



SM-CG Sec0064\_DC

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**Smart Meters Co-ordination Group  
Privacy and Security approach – part I**

**Version: 1.02**

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26

27 **VERSION CONTROL**

Version	Date	Modifications
0.1	01/09/2012	1st version for information to the Task Force
0.2	20/09/2012	Including 1 <sup>st</sup> comments by the AHWG
0.3	12/10/2012	Including contributions from TC's and recommendations
0.4	15/10/2012	Including results from the AHWG meeting
0.5	29/10/2012	Including ETSI contribution and aligning the sections
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0.7	1/11/2012	Including new versions of ETSI and TC294 sections
0.9	5/11/2012	Results from the meeting on 5-11-2012. Final version for distribution in SM-CG
1.00	05/03/2013	Implemented changes based on consultation in 2012



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1.02	17/07/2013	Updated chapter 3.2 on with feedback from TC205 related to the security requirements for the H1 interface, following an ANEC comment
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52 1 **INTRODUCTION**

53

54

55 1.1 **Background and objectives**

56

57 The Smart Meters Coordination Group published a Technical Report (TR): "Functional  
58 reference architecture for communications in Smart Metering Systems"  
59 (CEN/CLC/ETSI/FprTR 50572) that comprises a reference architecture, an overview of  
60 communication standards and the work programs of the European Standards Organizations  
61 (ESO's) regarding these standards.

62 Although the standards needed for interoperability of components of the Advanced Metering  
63 Infrastructure are dealt with in the current TR, another important issue still needs additional  
64 attention: Privacy of consumer owned data and the Security of transactions and data access  
65 within the AMI. Various stakeholders involved in or influenced by the implementation of  
66 Smart Meters still have serious concerns about the Privacy and Security of their assets.

67 In the SMCG plenary meeting on 27 June 2012 it was decided that a new chapter about the  
68 approach of the ESO's regarding Privacy and Security should be included in the SMCG  
69 deliverables. A Task Force was formed to define such an approach and give insight in the  
70 work planned by the Technical Committees to tackle the Privacy and Security requirements.

71

72 1.2 **Scope**

73

74 The scope of the work of the Task Force "Privacy & Security" can be derived from the  
75 functional reference architecture as defined in TR 50572 shown below. The approach of the  
76 Privacy and Security in standardisation and the current work of the TC's will focus on the  
77 interfaces as show in this figure.

78

79 However, even where the particular architecture being implemented by a member state  
80 respects the M/441 generic reference model, when considering P&S solutions in practice it is  
81 essential to take account of all the factors associated with the metering infrastructure  
82 concerned (gas, water or electricity), including the specific architecture being adopted by the  
83 member state concerned, the nature of the data involved and any differences of approach  
84 which may be necessitated by the very different characteristics of battery and mains powered  
85 meters.

86

87 The scope of this work is privacy and security within the boundaries of the architecture  
88 mentioned above.

89



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90 The EG2 DPIA [6] defines that privacy is a term that has received many interpretations over  
91 time, and often means different things in different contexts. A variety of definitions can be  
92 found and each culture and even each person has a different expectation on what constitutes  
93 as an invasion of privacy. In the context of this document, privacy is defined as data privacy  
94 and includes elements of protecting private life such as integrity of a person's home, body,  
95 conversations, honor and reputation following the Article 7 of the Charter of fundamental  
96 rights of the European Union.

97

98 Furthermore, this document [6] states that cyber security aims at safeguarding of the  
99 confidentiality, integrity and availability of information assets that support vital physical assets  
100 (such as the electricity grid) against attacks, malware etc., which will disrupt the delivery of  
101 electricity.

