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MP128B 'Incorrect Gas Network Operator Certificates'

Modification Report

Version 0.1

21 September 2021



About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

Contents

1. Summary.....	3
2. Issue.....	3
3. Solution	4
4. Impacts	5
5. Costs	6
6. Implementation approach	7
7. Assessment of the proposal	7
Appendix 1: Progression timetable	11
Appendix 2: Glossary	11

This document also has three annexes:

- **Annex A** contains the business requirements for the full MP128 solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the MP128B Proposed Solution.
- **Annex C** contains the responses received to the MP128 Refinement Consultation (this consultation was issued before the modification was split).

Contact

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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, collectively known as Gas Network Parties (GNPs)) to become Smart Metering Key Infrastructure (SMKI) Subscribers.

GNPs are required by the SEC to place their SMKI Organisation Certificates in the SMKI Repository and to undertake SMKI & Repository Entry Process Tests (SREPT). However, GNPs are not obligated to be DCC Users. Several Gas Network Operators (GNOs) who do not wish to be Data Communications Company (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.

This modification has been split into two parts. The Proposed Solution to this [MP128B 'Incorrect Gas Network Operator Certificates'](#) is that the Post Commissioning obligations be amended so that Suppliers can leave the Access Control Broker (ACB) Certificate in the GNO slot of the Gas Proxy Function (GPF). It will also be optional instead of mandatory for GNOs to become Subscribers for SMKI Organisation Certificates.

[MP128A 'Gas Network Operators SMKI Requirements'](#) seeks to separately address the issue where there is a change in organisation for the GNO on a Device, the incoming GNO will be unable to communicate with the Device if the previous GNO's Organisation Certificates are present. To provide a more robust solution, further reducing the risk of incorrect SMKI Organisation Certificates being present on a Device, changes are needed to the DCC Systems and Service Provider.

Suppliers and GNOs will be impacted by MP128B. DCC System changes are not necessary for the delivery of this modification, and therefore there are no DCC or SEC Party costs associated with this change. Implementation is targeted for February 2022. This modification is a Self-Governance Modification.

This modification also corrects a typographical error in SEC Appendix AC, which can be viewed in Annex B.

2. Issue

What are the current arrangements?

SEC Section B 'Accession' 2.10 currently requires all Network Parties (which includes Gas Networks and Gas Transporters) to become SMKI Subscribers.

Suppliers have an obligation in SEC Appendix AC 'Inventory, Enrolment and Decommissioning Procedures' to place Supplier and Network Operator SMKI Certificates on Devices Post Commissioning of Smart Metering Equipment Technical Specifications (SMETS) 2+ Devices.

The original policy intent was to include an obligation on GNPs, to ensure that the relevant SMKI Organisation Certificates can be placed by Suppliers and held on Devices. This allows:

- a Supplier to know the correct Network Operator; and

- future changes of status should the GNP want to become a DCC User.

What is the issue?

The SEC does not require GNPs 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.

Suppliers are responsible for placing the GNO SMKI Certificate on a Device at install. 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. Therefore, if the incorrect SMKI Certificate is placed on a Device by the Supplier's installer, if the GNO is no longer a DCC User, the Certificate cannot be changed.

What is the impact this is having?

The obligation to be a SMKI subscriber is incurring an unnecessary burden for GNOs where they feel there is no benefit in becoming DCC Users. If the current arrangements are not amended, the unnecessary costs and burden on Gas Networks will continue.

Additionally, obligating Suppliers to place GNO Organisation Certificates on Devices increases the risk of being unable to exchange those Certificates if the incorrect Certificate has been used.

Impact on consumers

This issue does not directly impact consumers.

3. Solution

Proposed Solution

Based on current arrangements, there are no grounds for a GNO having a mandatory obligation to place their SMKI Organisation Certificates in the SMKI Repository. Therefore, the solution seeks to make it optional for GNOs to place their Organisation Certificate in the SMKI Repository. During discussions with the Working Group and the Security Sub-Committee (SSC) it was agreed that flexibility must be provided as there may be GNOs who do wish to become DCC Users either now or in the future.

The solution seeks to amend the obligation on Suppliers in SEC Appendix AC to ensure that where an unrevoked SMKI Organisation Certificate for a GNO that is a DCC User exists, then the Supplier should put it onto the Device Post Commissioning. Where there is no GNO Organisation Certificate available in the SMKI Repository, the Supplier shall leave the ACB Certificate in the Device.

The solution also adds an obligation for GNOs to become a DCC User if they intend to become a Subscriber for SMKI Organisation Certificates.

The business requirements for the full MP128 solution can be found in Annex A. MP128B is progressing Requirements 1, 2 and 6 only, with the remaining requirements being covered under MP128A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators	✓	Gas Network Operators
✓	Other SEC Parties		DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers	✓	Meter Installers
✓	Device Manufacturers		Flexibility Providers

Suppliers

As the Party responsible for ensuring correct Certificates are present on the Device, Suppliers may need to update their Installation and Commissioning procedures.

