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MP128A ‘Gas Network Operators SMKI Requirements’

Annex A

Business requirements – version 0.6

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 Data Communications Company (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	Where a Gas Network Operator (GNO) that is a DCC User intends to cease to be a DCC User, it must ensure that its Organisation Certificates on the Devices are replaced with an Access Control Broker (ACB) Certificate prior to ceasing to be a DCC User.
2	A GNO shall submit a Certificate Revocation Request and shall not subscribe to any further Organisation Certificates prior to ceasing to be a DCC User.

Considerations and assumptions

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

1.1 General

This solution will be applied to Smart Metering Equipment Technical Specifications (SMETS)2 Gas Proxy Functions (GPFs) only.

[MP128B 'Gas Network Operators SMKI Requirements'](#) removed the Smart Energy Code (SEC) obligation on Gas Network Parties (GNPs) to become Smart Metering Key Infrastructure (SMKI) Subscribers unless the GNP is also a DCC User.

Following the implementation of MP128B, SEC Appendix AC 'Inventory, Enrolment and Decommissioning Procedures' allows Responsible Suppliers to leave the ACB Certificate in the GNO slot of a GPF Post Commissioning, unless an Organisation Certificate for a GNP that is a DCC User is available in the SMKI Repository. Prior to this implementation, the GNO slot would have to be populated with a GNO Organisation Certificate. However, there is currently no SEC requirement for Organisation Certificates to be removed from a Device if the GNO ceases to be a DCC User.

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. An example of this issue occurred when National Grid transferred ownership to Cadent Gas. Cadent Gas, which wasn't a DCC User, became the Network Operator for a large number of Devices which still held National Grid Certificates. This meant that Cadent Gas had no access to or communications with those Devices, as it was not the registered Network Operator 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.

1.2 Requirement 1: Where a GNO that is a DCC User intends to cease to be a DCC User, it must ensure that its Organisation Certificates on the Devices are replaced 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 without removing its Organisation Certificates, which would leave a large number of Devices with the incorrect GNO Certificate on the Device with no means of changing them through normal business operations.

1.3 Requirement 2: A GNO shall submit a Certificate Revocation Request and shall not subscribe to any further Organisation Certificates prior to ceasing to be a DCC User.

This requirement shall ensure that GNO Organisation Certificates are only held on GPFs where the GNO is a DCC User. This requirement will need to be reflected in SEC Appendix B 'Organisation Certificate Policy', section 4.9.1 (A) 'Circumstances for Revocation'. This would require an additional third sub-bullet (iii) to ensure a Subscriber requests to revoke its Certificates if it no longer intends to be a DCC User. It will also require an addition to SEC Section L11 'Subscriber Obligations'.

Glossary

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
GNP	Gas Network Party
GPF	Gas Proxy Function
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specifications
SMKI	Smart Metering Key Infrastructure