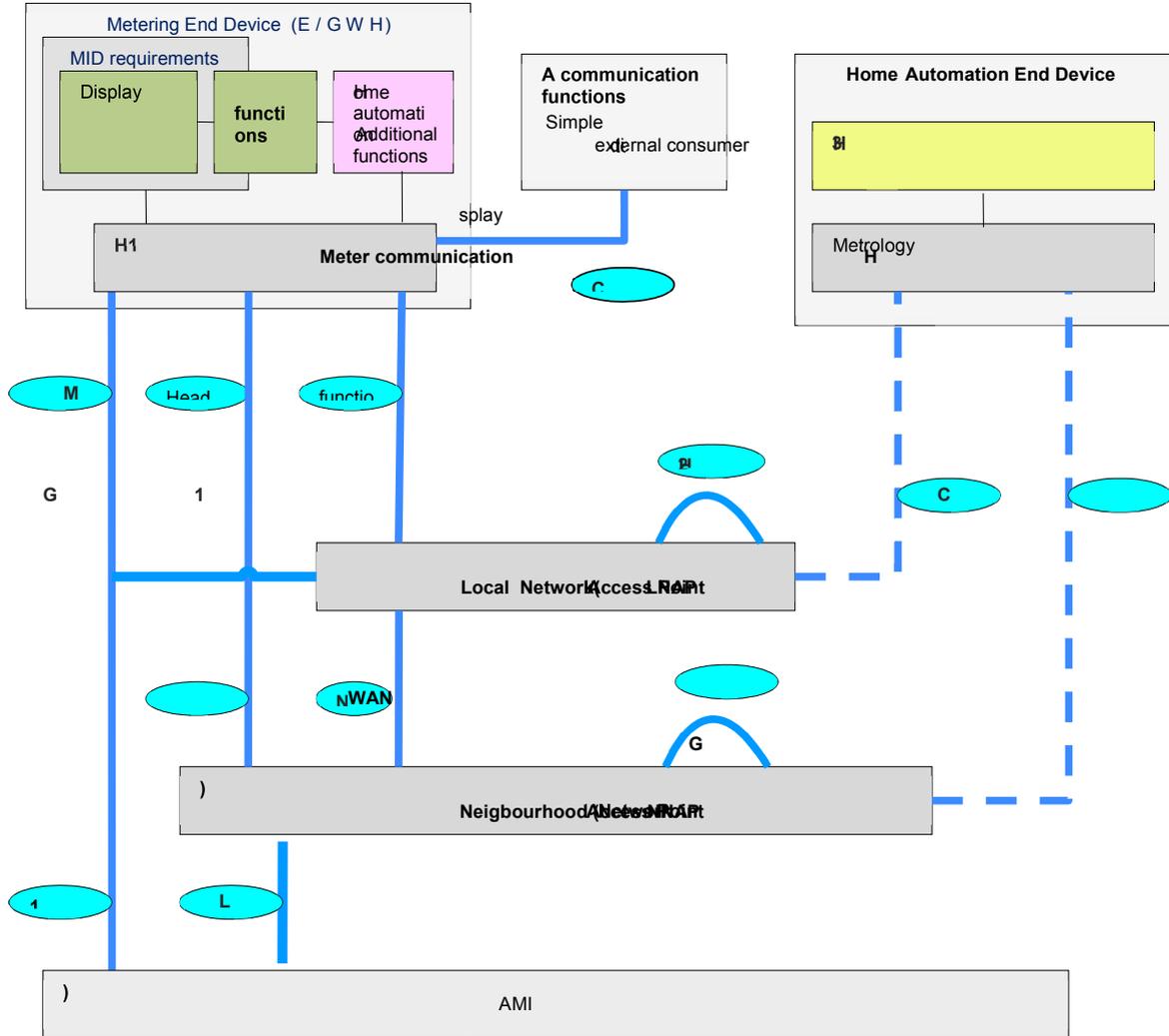
102

103 Although privacy and security issues are related, they require separate consideration. Whilst  
104 privacy cannot be assured without adequate security measures, ensuring security will not be  
105 sufficient to guarantee privacy.

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Figure 1 – The SM-CG functional reference model



115 2           **THE APPROACH TO DEFINE REQUIREMENTS FOR**  
116           **STANDARDS**  
117

118 2.1          **Introduction**  
119

120 The Smart Grid Coordination Group (SG-CG), acting on the M490 mandate, has provided in  
121 2012 a methodology to maintain standards and keep them updated to the latest  
122 developments in functionality and technology. In this methodology the basis for evaluation of  
123 existing standards is formed by the definition of basic functions which are represented as  
124 generic use cases. By using generic use cases as the basis of further standardization it can  
125 be assured that the resulting standards framework meets the desired quality level.

126 Basically, the SG-CG is applying the principles of system engineering to standardization, in  
127 this case in the area of Smart Grids. Furthermore it can be applied in other areas of complex  
128 systems, e.g. Smart Metering is using the same approach in its work for the Mandate M/441.  
129 The Task Force "Use Cases" of the SM-CG has been working on the definition of Use Cases  
130 since 2011 and its deliverables are reviewed by the SM-CG members mid 2012. These Use  
131 Cases are also the basis for the definition of Technical Requirements, which standards have  
132 to comply to. These Technical requirements include Security and Privacy requirements.  
133

134 In general the following steps are needed for the use case approach in standardization:  
135

136 1. Collecting and analysing requirements

137 a. Providing use cases

138 Different sources might suggest use cases to standardization. As these use cases  
139 should be considered as market needs, they might come from internal sources of the  
140 standardization organisation (e.g. Technical Committees) or from external  
141 stakeholders like R&D projects, regulation, legislation, or cooperation partners like  
142 associations. Ideally the requirements are directly formulated in the given use case  
143 template, see also the "Guidelines for developing Smart Metering Use Cases"  
144 (**SMCG\_Sec0044\_DC**).

145  
146 b. Discussing and harmonizing (different) use cases in order to generate or  
147 adapt broadly accepted Generic Use Cases.



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148 During the evaluation further information is provided in the Use Case template.  
149 According to the suggested transparent and open process different stakeholders (e.g.  
150 different TC's) might participate in the evaluation process and provide information in  
151 one common use case template. The external source can follow up the detailing and  
152 can comment on it. In case variations of use cases with same functions were  
153 provided, they have to be reviewed and combined to generic use cases.

154 Every Generic Use Cases will be accompanied by a system architecture, showing the  
155 system components that are internal system actors in the Use Cases. For Smart  
156 Metering this is the SM-CG reference model (see figure 1 in 1.2)

157

158 c. **Deliverable** : Generic Use Cases (GUC), which are used for further analysis  
159 in relation to standardization

160 For Smart Metering the Use Cases are described in SMCG\_Sec0051\_DC. The Use Case  
161 repositories are: SMCG\_Sec0052 (primary UC's) and SMCG\_Sec0053 (secondary UC's)  
162 and Technical Requirements are listed in SMCG\_Sec0054.

163

164 2. Analysis: The GUC and its systems architecture are mapped to

165 a. the reference architecture (here: Smart Grid Architecture Model developed by  
166 the SG-CG, SGAM, see figure 2)

167 The different layers of the architecture are providing lists of standards  
168 applicable for the relevant use case. Once the Use Cases and standards are  
169 linked, the Functional and Technical Requirements that apply to these  
170 standards are identified.

