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DP229

‘Notification of material change to User Systems to include de- commissioning’

Modification Report

Version 0.1

8 February 2023



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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC).

The SEC requires Users to notify the SSC of any new components or functionality to be included in their User System. However, the SEC does not explicitly state that Users must notify the SSC prior to discontinuing a component or functionality from their User System or de-commissioning the whole User System. The implicit requirement is being included in the Security Controls Framework (SCF) and that document is being updated to make the requirement explicit.

The Proposed Solution is to update the SEC to align the two, thereby reducing ambiguity surrounding Users' requirements.

There are no Data Communications Company (DCC) system changes associated with the modification. Therefore, the cost to implement is limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort. There are no impacts to SEC Parties from this modification as the obligation already exists implicitly.

The modification is Self-Governance and is targeted for the June 2023 SEC Release.

2. Issue

What are the current arrangements?

Assurance of User Systems

SEC Section G3 details the obligation on Users regarding their System security. Under clause G3.9, Users are required to notify the SSC of any new or materially changed component or functionality of their User System. The SSC will then assess the security impact of that material change prior to any approval for the component to be used Operationally.

Whilst there is no specific reference to the discontinuation of any User System component or functionality or de-commissioning an entire User System, it is considered that any de-commissioning would constitute a material change and therefore the requirement would apply. In any event, Sections G8.13 and G8.14 require a User to support the SSC to facilitate the assessment of compliance and provide any data that may reasonably be requested. The SSC is aware of several User Systems that will be de-commissioned soon and considers it to be a reasonable request to notify the SSC of such material changes.

The Security Controls Framework

The SEC, under Section G7.19(a), requires the SSC to develop and maintain the SCF. The purpose of the SCF is to provide support and guidance to all Parties involved in the User Security Assurance Process. The SCF is split into two documents: Part 1 which details the assessment methodology and Part 2 which provides Parties with specific guidance.

The SCF does not currently contain explicit guidance detailing the information Parties need to provide the SSC, to allow them to provide assurance upon de-commissioning a component of their User System.

What is the issue?

Currently, Section G3.9 does not specify discontinuation or de-commissioning explicitly. Users could therefore be unaware of the requirement to notify the SSC and have assurance undertaken before carrying out any de-commissioning.

The SCF is currently implicit in its requirements that all changes to User systems are required to be assured. The SSC is able to make changes to the SCF under Section G7.19 without the need for a modification. The SCF is currently being updated to make explicit those requirements apply when User systems are de-commissioned.

This discrepancy between documents could create confusion or ambiguity for Parties as to their responsibilities.

What is the impact this is having?

In recent months, two Parties have approached the SSC voluntarily notifying de-commissioning of a User System and querying what is required upon de-commissioning of a User System, and the SSC is aware of another that is pending. The SSC has provided that information but having carried out a review of the existing requirements, believes this should be made explicit to the benefit of others.

Impact on consumers

There is no direct impact on consumers from this modification.

3. Solution

The SSC is in the process of updating the SCF to specifically call out the requirement under de-commissioning of systems.

To align the SEC to the SCF and improve clarity the SEC will be updated under Section G3.9 to reflect the requirement on Users to notify the SSC when a component of their system is being discontinued or de-commissioned.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted	
Large Suppliers	Small Suppliers

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SEC Party Categories impacted			
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties		DCC

This change will make explicit an existing implicit requirement. Therefore there are no direct impacts on Parties as the requirement already existed. The requirement applies to all DCC Users.

DCC System

There will be no DCC System impacts from this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Devices

There will be no impact to Devices from this modification.

Consumers

There will be no impact to consumers from this modification.

Other industry Codes

There will be no impact to other industry Codes from this modification.

Greenhouse gas emissions

There are no impacts on Greenhouse gas emissions from this modification.

5. Costs

DCC costs

There are no DCC costs to implement this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a standalone modification is half a day of effort, amounting to approximately £300. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There will be no costs incurred by SEC Parties in implementing this modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **29 June 2023** (June 2023 SEC Release) if a decision to approve is received on or before 15 June 2023; or
- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received after 15 June 2023 but on or before 19 October 2023.

The SSC can already request the data required and therefore there is no impact on SEC Parties, hence a minimal two-week lead time is sufficient between decision and implementation. To minimise costs to SEC Parties this modification will target a scheduled SEC Release.

7. Case for change

Business case

The SSC has been contacted by two Parties in recent months querying what is required when de-commissioning their User System. This highlights the ambiguity that currently exists and should be rectified. The cost of the modification is limited to SECAS time and effort to implement the new SEC version. Although SEC Parties are not directly impacted by the modification as the requirement exists currently, this change will remove ambiguity over the requirements and will benefit them due to the added clarity.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (a)¹ by reducing the risk of a User's System being de-commissioned and introducing issues to either Devices or User Systems that impact consumers.

This modification will also better facilitate SEC Objective (f)² by reducing the chance of potential security defects being introduced to a User's System.

Views against the consumer areas

Improved safety and reliability

This modification will have a positive impact on reliability as Users will be more aware of their obligations and therefore there is a reduced risk of de-commissioning systems prior to appropriate assurance being completed.

Lower bills than would otherwise be the case

This modification will have no impact on consumer bills.

Reduced environmental damage

This modification will have no impact on reducing environmental damage.

Improved quality of service

This modification will have no impact on quality of service.

Benefits for society as a whole

This modification will have no impact on society as a whole.

Appendix 1: Progression timetable

This modification was raised 8 February 2023. It will be presented to the Change Sub-Committee (CSC) on 21 February 2023 for initial comment. Once the SSC has updated the SCF, the modification will return to CSC to approve the full Modification Report and proceed to the Report Phase.

Timetable	
Event/Action	Date
Draft Proposal raised	8 Feb 2023

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² Ensure the protection of Data and the security of Data and Systems in the operation of this Code

Timetable	
Event/Action	Date
Presented to CSC for comment and conversion to Modification Proposal	21 Feb 2023
<i>Modification Report approved by CSC</i>	<i>18 Apr 2023</i>
<i>Modification Report Consultation</i>	<i>19 Apr – 12 May 2023</i>
<i>Change Board Vote</i>	<i>24 May 2023</i>

Italics denote planned events that could be subject to change

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
CSC	Change Sub-Committee
DCC	Data Communications Company
SCF	Security Controls Framework
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSC	Security Sub-Committee