

Stage 01: Initial Modification Report

SECMP0022: Expanding SMKI PMA membership and removing Alternate restrictions

This Modification Proposal seeks to alter the current Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) membership in order to take account of its operational responsibilities, and to mitigate against the risk that a meeting is not quorate. This Modification Proposal also seeks to remove the restriction on SMKI PMA Members which prohibits each SMKI PMA Member from nominating an Alternate from the same organisation that employs them.



The recommendation is that this Modification Proposal should:

- follow Path 3: Self-Governance
- proceed to Modification Report consultation



Impacts SEC Panel, SMKI PMA and SMKI PMA membership.

What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
04	Final Modification Report

Modification raised by:

SMKI PMA

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SECMP0021

Initial Modification Report

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About this document

This document is an Initial Modification Report which enables the SEC Panel to carry out its initial consideration on how this Modification Proposal should be progressed through the Modification Process. The Panel will consider this report at their meeting on 14th October 2016.

1. Summary

This section provides an overview of SECMP0022. For further details on the Modification Proposal, please refer to subsequent sections.

Defined terms and acronyms used in this document are listed in the Appendix 1 of this document.

1.1 Why Change?

The initial role of the SMKI PMA was that of a management authority, rather than an operations unit. The SMKI PMA was not expected to manage day-to-day operational activities in relation to SMKI, Infrastructure Key Infrastructure (IKI), and DCC Key Infrastructure (DCCKI). As such, the Department for Business, Energy and Industrial Strategy (BEIS (previously DECC)) aimed to keep the number of SMKI PMA Members to a minimum so as not to be burdensome to Industry. On occasion the SMKI PMA has struggled to reach quorum. This matter has been further amplified as the SMKI PMA has seen its responsibilities expand since its creation.

1.2 Solution

SECMP0022 proposes updating the SMKI PMA's membership structure to add 1 Large Supplier seat, 1 Network seat (so as to have both an Electricity and Gas Network members) and 1 SMKI PMA Specialist who would become a voting Member.

Finally, the appointment of SMKI PMA Alternates would be brought in line with that of the other SEC Panel Sub-Committees and allow for SMKI PMA Alternates to be employees of the same organisation as the SMKI PMA Member who appointed them.

1.3 Potential Impacts

SECMP0022 will impact SEC Panel, SMKI PMA and SMKI PMA membership.

1.4 Proposed progression

The Proposer and SECAS propose that this Modification Proposal should be progressed as a Path 3 Modification (Self-Governance). The changes to the SMKI PMA membership and Alternate nomination mechanism are non-material and require minimal changes to the SEC.

The Proposer and SECAS propose that SECMP0022 should be implemented 5 Working Days (WDs) following the end of the Change Board vote 10WD referral period. This would mean that SECMP0022 could be implemented on an estimated date of 14th December 2016. This is subject to the modification proceeding as a Self-Governance, Path 3 Modification. The indicative progression timetable for SECMP0022 can be found in section 5.

2. Why Change?

2.1 Background

The SMKI PMA was established in July 2014 to set the strategic direction and the over-arching policy for management and control of the SMKI and other Public Key Infrastructure (PKI) Certificates, as laid out in SEC Section L: Smart Metering Key Infrastructure and DCC Key Infrastructure.

The initial role of the SMKI PMA was that of a policy management authority with no operational role. The SMKI PMA was not expected to manage day-to-day operational activities in relation to SMKI, Infrastructure Key Infrastructure (IKI), and DCC Key Infrastructure (DCCKI). As such, the Department for Business, Energy and Industrial Strategy (BEIS (previously DECC)) aimed to keep the number of SMKI PMA Members to a minimum so as not to be burdensome to Industry.

2.2 What is the issue?

The development of the SMKI Recovery Key Guidance (as set out in SEC Section L10) has led to the SMKI PMA having an operational involvement in the recovery decision making processes involved in a Recovery Event. As a result, the decisions it makes are more significant and may be required at short notice to convene to consider and make decisions.