171

172 b. and via a Risk Analysis to required privacy and security levels

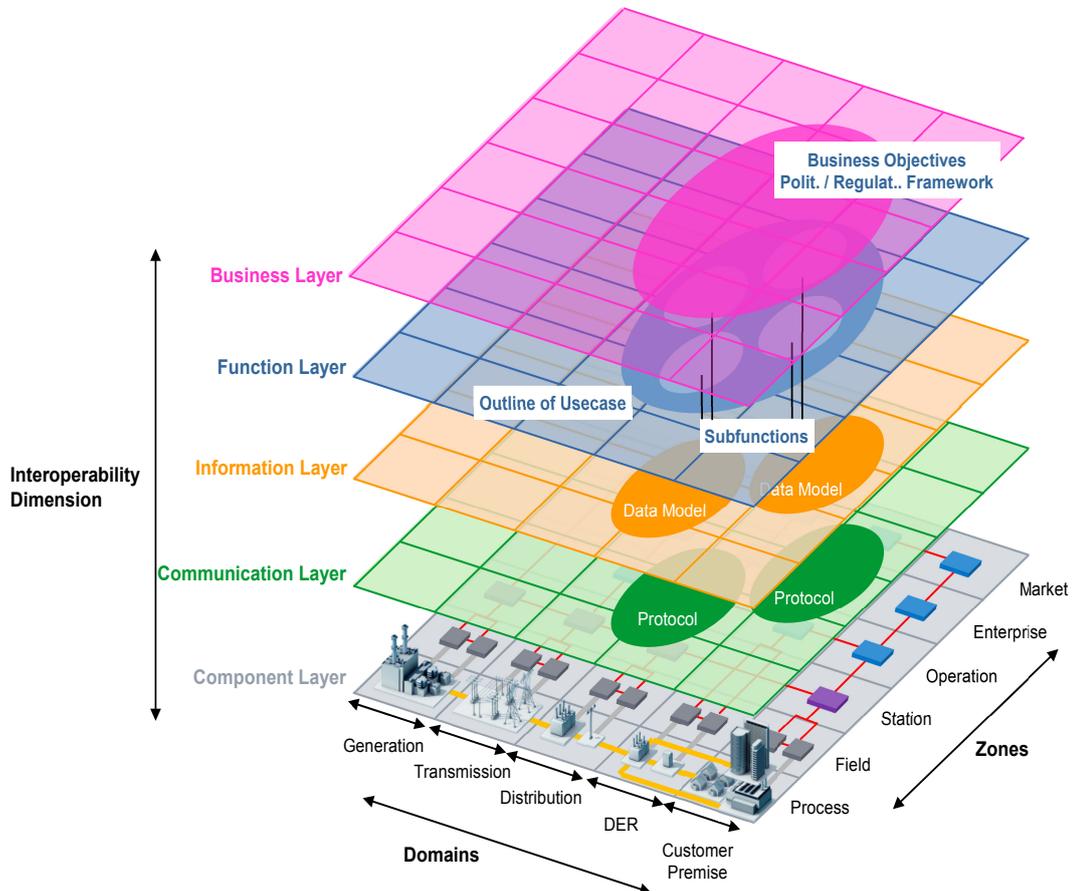
173 Based on the analysis of the use cases, the security and privacy risks can be  
174 evaluated separately and the applicable security level can be identified (see  
175 next section).

176

177 As recursive process this step might lead again to an update of the GUC  
178 (requirements, additional information like actors).

179

180



**Figure 2 – The Smart Grid Architectural Model (SGAM)**

181

182

183

184 3. Link privacy and security requirements

185 See section 2.2

186 4. Gap Analysis

187 By comparing the functionality and Technical Requirements given by the Use Case  
 188 with the characteristics of the standards, the completeness and compliance of these  
 189 standards can be checked.

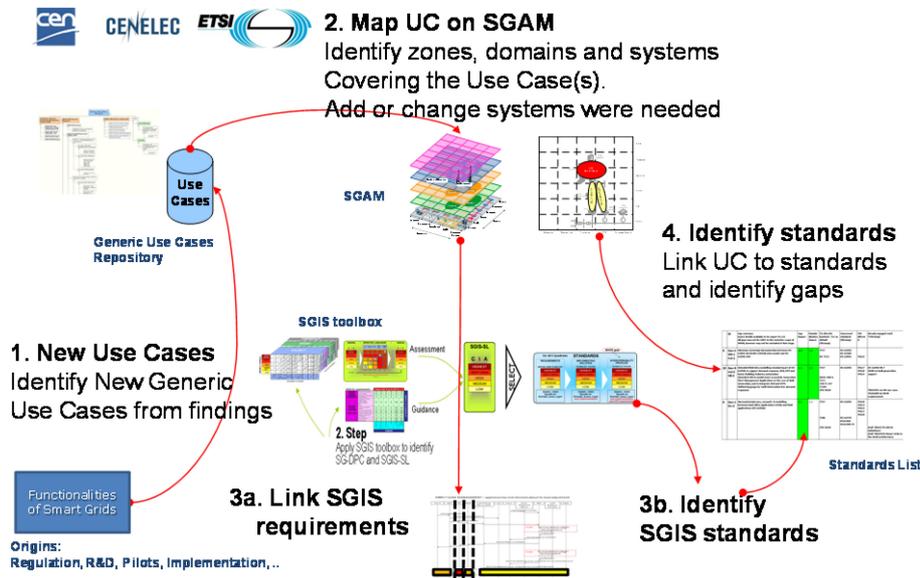
190 If a gap is identified, the missing standards (or features of the standard) leads to a  
 191 further item in the work programme for standardization.

192

193 The process described above is represented in Figure 3 below. It shows that the use cases  
 194 are a basis for identification, evaluation and maintenance of Smart Grid standards.

195

196



197

198

199

200

**Figure 3 - The maintenance of Smart Grid Standards**

201 **2.2 Definition of Privacy and Security Requirements**

202

203 **2.2.1 The SGIS toolbox**

204

205 The Use Cases comprise functional and technical requirements for Smart Grid standards.  
 206 According to step 2 “Analysis” in the former paragraph, Use Cases are mapped on the Smart  
 207 Grid Architectural Model (comprising definitions of Domains, Zones and Systems). This  
 208 activity starts with mapping the system architecture on the zones in this model. In doing so,  
 209 the detailed activities shown in the step-by-step description of the Use Cases describing the  
 210 interaction of system components among each other, can be mapped on the zones.  
 211 u Figure 4 shows the mapping of the SM-CG architecture; see ref [1] for an explanation.

