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Stage 03: Final Modification Report

SECMP0040:

Changes to how DCC Users Schedule & carry out User Security Assessments after completed of the User Entry Process

Summary

This Modification seeks to ensure that, Security Assurance Assessments (also referred to in this report as User Security Assessments) for Data Communications Company (DCC) Users are scheduled 12 months following completion of the User Entry Process and initial Full User Security Assessment (FUSA).

Modification Report Consultation Responses



- Respondents to the Modification Report Consultation (MRC) agreed by majority that SECMP0040 does better facilitate the Smart Energy Code (SEC) Objectives and should therefore be approved

Impacts



- All SEC Parties that are/wish to become a DCC user
- There are no impacts on DCC Central Systems and/or Party interfacing systems.

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

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About this Document

This document is the Final Modification Report (FMR) for SECMP0040. This document provides detailed information on the issue, solution(s), impacts, costs, industry consultation as well as Panel discussions and conclusions on the modification.

This document has two attachments:

- Attachment A contains the approved legal text changes to support this modification; and
- Attachment B contains the full responses received to the Modification Report Consultation (MRC).

The Change Board will have considered this modification and determined whether SECMP0040 should be approved on Wednesday 25th October 2017.

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1. Summary

This section provides an overview of SECMP0040. For further details on the Modification Proposal, please refer to the subsequent sections.

What is the issue?

This modification seeks to amend how Security Assurance Assessments for DCC Users are scheduled following completion of the User Entry Process.

What is the Proposed Solution?

The outcome of this Modification is to ensure that, following the initial FUSA, a DCC User has taken the necessary steps to schedule their next assessment within 12 months of the SEC Panel setting an assurance status of either 'approved' or 'approved subject to Party'.

Impacts – Proposed Solution

Party

Large Supplier Parties	X	Small Supplier Parties	X
Electricity Network Parties	X	Gas Network Parties	X
Other SEC Parties	X		

System

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

Implementation Costs

The total estimated implementation cost to deliver SECMP0040 is approximately £1,200 This total cost consists of:

- **£1,200** in SEC Administration effort; and
- **£0** in DCC effort.

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Implementation Date

SECAS recommends an implementation date of:

- 10 Working Days (WDs) following the end of the 10 WD referral period, which commences after the Change Board vote.

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2. What is the issue?

Background

Currently, the Security Sub-Committee (SSC) and the SEC Panel are responsible for reviewing the User Security Assessment Report and User Security Assessment Responses for each SEC Party that undertakes an initial FUSA prior to becoming a DCC User (as part of their wider User Entry Process requirements and as per SEC Section H1.10 (c)).

This review allows the SSC to provide an assurance status recommendation to the Panel. The Panel then consider this recommendation and set an agreed assurance status (as per [SEC Section G8.36](#)).

At their June 2017 meeting, the SSC agreed that a change should be made to the SEC regarding how Security Assurance Assessments are scheduled by DCC Users after the completion of the User Entry Process.

The SSC considered the need to introduce a requirement on DCC Users to take steps to schedule their next User Security Assessment (following completion of their initial FUSA) within 12 months of the SEC Panel setting an 'approved' or 'approved, subject to the party' assurance status.

The SSC considered that this 12-month timescale provides DCC Users with sufficient time to complete their next User Security Assessment and ensures that each DCC User has booked their next assessment within 12 months.

The SSC also considered that making such a change will help SECAS to more efficiently manage the scheduling of User Security Assessments and assess demand for the User Independent Security Assurance Service Provider (UISASP) (also referred to as the User Competent Independent Organisation (User CIO)).

What is the issue?

Currently, [SEC Section G8.42](#) to [G8.50](#) requires a DCC User to schedule and carry out its 'next User Security Assessment' "the first year after the year of the Initial User Security Assessment". This means that, if a DCC User has their initial FUSA in January 2018, their next User Security Assessment will not need to be scheduled and completed until December 2019.

The current wording in SEC Section G means that some DCC Users may have a longer window in which to schedule and complete their next User Security Assessments than others. Ultimately leading to an accumulation of DCC users requiring a reassessment at the end of the calendar year. Thus, impacting the capacity of the User CIO and SECAS' ability to manage user assessments.

