MP113 'Unintended Data Disclosure when using SR8.2'

September 2020 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Joe Hehir	SECAS
Joey Manners	SECAS
Tim Newton	Gemserv
David Walsh	DCC
Ian Speller	DCC
Mari Toda	DCC
Robin Seaby	DCC
Glenn Critchley	DCC
Robert Munro	DCC
Simon Trivella	British Gas
Paul Saker	EDF
Alex Hurcombe	EDF
Robert Williams	EON
Alastair Cobb	Landis + Gyr
Elias Hanna	Landis + Gyr
John Noad	Npower
Mahfuzar Rahman	Scottish Power
Emslie Law	SSE/OVO
Matthew Alexander	SSEN
Gemma Slaney	WPD
Rachel Norberg	Utilita

Issue

SECAS stated that his modification resulted from a Category 1 Incident raised by a Supplier which highlighted a known and as-designed behaviour of the DCC System.

Service Reference Variant 8.2 'Read Inventory' is used to pull data from the Smart Metering Inventory (SMI). One of the filters used is the Property Filter, which is the Post Code and Address Identifier (house name/number) that is combined to identify an address.

SECAS advised that on submission of the 'Property Filter' only (i.e. no MPxN), data will be returned and due to variations in address data, it will not always return the properties requested and return the details of an unintended property at the same postcode.

Therefore, it is possible for the SMI to also allow access to detailed inventory data for Parties who do not have consumer permission to view details such as the MPAN or MPRN. The return of the unintended data would be a breach of GDPR.

Proposed Solution

Business requirements

1. The DCC System shall not return personal data for a property when a DCC Service User queries the DCC System using SRV 8.2 'Read Inventory' without providing an MPAN or MPRN

2. DCC Service Users can still obtain information as to whether a Smart Meter installation exists at an address without supplying an MPAN or MPRN, but only returning the basic information required i.e. no detail of equipment installed or identity data such as GUID or MPxN

3. SRV 8.2 shall be able to provide accurate search results where there is more than one Communications Hub at a premise

The Working Group felt more clarity was needed for the requirements. Specifically, in regard to requirement 2, members wanted to know exactly what data should and shouldn't be provided with the provision of a unique reference. One member advised that the Device Type should be made available without the unique reference.

Regarding requirement 3, the DCC sought more clarity on what is meant by "accurate" search results and what the underlying issue is that it is referring to. SECAS advised that an SSC Member had suggested this requirement be investigated as this modification was looking to address SRV 8.2.

Solution options

SECAS presented two solution options in order to facilitate the requirements. It noted that these had been reviewed and recommended by the Security Sub-Committee.

Option 1 – New SRV for basic SMI information

- A new SRV for Users to read the SMI to establish if a Smart Metering System exists at a property, without having to provide a GUID or MPxN

- The new SRV would not return any personal data such as an MPxN

- Existing SRV 8.2 will be restricted so that Users can only use this if they provide an MPxN

Members agreed that their preference would be for no new SRVs to be introduced if it were possible. They questioned the need to search the inventory without a unique reference and whether Parties were actually doing this on a large scale. If not, they agreed that SRV 8.2 should just be changed so

that the provision of a unique reference is mandatory when using it. The DCC believed this would be a relatively low impact change.

SECAS agreed to investigate with Parties how common it is to search the SMI without the provision of a unique reference and the use cases for doing so.

Option 2 – Improve the underlaying SMI search logic

- The DCC are to improve the underlying search logic for SRV 8.2 so there are less errant returns to the query

- This would include consistent references to flat numbers at a single street address and consistent address formulation

Members agreed that the formulation of address data is an issue. The DCC also highlighted the potential difficulties with linking this solution to the Faster Switching Programme, which SSC members had recommended.

The DCC questioned whether MP077 'DCC Service Flagging' would go some way to resolve the issue of address data. A member advised that it would help but it would not solve the underlying issue with data privacy and the SMI that this modification seeks to resolve.

Next steps

The following actions were recorded from the meeting:

- SECAS to investigate with Parties how common it is to search the SMI without the provision of a unique reference and the use cases for doing so.

- SECAS to investigate what data should and should not be returned by the SMI without the provision of a unique reference.

- SECAS to investigate what constitutes "accurate data" when there is more than one Communications Hub at a premise.

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