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Paper Reference:	**TABASC_45_1508_14**
Action:	**For Decision**

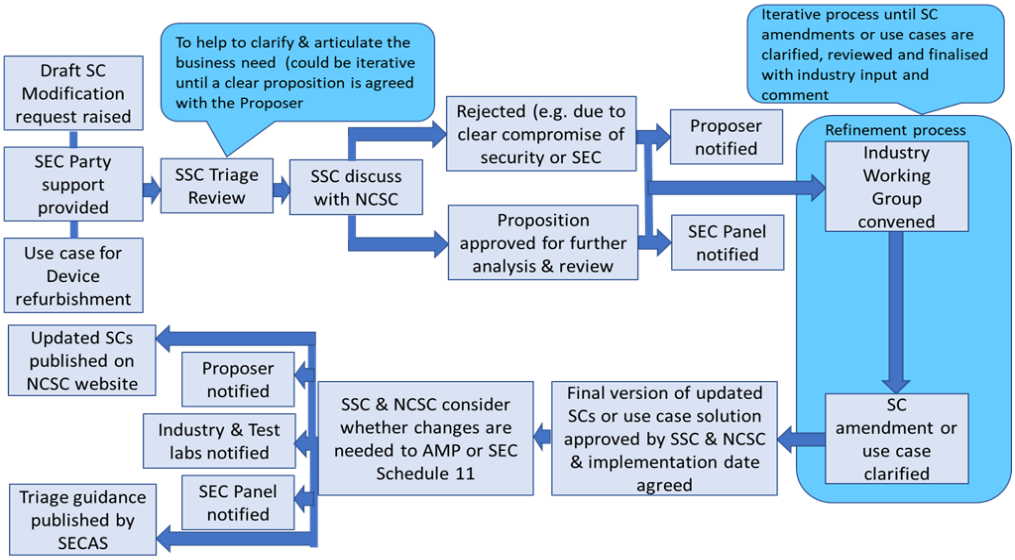
Use Case for Device Refurbishment

1. Purpose

E.ON have submitted a use case for Device Refurbishment in line with the methodology approved by SSC – see Annex 1. The purpose is to obtain SSC agreement to confirm that the business need is clearly articulated and that there is no unacceptable compromise of security controls or SEC obligations to prevent the use case from being progressed to the next stage of consideration.

2. Background

The SSC has approved a methodology for assessing and approving (or rejecting) use cases for Device refurbishment. Any party may provide a use case for Device refurbishment using the process described in the SEC website here. The process is set out in the diagram below.



3. Recommendation

The SSC is now requested to:

- **NOTE** the use case for the Deployment of Vanilla DNO Certificates (see Annex 1);
- **CONFIRM** whether any clarifications are needed to the proposal; and
- **AGREE** whether there are any Technical or Business Architectural concerns to be raised to the SSC.

- Annex 1 - Meter Triage – Deployment of Vanilla DNO Certificates

Gordon Hextall

SSC Chair

7 August 2019

Annex 1: Meter Triage – Deployment of Vanilla DNO Certificates

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Proposal for a Modification to the CPA Security Characteristics (SCs) or for a Use Case for Guidance on Device Refurbishment

The SEC Security Sub-Committee (SSC) is responsible for maintaining the CPA Security Characteristics and for providing advice on security matters:

"SEC G7.19 (f) liaise and work with the NCSC to develop and maintain CPA Security Characteristics that set out the levels of security required for Smart Meters, Communications Hubs and HCALCs that are proportionate and appropriate taking into consideration the security risks identified in the Security Risk Assessment."

The SSC has established a process for considering proposals for SC Modifications that is explained https://smartenergycodecompany.co.uk/latest-news/how-to-modify-the-cpa-security-characteristics/. The same process can be used to propose a Use case for Guidance on Device Refurbishment.

Any party can raise a draft SC Modification Proposal but must also have the support of a SEC Party.

This form should be completed and submitted to the SSC for consideration by e-mailing the form to ssc@gemserv.com

SC Modification Proposal (complete as appropriate)

Proposed SC Modification Title:
Device Refurbishment – Security Characteristics Amendment

Use Case for Device Refurbishment (complete as appropriate)

Proposed Use Case Title:
Meter Triage – Deployment of Vanilla DNO Certificates

Name:	David Lyons
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SEC Party:	E.ON Energy Solutions Limited
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1. What issue are you looking to address?

