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04: Modification Report Consultation Responses

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
04	Decision

SECMP0040 'Changes to how DCC Users Schedule & carry out User Security Assessments after completed of the User Entry Process'

About this document

This document contains the collated responses to the SECMP0040 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Caroline Gundu on 020 7090 1037 or email SEC.Change@gemserv.com.

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0040.

The Change Board will consider these responses at its meeting on 25th October 2017, where it will determine whether SECMP0040 should be approved.

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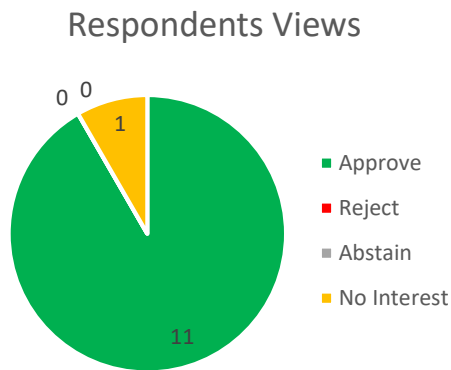
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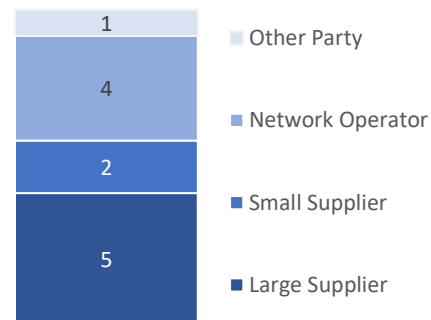
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Summary of Responses

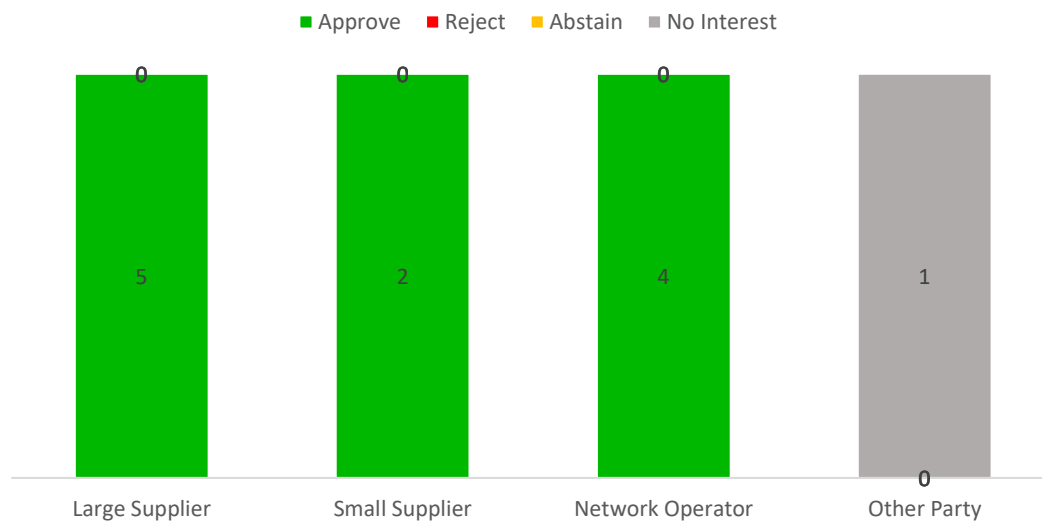
This section summarises the responses received to the SECMP0040 MRC.



Number of Respondents (by Party Type)



Views by Party Type



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Question 1

Q1: Do you believe that the proposed solution better facilitates the SEC Objectives and should be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
Wheatley Associates Ltd	Other Party	Neutral	No interest
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN agrees that this proposal better facilitates SEC Objective f). We agree with the proposer that this proposed change will ensure that each DCC user has to complete their next User Security Assessment within a more clearly defined timescale.
ENGIE	Small Supplier	Yes	The proposed change will give all SEC Parties a fair, consistent timetable when it comes to scheduling their security assessments.
Northern Powergrid	Network Operator	Yes	The proposal supports the sixth General SEC Objective of ensuring the protection of Data and the security of Data and Systems in the operation of the Code. It is clear that the intention of the SEC is that User Security Assessments are to be undertaken at annual intervals; this change proposal removes any ambiguity regarding the interpretation of 'the first year after the year of the Initial User Security Assessment' statement
E.ON Energy Solutions	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We believe that the proposed solution better facilitates SEC Objective (g) as it clarifies the obligations on SEC Parties around undertaking User Security Assessments, enabling SECAS to more efficiently manage User Security Assessments and the demand for the User CIO. As a consequence, SEC Objective (f) will also be better facilitated as this will ensure that Parties have their undertaking User