212

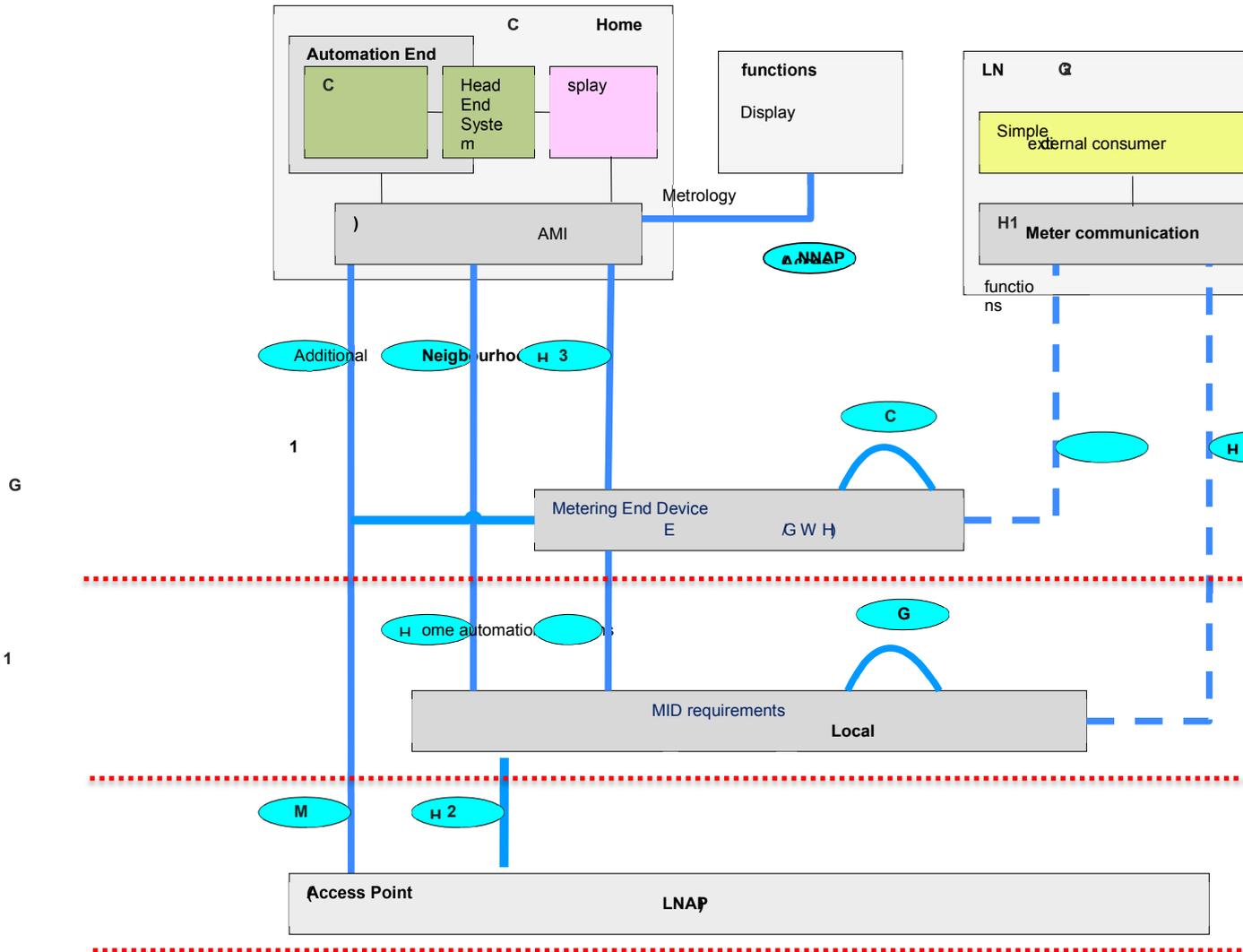


Figure 4 - Mapping SM-CG reference architecture on SGAM zones

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As a next step, the use cases are mapped on the SGAM in order to be able to perform a risk analysis on the use case, because the risks are depending on the concerning domains and zones.

For every use cases, mapping on domains/zones and a risk analysis can be performed based on the toolbox developed by the Smart Grid Information Security (SGIS) group [ref 5] of the SG-CG. Depending on the domain/zone and the type of data a Risk Impact Level can be attached to every step/transaction in the Use Case.

Figure 5 shows a table that is used to define the risk impact level.



<b>RISK IMPACT LEVELS</b>	<b>HIGHLY CRITICAL</b>	regional grids from 10GW	from 10 GW/h	from 50% population in a country or from 25% in several countries	international critical infrastructures affected	not defined	company closure or collateral disruptions	direct and collateral deaths in several countries	permanent loss of trust affecting all corporation	Third party affected
	<b>CRITICAL</b>	national grids from 1 GW to 10GW	from 1 GW/h to 10GW/h	from 25% to 50% population size affected	national critical infrastructures affected	not defined	temporary disruption of activities	direct and collateral deaths in a country	permanent loss of trust in a country	>=50% EBITDA
	<b>HIGH</b>	city grids from 100MW to 1GW	from 100MW/h to 1GW/h	from 10% to 25% population size affected	essential infrastructures affected	unauthorized disclosure or modification of sensitive data	prison	direct deaths in a country	temporary loss of trust in a country	<50% EBITDA
	<b>MEDIUM</b>	neighborhood grids from 10MW to 100MW	from 10MW/h to 100MW/h	from 2% to 10% population size affected	complimentary infrastructures affected	unauthorized disclosure or modification of personal data	fines	seriously injured or discapacity	temporary and local loss or trust	<33% EBITDA
	<b>LOW</b>	home or building networks under 10 MW	under 10MW/h	under 2% population size affected in a country	no complimentary infrastructures	no personal nor sensitive data involved	warnings	minor accidents	short time & scope (warnings)	<1% EBITDA
		Energy supply (Watt)	Energy flow (Watt/hour)	Population	Infrastructures	Data protection	other laws & regulations	HUMAN	REPUTATION	FINANCIAL
		OPERATIONAL (availability)				LEGAL				

**MEASUREMENT CATEGORIES**

227  
228  
229

**Figure 5 - Definition of the Risk Impact Level**

230 The SGIS toolbox [ref 5] describes how the risk impact level combined with a probability  
231 analysis will result in a security level from 1-5.  
232 Finally, these levels are mapped on a large list of security requirements that are currently  
233 derived from NIST (NISTIR-7628), so this procedure results in the identification of Privacy  
234 and Security requirements per use case and even per step/transaction in a Use Case.  
235 The SGIS approach leads to an accurate definition of appropriate P&S requirements that  
236 match the implemented architecture and functionalities.  
237 Please note that the approach described above does not have the intention to select the final  
238 security requirements on European level, but just gives the guidelines how to come to these  
239 requirements and what would be the technical consequences of implementing specific Use  
240 Cases.

241  
242 **2.2.2 Requirements for standards and final implementations**  
243

244 The method in the former section shows how Use Cases can be used to identify the  
245 appropriate Privacy and Security requirements. However, since system architectures and  
246 Use Cases may differ per Member State or even within Member States, a final Risk Analysis  
247 and definition of requirements can only be done when the ICT architecture and functionalities



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248 are fixed. The member states can use the method as described and Generic Use Cases to  
249 come to the final Use Cases and requirements, so a jump start is possible. The Generic Use  
250 Cases and requirements will be maintained by one or more horizontal Technical Committees,  
251 so newest technical and functional developments will be taken in account.