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3. Proposed Solution

Proposed solution

Scheduling Security Assurance Assessment

SECMP0040 will require DCC Users to take the necessary steps to schedule their next Security Assessment within 12 months of the SEC Panel setting an assurance status of either 'approved' (as per SEC Section G8.36 (a)) or 'approved, subject to Party' (as per SEC Section G8.36 (b)).

This means that every DCC User will have 12 months to schedule their next User Security Assessment.

Completing Security Assurance Assessments

For the avoidance of doubt, SECMP0040 does not introduce timescales for the completion of a User's next Security Assessment. However, the default timescale defined in the [Security Controls Frameworks](#) state that Security Assurance Assessments must be scheduled 12 weeks prior the start of the assessment.

This (combined with SECMP0040) will effectively provide a maximum of 15 months between the assurance status being set and the start of the next User Security Assessment.

Draft legal text changes

The SSC proposes amendments to the **Security Assurance Assessment: Post-User Entry Process** clauses within **SEC Section G: Security**. Specifically, to SEC Sections G8.41, G8.42, G8.44, G8.45, G8.47 and G8.50. These Sections refer to **Supplier Parties**, **Network Parties**, **Other Users** and the **User Security Self-Assessment** process.

The approved legal text changes to SEC Section G: Security are provided in Attachment A.

Proposer's views against the General SEC Objectives

The Proposer believes that this Modification Proposal better facilitates General SEC Objective (f)¹.

The Proposer believes that SECMP0040 better facilitates Objective (f) because it will ensure that each DCC User has booked their next User Security Assessment within 12 months of the Panel setting an assurance status of 'approved' or 'approved subject to

¹ Objective (f): the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code.



Party. This in turn will allow SECAS to more efficiently manage User Security Assessment and the demand for the User CIO.

For the avoidance of doubt, the Proposer believes that this modification is neutral against Objectives (a), (b), (c), (d), (e), (g) and (h).

Please note that detailed descriptions of all the General SEC Objectives can be found in [SEC Section C 1.1](#).

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4. Impacts

The following section sets out the impacts of SECMP0040.

SEC Party impacts

Large Supplier Parties	X	Small Supplier Parties	X
Electricity Network Parties	X	Gas Network Parties	X
Other SEC Parties	X		

All SEC Parties that are/wish to become a DCC User will be impacted as this modification will affect how SEC Parties schedule the User Security Assessment following initial FUSA.

Central System impacts

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

Testing

There will be no testing required.

SEC and Subsidiary Document impacts

SECMP0040 will impact SEC Section G: Security as changes are required to the clauses set out in G8.41, G8.42, G8.44, G8.45, G8.47 and G8.50.

Impacts on other industry codes

This modification will not impact other Energy Codes.

Greenhouse Gas Emission impacts

This modification will not impact Greenhouse Gas Emissions.

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5. Costs

Estimated Implementation costs

The total estimated implementation cost to delivery SECMP0040 is approximately **£1,200**.

SEC costs

The estimated SEC implementation cost is detailed in the table below:

SECAS implementation costs		
Implementation Activity	Effort (man days)	Cost
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 updated any impacted SEC guidance materials.	Two	£1,200 ²

² SEC man day effort based on a blended rate of £600 per day.



6. Implementation

Recommended implementation date

SECAS recommends an implementation date of:

- 10 Working Days (WDs) following the end of the 10 WD referral period, which commences after the Change Board vote.

Should no referral be received SECMP0040 will be implemented on 22nd November 2017.

7. Panel Conclusions

Panel conclusions

The Panel **unanimously** agreed that due process has been followed and that SECMP0040 should progress to MRC.

The Panel also agreed that SECMP0040 is a Path 3: Self-Governance Modification Proposal and that the draft legal text changes to the SEC deliver the intention of the modification.

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Appendix 2: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
DCC	Data Communications Company
FMR	Final Modification Report
FUSA	Full User Security Assessment
IMR	Initial Modification Report
MRC	Modification Report Consultation
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSC	Security Sub-Committee
UISASP	User Independent Security Assurance Service Provider
User CIO	User Competent Independent Organisation
WD	Working Day

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