The existing SMKI PMA membership structure can make it challenging to reach a quorum at short notice. Therefore, this Modification Proposal suggests expanding the number of voting members in the SMKI PMA to ensure a quorum being reached at short notice.

The consideration of this modification by the SMKI PMA, prior to its submission, was prompted in light of a recent scenario where SMKI PMA struggled to reach a quorum which could have affected the ability for the SMKI PMA to fulfil their operational roles.

3. Solution

3.1 What's the solution?

The Proposer suggests updating the SMKI PMA's current membership structure. This involves increasing the number of large Supplier seats by one and increasing the number of Network seats to two, with one being voted on to the SMKI PMA by Electricity Network Parties and one by Gas Network Parties. The resulting changes would mean that the new SMKI PMA structure would be:

- 1 independent chair;
- 3 Large Supplier seats;
- 1 Small Supplier seats;
- 1 Electricity Networks seat;
- 1 Gas Network seat;
- 1 Other Party seat;
- 1 SSC representative; and
- 1 TABASC representative.

SECMP0022 also seeks to change the role of the SMKI Specialist from a non-voting Member, to a voting Member. This is to further mitigate against any risks on reaching a quorum.

Finally, in order to mitigate against further quorum issues it is recognised that, in light of the proposed change to the SMKI PMA membership, SEC Section L1.12 (c) should be removed from the Code. This clause states that SMKI PMA Members can only nominate alternate representatives from outside their organisation. The removal of this clause will enable SMKI PMA Members to nominate an Alternate from the organisation that employs them, increasing the availability and options around SMKI PMA alternatives nominations, and also bring the SMKI PMA's Alternate structure in line with that of other SEC Panel Sub-Committees.

3.2 Draft Proposed Legal Text

The Proposed legal drafting to deliver the above changes in support is provided in Attachment B.

3.3 Views against SEC Objectives

The table below highlights the Proposers view on how this Modification would better facilitate the achievement of the SEC objectives.

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
g) To facilitate the efficient and transparent administration and implementation of this Code.	General SEC objective (g) is better facilitated by this modification. As the role of SMKI PMA has expanded to include an operational aspect, the structure of its membership should also be altered to facilitate these added responsibilities.

4. Impacts and Costs

4.1 Impacts

The following section sets out the assessment of the impacts arising from SECMP0022.

Potential Impacts of SECMP0022	
Smart Energy Code Parties	
Suppliers	No Impact
Networks	
DCC	
Other	
Systems	
DCC Systems	No Impact
User Systems	
Smart Metering Systems	
Other	
SEC and subsidiary documents	
SEC Sections	SEC Section L (Smart Metering Key Infrastructure) will require amendment, primarily Section L1 as well as minor changes to Section L13. These changes detailed in Attachment B. to this document.
Subsidiary Documents	No Impact
Other Industry Codes and Documents	
No Impact	
Greenhouse gas emissions	
No Impact	

4.2 Costs

The costs to implement this change will be limited to the Code Administrator time and effort to making the necessary amendments to the SEC and release a new version to SEC Parties and the publication of it on the SEC Website.

The table below sets out the estimated working day effort to implement this change:

Implementation activities, cost and effort		
Implementation activities	Effort	Cost
<ul style="list-style-type: none">• Application of approved changes to the SEC• Publication of new version of the SEC on the SEC Website and issuance to SEC Parties• Review and update any impacted SEC guidance materials	2 Man Days maximum	£1200 ¹

¹ Based on a blended rate of £600 per day

5. Proposed Progression

5.1 Modification Path and the need for Refinement

It is proposed that SECMP0022 is progressed as a Path 3: Self-Governance modification Proposal. The proposed changes are not material, as they only relate to the makeup of the SMKI PMA Panel Sub-Committee. The changes to which, seeks to aid the efficient discharge of its duties in support of the SEC Panel responsibilities.

