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MP128B ‘Incorrect Gas Network Operator Certificates’

Annex C

Refinement Consultation responses

About this document

This document contains the non-confidential collated responses received to the MP128 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	Yes	Cadent agrees that the proposed solution if once implemented will benefit not only the consumer experience but the obligation on Gas Networks and suppliers. This solution will benefit the smart programme overall.
Wales & West Utilities	Gas Network Party	Yes	Wales & West Utilities Limited agrees with the solution as it will remove the obligation on Suppliers to install GNO SMKI Organisation Certificates on any future Gas Smart Meter installs. It will also remove the obligation on GNOs to maintain their SMKI infrastructure along with the associated costs.
SGN	Gas Network Party	Yes	We agree that the obligation on Suppliers to install GNO SMKI Organisation Certificates on gas meters should be removed.
Northern Gas Networks	Gas Network Party	Yes	NGN understands the proposed solution and believes that it's implementation will be to the benefit of Gas Network Parties, Customers and the smart meter programme as a whole
ESP Utilities Group	Gas Network Party	Yes	We agree with the rationale provided by the proposer that implementing the proposed solution would seek to remove burdens on Gas Network Parties that do not contain an inherent benefit to any SEC parties and was initially implemented as a method to 'future-proof' rather than solve an underlying issue.

Question 2: Will there be any impact on your organisation to implement MP128?

Question 2			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	No	The only impact will be positive that Cadent will not be required to go through the SREPT process again.
Wales & West Utilities	Gas Network Party	No	The Smart Gas Meters are not owned by the GNOs and so we do not need to remotely connect to them. Furthermore, GNOs are not Full DCC Users and the data available, via the DCC, does not contain any useable data to economically enhance the management of our networks.
SGN	Gas Network Party	No	GNOs do not need to remotely connect to gas meters as they are not our assets and they do not hold any useable information that could be utilised to manage our networks. GNOs do not access any critical commands via DCC so our SMKI infrastructure is mainly redundant.
Northern Gas Networks	Gas Network Party	No	There will be no detrimental impact to NGN with the implementation of MP128.
ESP Utilities Group	Gas Network Party	No	We will not face any impacts to implement MP128.

Question 3: Will your organisation incur any costs in implementing MP128?

Question 3			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	No	There will be no costs to Cadent if implemented what again is another positive.
Wales & West Utilities	Gas Network Party	Yes	Any costs would be minimal to decommission our HSM (High Security Module) and dedicated LAN (Local Area Network) connections. Any redundant equipment will be reused within Wales & West Utilities Limited.
SGN	Gas Network Party	Yes	Only decommissioning costs around our HSM and dedicated LAN connections but we see this as minimal. All redundant kit will be reused within our organisation.
Northern Gas Networks	Gas Network Party	No	There will be minimal costs to decommission the HSM (The Hardware Security Module needed to generate and store the SMKI keys), however these are not considered to be material. There will also be cost savings achieved due to no longer having to maintain the HSM, though, again, these are not considered to be material. These costs would be ongoing should MP128 not be implemented.
ESP Utilities Group	Gas Network Party	No	-

Question 4: Do you believe that MP128 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	Yes	Cadent believes that the implementation of MP128 would simplify the overall installation process for smart meters whilst not impacting the operation of the smart meter itself. All SEC parties would benefit from this simplified process. It also removes an obligation on suppliers to apply the certificates meaning there will be less mistakes and error in applying the wrong network certificate.
Wales & West Utilities	Gas Network Party	Yes	By removing this obligation, it will eliminate the potential for Suppliers to install the wrong GNO SMKI Certificates on Smart Gas Meters. It should also make the Suppliers' installations more straightforward and save costs.
SGN	Gas Network Party	Yes	It removes the Supplier obligations to install GNO SMKI Certificates thus making the installation of a smart meter simpler as less tasks to do and less mistakes are possible.
Northern Gas Networks	Gas Network Party	Yes	NGN believes that the implementation of MP128 would simplify the installation and enrolment process for smart meters, whilst not detrimentally impacting the manufacture, operation or output of the meter itself. All parties would benefit from this simplified process. MP128 also removes an obligation on suppliers, negating any need for them to monitor/manage this obligation.
ESP Utilities Group	Gas Network Party	Yes	We believe SEC objectives D and G are better facilitated as this change removes unnecessary costs and obligations, from the code, thus improving on those objectives respectively

Question 5: Noting the costs and benefits of this modification, do you believe MP128 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	Yes	Implementation of MP128 will benefit all SEC parties with little or no cost.
Wales & West Utilities	Gas Network Party	Yes	As mentioned in our answer to Question 5, it will be a task that Suppliers no longer need to do and should result in a cost saving. Also, it will remove the obligation for GNOs to hold and make SMKI Certificates available to Suppliers, as GNOs receive no benefits from this responsibility.
SGN	Gas Network Party	Yes	GNOs derive no benefits from having to hold and make SMKI Certificates available to Suppliers. It also removes a post completion obligation on Suppliers to check that the correct GNO SMKI Certificate has been installed. Suppliers incur additional cost if they have to revisit a meter to correct any GNO SMKI Certificate errors.
Northern Gas Networks	Gas Network Party	Yes	NGN believes that the implementation of MP128 is to the benefit of all SEC parties, with little or no cost or effort to implement.
ESP Utilities Group	Gas Network Party	Yes	Given the benefits of this modification, we believe MP128 should be approved.

Question 6: How long from the point of approval would your organisation need to implement MP128?