252

253 Although they are of generic nature, the Privacy and Security (P&S) requirements identified  
254 by the SM-CG (see output from the task Force Use Cases) and SG-CG (NISTR 7628) are  
255 input for the ESO's to check if their standards can meet these generic requirements. It is  
256 therefore recommended by the Task Force that the relevant Technical Committees take  
257 these requirements as input for their work and select which of these apply to their scope.  
258 It is also recommended that currently available national P&S requirements and the above  
259 mentioned available requirements are used as input to define a European reference list of  
260 P&S requirements. This new list would tune the SGIS toolbox to Smart Metering specifics  
261 and improve its applicability for Smart Metering.

262 When selecting and defining P&S requirements it is important to take notice of the  
263 differences between architectures and products used in the scope of the M441 mandate and  
264 the technical and economical feasibility and consequences of implementation. For example  
265 certain requirements can be unrealistic for battery powered meters because of the power  
266 usage related with the technologies that should fulfil these requirements.

267 Furthermore it is important to note that a list of generic P&S requirements can only serve as  
268 a guideline for reference purposes by TC's and member states.

269

270 Various initiatives have been taken by European organisations to formulate  
271 recommendations regarding the Privacy and Security requirements that apply to Smart Grid  
272 and Smart Metering applications.

273

274 The report written by Expert Group 2 (EG2) of the Task Force Smart Grids [ref 4] in 2011  
275 states that:

- 276 • ESO's should be tasked with updating, extending or developing new standards  
277 covering the security aspects of Smart Grid interfaces based on **European**  
278 **requirements**
  
- 279 • ESO's joint working group should review the Expert Group recommendations and list  
280 of relevant standards and add the latest amendments, additions and future work  
281 required before starting any new standardisation work, based on the **still to be**  
282 **defined requirements**

283 The EG2 report further recommends that:



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284 ESO's are tasked with evaluating the current state of cryptographic primitives through their  
285 relevant technical committees and make available the most appropriate technologies within  
286 the relevant standards framework. This should ensure

- 287 • Not to preclude the initial adoption of symmetric key cryptography followed by smooth  
288 migration to asymmetric cryptography if required;
- 289 • A business model is investigated to make the creation and maintenance of  
290 certification authorities (needed for asymmetric cryptography) possible;
- 291 • A study is conducted on how to handle multi-national key management (e.g. one  
292 supra-national European certification authority certifying national certification  
293 authorities) and who should be in charge of performing this key management activity.

294

295 The Article 29 Data Protection Party (WP 183 opinion 12/2011 on Smart Metering adopted  
296 on 4 April 2011) [ref. 3] concludes that:

297 Technical and organizational safeguards should cover at least the following areas:

- 298 • The prevention of unauthorized disclosures of personal data;
- 299 • The maintenance of data integrity to ensure against unauthorized modification;
- 300 • The effective authentication of the identity of any recipient of personal data;
- 301 • The avoidance of important services being disrupted due to attacks on the security of  
302 personal data;
- 303 • The facility to conduct proper audits of personal data stored on or transmitted from a  
304 meter;
- 305 • Appropriate access controls and retention periods;
- 306 • The aggregation of data whenever individual level data is not required.

307

308 According to the Commission Recommendation [ref. 2] of 9 March 2012 on preparations for  
309 the roll-out of smart metering systems, the following conditions apply (and therefore should  
310 be included as legal conditions in the Smart Metering Use Cases):

- 311 • Directive 95/46/EC on the protection of individuals with regard to the processing of  
312 personal data
- 313 • Directive 2002/58/EC concerning the processing of personal data and the protection  
314 of privacy

315



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316 The AHWG recommends analysing the approach for data privacy in line with the EG2  
317 recommendations and DPIA approach defined by EG2. The AHWG will take this action into  
318 the work program of 2013.

319

320 Regarding data security the Commission Recommendation states that:

- 321 • The use of encrypted channels is recommended as it is one of the most effective  
322 technical means against misuse.
- 323 • Member States should take into account that all present and future components of  
324 smart grids ensure compliance with all the 'security-relevant' standards developed by  
325 European standardization organizations, including the Smart Grid Information  
326 Security essential requirements in the Commission's standardization mandate M/490.
- 327 • The international security standards should also be taken into account, in particular  
328 the ISO/IEC 27000 series ('ISMS family of standards').

329

330 Based on the input listed above, it is recommended that after defining a European reference  
331 list of P&S requirements for Smart Metering, a study is performed to explore a possible  
332 certification approach for both products and organizations involved in Smart Metering.



333

334 3           **STATUS OF THE WORK BY TECHNICAL COMMITTEES**

335

336 3.1          **TC13**

337

338 3.1.1       **Overview of TC13 WG02 P&S task force**

339

340 The CLC TC13 WG02 (Data models and protocols for additional functionality of and data  
341 exchange in interoperable multi-utility smart metering systems) has created a task force for  
342 addressing Data Security & Privacy requirements applicable to data exchanges

343 The task force objectives are to:

- 344       • Review the use cases applicable to the SM-CG Reference architecture with a security  
345       perspective and in liaison with the WG02 Use Case Task Force
- 346       • Identify additional security use cases related to key and certificate provisioning, key  
347       and certificate management, security level increase and end to end data and  
348       message protection
- 349       • provide security requirements at the data model level and the application layer level,  
350       independently from any transport or lower protocol layer
- 351       • provide a framework for assessing security gaps in existing communication protocol  
352       standards

353 P&S task force members are security experts from the metering, smart card, silicon and  
354 utility industries.

355

356 3.1.2       **Security Use Cases**

357 The main security uses cases are listed below:

358

- 359       • Provide meter with symmetric keys
- 360       • Provide meter with asymmetric key pairs
- 361       • Provide meter with a trust anchor (PKI)
- 362       • Provide meter with public key / certificate of manufacturer and / or client(s)/ third party
- 363       • Provide client / third party with meters' public key /certificate
- 364       • Perform key establishment
  - 365           – a) for transporting a new symmetric key between trusted entities
  - 366           – b) for agreeing a new shared symmetric key between trusted entities
- 367       • Set the security policy according to security level
- 368       • Transfer crypto-protected data / messages to/from the smart meter



369

370 **3.1.3 Security requirements**

371 Security requirements for device access control and message protection are based on the  
372 NISTIR 7628 Smart Grid Guidelines for Smart Grid Cyber Security [Aug 2010].