None of the criteria that would define this modification as having a material impact and therefore a Path 2 Modification: Authority Determination (as per SEC Section D2.6 (a), (b), (c), (d) and (e)), are believed to be met.

As the changes to support this modification have been considered by the SMKI PMA prior to the submission of the Modification Proposal and the necessary changes to the SEC drafted as part of the modifications submission, no further refinement is required. Therefore it is proposed that the Modification Proposal is submitted straight for Modification Report Consultation prior to Change Board vote.

5.2 Progression Timetable

As SECMP0022 does not require further refinement, a draft Modification Report, provided as Attachment C, has been prepared. Also attached to this IMR is the proposed Modification Report Consultation response form, provided as Attachment D.

5.3 Indicative Progression Plan

The following is an indicative progression timetable, based on SECMP0022 progressing to Modification Report Consultation as a Path 3: Self-Governance modification.

Modification Timetable		
Activity	Start	Finish
Modification Proposal Raised	Mon 03/10/16	n/a
Panel reviews Initial Modification Report	Mon 7/10/16	Fri 14/10/16
Modification Report stage	Mon 19/10/16	Fri 9/11/16
Change Board vote	Wed 16/11/16	Wed 23/11/16
Implementation	5 Working Days after end of the 10WD referral period (estimated date: 14 th December 2016)	

6. SEC Panel Decisions

The Panel is requested to **NOTE** the contents of this IMR for SECMP0022 and, pursuant to SEC Section D3.6, **AGREE** the following as set out in this Initial Modification Report:

- Whether to accept the Modification Proposal;
- That it is a Path 3 Modification Proposal (taking into account the view expressed by the Proposer);
- That the Modification Proposal does not require refinement as set out in Section D6.2;
- The Modification progression timetable set out in Section D6.3; and
- To submit SECMP0022 for Modification Report Consultation.

7. Further Information

More Information is available in:

- Attachment **A**: SECMP0022 Modification Proposal form
- Attachment **B**: SECMP0022 draft legal text
- Attachment **C**: SECMP0022 draft Modification Report
- Attachment **D**: SECMP0022 Report Phase Consultation Response form

For further information, please see the [Modification Register](#) page of the SEC website.

Or contact the SECAS at secas@gemserv.com.

Appendix 1 – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
DCKI	Data Communications Company Key Infrastructure	The public key infrastructure established by DCC to provide, amongst other things, transport layer security across DCC Gateway Connections.
IKI	Infrastructure Key Infrastructure	A Public Key Infrastructure used to secure interfaces to the SMKI.
	Recovery Event	Incident in which the DCC has notified the SMKI PMA that a Relevant Private Key has been (or is suspected of having been) Compromised; and in consequence, the SMKI PMA has decided to require the use of the Recovery Private Key or Contingency Private Key in accordance with the SMKI Recovery Procedure.
SSC	Security Sub Committee	The Sub-Committee established pursuant to Section G7 (Security Sub-Committee).
SMKI	Smart Meter Key Infrastructure	The public key infrastructure established by DCC for the purpose, among other things, of providing secure communications between Devices and Users.
SMKI PMA	Smart Meter Key Infrastructure Policy Management Authority	The Sub-Committee of that name established pursuant to Section L1 (SMKI Policy Management Authority).
TABASC	Technical Architecture and Business Architecture Sub-Committee	Means the Sub-Committee established pursuant to Section F1 (Technical Architecture and Business Architecture Sub-Committee).

References

The following table contains any useful links relevant to this change or referenced in this document.

Links and References	
Description	Link
SECTION L – Smart Metering Key Infrastructure and DCC Key Infrastructure	https://www.smartenergycodecompany.co.uk/docs/default-source/sec-documents/smart-energy-code-4.15/sec-4-15-section-l---smart-metering-key-infrastructure.pdf?sfvrsn=3