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MP128A ‘Gas Network Operators SMKI Requirements’

Annex A

Business requirements – version 0.3

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	The DCC shall update its Post Commissioning reporting to reflect that Suppliers are able to leave the Access Control Broker (ACB) Certificate in the Gas Network Operator (GNO) slot of a Gas Proxy Function (GPF).
2	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.
3	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 GPFs only.

The Smart Energy Code (SEC) does not require GNOs to become DCC Users. Several 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 their organisations or wider smart metering by being compelled to make their SMKI Organisation Certificate available in the SMKI Repository.

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 systems are capable of doing so. This is particularly relevant where National Grid transferred ownership to Cadent Gas. Now Cadent Gas are the GNO for those Devices but National Grid still has its Certificate held in those Devices. This means that Cadent Gas has no access/communications with those Devices as it is not the registered GNO 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.

The following requirements will not resolve those Devices already experiencing the issue highlighted in the scenario above. However, the SMKI Policy Management Authority (SMKI PMA) has agreed to carry out a Recovery Event as defined in SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' which will resolve the Devices in the Cadent Gas area. This does not require a modification.

1.2 Requirement 1: The DCC shall update its Post Commissioning reporting to reflect that Suppliers are able to leave the ACB Certificate in the GNO slot of a GPF.

In accordance with Inventory Enrolment and Decommissioning Procedures (IEDP) (5.3), the Responsible Supplier must place the SMKI Certificates for the given Network Operator in the SMETS2 Device within seven days from being commissioned. If the Supplier were to leave the ACB Certificate in the GNO slot of the Device, this would count as a failure against the obligation.

Following the implementation of [MP128B 'Incorrect Gas Network Operator Certificates'](#), this obligation has been amended to allow Responsible Suppliers to leave the ACB Certificate in the GNO slot of the Device. The DCC consequently need to update its reporting on Post Commissioning Obligations to reflect this.

1.3 Requirement 2: 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.

This will be a DCC System impacting requirement.

1.4 Requirement 3: 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
GPF	Gas Proxy Function
IEDP	Inventory Enrolment and Decommissioning Procedures
SMETS	Smart Metering Equipment Technical Specifications
SMKI	Smart Metering Key Infrastructure
SMKI PMA	SMKI Policy Management Authority
SREPT	SMKI Repository Entry Performance Testing