MP128A 'Gas Network Operators SMKI Requirements'

April 2022 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Kev Duddy	SECAS
Anik Abdullah	SECAS
Joey Manners	SECAS
Khaleda Hussain	SECAS
Mike Fenn	SECAS
Tom Mudryk	SECAS
Rainer Lischetzki	SECAS
Elizabeth Woods	SECAS
David Walsh	DCC
David Rollason	DCC
Emma Johnson	British Gas
Alex Hurcombe	EDF Energy
Daniel Davies	ESG Global
Alastair Cobb	Landis+Gyr
Ralph Baxter	Octopus Energy
Mafs Rahman	Scottish Power
Gordon Hextall	Security Sub-Committee (SSC)
Matt Alexander	SSE Networks
Shuba Khatun	SSE Networks
Audrey Smith-Keary	SSE - OVO
Emslie Law	SSE - OVO
Robert Johnstone	Utilita
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 and the DCC Impact Assessment response.

Issue

Once a Gas Network Party (GNP) Certificate is placed on a Device, it can only be changed by the GNP for the given Certificate and only if that GNP is a Data Communications Company (DCC) User.

An example of this issue occurring was when Cadent Gas took over as the Network Party for National Grid Devices; the Gas Proxy Functions (GPFs) still had National Grid Organisation Certificates present in the Network Operator Trust Anchor Cells and so Cadent were unable to communicate with those Devices or change the Certificates.

Proposed Solution

The Proposed Solution is to make it mandatory for GNPs that intend to cease to be DCC Users to replace their Organisation Certificates with Access Control Broker (ACB) Certificates.

Business Requirements

SECAS presented the following business requirements:

1. The DCC shall update its Post Commissioning reporting to reflect that Suppliers are able to leave the ACB Certificate in the Gas Network Operator (GNO) slot of a 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.

DCC Impact Assessment

The DCC has provided a timescale from approval to implementation of seven months.

The DCC has quoted a total cost to implement MP128A of **£158,050** which comprises:

- £69,639 in Design, Build and Pre-Integration Testing (PIT) costs.

- £88,411 in post-PIT Release costs (Systems Integration Testing (SIT) and Transition to Operations (TTO)).

Working Group Discussion

Business Requirement 1

SECAS (MF) advised that during the DCC Impact Assessment the Technical Operations Centre (TOC) suggested incorporating requirement 1 into a different modification, MP183 'Post Commissioning Obligations Reporting', which is seeking to update the criteria by which the DCC report failures in the Post Commissioning process. The TOC advised this could save approximately £10,000 in implementation costs for MP128A. SECAS advised that the Proposers of both modifications had agreed with this approach, and the requirement has been removed from the scope of MP128A. The Working Group agreed with this approach.

Business Requirement 2

SECAS (MF) advised that requirement 2 will require a DCC System change.

The DCC System and Great Britain Companion Specification (GBCS) currently support the mechanism for replacing Organisation Certificates with ACB Certificates. However, in the scenario where an ACB Certificate has been placed on a GPF by a departing GNP, any subsequent Service Reference Variant (SRV) 6.21 'Request Handover of DCC Controlled Device (Update Supplier Certificates)' request to place a new GNP Organisation Certificate on that Device will need to pass Device anti-replay checks for the Network Operator Trust Anchor Cell.

The solution is that the DCC System will record the 'Originator Counter' of the SRV 6.15.1 'Update Security Credentials (Known Remote Party (KRP))', which places the ACB Certificate on the Device, and then generate a higher Originator Counter when an SRV 6.21 is processed to replace that ACB Certificate with the Organisation Certificate of an incoming GNP.

A Working Group member (TM) advised that an issue had recently been investigated by the Smart Meter Device Assurance Sub-Committee (SMDA) whereby Electricity Smart Metering Equipment (ESME) Devices had no SEC requirement to reset their Originator Counters, meaning that following a change in Certificates an incoming Network Operator would not know what Originator Counter to exceed when sending Critical Commands to the Device. SECAS and the member agreed to investigate whether this issue would also impact Gas Smart Metering Equipment (GSME), including GPFs.

Another Working Group member (DD) noted that in order to update Device Certificates in this way, and especially if they are required to do so in bulk, Suppliers may need to design new business processes. SECAS (MF) advised that while this was outside the scope of MP128A, this point would be drawn out in the Modification Report so that it is clear to Suppliers what is required of them when this modification is implemented.

Business Requirement 3

SECAS (MF) advised that requirement 3 will require an addition to SEC Appendix B 'Organisation Certificate Policy' section 4.9.1(A) 'Circumstances for Revocation' and an update to DCC internal processes to ensure these Certificate Revocation Requests are accepted as valid. The Working Group agreed with this approach.

Next Steps

The following actions were recorded from the meeting:

- SECAS to investigate the issue of Originator Counters not being reset in GSME Devices.

- SECAS to present MP129 to the Change Sub-Committee (CSC) for progression to Report Phase.

- SECAS to issue a Modification Report Consultation.

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