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DP205

‘Updating terminology to align with the NCSC’

Modification Report

Version 0.1

10 May 2022

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions. This document will be updated as this modification progresses.

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Contact

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1. Summary

This proposal has been raised by Emslie Law from OVO Energy Limited.

The Proposer has highlighted a recent [article](#) published by National Cyber Security Centre (NCSC) highlighting an issue with terminology which is deemed not inclusive. The Proposer believes that the Smart Energy Code (SEC) should align with the NCSC, whereby the terms “black-list” and “white-list”, should be replaced with “deny list” and “allow list”.

This issue was initially raised at the Technical Specification Issue Resolution Subgroup (TSIRS), however the TSIRS believed that it was a wider issue. This has now been passed to the Smart Energy Code Administrator and Secretariat (SECAS) to progress as a modification.

2. Issue

What are the current arrangements?

The SEC currently uses the terms “blacklist/black-list” and “whitelist/white-list” to mean “deny list” and “allow list”. These terms are subsequently used throughout the SEC and its documents, most notably in the Data Communications Company (DCC) User Interface Specification (DUIS) but also in the Message Mapping Catalogue (MMC), Great Britain Companion Specification (GBCS) and other documents. There are also many instances of these terms used in DCC Systems and in the Central Products List (CPL).

What is the issue?

A recent [article](#) published by NCSC highlighting an issue with terminology which is deemed not inclusive. The NCSC has stated that the “blacklist/whitelist” terminology in use within the SEC and its documents is ‘not acceptable’ and should no longer be used. In order to align with the NCSC, the Proposer believes the terms “blacklist/black-list” and “whitelist/white-list”, should be replaced with “deny list” and “allow list”. The Proposer believes that no justification or business case should be needed to address this.

This issue was initially raised at the TSIRS under Action TS1506; however TSIRS members believed that it was a wider issue than just the Technical Specification documents. Therefore, the issue has been passed onto SECAS to progress it as a modification.

What is the impact this is having?

The NCSC considers that the language used within the SEC to have unacceptable connotations and is not in alignment with the NCSC. The Proposer believes there should be acknowledgement that certain terms change over time and need to change within the SEC documents.

Impact on consumers

There is no impact on consumers.

3. Assessment of the proposal

Observations on the issue

Initial assessment

The DCC has given an initial indication that this modification could require DCC System changes. SECAS considers that more discussion will be needed with the DCC around this, in particular to look at the background code which uses these terms and the cost of changing all the terms used. It is possible these terms within the SEC cannot be changed without affecting other systems and documents. Such changes, and the costs these would incur, would likely have a negative consumer impact in the current economic climate, and as such any approaches that would avoid incurring unnecessary cost should be explored.

Areas for assessment

As part of the modification's assessment, SECAS will engage with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums.

SECAS believes the following Sub-Committees will need to input to this modification:

Sub-Committee	Input needed
OPSG	None – legal text change only and therefore no impact on Operational processes
SMKI PMA	SMKI document set will be directly impacted by this proposal
SSC	None – no impacts on the security arrangements
TABASC	None – no architecture changes should result from this modification

Appendix 1: Progression timetable

This Draft Proposal was raised on 10 May 2022. This proposal will be presented to the Change Sub-Committee (CSC) on 17 May 2022 for initial comment.

Due to the high number of modifications which have been raised this month SECAS is recommending this modification is added to the waiting list until there is sufficient capacity to progress the Proposal.

Timetable	
Event/Action	Date
Draft Proposal raised	10 May 2022
Presented to CSC for initial comment	17 May 2022
CSC agree this Proposal is placed on the waiting list	17 May 2022

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
DUIS	DCC User Interface Specification
GBCS	Great Britain Companion Specification
MMC	Message Mapping Catalogue
NCSC	National Cyber Security Centre
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrators and Secretariats
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSIRS	Technical Specification Issue Resolution Subgroup