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## MP134B ‘Use of SMKI Certificates relating to a SoLR event – Part 2’

### November 2021 Working Group – meeting summary

#### Attendees

Attendee	Organisation
Ali Beard	SECAS
Khaleda Hussain	SECAS
Kev Duddy	SECAS
Mike Fenn	SECAS
Joey Manners	SECAS
Anik Abdullah	SECAS
Andrew Firth	AltHANCo
David Jones	AltHANCo
David Walsh	DCC
Robin Seaby	DCC
Easton Brown	DCC
Sarah-Jane Russell	British Gas
Julie Geary	E.ON
Alex Hurcombe	EDF Energy
Daniel Davis	ESG Global
Terry Jefferson	EUA
Alastair Cobb	Landis + Gyr
Ralph Baxter	Octopus Energy
Michael Walls	Ofgem
James Doyle	Outfox the Market
Emslie Law	Ovo Energy
Mafs Rahman	Scottish Power
Eric Taylor	SLS Corp
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Robert Johnstone	Utilita
Gemma Slaney	WPD
Kelly Kinsman	WPD

## Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified, the business requirements, the proposed solution, the DCC Preliminary Assessment findings and the proposed next steps.

## Issue

- Where a Supplier undergoes a disorderly exit from the market the Smart Metering Key Infrastructure (SMKI) PMA has the authority to delay revocation of the failed Suppliers SMKI Certificates.
- There is a concern that this does not fit with the Security Trust Model.

## Proposed Solution

- The proposed solution is to develop a new use case 'Supplier of Last Resort (SoLR) Contingency'.

## Business Requirements

1. A new User role is created with roles as defined in Appendix AD 'DCC User Interface Specification' (DUIS).
2. Smart Energy Code (SEC) Parties acting in that User Role can subscribe for Extensible Markup Language (XML) Signing Certificates, but not Digital Signing Keys for signing Critical Commands.
3. The new User Role will only be able to send Service Request 1.6 'Update Payment Mode'. The solution should be configurable to enable other Service Request to be added to the list of SRVs that this User Role is eligible to use.
4. Parties acting in this User Role must be able to create Authorised Responsible Officers (AROs) and Senior Responsible Officers (SROs) to enable submission of Anomaly Detection Threshold (ADT) files that will allow the new User Role to send Service Requests to Devices registered to a specific Supplier.
5. The content of the Service Request (for SMETS1 Devices) and Signed Pre-Command (for SMETS2+ Devices) must be checked to only accept change Payment Mode to Credit.
6. The default position will be that Users in this User Role will only be able to send the Service Requests listed in requirement 3 and will only be able to do so in the event of a Supplier failure and upon specific instruction from the Authority. Additional validation is set out in this requirement.
7. The DCC should remain able to send Alerts to the Supplier after the Supplier's Certificates have been revoked (noting that they will be routed to the failed Supplier's SRP).

## DCC Preliminary Impact Assessment findings

- A total cost of £632,500-£1,082,500 to Pre-Integration Testing (PIT).
- A timescale up to PIT is three to six months.

- A total cost to complete the DCC Impact Assessment is £28,020.
- Time to complete the DCC Impact Assessment is 30 Working days.

## Working Group Discussion

SECAS (AB) provided an overview of the meeting objectives, the issue and the business requirements, the Proposed Solution and the DCC Preliminary Assessment findings. The Working Group noted the issue and provided no further comments.

SECAS (AB) provided the update on MP134B consumer benefits and highlighted there is no consumer benefits in delaying SMKI certificates but there is the benefit of an increased security element. MP134B will benefit against SEC objective (f), to ensure the protection of data and the security of data and systems in the operation of the SEC. A Working Group member (DD) highlighted they are not supportive of MP134B considering there are no consumer benefits and the likelihood of costs involved to Shared Resource Providers (SRPs) be high and was not in favour of the idea. The Working Group discussed the negative impact of changing prepayment customers to credit customers and the changing of modes will add confusion to consumers. Another Working Group member (SR) supporting this by saying prepayment customers will be the most impacted and disadvantaged and queried if there was another solution which could be explored. They questioned if the change will not be in effect until 2023 what the benefit was considering the cost and the time the solution is required to cover to be short (a few days between Supplier failure and appointment of a SoLR). SECAS (AA) advised an alternative solution may be a product of the faster switching changes which are soon to be implemented and agreed there will be instances where the period of the issue will be short, but it will still be an existing problem. The Working Group highlighted that the cost is expensive for potentially a little benefit for a short period of time. SECAS (AA) advised this was discussed as being the highest risk to this modification and the second highest risk was the behaviour change which customers will be going through, specifically prepayment customers.

The Proposer (EB) advised we could potentially put this modification on hold until faster switching has been delivered to determine if it is still a problem following faster switching. The Proposer agreed with Working Group members moving from prepayment mode to credit mode is not ideal. A DCC member (DW) highlighted MP134B has not shown much support from members and that the DCC believed that it was very expensive for a change so short. It was suggested that the Proposer consider withdrawing the modification. SECAS (AB) iterated the withdrawal process to the Working Group members who noted the steps. SECAS will speak to the Proposer outside of the Working Group regarding the concerns raised. If the Proposer decides to continue the next steps will be to moving onto a consultation which will show what level of support MP134B has.

The Working Group noted the next steps and provided no further comment.

## Next Steps

The following actions were recorded from the meeting:

- SECAS to discuss with the Proposer regarding the concerns raised at the meeting.
- SECAS to issue MP134B for a Refinement Consultation to understand the appetite for the modification from the industry.