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Paper Reference:	SECCB_32_2407_03
Action:	For Decision

MP074 Change Board vote

1. Purpose

[MP074 'Clarity on Obtaining SMKI Device Certificates'](#) has undergone Modification Report Consultation and is now being presented to the Change Board for vote. The Change Board are invited to determine whether MP074 should be approved or rejected under Self-Governance.

This paper provides a high-level summary of the key points. Full details can be found in the Modification Report in Appendix A and the responses received to the Modification Report Consultation in Appendix B.

2. Summary of the proposal

What is the issue?

The Smart Metering Key Infrastructure (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. An Agreed Interpretation of this process has been published on the SEC website. Unfortunately, this is not clearly reflected in the SEC and could cause ambiguity for DCC Users when requesting SMKI Device Certificates.

What is the Proposed Solution?

MP074 seeks 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.

3. Modification Report Consultation responses

Five responses were received in the Modification Report Consultation, and the full responses can be found in Appendix B. The responses included two from Large Suppliers, one from an Other SEC Party, one from a Network Party and one from the SMKI PMA.

All five of the respondents felt that MP074 should be approved and gave their rationales on their decisions. A Large Supplier felt that this modification would help to better facilitate SEC Objectives (f) and (g), while the second Large Supplier believed that SEC Objectives (a) and (f) are better facilitated. The Network Party agreed with the proposed changes to the legal text, stating that it

aligned to the agreed interpretation. They felt that there will be clarity and consistency in the process of obtaining device certificates. Although they approved MP074, the Other SEC Party did not make any comments.

The SMKI PMA added that the risks will be reduced in the end-to-end Smart Metering System, but made further comments regarding the legal text, which they noted could result in an unintended consequence which will need to be corrected. These amendments, a change to SEC Appendix D section 5, have now been made to remove any misinterpretation and the updated legal text can be found in Annex A of the Modification Report.

The Proposer has also suggested including some further changes to the legal text, in order to correct typographical errors identified in the SEC Appendices affected by MP074. These changes have also been reflected in Annex A of the Modification Report.

4. Next steps

Determination approach

The Panel has determined that MP074 is a Self-Governance Modification. The Change Board's vote will therefore form a decision on the modification.

This decision will subject to a 10 Working Day objection period where Parties can refer the decision to the Panel. If no objection is received, the Change Board's decision will be final.

Implementation approach

The Panel has agreed the following implementation approach of:

- 7 November 2019 (November 2019 SEC Release) if a decision to approve is received by 24 October 2019.

5. Recommendations

The Change Board are requested to:

- **AGREE** that MP074 should proceed to vote;
- **DETERMINE** whether MP074 should be **APPROVED** or **REJECTED** under Self-Governance; and
- **PROVIDE** rationale for this decision against the General SEC Objectives.

Bradley Baker

SECAS Team

17 July 2019

Attachments

- **Appendix A:** MP074 Modification Report
 - **Annex A:** MP074 legal text

- **Appendix B:** MP074 Modification Report Consultation responses