Building on Meter Triage "Use Case 001", E.ON is seeking the capability to securely replace Distribution Network Operator (DNO) certificates installed on SMETS2 assets removed and returned to Energy Supplier or Meter Manufacturer secure facilities for triage.

2. Why does this issue need to be addressed? *(i.e. Why is doing nothing not an option?)*

SMETS2 meters are removed for a variety of reasons, as outlined in Meter Triage "Use Case 001". In most cases, the asset will either have been partially or fully installed and commissioned prior to its removal and return. Commissioning through the DCC results in the application of a DNO certificate, and Suppliers will have to assume that this stage has been reached for the meters subsequently returned for triage.

Given the number of DNO regions, Suppliers are likely to rapidly build up stocks of triaged SMETS2 assets, where the corresponding DNO certificate will geographically restrict asset re-use. These geographically tied SMETS2 assets will subsequently pose problems for warehouse stock management processes and restrict the re-distribution of triaged SMETS2 assets to Meter Technicians operating solely within the confines of specific DNO regions.

As there are fourteen DNO areas, this could mean Suppliers having to have up to fourteen different stock locations for each asset type in their warehouse. Assuming the use of a multi-source strategy and the different meter variants required, this could lead to over 100 extra stock locations being required. Given the evolving profile of the smart meter rollout, warehouse space used by Suppliers will be in significant demand, and Suppliers will always look to maximise operational efficiencies in these facilities. If it was deemed unfeasible to manage such a complex warehouse operation, these assets may have to be scrapped with significant benefits from the original meter triage use case then being lost.

Where a Meter Technician operates across DNO region boundaries, issuing triaged meter assets is likely to result in additional failed installations as we believe that the DNO Certificate could result in commissioning issues. Further failed installations will result in complaints from energy consumers and wasted Meter Technician time. Such failed installations will mean previously triaged SMETS2 assets are returned for further meter triage activity, resulting in wasted effort and increasing the potential for assets to be scrapped.

E.ON believes that permitted meter triage solutions should allow "known-good" SMETS2 assets to be deployed and re-used in any location in Great Britain during subsequent installations. We believe this ability supports delivery of mandate obligations in a way that is cost effective, while also reducing the risk of environmental impacts caused by scrapping of SMETS2 assets that could be realistically re-used. This will also reduce the likelihood of the GB Smart Metering Programme attracting adverse press publicity owing to meter triage capability constraints which result in avoidable costs being incurred.

3. What is your Proposed Solution?
An amendment to the existing permitted "Meter Triage Use Case 001", which would allow the deployment of a vanilla DNO key (or alternative solution) during the triage of assets. If adopted, this vanilla DNO key solution would overwrite any DNO key applied during a previous installation and commissioning conducted through the DCC. The use of a vanilla DNO key would remove the requirement for Meter Manufacturers or Energy Suppliers undertaking meter triage to hold and manage additional sensitive key material. The deployment of vanilla DNO keys would be conducted in a secure location either at premises of the Meter Manufacturer or Energy Supplier. This aligns with the Security Constraints outlined in "Meter Triage Use Case 001", which required that triage is only "*…undertaken in a Supplier or manufacturing facility, not at a consumer site…*".

4. Does this affect an existing SC? If so, please explain the specific SC affected?	To be determined
We believe that the assessment of this new Meter Triage Use Case will determine any impacts on Security Characteristics.	

5. Does this require a new SC? If so, please explain.	To be determined
We believe that the assessment of this new Meter Triage Use Case will determine any impacts on Security Characteristics.	

6. Is this Proposal considered to be an urgent business need? If so, please explain.	Yes
While "Meter Triage Use Case 001" is welcomed by E.ON and offers us (and other Energy Suppliers) specific benefits, this additional triage use case is believed to offer further opportunities. Having the ability to re-use successfully triaged assets in any DNO region will reduce the volume of compliant SMETS2 assets that are scrapped. All SMETS2 installing suppliers are expected to have built up stocks of part-commissioned or previously installed assets, which our cost-focussed energy consumers and stakeholders will expect us to proactively re-use. Delays to decision-making on this (and other) additional use cases will increase the number of assets being written off and scrapped.	