373 The Task force TC13 WG02 P&S has issued a document delivering a set of security  
374 requirements for message protection and access control which is available on the CENELEC  
375 collaborative site.

376 **This set can be used as input for the creation of a European reference set.**

377

378 **3.1.4 Crypto-algorithms**

379

380 TC13 WG02 P&S Task force is elaborating a new set of modern crypto suites based on  
381 Elliptic Curve Cryptography. The aim is to enhance security properties of existing standard  
382 protocols with extended security mechanism addressing new needs such as digital signature  
383 (for proof of origin and non-repudiation), support of X509 certificates and new key agreement  
384 methods for easing the large scale distribution of keys (Diffie Hellman key agreement  
385 scheme)

386 These new crypto-suites have been selected from the NSA (National Security Agency, USA)  
387 Suite B. The suite B defines a common suite of public standards, protocols, algorithms and  
388 modes allowing interoperability of cryptographic solutions and secure information sharing  
389 between partners.

390 The DLMS COSEM protocol standard (IEC62056 series) is currently being revised to support  
391 these new security suites, in addition to the existing AES 128 GCM cipher-suite. A new  
392 version of the DLMS COSEM standard will be available by end of 2012.

393

394 TC13 WG02 has picked up the following key elements from the NSA Suite B:

- 395 • ECDSA (Elliptic Curve Crypto based Digital Signature) scheme for providing strong  
396 authentication of metering data and commands/controls . (FIPS PUB 186-3)
- 397 • ECDH (Elliptic Curve Crypto based Diffie Hellman) key agreement for establishing a  
398 common shared symmetric key between trusted partners. (NIST SP 800-56A)
- 399 • NIST standard named Elliptic curves P-256 and P-384, providing a common set of  
400 domain parameters over a prime field, for the purpose of interoperability of the  
401 crypto-operations
- 402 • Suite B Implementers' Guide to FIPS 186-3 (ECDSA)
- 403 • Suite B Implementers' Guide to NIST SP 800-56A (ECDH)



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404 Liaisons are established between the TC13, TC57 and SGIS Privacy and Security working  
405 groups for leveraging on these new crypto standards and allowing the reuse of crypto  
406 algorithm across the Smart Metering and Smart Grid architecture

407

### 408 3.1.5 **Data protection and message protection**

409 The level of protection of messages (communication layer) during transport or the level of  
410 data protection (information layer) can be determined using different security suites and  
411 policies which are selectable in relation with the security level and the security use cases of  
412 the project.

413 This supports a clear separation between the information layer and the communication layer  
414 (in line with the SG-CG reference architecture for the Smart Grid) and addresses properly the  
415 need for end to end data security between market entities.

416

### 417 3.2 **TC205**

418

419 In the domain of M 441 (Smart Metering) a simple display (a display with reduced functions)  
420 is connected via the interface H1 directly to the data collector. Since the display is  
421 considered to be an information sink (only receiving information), the necessary security  
422 measures should be implemented in the smart meter This would imply for example protection  
423 of the data transferred to the display, from external access as specified in the Smart Metering  
424 Technical Requirements (SMCG\_Sec0060\_DC\_UseCaseTechnicalRequirements, TR-PRIV-  
425 02 and TR-SEC-05).

426

427 In the M490 domain (Smart Grid) a display with higher functionality can be connected via the  
428 H2/H3 interface. Such a display can be regarded as a ("normal") HBES device and no  
429 additional security provisions are required, as all functions and security provisions of the  
430 display are handled within the HBES and the Gateway to HBES respectively. In case of open  
431 HBES media, further HBES specific security mechanisms may however have to be put in  
432 place and specified.

433 At field level, in HBES, security is positively influenced by inherent system conditions:

- 434 - HBES is a closed system. Physical access is required to impair security.
- 435 - In order to impair security, knowledge on the structure and the data of the specific HBES
- 436 solution is required. Even after recording the data transfer in the specific HBES system,
- 437 this information provides insufficient knowledge on the HBES installation, to create
- 438 serious security risks.

439

440 The many buildings equipped with HBES over the last decades corroborate the above.



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441 In case an HBES system is connected via a gateway to non-HBES systems, the HBES  
442 security level is ensured through specific security provisions in the gateway.  
443 In addition, the security regarding the Smart Grid part in the building is ensured by security  
444 provisions in the connection to the WAN, the "Local Network Access Point" (LNAP).  
445

### 446 **Conclusion:**

447 As security is ensured by the Smart Meter (for H1 interface) and the LNAP / NNAP (for the  
448 H2-H3 interfaces), all connection points between home/building and WAN are secured.  
449 Therefore, there is no need for additional security precautions for the SG Demand Side  
450 elements that are in scope of TC205 WG16&18.

451 Therefore, there is no need for additional security precautions for the SG Demand Side  
452 "behind" the gateway..  
453

454

455

### 455 3.3 **TC294**

456

457 On the last plenary meeting in November 2011 several resolutions were taken that show the  
458 importance of the P&S aspects for the TC.

- 459 • One is the enhancement of general scope of CEN/TC 294 with the paragraph:  
460 "Secure communication covering data privacy as an inherent property, providing a  
461 scalable mechanism for security services, data integrity, authentication and  
462 confidentiality."
  
- 463 • The other is the decision for a preliminary new work item to create an Amendment to  
464 prEN 13757-3 "Communication systems for and remote reading of meters - Part 3:  
465 Dedicated application layer" to include applications requiring data security, data  
466 integrity, authentication and confidentiality.  
467 This decision was based on the special aspects that different national legislative  
468 requirements regarding communication security will be standardized in this  
469 Amendment to ensure interoperability of Smart Meters by adding new cryptographic  
470 modes and insert methods as well as data elements to provide an integrity check to  
471 cover legislative requirements.

