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# MP113

## ‘Unintended Data Disclosure when using SR8.2’

### Modification Report

Version 0.3



## About this document

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This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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## 1. Summary

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This proposal was raised by Ian Speller (interim Chief Information Security Officer (CISO)) from the Data Communications Company (DCC).

DCC Service Users routinely query the DCC System to discover or validate various customer, property or meter data as part of their business processes. Queries can be generated using various identifiers, including the Meter Point Administration/Reference Number (MPxN), address and postcode, which are all treated as personal data under the General Data Protection Regulation (GDPR).

A known and as-designed behaviour of the current design of the DCC System has been discovered to cause a potential breach in GDPR. If a DCC Service User submits a query to the DCC Systems with a house name/number and postcode, but without a unique reference, the results may return data of an unintended property at a matching postcode.

The Proposer believes that the risk with the current arrangements is that the DCC could return data that could include unintended personal data, which would be a breach of GDPR. Therefore, the DCC System should be changed to prevent this.

## 2. Issue

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### What are the current arrangements?

DCC Service Users routinely query the DCC System to discover or validate various customer, property or meter data as part of their business processes using Service Request (SR) 8.2 'Read Inventory'. Queries can be generated using various identifiers, including the MPxN, address and postcode, which are all treated as personal data under GDPR.

The SEC defines the rules and parameters for use of the query functionality by DCC Users. Suppliers commonly use the query functionality in order to discover the data related to the MPxN including Devices, following a consumer Change of Supplier (CoS) request.

### SRV8.2 'Read Inventory'

Inputs for this Service Request can be the Device ID, MPxN, Unique Property Reference Number (UPRN) (all unique identifiers of a Device or property) or alternatively an address. Specifically, any of the following;

- Device ID
- Device Type
- Device Status
- Device Manufacturer
- Device Model
- Smart Metering Equipment Technical Specifications (SMETS)/ Communications Hub Technical Specifications (CHTS) Version
- Device Firmware Version
- Device Firmware Version Status
- Certified Products List (CPL) Status
- Date Commissioned
- Import MPxN
- Secondary Import MPAN
- Export MPAN
- Electrical Smart Meter Equipment (ESME) Variant
- UPRN
- Property Filter - Post Code and Address Identifier (house name/number) that is combined to identify an address
- Communications Services Provider (CSP) Region

On submission of the 'Property Filter' only, data will be returned and due to variations in address data will not always return the properties requested. It will also allow access to detailed inventory data for Parties who do not have consumer permission to view detail such as the MPAN or MPRN.

### What is the issue?

Investigation into a complaint raised by a Supplier (via a severity Category 1 Incident) has highlighted a known and as-designed behaviour of the DCC System. It is possible for a DCC Service User to submit a query to the DCC System with a house name and postcode, but without a unique reference (e.g. MPxN). This may in certain circumstances return the details of an unintended property at the same postcode.

The Service Request (SR) is detailed in SEC Appendix AD 'DCC User Interface Specification' (DUIS). To allow compliance with SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure', an amendment to the DUIS is required. This would facilitate additional commands and parameters in the DCC System to allow safe queries to be applied when submitted without MPxN or Device specific details.

### What is the impact this is having?

The Proposer believes that the risk with the current arrangements is that the DCC could return data that could include unintended personal data. This is a breach of GDPR, and the SEC Panel and the Security Sub-Committee (SSC) have agreed that this needs to be addressed.

The Proposer believes a change to the current arrangements is required. This should provide a method by which these queries can be carried out, but only return the necessary data and avoid any exposure of Personal Data as defined by GDPR. DCC Users should be able to send these queries without using a unique reference relating to equipment on site i.e. an MPxN or Globally Unique Identifier (GUID).

### 3. Assessment of the proposal

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#### Observations on the issue

##### Change Sub-Committee

The CSC unanimously agreed that the issue has been clearly defined and understood. It recommended that the Panel should convert this Draft Proposal into a Modification Proposal and that it should enter the Refinement Process.

One member recommended that once in refinement, the solution could be based on other Application Programming Interface (API) solutions such as the Electricity Central Online Enquiry Service (ECOES). This would be in the context of how these APIs ensure searches do not breach GDPR.

##### SMKI PMA

The Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) advised that it did not need to be kept updated with the progress of this proposal. However, a member noted that it believed it would not be a GDPR breach if a DCC User discarded any data it should not have received, including as a result from using SR8.2. It advised that a User would be in breach of GDPR if it stored or used the erroneously received data.

##### SSC

The SSC agreed with the issue outlined in this proposal and advised that it was already aware due to the Supplier raised incident mentioned in this document.

## Appendix 1: Progression timetable

On 13 March 2020, the Panel will consider the CSC's recommendation to convert this Draft Proposal into a Modification Proposal and for it to proceed to the Refinement Process.

Timetable	
Action	Date
Draft Proposal raised	28 Jan 2020
Presented to CSC for final comment and recommendations	25 Feb 2020
Panel converts Draft Proposal to Modification Proposal	13 Mar 2020
Business requirements developed with DCC	Apr 2020
Business requirements discussed with SSC	22 Apr 2020
Update Panel	12 Jun 2020

## Appendix 2: Glossary

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

Glossary	
Acronym	Full term
API	Application Programming Interface
CHTS	Communications Hub Technical Specifications
CoS	Change of Supplier
CPL	Certified Products List
CSP	Communications Services Provider
DCC	Data Communications Company
DUIS	DCC User Interface Specification
ECOES	Electricity Central Online Enquiry Service
ESME	Electrical Smart Meter Equipment
GDPR	General Data Protection Regulation
GUID	Globally Unique Identifier
MPAN	Meter Point Administration Number
MPRN	Meter Point Reference Number
PMA	Policy Management Authority
SMETS	Smart Metering Equipment Technical Specifications
SMKI	Smart Metering Key Infrastructure
SSC	Security Sub-Committee
UPRN	Unique Property Reference Number