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DP113

‘Unintended Data Disclosure when using SR8.2’

Modification Report

Version 0.2

About this document

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

This proposal was raised by Ian Speller 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 General Data Protection Regulation (GDPR).

A 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 System with a house name 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 and the System should be changed to prevent this.

2. Issue

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.

What is the issue?

Investigation into a complaint raised by a Supplier (via a severity Category 1 Incident) has highlighted the 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 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).

Appendix 1: Progression timetable

Throughout the month of February, we will seek the views of the Panel Sub-Committees. The proposed timetable for DP113 is for the Draft Proposal to be presented at the next Change Sub-Committee (CSC) meeting for decision and to Panel in March for conversion to a Modification Proposal. If the Panel agrees it should become a Modification Proposal it should then proceed to the Refinement Process.

Timetable	
Action	Date
CSC recommendation that Panel convert into a Modification Proposal	25 Feb 2020
Panel consider the CSC's recommendation	13 Mar 2020
Develop strawman solution with Proposer	16 Mar – 27 Mar 2020
Request Preliminary Assessment	30 Mar 2020
Update Panel	15 May 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
CoS	Change of Supplier
DCC	Data Communications Company
DUIS	DCC User Interface Specification
GDPR	General Data Protection Regulation
GUID	Globally Unique Identifier
MPAN	Meter Point Administration Number
MPRN	Meter Point Reference Number
SSC	Security Sub-Committee