472

473 After this resolutions the working group 4 (WG4) of CEN/TC 294 starts actions for this  
474 amendment. The current modes and methods in prEN 13757-3 are limited to more or less  
475 one symmetrical encryption mode (AES128) but no authentication. All members of WG4  
476 agreed that a definition of additional techniques is necessary to fulfil the requirements for  
477 privacy and security.  
478



## SM-CG Sec0064\_DC

479 Starting the work in WG4 several countries (Italy, France, Germany) presented their national  
480 approach for this aspect. After that it was directly clear that the national requirements are  
481 different and WG4 could not get to a consensus which techniques to be implemented in the  
482 standard and which not. Therefore WG4 asked CEN/TC 294 for further instruction how to  
483 handle this point.

484

485 To prepare a general decision for the next CEN/TC 294 plenary meeting in November 2012 a  
486 ballot was launched to get a European wide view, which direction for the member states is  
487 appropriate to solve requirements of security and privacy in terms of scalability. The result is  
488 just available and shows again the diversity of this aspect. **It will be discussed** in the  
489 plenary meeting in November and decisions for actions may be taken according this  
490 preliminary work item ("Amendment"). ***The TC294 intends to use the guidance developed***  
491 ***by the SMCG and SGCG regarding the approach of privacy and security where***  
492 ***appropriate.***

493

494

### 495 3.4 ETSI

496

497 In 2009 ETSI Telecommunications and Internet converged Services and. Protocols for  
498 Advanced Networking (TISPAN) developed a methodology for analysing security of mobile  
499 and fixed communications which was published as TVRA (threat, vulnerability and risk  
500 assessment).

501

502 [http://docbox.etsi.org//Workshop/2009/200903\\_TVRA/TVRA\\_006\\_TVRA\\_web\\_user\\_guid](http://docbox.etsi.org//Workshop/2009/200903_TVRA/TVRA_006_TVRA_web_user_guid)  
503 [e.pdf](#)

504

505 More recently the ETSI M2M group has undertaken some work on the risks and  
506 vulnerabilities of M2M architecture and services. It was found necessary to augment the  
507 basic framework of the analysis for a number of reasons.

508

509 Some of these relate to the distinctive characteristics of M2M working. For instance the use  
510 cases considered were those from the SM-CG regarding smart meters, where there is a  
511 mixture of automated functions, such as periodic meter reading by the responsible party, and  
512 consumer-initiated ones such as monitoring own consumption.

513

514 These features meant the need to take into account two further factors in the security  
515 analysis.



516

517       • The first of these was detectability; the need for the machine to become aware of and  
518       react to a security breach such as meter-tampering. This is especially important  
519       where the infrastructure is the sort of ‘street furniture’ that goes unremarked by  
520       passers-by.

521

522       • The second is recoverability: since the equipment may be dispersed or inaccessible,  
523       it must be possible to undertake at least some remediation and reset functions  
524       remotely.

525

526   As risk is a function of probability and impact, these two new factors influence all aspects of  
527   traditional assessment: for instance, the probability of a successful attack on a remote or  
528   unmonitored device could be either higher or lower, but the impact is likely to be higher.

529

530   An example of such an analysis performed by ETSI can be found in:-

531

532   [http://www.etsi.org/deliver/etsi\\_tr/103100\\_103199/103167/01.01.01\\_60/tr\\_103167v01](http://www.etsi.org/deliver/etsi_tr/103100_103199/103167/01.01.01_60/tr_103167v010101p.pdf)  
533   [0101p.pdf](http://www.etsi.org/deliver/etsi_tr/103100_103199/103167/01.01.01_60/tr_103167v010101p.pdf)

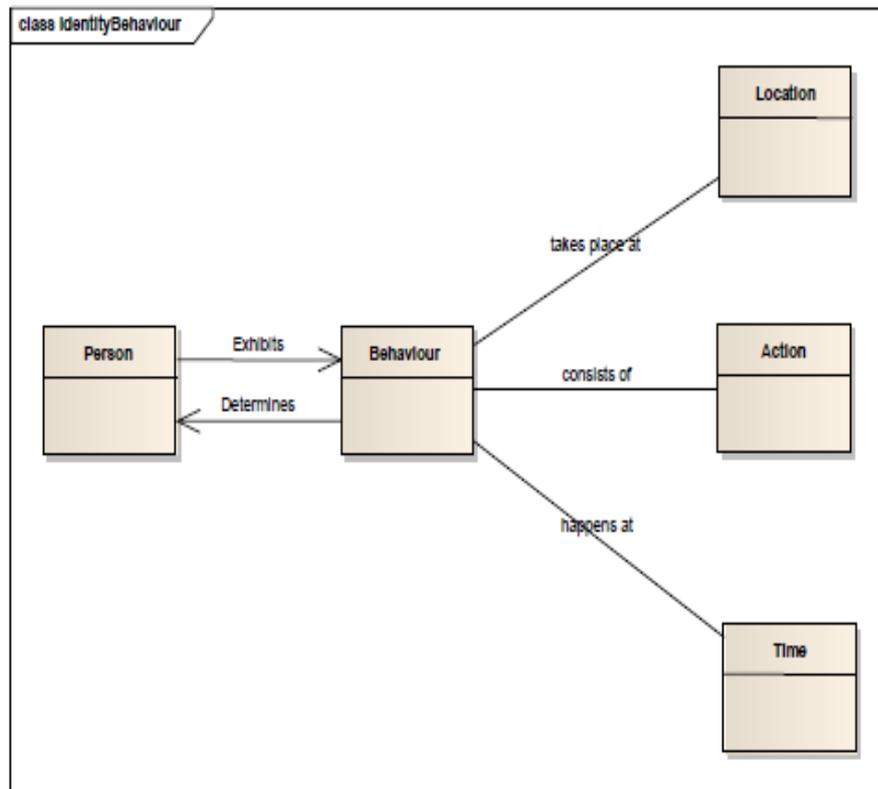
534

535   Security has traditionally been analysed in terms of Confidentiality, Integrity and Availability.  
536   More recently the EU has asked that the additional aspects of Privacy and Service  
537   Resilience are also considered.