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			Security Assessments undertaken on a timely basis, ensuring that all Parties are verified as meeting the security obligation in the Code.
Electricity North West Limited	Network Operator	Yes	We agree the Modification Proposal better facilitates General SEC Objective f) to ensure the security of Data and Systems in the operation of the SEC for the reasons given and is neutral against Objectives a), b), c), d), e) and h). However, we disagree that this Modification Proposal is neutral against Objective g) as it would better facilitate the efficient administration of the SEC by providing clarity on the timeframes for scheduling a User Security Assessment.
First Utility	Large Supplier	Yes	This change proposal meets SEC Objective F in that it will ensure Users arrange a security assessment at least once per year.
One Wales Energy	Small Supplier	Yes	
ScottishPower Energy Retail Ltd	Large Supplier	Yes	We believe Modification Proposal SECMP0040 better facilitates SEC Objectives: (a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain; and (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.
SSE Energy Supply Limited	Large Supplier	Yes	We agree that this modification better facilitates General SEC Objective (F). The solution offers benefits for parties and also for SECAS' administration of User Security Assessments. We are supportive of the views expressed by SEC Security Committee in the development of this proposal.

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Western Power Distribution	Network Operator	Yes	I believe that this modification better facilitates SEC Objective (f) but for the reason that it means that there will be a more consistent timeframe for Users to complete their User Security Assessments. For the reason that the proposer has given that this modification will 'allow SECAS to more efficiently manage User Security Assessment and the demand for the User CIO' I believe that it also better facilitates SEC Objective (g) 'to facilitate the efficient and transparent administration and implementation of the Code'.
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Question 2

Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0040 should be approved?

Party Name	Party Category	Yes/No	Comments
Wheatley Associates Ltd	Other Party	Neutral	No interest
Scottish and Southern Electricity Networks	Network Operator	Yes	The impacts upon our business will be minimal and we are therefore supportive of the proposal.
ENGIE	Small Supplier	Yes	The only impact on ENGIE is the timetable for us to schedule our follow up assessments after the initial Full User Security Assessment, however I feel the change is beneficial to all SEC Parties for the reasons outlined in my answer to Q1.
Northern Powergrid	Network Operator	Yes	We do not envisage this change would give rise to a material impact or cost.
E.ON Energy Solutions	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We agree that SECMP0040 should be approved as any costs are easily outweighed by the benefits to be gained.
Electricity North West Limited	Network Operator	Yes	Currently, there is ambiguity in the drafting of Section G regarding how the SECAS and a DCC User should define the anniversary of the DCC Users' Initial User Security

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			Assessment' and consequently when the next User Security Assessment should be scheduled. We have sought clarify from SECAS on the calendar month and calendar year for our next User Security Assessment (based on agreement when our anniversary would fall) and so far SECAS have only provided a calendar year. This is insufficient detail for planning the time and resource needed to complete an assessment for our organisation. This modification will provide clarity that the scheduling of the next assessment must be within 12 months of the SEC Panel setting an assurance status. This proposal combined with the Security Control Frameworks statement that the next assessment must be scheduled within 12 weeks prior to the start of the Assessment provides a timetable for maximum of 15 months between the assurance status being set and the start of the next User Security Assessment. The modification also proposes under G8.50 (b) to reduce the timeframe for a User t to submit the outcome of the User Security Self-Assessment to the User Independent Security Assurance Service Provider from 13 to 12 months after the date of the completion of the previous User Security Assessment, We disagree with the reduction and recommend the existing 13 month timeframe remains as this introduces inconsistency between the follow up timescales for different assessment types. But we agree the clock should start from completion rather than commencement of the previous User Security Assessment.
First Utility	Large Supplier	Yes	This modification should be approved as it ensures that all Users will have to arrange a security assessment within 12 months of the previous assessment. This means that no one particular User will benefit from having security assessments held less often.

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One Wales Energy	Small Supplier	Yes	
ScottishPower Energy Retail Ltd	Large Supplier	Yes	We do not anticipate any significant impact on our organisation as a result of the implementation of SECMP0040
SSE Energy Supply Limited	Large Supplier	Yes	We believe the proposal should be approved as this is an administrative change with minimal impact to our organisation.
Western Power Distribution	Network Operator	Yes	

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Question 3

Q3: Do you agree that draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
Wheatley Associates Ltd	Other Party	Neutral	No interest
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN agrees that the draft legal text change will deliver the intention of the modification.
ENGIE	Small Supplier	Yes	Having clarified the legal text with Gordon Hextall who proposed the change, I agree the text delivers the intended modification.
Northern Powergrid	Network Operator	No	The draft legal text changes suggest a different sequence of the various types of Security Assessments for both larger and smaller Electricity Network Operators than is described in both the SEC (at section G8.44 and G 8.45) and Part 1 of SEC's Security Controls Framework document. The draft legal text wording suggests that: For a larger Electricity Network Operator: • The initial Full User Security Assessment is followed by another Full user Security Assessment

