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DP198

‘Further Changes from the Review of the SMKI and DCCKI Document Set’

Modification Report

Version 0.1

11 January 2022



About this document

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

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA).

The most recent review of the SMKI and Data Communications Company (DCC) Key Infrastructure (DCCKI) Document Set was undertaken in early 2021 and [MP173 'SMKI & DCCKI Document Set reviews'](#) was raised to implement the recommendations made by the review whilst recognising that some observations needed further work.

The observations of the SMKI and DCCKI Document Set review that require further work relate to SEC Appendix L 'SMKI Recovery Procedure' and the processes for the Recovery of the SMKI Contingency. Specifically, there is a discrepancy in the order of the steps set out in Appendix L sections 5 and 6 that need clarification with the DCC to ensure these align with the correct operational processes and the order of the steps.

There is a risk that, should it be necessary to initiate Recovery of the SMKI Contingency Key that it would not be successful.

2. Issue

What are the current arrangements?

Review of the SMKI and DCCKI Document Sets

The SMKI PMA has an obligation in SEC Section L1.17 to periodically review the effectiveness of the SMKI Document Set (which is defined in SEC Section L9.3) and the DCCKI Document Set (which is defined in SEC Section L13.31). The most recent review was undertaken in early 2021 and [MP173 'SMKI & DCCKI Document Set reviews'](#) was raised to implement the recommendations made by the review is being progressed through the Modification Process whilst recognising that some observations needed further work.

SMKI Recovery Procedure

The SMKI Recovery Procedure sets out the procedural requirements and the rights and obligations in respect of the DCC, Parties and the SMKI PMA relating to recovery from the Compromise (or suspected Compromise) of a Relevant Private Key. It was drafted prior to the start of DCC live operations and there is a need to ensure alignment with actual operational processes.

What is the issue?

The observations of the SMKI and DCCKI Document Set review that require further work relate to SEC Appendix L and the processes for the Recovery of the SMKI Contingency. Specifically, there is a discrepancy in the order of the steps set out in Appendix L sections 5 and 6 that need clarification with the DCC to ensure these align with the correct operational processes and the order of the steps.

What is the impact this is having?

There is a risk that, should it be necessary to initiate Recovery of the SMKI Contingency Key that it would not be successful.

However, the inaccuracies in SEC Appendix L Sections 5 and 6 relate to a Compromise of the Private Keys held by the DCC, which is a very low likelihood. If these Keys were Compromised, then in practice, the SMKI PMA, the DCC and the Data Services Provider (DSP) would collaborate to make the SMKI Recovery work properly, with the SMKI PMA providing the governance cover. However, this would be in a different order of steps to those set out in SEC Appendix L.

If the SMKI Recovery didn't work, then this would not be a consequence of the SEC setting out the steps in the wrong order, it would be because the DCC Systems failed in some way and there should be no impact on the supply of energy to consumers.

Impact on consumers

This issue does not impact consumers.

Appendix 1: Progression timetable

This proposal will be presented to the Change Sub-Committee (CSC) on 18 January 2022 for initial comment. Due to the high number of open modifications, SECAS is recommending this Draft Proposal be added to the waiting list until it has the capacity to move it forward. This will allow SECAS to focus on progressing more developed modifications to completion.

Timetable	
Event/Action	Date
Draft Proposal raised	11 Jan 2022
Presented to CSC for initial comment	18 Jan 2022

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
DCC	Data Communications Company
DCCKI	Data Communications Company Key Infrastructure
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
PMA	Policy Management Authority
SMKI	Smart Metering Key Infrastructure