accurately reflected in the SEC. SEC Parties may not have enough clarity regarding the process in order to obtain SMKI Device Certificates via the SMKI Portal Interface Over the Internet (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.

3. Solution

Proposed Solution

After consideration of industry comments and discussions with the DCC, the Proposer (the SMKI PMA) believes that the most effective solution is to change the legal text in the SEC to reflect the Agreed Interpretation thereby ensuring there is clarity and consistency in the process of obtaining Device Certificates.

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

There is no impact on Parties to implement this modification. All Parties will benefit from this as it will ensure clarity for all Parties. There may be some consequential impacts to Parties who currently use SPOTI.

DCC System

There is no impact on DCC Central Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix D 'SMKI Registration Authority Policies and Procedures'
- Appendix K 'SMKI and Repository Test Scenarios Document'
- Appendix M 'SMKI Interface Design Specification'
- Appendix N 'SMKI Code of Connection'

Other industry Codes

There are no impacts identified 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 implementing 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 will be no costs on Parties to implement this modification.

6. Implementation approach

Recommended implementation approach

SECAS are recommending an implementation date of:

- **7 November 2019** (November 2019 SEC Release) if a decision to approve is received on or before 24 October 2019.

This is the next available SEC Release that this change can be included in.

7. Discussions and development

Discussions by the Sub-Committees

The Sub-Committees were all supportive of this modification. No comments were received.

Comments from the DCC

Comments were received from the DCC indicating that any Registered User on the DCC Gateway can have access to device certificates (whether or not they are installing devices) and it should be made clear that Parties using SPOTI can only access Organisation Certificates not Device Certificates.

Comments from Parties

No comments were received from any Parties.

8. Conclusions

Benefits and drawbacks

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

Benefits

- The SEC will accurately reflect the process for obtaining Device Certificates, in line with the Agreed Interpretation published by the SMKI-PMA and SSC.

Drawbacks

- No drawbacks have been identified.

Proposer's rationale against the General SEC Objectives

Objective (a)[1]

The Proposer believes that MP074 will better facilitate SEC Objective (a) by ensuring the SEC provides accurate information for Parties on the process of obtaining Device Certificates.

Objective (e)[2]

The Proposer believes that MP074 will better facilitate SEC Objective (e) by ensuring the SEC accurately reflects the security procedures in the process of obtaining Device Certificates.

Sub-Committee views

The Sub-Committees were supportive of this modification and had no specific comments.

Panel's conclusions

The Panel agreed that the Draft Proposal should be converted to a Modification Proposal to be progressed to the Report Phase. The panel also agreed upon the proposed implementation approach and that MP074 should be progressed as Self-Governance.

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

[2] Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy

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**
CSR	Certificate Signing Request
DCC	Data Communications Company
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI	Smart Metering Key Infrastructure
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMKI RAPP	Smart Metering Key Infrastructure Registration Authority Policies and Procedures
SPOTI	SMKI Portal Interface Over the Internet
SSC	Security Sub-Committee
UEPT	User Entry Process Testing

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