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Action:	For Information

MP128 Business Requirements

1. Purpose

The purpose of this document is for the Technical Architecture and Business Architecture Sub-Committee (TABASC) to provide views on the business requirements for [MP128 'Gas Network Operators SMKI Requirements'](#). Specifically, we seek the TABASC views on:

- If the solution is suitable to proceed to Preliminary Assessment?
- If the business requirements are clear and unambiguous?

2. Summary of the proposal

What is the issue?

The SEC does not require Gas Network Operators (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 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 is a DCC User. This is particularly relevant where National Grid transferred ownership to Cadent Gas. Now Cadent Gas, who aren't a DCC User, are the Network Operator 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 Network Operator on the Certificate.

Proposed Solution

The Proposed Solution will be applied to Smart Metering Equipment Technical Specifications (SMETS)2 Gas Proxy Functions (GPFs) only.

GPFs are manufactured with Access Control Broker (ACB) Certificates ready 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.

Therefore, it is proposed that the Post Commissioning obligations be amended so that Suppliers must leave the ACB Certificate in the GNO slot of the Device, unless a GNO that is a DCC User wishes to place its Organisation Certificate on the Device.

Also, it will be optional instead of mandatory for GNOs to become Subscribers for Organisation Certificates.

3. Business requirements

Following discussion at a requirements workshop, a set of business requirements has been developed with input from the Proposer, SMKI PMA, the DCC and the Data Services Provider (DSP).

Ref.	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
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

The full details of the business requirements can be found in Appendix A.

4. Questions for the TABASC

We seek the TABASC's views on the following questions to feed into the business requirements before we request a Preliminary Assessment:

- Is the solution suitable to proceed to Preliminary Assessment?
- Are the business requirements clear and unambiguous?

5. Next steps

Once the TABASC and the Working Group are content that the business requirements are satisfactory, MP128 will be submitted to the DCC for Preliminary Assessment.

6. Recommendations

The TABASC is requested to PROVIDE views on the suitability of the business requirements to deliver the Proposed Solution.

Joe Hehir

SECAS Team

27 May 2021

Attachments:

- **Appendix A: MP128 Business Requirements v0.1**