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# MP128 ‘Gas Network Operators SMKI Requirements’

## Business requirements – version 0.1

### About this document

This document contains the business requirements that support the solution for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

### Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	Suppliers will no longer be permitted to install Devices with Gas Network Operator (GNO) Certificates in the GNO slot of Smart Metering Equipment Technical Specifications (SMETS)2 Gas Proxy Functions (GPFs) and they must ensure that within 7 days of commissioning the GPF, the GNO slot contains an Access Control Broker (ACB) Certificate
2	A Responsible Supplier will place the GNO Certificate in a commissioned SMETS2 GPF only if requested by a GNO that is a DCC User
3	The DCC will update its Post Commissioning reporting to reflect that Suppliers are able to leave the ACB Certificate in the GNO slot of a GPF
4	Where a GNO that is a DCC User intends to cease to be a DCC User, it must replace its Organisation Certificates on the Devices with an ACB Certificate prior to ceasing to be a DCC User
5	It will be optional, not mandatory (as it is currently) for Gas Networks to become Subscribers for Organisation Certificates

## Considerations and assumptions

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This section contains the considerations and assumptions for each business requirement.

### 1.1 General

This solution will be applied to SMETS2 GPFs only.

The SEC does not require GNOs to become DCC Users. Several GNOs who do not wish to be DCC Users have experienced difficulty and disproportionate costs in obtaining SMKI Organisation Certificates and see no benefit to their organisations or wider smart metering by being compelled to make their SMKI Organisation Certificate available in the SMKI Repository.

Once a Network Operator Certificate is placed on a Device, it can only be changed by the Network Operator for the given Certificate and only if the Network Operator systems are capable of doing so. This is particularly relevant where National Grid transferred ownership to Cadent Gas. Now Cadent Gas are the GNO for those Devices but National Grid still has its Certificate held in those Devices. This means that Cadent Gas has no access/communications with those Devices as it is not the registered GNO on the Certificate.

GPFs are manufactured with ACB Certificates already loaded in the GNO slot of the Device. If an ACB Certificate is in the GNO slot in the GPF, then it will be possible in the future to enable that to be replaced with a GNO Certificate, should a GNO wish to become a DCC User and to communicate with the Device.

The following requirements will not resolve those Devices already experiencing the issue highlighted in the scenario above. However, the SMKI PMA has agreed to carry out a Recovery Event as defined in SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' which will resolve the Devices in the Cadent Gas area. This does not require a modification.

### 1.2 Requirement 1: Suppliers will no longer be permitted to install Devices with GNO Certificates in the GNO slot of SMETS2 GPFs and they must ensure that within 7 days of commissioning the GPF, the GNO slot contains an ACB Certificate.

With it being optional for GNOs to become DCC Users, Suppliers shall leave the ACB Certificate in the GNO slot of the GPF.

This will require amendments to SEC Appendix AC 'Inventory, Enrolment and Decommissioning Procedures' (IEDP).

This is expected to be a non-DCC System impacting requirement.

### 1.3 Requirement 2: A Responsible Supplier shall place the GNO Certificate in a commissioned SMETS2 GPF only if requested by a GNO that is a DCC User.

A GNO may choose to become a full DCC User and therefore hold Organisation Certificates. Only a Supplier Party can load the GNO Certificates onto the Device and therefore, where requested by a GNO that is a DCC User, a Supplier must load GNO Certificates onto the applicable Devices.

#### **1.4 Requirement 3: The DCC shall update its Post Commissioning reporting to reflect Suppliers being able to leave the ACB Certificate in the GNO slot of a GPF.**

In accordance with IEDP (5.3), the Responsible Supplier must place the SMKI Certificates for the given Network Operator in the SMETS2 Device within seven days from being commissioned. If the Supplier were to leave the ACB Certificate in the GNO slot of the Device, this would count as a failure against the obligation.

If business requirement 1 is implemented, this obligation must be amended to allow Responsible Suppliers to leave the ACB Certificate in the GNO slot of the Device. The DCC would consequently need to update its reporting on post-commissioning obligations to reflect this.

#### **1.5 Requirement 4: Where a GNO that is a DCC User intends to cease to be a DCC User, it shall replace its Organisation Certificates on the Devices with an ACB Certificate prior to ceasing to be a DCC User.**

This requirement will ensure that where a change in organisation of a GNO occurs, the incoming organisation will be able manage the GNO security credentials on its Devices, if that organisation is a DCC User and chooses to do so.

This will prevent the scenario in which a GNO has placed Organisation Certificates in the SMKI Repository but then transfers ownership to another GNO but did not remove its Organisation certificates. This will leave a large number of Devices with the incorrect GNO Certificate on the Device and no means of changing them through normal business operations.

#### **1.6 Requirement 5: It shall be optional instead of mandatory for Gas Networks to become Subscribers for Organisation Certificates.**

SEC Section B 'Accession' (2.10) requires all Network Parties to become SMKI Subscribers for those Organisation Certificates which pertain to it. They must do this as soon as reasonably practicable after their accession to the SEC.

The Proposer believes this is a very expensive process for Gas Network Parties that do 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 Parties since they do not receive Alerts. Consequently, the Proposer feels that Gas Network Parties currently have no benefit in becoming DCC Users. Gas Network Parties that wish to become SMKI Subscribers must be DCC Users because otherwise they will be unable to replace their Organisation Certificates at the end of life or if there is a SMKI Recovery Event since it requires a Critical Command to replace security credentials which can only be sent by DCC Users.

## Glossary

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

Glossary	
Acronym	Full term
ACB	Access Control Broker
DCC	Data Communications Company
GNO	Gas Network Operator
GPF	Gas Proxy Function
SMETS	Smart Metering Equipment Technical Specifications
SMKI	Smart Metering Key Infrastructure
SREPT	SMKI Repository Entry Performance Testing