538

539       • **Privacy:** This could be typified as the mere existence of a message rather than its  
540       actual content. It is necessary. Therefore, to limit possibilities for the collection of data  
541       from which inferences could be drawn about lifestyle leading to unsolicited marketing.  
542       The following working definition of Privacy was agreed “*Definition of Privacy: The*  
543       *right of the individual to have his identity, agency and action protected from any*  
544       *unwanted scrutiny and interference*”

545



546

547

548

549

- This leads us to define two new concepts of ‘unobservability’ and ‘unlinkability.’

550

- **unlinkability:** act of ensuring that a user may make multiple uses of resources or services without others being able to link these uses together

551

552

- **unobservability:** act of ensuring that a user may use a resource or service without others, especially third parties, being able to observe that the resource or service is being used

553

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557

- **Service Resilience:** This has to do with the availability of alternative channels for communication. Unlike for example, a mobile phone, which is typically locked to a particular service provider, the smart electricity meter, should be able to communicate on any available network. For example, at any given point in a street or even house, one particular supplier’s radio signal will be the strongest – and this may well change during the 15-year installed life of the meter. This has a large impact on the way security credentials are provisioned and re-provisioned or exchanged. As a result of joint work with ENISA ETSI has agreed that Service Resilience will be an additional

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565 factor its analysis and specification of security features:- see  
566 <http://www.enisa.europa.eu/activities/Resilience-and-CIIP>

567  
568 The next stage in ETSI's work will be to analyse:  
569

- 570 • Differences and commonalities between National security requirements for smart
- 571 metering, to find a suitable path for a common approach
- 572 • Apply the augmented ETSI TVRA framework to identify potential threats and ensure
- 573 that suitable countermeasures are addressed in applicable ETSI standards
- 574 • Use Cases for smart meter implementation from M/441 and M/490 to become aligned
- 575 with the ETSI M2M Smart Metering Use Cases (TR 102 691)
- 576 • Apply SGIS toolbox to the resulting use cases to propose a consistent mapping
- 577 between SGIS Security Levels and TC M2M security specifications.
- 578

579 A new work item in ETSI M2M (DTR/M2M-0021) has been agreed to create an amendment  
580 to ETSI TR103 167:

581 [M2M\(12\)21\\_108\\_Machine-to-Machine\\_communications\\_M2M\\_Smart\\_Energy\\_Infras.zip](#)

582  
583  
584 [http://docbox.etsi.org/M2M/M2M/05-  
585 CONTRIBUTIONS/2012/M2M\(12\)22\\_100\\_Annex\\_1\\_Vertival\\_Application\\_Specific\\_Threat  
586 s\\_-\\_Smart\\_Mete.zip](http://docbox.etsi.org/M2M/M2M/05-CONTRIBUTIONS/2012/M2M(12)22_100_Annex_1_Vertical_Application_Specific_Threats_-_Smart_Mete.zip)

587  
588 So far, one national smart meter security requirements document has been analysed and 54  
589 potential vulnerabilities listed. Since the SM-CG already has progressed regarding these  
590 topics and the Task Force recommends following the SG-CG approach for defining P&S  
591 requirements, the augmented TVRA framework could be further exploited / adapted to be  
592 used for the use case based Risk Assessment process inherent to the use of the SGIS  
593 Toolbox: In this manner, specific threats and countermeasures applicable to a particular use  
594 case could be identified.

595  
596 All further work on P&S requirements for Smart Metering is proposed to be performed in the  
597 context of the SM-CG (see recommendations in chapter 4).

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601



602 4 **FINAL CONCLUSIONS**

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604 Based on the work performed by the Smart Grid Coordination Group regarding the definition  
605 and selection of Privacy and Security requirements and the recommendations from various  
606 organisations, the Smart Meter Coordination Groups recommends:

- 607 • That the SG-CG toolbox for defining security requirements is adopted for defining and  
608 selecting requirements for Smart Metering when available;
- 609 • That the EG2 DPIA template will be considered for defining and selecting privacy  
610 requirements for smart metering when available;
- 611 • That a European reference set of P&S requirements is defined and integrated with  
612 the SG-CG toolbox and the EG2 DPIA;
- 613 • That the Technical Committees use the SG-CG toolbox, EG2 DPIA and reference set  
614 of requirements as input for their work on P&S related aspects in their standards;
- 615 • That a study is performed to explore a possible European level approach for  
616 certification of Smart Metering related products, within the scope of the M441  
617 mandate, based on the reference set of P&S requirements.

618 When following the above recommendations it is important to note that the applicability of  
619 requirements is depending on the nature of architectures and products in the scope of the  
620 M441 mandate.

621

622 5 **WORK PLAN FOR 2013**

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624 Based on the above conclusions, the following work plan for 2013 is proposed:

625

Action	Timing
Process comments on 2012 report by ANEC and ETSI	Done
Deliver new report and work plan to SMCG	Done
Develop collection of Smart Metering security requirements	March 2013
Describe and compare existing certification approaches for security (Common Criteria, CPA, CSPN ...)	Q2 2013
Work with SGIS to integrate the Smart Metering P&S requirements	Q3 2013



Define recommendations / next steps regarding the use of Smart Metering security requirements and an approach for certification	Q3 2013
Expand the report with a chapter on Privacy: <ul style="list-style-type: none"> <li>Considering the EG2 DPIA template, for privacy impact assessment</li> <li>Identifying privacy related recommendations and best practices</li> <li>Including some information on cooperation on this topic with the SG-CG SGIS</li> </ul>	Q3 2013
Follow the work of the SGIS updating the toolbox and evaluate which domain specific adaptations for smart metering are needed. Create a guideline/approach on how to use the SGIS risk impact table for smart metering	Q3 2013
Deliver final version 2 of the AHWG P&S report	Q4 2013
Include the latest work plans regarding privacy and security of the coordinating Technical Committees	Q4 2013

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628 6

**REFERENCES**

629

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631 - CEN/CLC/ETSI/FprTR 50572

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635 [4] EG2 report Essential Regulatory Requirements and Recommendations for Data  
636 Handling, Data Safety, and Consumer Protection, December 2011

637 [5] SG-CG SGIS draft Summary Report, August 2012

638 [6] Data Protection Impact Assessment Template for Smart Grid and Smart Metering  
639 systems - Expert Group 2: Regulatory Recommendations for Privacy, Data  
640 Protection and Cyber-Security in the Smart Grid Environment, December 2012

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