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Action:	For Discussion

MP134B DCC Preliminary Assessment

1. Purpose

[MP134B 'Use of SMKI Certificates relating to a SoLR event Part-2'](#) is currently undergoing the Refinement Process. The Data Communications Company (DCC) has completed its Preliminary Assessment. We seek the Technical Architecture and Business Architecture Sub-Committee (TABASC) input on the following questions before this is presented at Change Board for Impact Assessment request:

- Does the DCC's solution deliver the business requirement?
- Is the developed solution cost-effective?

This paper provides a high-level summary of the key points. The DCC Preliminary Assessment can be found in Appendix A and the business requirements in Appendix B.

2. Summary of the proposal

What is the issue?

The Supplier of Last Resort (SoLR) process was developed by Ofgem to manage the exit of failed Suppliers from the market where no trade sale or commercial agreement is possible. Once Ofgem revokes the supply Licence of a failing Supplier, the DCC are required to revoke the Smart Metering Key Infrastructure (SMKI) Certificates. Whilst SoLRs to date have involved Suppliers exiting the market in an 'orderly' way, there is a concern that a Supplier falling out of the market in a 'disorderly manner' could expose prepayment consumers to the risk of supply continuity. In 4 October 2021 [MP134A Use of SMKI Certificates relating-to-a-SoLR-event](#) was implemented as an immediate but short term measure to allow the Smart Metering Key Infrastructure (SMKI PMA) to allow the delay of the revocation of the failed Suppliers SMKI Certificates. This has worked adequately since implementation but there is a concern that this does not fit with the Security Trust Model. In addition, it adds a burden to the Chair of the SMKI PMA to check emails late at night and on weekends.

What is the Proposed Solution?

The Proposed Solution is to build a new User Role currently titled 'SoLR Contingency'. This will be created for Shared Resource Providers (SRPs) to send Commands to Devices in the event of a Supplier failure (a SoLR situation). The new User Role would identify the SRP acting in this capacity and limit its capabilities in that capacity to allow messages that would ensure prepayment consumers are put into a mode where they would not lose supply during the transition process.

3. Business requirements

The below are the list of business requirements for MP134B: -

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).

4. DCC Preliminary Assessment

The DCC has now completed its Preliminary Assessment of the Proposed Solution. Its response can be found in Appendix A, and a copy of the agreed business requirements can be found in Appendix B.

DCC implementation costs

The DCC has provided the following cost estimates in the Preliminary Assessment:

Breakdown of DCC costs	
Cost up to Pre-Integration Testing (PIT)	Cost for a full Impact Assessment
£632,500 – £1,082,500	£28,020

5. Implementation approach

This change is currently targeted for the June 2023 SEC Release (6 June 2023). Design, Build, and Pre-Integration Testing (PIT) is expected to take about three to six months to complete. Details of the implementation will be finalised in the Full Impact Assessment.

6. Refinement Consultation responses

SECAS received seven responses to the Refinement Consultation. The general theme of the responses was that the majority of respondents were not in favour of taking of taking MP134B forward any further, with one Party suggesting the costs should not be expended on the DCC Full Impact Assessment. Industry Parties highlighted there would be impact to their organisation if MP134B was approved, incurring charges and a need for further debt management processes.

The full refinement consultation responses can be found in Appendix C.

7. DSP Re-procurement

The Chair of the SMKI-PMA has written to the DCC to ask that this change be considered in DSP re-procurement. SECAS has spoken with the DCC who have advised that in order for this to be considered it would need to complete the Full Impact Assessment. The authorisation to request the Full Impact Assessment will be requested at the Change Board meeting on the 20 April 2022.

8. TABASC input on the Preliminary Assessment response

We seek the TABASC's views on the following questions to feed into the Modification Report before we proceed to Change Board for a DCC Impact Assessment request:

- Does the DCC's solution deliver the business requirements?
- Is the developed solution cost-effective as a part of a SEC Release?
- Is the developed solution cost-effective as a part of a DSP re-procurement process?

9. Next steps

The SSC and SMKI-PMA will also review the Refinement Consultation responses for feedback. Unless the feedback we receive suggests otherwise, we will then seek the Change Board's approval of the Impact Assessment costs. We will subsequently request a DCC Impact Assessment if the costs are approved.

Timetable	
Event/Action	Date
Refinement Consultation	28 Feb 2022 – 18 Mar 2022
Present to TABASC	7 Apr 2022
Present to SMKI-PMA	13 Apr 2022
Present to SSC	13 Apr 2022
Impact Assessment costs approved by Change Board	20 Apr 2022
Impact Assessment requested	20 Apr 2022

10. Recommendations

The TABASC is requested to **PROVIDE** views and comments on the questions set out in this paper.

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SECAS Team

31 March 2022

Attachment

- **Appendix A:** MP134B DCC Preliminary Assessment.
- **Appendix B:** MP134B Business requirements.
- **Appendix C:** MP134B Refinement consultation responses