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			• They will be conducting Self-Assessments For a smaller Electricity Network Operator: • The initial Full User Security Assessment is followed by another Full user Security Assessment This is not consistent with the sequence per the extract below from Part 1 of SEC's Security Controls Framework (which matches that in SEC 5.9): <table><tr><th></th><th># of Smart Metering Systems</th><th>User Entry / Year One</th><th>Year Two</th><th>Year Three</th></tr><tr><td rowspan="2">Supplier Parties</td><td>More than 250,000¹</td><td>Full Assessment</td><td>Full Assessment</td><td>Full Assessment</td></tr><tr><td>250,000 or less</td><td>Full Assessment</td><td>Verification Assessment</td><td>Self-Assessment</td></tr><tr><td rowspan="2">Network Parties</td><td>More than 250,000</td><td>Full Assessment</td><td>Verification Assessment</td><td>Verification Assessment</td></tr><tr><td>250,000 or less</td><td>Full Assessment</td><td>Verification Assessment</td><td>Self-Assessment</td></tr><tr><td>Other Users</td><td>n/a</td><td>Full Assessment</td><td>Self-Assessment</td><td>Self-Assessment</td></tr></table>		# of Smart Metering Systems	User Entry / Year One	Year Two	Year Three	Supplier Parties	More than 250,000 ¹	Full Assessment	Full Assessment	Full Assessment	250,000 or less	Full Assessment	Verification Assessment	Self-Assessment	Network Parties	More than 250,000	Full Assessment	Verification Assessment	Verification Assessment	250,000 or less	Full Assessment	Verification Assessment	Self-Assessment	Other Users	n/a	Full Assessment	Self-Assessment	Self-Assessment
	# of Smart Metering Systems	User Entry / Year One	Year Two	Year Three																											
Supplier Parties	More than 250,000 ¹	Full Assessment	Full Assessment	Full Assessment																											
	250,000 or less	Full Assessment	Verification Assessment	Self-Assessment																											
Network Parties	More than 250,000	Full Assessment	Verification Assessment	Verification Assessment																											
	250,000 or less	Full Assessment	Verification Assessment	Self-Assessment																											
Other Users	n/a	Full Assessment	Self-Assessment	Self-Assessment																											
E.ON Energy Solutions	Large Supplier	Yes (Modified)	However we believe the following amendments should be considered: G8.41: the current drafting with regard to scheduling is a little ambiguous so we would suggest a minor amendment to the effect of “take necessary steps to schedule a Full User Security Assessment to be completed within 12 months of their initial”																												

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			G8.41 b)(ii) “both” is not needed in the text, and we believe “such steps” should be clarified with the addition of “as in G8.41 b)(i)” so that this passage reads “taking such steps as in G8.41 b)(i) and being subject to” G8.41: we believe that the last sentence should be reworded to facilitate ease of reading, and suggest “Thereafter the User shall schedule a Full User Security Assessment to be completed within 12 months of its previous Full User Security Assessment.” G8.42: we propose the same amendments as noted for G8.41 in addition to the following which we believe more clearly reflect the intent of the proposal: “The User must also take necessary steps to: Schedule a User Security Self-Assessment to be completed within 12 months of their Verification Security Assessment; Schedule a Full User Security Assessment to be completed within 12 months of their User Security Self-Assessment; Schedule a category of security assurance assessment which repeats the same [annual] sequence as that of paragraphs (X) to (X) to be completed within 12 months of their previous [Assessment].” Or “The User must take necessary steps to comply with the following triennial security assessment cycle, wherein the first instance of the first stage is scheduled to be
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			completed within 12 months of their first Full User Security Assessment: Verification Security Assessment (scheduled to be completed within 12 months of the previous assessment) User Security Self-Assessment (scheduled to be completed within 12 months of the previous assessment) Full User Security Assessment (scheduled to be completed within 12 months of the previous assessment)” G8.44: we propose the same amendments as noted for G8.41 in addition to the following which we believe more clearly reflect the intent of the proposal: “The User must take necessary steps to comply with the following triennial security assessment cycle, wherein the first instance of the first stage is scheduled to be completed within 12 months of their first Full User Security Assessment: Verification Security Assessment (scheduled to be completed within 12 months of the previous assessment) Full User Security Assessment (scheduled to be completed within 12 months of the previous assessment)” G8.45: we propose the same amendments as noted for G8.41 in addition to the following which we believe more clearly reflect the intent of the proposal: “The User must take necessary steps to comply with the following triennial security assessment cycle, wherein the first instance of the first stage is scheduled to be completed within 12 months of their first Full User Security Assessment: Verification Security Assessment (scheduled to be completed within 12 months of the previous assessment)
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			User Security Self-Assessment (scheduled to be completed within 12 months of the previous assessment) Full User Security Assessment (scheduled to be completed within 12 months of the previous assessment)” G8.47: we propose the same amendments as noted for G8.41 in addition to the following which we believe more clearly reflect the intent of the proposal: “The User must take necessary steps to comply with the following triennial security assessment cycle, wherein the first instance of the first stage is scheduled to be completed within 12 months of their first Full User Security Assessment: Verification Security Assessment (scheduled to be completed within 12 months of the previous assessment) User Security Self-Assessment (scheduled to be completed within 12 months of the previous assessment) Full User Security Assessment (scheduled to be completed within 12 months of the previous assessment)” G8.50(a): we propose the following amendment “have taken necessary steps to schedule the User Security Self-Assessment to be completed within 12 months of their previous assessment”. When reviewing this proposal we noticed that G8.50(b) does not logically follow G8.50 and so also suggest an amendment to this passage as outline below: “G8.50(b): complete their User Security Self-Assessment in accordance with the User Security Assessment Methodology; and ”
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EDF Energy	Large Supplier	Yes	We have not identified any issues with the draft legal text,
Electricity North West Limited	Network Operator	Yes	However, we also recommend that throughout the new legal drafting of Section G that after reference to the “..User shall within 12 months after” the term “ <i>completion of</i> ” should be used for the avoidance of doubt. For example under G8.44 [“...the User shall within 12 months after <u>completion of</u> such Verification User Security Assessment...”]
First Utility	Large Supplier	Yes	
One Wales Energy	Small Supplier	Yes	
ScottishPower Energy Retail Ltd	Large Supplier	No	The proposed solution set out in the FMR states: “SECMP0040 will require DCC Users to take the necessary steps to schedule their next 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)).” However, we do not agree that this is reflected in the draft legal text, which we consider ambiguous: in our view it might be construed as meaning that that the next assessment is due within 12 months of the User Independent Security Assurance

