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DP128

‘DCC – Gas Network Operators SMKI Requirements’

Modification Report

Version 0.1

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 SMKI Subscribers.

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). This is a very expensive process if the Gas Network doesn't have the infrastructure to create and maintain the SMKI Keys and to complete SREPT and this obligation provides no benefit to Gas Network Operators since they don't receive alerts and don't have any aspirations to become DCC Users issuing critical commands. Gas Distribution networks feel they have no current benefit in becoming DCC users.

This obligation is incurring a large burden of costs for Gas Network Operators and Gas Transporters for no benefit which increases the costs and efficiency of smart metering overall. There are currently no benefits for the Gas Distribution Networks.

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

“Network Parties to become Subscribers

X1.11 Prior to the commencement of the provision of Enrolment Services by the DCC pursuant to Section H5 (Smart Metering Inventory and Enrolment Services), each Network Party shall ensure that it has become a Subscriber for those Organisation Certificates which pertain to it and that are required by Responsible Suppliers for the purpose of complying with their obligations under Clause 5 (Post-Commissioning Obligations) of the Inventory Enrolment and Decommissioning Procedures.”

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). This is a very expensive process if the Gas Network doesn't have the infrastructure to create and maintain the SMKI Keys and to complete SREPT and this obligation provides no benefit to Gas Network Operators since they don't receive alerts and don't have any aspirations to become DCC Users issuing critical commands. Gas Distribution networks feel they have no current benefit in becoming DCC users.

What is the impact this is having?

This obligation is incurring a large burden of costs for Gas Network Operators and Gas Transporters for no benefit which increases the costs and efficiency of smart metering overall. There 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

Table title	
Action	Date
CSC initial consideration	28 Apr 2020
CSC recommendation that Panel convert into a Modification Proposal	28 May 2020
Panel convert Draft Proposal to Modification Proposal	19 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
CSC	Change Sub-Committee
CSP	Communications Service Provider
DCC	Data Communications Company
SEC	Smart Energy Code
SMKI	Smart Meter Key Infrastructure
SREPT	SMKI & Repository Entry Process Tests