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DP128

‘DCC – Gas Network Operators SMKI Requirements’

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 has been raised by Earl Richards from Cadent Gas.

There is a SEC obligation on all Network Parties (which includes Gas Networks and Gas Transporters) to become Smart Metering Key Infrastructure (SMKI) Subscribers.

Gas Network Operators are required by the Smart Energy Code (SEC) to place their SMKI Organisation Certificates in the SMKI Repository and to undertake SMKI & Repository Entry Process Tests (SREPT). The Proposer believes this is a very expensive process if the Gas Network Party (GNP) does not have the infrastructure to create and maintain the SMKI Keys and to complete SREPT. They also consider this obligation provides no benefit to GNP since they do not receive alerts.

Consequently, the Proposer feels that GNPs have no current benefit in becoming DCC Users.

2. Issue

What are the current arrangements?

There is a SEC obligation on all Network Parties (which includes Gas Networks and Gas Transporters) to become SMKI Subscribers. The original policy intent was to include an obligation on Gas Networks and Gas Transporters, to ensure that the relevant SMKI Organisation Certificates are in the Devices. This will:

- enable a Supplier to know the correct Network Operator; and
- allow for future changes should the Gas Network or Gas Transporter want to become a DCC User and carry on with their SEC obligation.

There are also multiple references throughout the SEC to obligations on Network Parties in general and to gas Network Parties in particular.

What is the issue?

Gas Network Operators are required by the SEC to place their SMKI Organisation Certificates in the SMKI Repository and to undertake SMKI & Repository Entry Process Tests (SREPT). The Proposer believes this is a very expensive process if the Gas Network Party does not have the infrastructure to create and maintain the SMKI Keys and to complete SREPT. They also consider this obligation provides no benefit to Gas Network Operators since they do not receive Alerts. Consequently, the Proposer feels that Gas Distribution Networks have no current benefit in becoming DCC users.

What is the impact this is having?

This obligation is incurring a burden of costs for Gas Network Operators and Gas Transporters where they feel there is no benefit which increases the costs and efficiency of smart metering overall. The Proposer feels are currently no benefits for the Gas Distribution Networks. If the current arrangements are not amended, the unnecessary costs and burden on Gas Networks will continue.

Appendix 1: Progression timetable

This Proposal will be presented to the Change Sub-Committee (CSC) for initial comment on 26 May 2020.

Timetable	
Event/Action	Date
Draft Proposal raised	11 May 2020
Presented to CSC for initial comment	26 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
CSC	Change Sub-Committee
CSP	Communications Service Provider
DCC	Data Communications Company
GNP	Gas Network Party
SEC	Smart Energy Code
SMKI	Smart Meter Key Infrastructure
SREPT	SMKI & Repository Entry Process Tests