



Stage 03: Modification Report

What stage is this document in the process?

SECMP0022:

Expanding SMKI PMA membership and removing Alternate restrictions

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

Modification raised by:

SMKI PMA

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Any questions?

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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.



Impacts SEC Panel, SMKI PMA and SMKI PMA membership.

SECMP0022 Modification Report



Administered by Gemserv
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SECMP0022 Modification
Report

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Version 1.0

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About this document

This document is the Modification Report for SECMP0022. The SEC Panel has considered this report to ensure that due process has been followed and determined that it should be issued for Modification Report Consultation. SEC Parties are asked to comment on the suitability of this Proposal before the Change Board make a determination.

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 Glossary (Section 9) 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 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 Impacts and Costs

The impacts of this Modification Proposal are minimal. SECMP0022 will impact SEC Panel, SMKI PMA and SMKI PMA membership. 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.

1.4 Implementation

As this Modification Proposal only involves minor changes to SEC Section L it is proposed to implement this Modification Proposal 5 Working Days (WD) following the end of the 10 WD referral period following the Change Board Vote (subject to the modification being progressed as a Path 3 'Self Governance' Modification Proposal).

1.5 Progression path

This Modification Proposal addresses a SMKI PMA identified issue with the current membership in relation to quorum. The changes are non-material and require minimal changes to the SEC. Therefore, this Modification Proposal is being progressed as a Path 3 Modification (Self Governance). It should proceed to the Modification Report Consultation as no refinement is required.

Section 6 of this document contains a detailed timetable, for the progression of the Modification Proposal through the process.

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 proposes the expansion of 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 Proposed 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 sees 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 help 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 A.

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	
Impact on Consumers	
No Impact	
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 A.
Subsidiary Documents	None
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. Implementation

5.1 Recommended Implementation approach

As this Modification Proposal only involves a documentation only change to SEC Section L, and should have no impact on SEC Parties or the DCC, the following implementation approach is proposed:

- **5 Working Days** following the end of the 10 Working Day referral period that applies after the Change Board vote.

Note this is subject to SECMP0022 being treated and voted on by the Change Board as a Path 3 Self-Governance Modification Proposal.

6. Views on SECMP0022

This section contains the initial views of the Proposer regarding the modification's benefits against the SEC Objectives.

6.1 Proposers Views against SEC Objectives

Objectives (g): the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.

The Proposer believes General SEC objective (g) is better facilitated by SECMP0022. As the role of the SMKI PMA has expanded to include an operational aspect, the structure of its membership requires expansion to mitigate against any risk that quorum cannot be met impacting its ability to discharge and delivery its responsibilities.

The removal of SEC Section L1.12(c) further reduces the risk that quorum cannot be met by enabling SMKI PMA Members to nominate an Alternate from the same organisation that employs them.

6.2 Sub-Committee Views on SECMP0022

This Modification Proposal relates to the governance of the SMKI PMA. This modification was raised by the SMKI PMA and reflect the views of the SMKI PMA Sub-Committee.

These changes do not impact the Technical or Business Architecture or matters relating to the Security Architecture and/or provisions, and therefore no other Panel Sub-Committee remits are impacted by this change.

6.3 SEC Party views

This section will be updated to summarise the Modification Report Consultation responses following the completion of the consultation.

7. SEC Panel Decisions

The Panel:

- **AGREED** to allow the Modification Report to proceed to the Modification Report Consultation;
- **AGREED** that no Party Categories that are likely to be affected by the Modification Proposal; and
- **AGREED** that the Modification Report Phase consultation will follow the timetable as set out below:

Modification Timetable	
Activity	Date
Modification Report Phase consultation	17 th October - 7 th November 2016
Change Board vote	23 th November 2016
Self-Governance referral period	24 th November – 7 th December 2016
Implementation	5 WDs following the end of referral period (estimated date: 14 th December 2016)

8. Further Information

More information is available in:

- Attachment **A**: SECMP0022 - Legal Text
- Attachment **B**: SECMP0022 - Modification Report 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