Gas Network Operators

GNOs may have to update their internal processes to ensure they are not attempting to subscribe for SMKI Organisation Certificates unless they are also DCC Users. They may also have to introduce a check to ensure that they are submitting a Certificate Revocation Request if they intend to cease being DCC Users.

Meter Installers

Suppliers are ultimately responsible for ensuring the correct Certificates are present on the Device. However individual Supplier processes may vary in delegating the action of placing the Certificates on the Device.

Device Manufacturers

Suppliers may contract Device Manufacturers to place ACB Certificates on a Device as default during the manufacturing process.

DCC System

This modification will have no impact on DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section B 'Accession'
- Appendix AC 'Inventory, Enrolment and Decommissioning Procedures'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Consumers

There are no impacts to consumers from this modification.

Other industry Codes

There are no impacts to other industry Codes from this modification.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions from this modification.

5. Costs

DCC costs

There are no DCC costs to implement this modification.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There are no costs for SEC Parties associated with implementing this modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **24 February 2022** (February 2022 SEC Release) if a decision to approve is received on or before 10 February 2022; or
- **10 Working Days following approval** if a decision to approve is received after 10 February 2022.

For the purposes of mitigating further costs to industry of resolving incorrect certificate instances, it is important these changes are introduced to the SEC at the earliest opportunity. SECAS will aim to include this in the February 2022 SEC Release, however if this is not possible an ad hoc release may be necessary.

7. Assessment of the proposal

Observations on the issue

When the original modification was discussed with the Change Sub-Committee (CSC) members, it was agreed the issue was clearly defined. A CSC member had concerns on how the change would affect Suppliers moving forward. SECAS confirmed that Suppliers will be required to ensure they place the Gas Network Organisation Certificates on Devices where a SMKI Certificate exists and a ACB Certificate where no Gas Network Organisation Certificate exists.

The SMKI Policy Management Authority (PMA) agreed that the GNP obligations were initially included in the SEC as future proofing, but the benefits expected may no longer be realised. Furthermore, a member outlined there could be increased risks if GNOs are required to have Certificates on Gas Smart Metering Equipment (GSME), as GNPs are unable to update Certificates if the Device moves to another Network Operator after the sale of a Gas Network business, for example. This would result in the incoming organisation fulfilling the role of the GNO being unable to communicate with the Device. MP128A will deal with a DCC System change to address this issue.

The SSC agreed with the SMKI PMA that the obligation was put in place initially as future proofing. They were supportive of making the requirement optional rather than mandatory.

When the Proposer raised this modification the costs to become a SMKI Subscriber were estimated by the Proposer to be around £100,000. However, following the Trusted Service Provider (TSP) re-procurement the costs have reduced to around £100. However, the SSC and the SMKI PMA agreed that GNPs should have the option to become SMKI Subscribers and DCC Users.

Solution development

Post Commissioning obligations

The initial solution from the Proposer was to change the obligation in SEC Section X1.11. However, following advice from the SMKI PMA, the solution was developed into focusing on SEC Appendix AC.

The updated solution seeks to amend the obligation on Suppliers in Appendix AC to clarify that, where a SMKI Organisation Certificate for a Gas Network Operator or Gas Transporter exists, then they should put it onto the Device Post Commissioning and where no Network Organisation Certificate exists the Supplier should use the ACB Certificate. This is to avoid Suppliers being required to select a GNO Certificate where none is available.

Rules for Commissioning with GNP Organisations Certificates

The business requirements originally stated that Suppliers should place a GNO Certificate on the GPF only when asked by a GNO that is a DCC User.

A Supplier raised concern with the wording of this requirement, as it would require Suppliers to make bilateral agreements with each of the GNOs which would be difficult to manage. It preferred the requirement to be that if a Supplier knows there is a GNO Certificate available in the repository, then it would automatically put it on the GPF, rather than waiting for the GNO to ask it to. The Supplier advised that this process is already being followed due to current issues with getting GNOs to upload Certificates to the repository. It confirmed that in cases where it cannot obtain the GNO Certificate, it would place an ACB Certificate on the GPF instead. Another Supplier agreed with the points above. It believed that the process would not work if Suppliers had to work based on a request by a specific GNO.

It was therefore agreed that Suppliers will leave ACB Certificates on the GNO slot of the GPF unless there is a GNO Certificate available in the repository, in which case, the Supplier will automatically put it on rather than wait to be asked by the GNO.