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			Service Provider having left site, or provided its report to the User etc. We would, therefore suggest substituting the following text: “After completing its initial Full User Security Assessment (or after the Follow-up Security Assessment where there was one) for the purposes of the User Entry Process, a User shall schedule a User Security Assessment with the User Independent Security Assurance Service Provider, or a User Security Self-Assessment in accordance with the provisions of Sections G8.41 to G8.47, within 12 months of the date on which the Panel set an assurance status of: (a) approved; or (b) approved, subject to the User: (i) taking such steps as the User proposes to take in its User Security Assessment Response in accordance with Section G8.26(b); or (ii) both taking the steps referred to in (i) above and being subject to a Follow-up Security Assessment by such date as the Panel may specify.” However, it is worth noting that if, as we are led to believe, Users routinely have their assurance status changed from ‘<i>approved subject to</i>’ to ‘<i>approved</i>’, then that materially alters the effect of this proposal: in that the date referred to as a single date actually becomes two separate dates, with the User able to select its preference. We do not believe this was the intent of the Code or of this change, and would welcome clarification for the SSC and Panel in this regard.
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SSE Energy Supply Limited	Large Supplier	Yes	We do not believe there to be any issues with the draft legal text.
Western Power Distribution	Network Operator	Yes	

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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Wheatley Associates Ltd	Other Party	Neutral	No interest
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN agrees that the change should be implemented as soon as reasonably practicable.
ENGIE	Small Supplier	Yes	A timescale of three months for implementation seems fair and gives sufficient time for affected DCC users to prepare for the modification.
Northern Powergrid	Network Operator	Yes	The recommended implementation date should mean that the change is in place before the second round of assessments.
E.ON Energy Solutions	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date; however consideration may need to be given to those Parties who completed the initial User Security Assessment process early and so may be given a limited amount of time to schedule their next assessment as a result of this Modification being made.
Electricity North West Limited	Network Operator	Yes	The implementation date has not been given in the documentation. However, we estimate the implementation date of this proposal to be the 18 October 2017 (based on 10

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			Working Days (WDs) following the end of the 10 WD referral period, which commences after the Change Board vote which is scheduled for the 20 September 2017). We want this modification to be implemented as soon as possible to give clarity and enable us to plan for our next User Security Assessment.
First Utility	Large Supplier	Yes	We agree that the change modification should be implemented as soon as possible.
One Wales Energy	Small Supplier	Yes	
ScottishPower Energy Retail Ltd	Large Supplier	Yes	We think this modification should be made as soon as is reasonably practicable
SSE Energy Supply Limited	Large Supplier	Yes	We agree with the implementation date and the intention of the proposer to benefit parties caught in between both arrangements.
Western Power Distribution	Network Operator	Yes	

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