

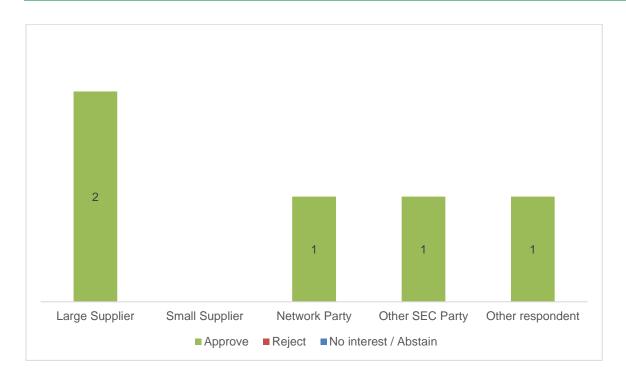
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# MP074 'Clarity on Obtaining SMKI Device Certificates' Modification Report Consultation responses v2.0

### About this document

This document contains the full non-confidential collated responses received to the MP074 Modification Report Consultation.

## **Summary of responses**







# Question 1: Do you believe that MP074 should be approved?

Question 1				
Respondent	Category	Response	Rationale	
SSEN	Networks Party	Yes	SSEN agree to the proposed changes to the legal text, aligning it to the agreed interpretation. This will ensure there is clarity and consistency in the process of obtaining device certificates.	
EDF Energy	Large Supplier	Approve	We believe that this change better facilitates SEC Objective (f) as it will ensure that the SEC reflects the security procedures Parties are required to follow when obtaining Device Certificates.	
			We also believe that this change better facilitates SEC Objective (g) as it will ensure the SEC accurately reflects the security procedures to be followed in the process of obtaining Device Certificates.	
			We believe that this change is neutral against the other SEC Objectives; it certainly does not better facilitate Objectives (a) or (e) as noted in the Modification Report.	
Scottish Power	Large Supplier	Approve	We consider that the implementation of SECMP074 would better facilitate SEC Objectives:	
			(a) in that it would help to ensure Parties are aware of the correct process to follow in obtaining Device Certificates for SMS installation; and	
			(f) in that it would assist Parties in discharging their obligations with regard to the security of Data that is within the purview of the Code.	
SMS PIc	Other SEC Party	Approve	-	
SMKI PMA	Other respondent	Approve	The Proposed Modification will reduce risks to the end-to-end smart metering system.	





# Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	
SSEN	Networks Party	N/A	
EDF Energy	Large Supplier	N/A	
Scottish Power	Large Supplier	N/A	
SMS PIc	Other SEC Party	N/A	
SMKI PMA	Other respondent	It has been pointed out to me that part of the legal text could result in an unintended consequence and needs to be corrected.	
		The aim of the SMKI PMA in proposing this Modification is that SMKI Device Certificates should only be obtained:	
		a) by a User organisation that has completed the User Entry Process as confirmed by the Code Administrator in SEC H1.11 that the user has completed each and every requirement set out in SEC Section H1.10 including having its security assurance status set as 'approved' or 'approved subject to the User taking steps' as specified by the SSC which is covered in H1.10(c).	
		The current legal drafting refers only to having completed User Entry Process Tests which is but one sub-set of H1.10 i.e. H1.10(b). The legal drafting therefore needs to reflect the SMKI PMA intent.	
		b) by a DCC Gateway connection and this isn't currently explicit in the legal drafting.	