Question 6			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	0 Months	Cadent would implement MP128 immediately.
Wales & West Utilities	Gas Network Party	A few days to plan the activity into our maintenance schedule.	The only activity would be to decommission the HSM and LAN connections.
SGN	Gas Network Party	Immediate	SGN would decommission our HSM and dedicated LAN links. All the redundant kit would be repurposed for other SGN usage.
Northern Gas Networks	Gas Network Party	0-3 Months	NGN could implement MP128 almost immediately. The decommissioning of our HSM for SMKI purposes would be required.
ESP Utilities Group	Gas Network Party	-	-

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	Yes	Cadent believes that the implementation of MP128 approach is the simplest and most effective.
Wales & West Utilities	Gas Network Party	Yes	The implementation of MP128 is simple and has minimal cost implications.
SGN	Gas Network Party	Yes	Simple and straight forward at minimal cost.
Northern Gas Networks	Gas Network Party	Yes	NGN believes that the implementation approach is the simplest and most effective way to achieve the desired outcome.
ESP Utilities Group	Gas Network Party	Yes	We support the implementation approach as proposed in the modification report.

Question 8: Do you agree that the legal text will deliver MP128?

Question 8			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	Yes	The text is clear in Section 5.3(a) and 6.2(b). However, we would like to see section 6.2(b) mirror 5.3(a) by removing the words Gas Transporter.
Wales & West Utilities	Gas Network Party	Yes	Generally, we agree with the legal text, as it removes the Gas Transporter from the Device Security Credential checks under Network Parties (Section 5.3(a)). However, this also needs to be replicated in Section 6.2(b) which can be achieved by removing the reference to Gas Transporter.
SGN	Gas Network Party	Yes	The legal text appears to remove the Gas Transporter (GNO) from the Device Security Credential checks under Network Parties. Section 5.3(a) and 6.2(b). However, we would like to see section 6.2(b) mirror 5.3(a) by removing the words 'Gas Transporter'.
Northern Gas Networks	Gas Network Party	Yes	The text provided appears to meet the intent of the modification proposal, with the following amendment: that section 6.2(b) mirror 5.3(a) by adding the 'Electricity' before 'Network Party' and removing 'Gas Transporter (as applicable)
ESP Utilities Group	Gas Network Party	Yes	We are satisfied that the legal text delivers the intent of MP128.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP128 is implemented?

Question 9			
Respondent	Category	Response	Rationale
Cadent Gas Ltd	Gas Network Party	Yes	Cadent believes that the installation process will be simpler by not having to install an unused SMKI Certificate.
Wales & West Utilities	Gas Network Party	Yes	The Gas Smart Meter installation will be more straight forward, as the unused SMKI Certificate will not have to be installed. Costs associated with this and the administration of ensuring the correct GNO SMKI Certificate has been applied should benefit the consumer.
SGN	Gas Network Party	Yes	Smart installations will be simpler by not having to install an unused SMKI Certificate. Supplier will have less administration to do as they no longer have to figure out which GNO SMKI Certificate is required for every postcode.
Northern Gas Networks	Gas Network Party	Yes	NGN do not believe that there will be any detrimental impact to consumers if MP128 is implemented, however consumers will benefit indirectly from the simplified installation process and suppliers no longer having the overhead of maintaining compliance with the obligation to install the correct GNP Organisation certificate on each meter.
ESP Utilities Group	Gas Network Party	No	We have not identified any impacts to consumers if MP128 is implemented.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
Cadent Gas Ltd		<p>By implementing MP128 it will prove beneficial not just for the Gas Network Operators but the overall programme. Ranging from the consumer experience of having a smart meter installed to the installation end to end process.</p> <p>By removing the GNO SMKI Certificate on a meter you also remove a possible route for a cyber-attack on meters that could result in a GNO paying £millions to rectify even though GNOs never access a meter for reads.</p> <p>Ofgem have also highlighted in the GDN RIIO-2 draft determinations that they saw no evidence that GNOs would be obligated to join DCC, This is a further reason for implementing MP128.</p>
		<p>Evidence from DNOs has confirmed that many Smart Electricity Meters have been installed with an incorrect DNO SMKI Certificate. Meters with an incorrect certificate cannot be accessed by the DNO for that network. GDNs are not Full DCC Users and cannot check that the correct certificates have been applied in their respective networks. This can only be checked by the DCC, putting an extra burden on their resources.</p> <p>The recent RIIO-GD2 draft determinations published by Ofgem do not suggest that GDNs will be mandated to become Full DCC Users.</p> <p>Removing this obligation from GNOs would also eliminate a potential route for a cyber-attack on the Smart Meter infrastructure</p>
SGN	Gas Network Party	<p>Post commissioning checks by DNOs have shown that Suppliers regularly put the incorrect DNO SMKI Certificate on a meter making DNO access impossible. GNOs suspect that the same problem is happening with our SMKI Certificates.</p>

Question 10		
Respondent	Category	Comments
		<p>By removing the GNO SMKI Certificate on a meter you also remove a possible route for a cyber attack on meters that could result in a GNO paying £millions to rectify even though GNOs never access a meter for reads.</p> <p>Ofgem also highlighted in GDN RIIO-2 draft determinations that they saw no evidence that GDNs would be obligated to join DCC,</p>
Northern Gas Networks	Gas Network Party	NGN do not anticipate any obligation being placed on GNPs to become full members of the DCC. This is a further reason for the implementation of MP128
ESP Utilities Group	Gas Network Party	No further comments.