Amending GNP Certificates following a sale of a Gas Network Business

The Proposer also highlighted that they were the owners of a cohort of Devices that were bought from another Gas Network Business. Suppliers had placed the previous company's SMKI Certificates on the Devices. Since there is no way for a GNO taking ownership of those Devices to change the Certificates, the Proposer had not been able to change the Certificates and furthermore was not able to communicate with those Devices. Under MP128A the Proposed solution is to enable a DCC System change to enable an 'outgoing' GNO to remove their Certificates and the 'incoming' GNO to replace their Certificates. [MP128B 'Incorrect Gas Network Operator Certificates'](#) was raised to deliver the necessary changes to Supplier and GNO obligations in the SEC, and [MP128A 'Gas Network Operators SMKI Requirements'](#) is intended to deliver the changes to the DCC System and DCC Post Commissioning reporting required for an enduring solution.

Splitting the MP128 solution

An additional issue was identified during the investigation of this modification where a GNO Certificate has been placed on a meter and is either incorrect or a company has been bought by another rendering the Certificate incorrect, the GNO is unable to communicate with the meter. Following the Refinement Consultation, the SMKI PMA sought for the non-DCC System parts of the MP128 solution to be implemented quicker to mitigate this issue as soon as possible. The Proposer agreed to this, and subsequently split MP128 into two separate parts to facilitate this.

The legal text changes intended to be delivered by this MP128B are designed to meet Requirements 1, 2 and 6 in Annex A. Requirements 3, 4 and 5 are intended to be met by the implementation of

MP128A. The Preliminary Assessment completed under MP128 does not apply to the requirements included under MP128B.

Support for Change

The SMKI PMA is supportive of the requirements included under MP128B being progressed to decision separately as soon as possible.

All five respondents to the Refinement Consultation (which was issued before the modification was split into MP128A and MP128B) were GNPs. All respondents noted that the change would have no or very minor impacts or cost on their business. They believed that the Proposed Solution should be approved and would promote efficiency.

Business Case for Change

Advantages to implementing this change

- GNPs that believe they receive no benefit from being a DCC User will not be obligated to place their SMKI Organisation Certificates in the SMKI Repository or to undertake SREPT and will therefore not incur any associated costs.
- In the event of a Gas Network Organisation (that is not a DCC User) being sold, the Certificates held on Devices will no longer become obsolete with no way to change them except a site visit and possibly replacement of the Device.

Disadvantages of implementing this change

- Some Suppliers may have to update training for installers to ensure they understand the change to the process.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification better facilitates SEC Objective (d)¹ by providing optionality for GNPs to not undergo the SREPT, which the Proposer believes would be more cost-efficient.

Industry views

The Refinement Consultation respondents also agreed that this better facilitated SEC Objective (d).

One respondent also believed this modification better facilitated SEC Objective (g)² as this change will remove unnecessary costs and obligations.

¹ To facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy.

² To facilitate the efficient and transparent administration and implementation of this Code.

Views against the consumer areas

Improved safety and reliability

The Modification Proposal is neutral against this consumer benefit area.

Lower bills than would otherwise be the case

The Modification Proposal is neutral against this consumer benefit area.

Reduced environmental damage

The Modification Proposal is neutral against this consumer benefit area.

Improved quality of service

The Modification Proposal is neutral against this consumer benefit area.

Benefits for society as a whole

The Modification Proposal is neutral against this consumer benefit area.

Appendix 1: Progression timetable

This modification will be presented to the CSC on 28 September 2021 for approval to progress to the Report Phase. If approved, this will be issued for Modification Report Consultation and then referred to the Change Board for vote on 27 October 2021 under Self-Governance.

Timetable	
Event/Action	Date
MP128 Draft Proposal raised	11 May 2020
Presented to CSC for initial comment	26 May 2020
Panel converts Draft Proposal to Modification Proposal	19 Jun 2020
Solution development with Proposer	W/C 21 Jun 2020
Modification discussed at SMKI PMA	21 Jul 2020
Modification discussed at SSC	22 Jul 2020
Modification discussed at Working Group	5 Aug 2020
Refinement Consultation	17 Aug – 7 Sep 2020
Business requirements developed with Proposer	Jan – Mar 2021
Modification discussed at SMKI PMA	18 May 2021
Modification discussed at Working Group	2 Jun 2021
Modification discussed at TABASC	3 Jun 2021
Preliminary Impact Assessment requested	6 Jul 2021
Preliminary Impact Assessment returned	10 Aug 2021
MP128 split into MP128A and MP128B	10 Sep 2021
Modification Report approved by Change Sub-Committee	28 Sep 2021
Modification Report Consultation	29 Sep – 18 Oct 2021
Change Board Vote	27 Oct 2021

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
ACB	Access Control Broker
CSC	Change Sub-Committee
DCC	Data Communications Company
GNO	Gas Network Operator
GNP	Gas Network Party
GPF	Gas Proxy Function
GSME	Gas Smart Metering Equipment

Glossary	
Acronym	Full term
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMKI	Smart Metering Key Infrastructure
SMKI PMA	SMKI Policy Management Authority
SREPT	SMKI & Repository Entry Process Tests
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSP	Trusted Service Provider