

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

## MP128 ‘Gas Network Operators SMKI Requirements’

### September 2021 Working Group – meeting summary

#### Attendees

Attendee	Organisation
Ali Beard	SECAS
Bradley Baker	SECAS
Kev Duddy	SECAS
Mike Fenn	SECAS
Joey Manners	SECAS
Julian Hughes	TABASC
Gordon Hextall	SSC / SMKI PMA
Tosin Adeoye	DCC
Arlene Brown	DCC
Janine Hughes	DCC
Del Kang	DCC
Remi Oluwabamise	DCC
David Walsh	DCC
Nathan Williams	DCC
Eleanor Taylor	BEIS
Sarah-Jane Russell	British Gas
Tristan Fowler	ENSEK
Daniel Davies	ESG Global
Alastair Cobb	Landis & Gyr
Ralph Baxter	Octoenergy
Michael Walls	Ofgem
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Robert Johnstone	Utilita
Kelly Kinsman	WPD
Gemma Slaney	WPD

## Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issues and potential solutions identified in [MP128 'Gas Network Operators SMKI Requirements'](#), the draft business requirements, and the Data Communications Company's (DCC's) Preliminary Assessment response.

## Issue

- Once a Network Operator (NO) Certificate is placed on a Device, it can only be changed by the NO for the given Certificate and only if the NO is a DCC User.
- Several Gas Network Operators (GNOs) who do not wish to be DCC Users have experienced difficulty and disproportionate costs in obtaining Smart Metering Key Infrastructure (SMKI) Organisation Certificates and see no benefit to doing so.

## Proposed Solutions

- Suppliers must leave the Access Control Broker (ACB) Certificate in the GNO slot of the Device, unless a GNO is a DCC User and has its Certificates available in the SMKI repository.
- It will be optional instead of mandatory for GNOs to become Subscribers for Organisation Certificates.

## Business Requirements

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 the GNO is a DCC User and has its Certificate available in the SMKI Repository.
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	A GNO shall submit a Certificate Revocation Request and shall not subscribe to any further Organisation Certificates if it no longer intends to be a DCC User.
6	It will be optional, not mandatory (as it is currently) for Gas Networks to become Subscribers for Organisation Certificates.

## Working Group Discussion

SECAS provided an overview of the background to the modification, and a summary of the DCC's Preliminary Impact Assessment response. SECAS presented the current draft of the business requirements, noting that potential re-wording of Requirements 1 & 2 had already been highlighted. SECAS noted that the DCC had advised that only Requirement 4 would necessitate a change to the DCC Total System, and provided the details of the Data Service Provider (DSP) technical solution for Requirement 4.

SECAS asked the Working Group to note potential changes to the business case for MP128:

1. The planned execution of the SMKI Key Recovery Test, which will provide a one-off fix to the specific issue of Cadent Gas Devices still containing National Grid Gas PLC Certificates.
2. The reduced cost to GNOs of obtaining SMKI Organisation Certificates following the re-procurement of the Trusted Service Provider.

The SMKI PMA Chair pointed out that planned SMKI Key Recovery to correct incorrect GNO Certificates is unrelated to this SEC Modification. SECAS also asked the Working Group to note that the Department for Business, Energy & Industrial Strategy (BEIS) have questioned the validity of the proposed solution method, specifically with regards to which Trust Anchor Cells will be populated.

One Working Group member questioned whether Requirement 4 was possible, asking if GNOs are able to send SRV 6.15.1 with an ACB Certificate. Another member stated Certificate processes are heavily audited for security purposes, and that they should therefore work as documented. Another member stated that the correct process is for Suppliers to request the DCC place an ACB Certificate on a Device, and that this is an issue with the wording of Requirement 4. SECAS took an action to establish the exact method and clarify the business requirements, if necessary.

One member questioned the costs and business benefit if the modification would only resolve the Cadent issue. The Chair of the SMKI PMA responded that this modification which would provide an enduring solution should not be confused with the SMKI Key Recovery Test. The Proposer is aware of the potential changes to the business case due to the reduction in cost of GNOs obtaining Organisation Certificates, and still wishes this modification to proceed, as there is still a need for an enduring solution to the issue.

One member stated that the Modification Report makes too much mention of Cadent Gas, making the modification sound like a one-off fix for this specific instance. Another member agreed, and requested that the wording of the problem statement be amended to reflect the way the issue has evolved since it was raised. SECAS agreed to make the wording clearer.

## Next Steps

The following actions were recorded from the meeting:

- SECAS to discuss the Business Requirements with the DCC and clarify the solution methodology.
- SECAS to update the Modification Report to reflect the recent discussions and changes to wording.
- Following clarifications and amendments, SECAS to issue modification for Refinement Consultation.