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DP296

‘Alignment with updated ISO standards’

Modification Report

Version 0.1

4 July 2025



About this document

This document is a Modification Report. It 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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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA).

The Smart Energy Code Administrator and Secretariat (SECAS) receives reports and maintains a log of typographical errors, cosmetic and other inconsistencies, omissions and other clarifications that are required to be corrected within SEC documentation. Any such instances that are identified by any Party and notified to SECAS are placed on the log and are amended at an appropriate point. The Proposed Solution to this modification aims to address the International Organisation for Standardisation (ISO) standards referred to in SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' and Appendix AT 'SMETS1 Cryptographic Key Management Policy'.

This modification will have no direct impacts on any SEC Party but will give greater clarity and transparency to the SEC Documents. Implementation costs are limited to SECAS time and effort to update the SEC. Implementation is targeted for an ad hoc SEC Release prior to October 2025. This is a Fast-Track Modification.

2. Issue

What are the current arrangements?

The current SEC Documents have some minor errors which have occurred due to an update in ISO Standard numbers. SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' and SEC Appendix AT 'SMETS1 Cryptographic Key Management Policy' currently refer to ISO27001 (2013) and ISO27002 (2013) and to specific 'A.10' controls.

What is the issue?

These standards have been updated to ISO27001 (2022) and ISO 27002 (2022) and the controls have changed from 'A.10' to 'A.8.24'. To align with the agreed transition period, the change to compliance with the new standards is required to be implemented by October 2025.

What is the impact this is having?

If these corrections are not resolved, the SEC Documents will contain inconsistencies. Although these are only typographical errors, leaving these in could cause confusion for Parties when reading these documents.

If these errors remain, it could make it harder for Parties to comply with these documents and make the documents in question harder to maintain, increasing the chance of further inconsistencies occurring in the future.

Impact on consumers

The identified issue does not impact consumers.

3. Solution

Proposed Solution

The Proposed Solution is to update the SEC to the correct references.

The proposed Legal Text changes can be found in Annex A.

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
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties		DCC

There are no direct impacts on SEC Parties from this modification. All Parties will indirectly benefit from this modification as the SEC Documents will have greater clarity and transparency.

DCC System

This modification does not impact the Data Communications Company (DCC) Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section L ‘Smart Metering Key Infrastructure and DCC Key Infrastructure’
- Appendix AT ‘SMETS1 Cryptographic Key Management Policy’

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Devices

This modification does not impact Devices.

Consumers

This modification does not impact consumers.

Other industry Codes

This modification does not impact other industry Codes.

Greenhouse gas emissions

This modification does not impact greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs associated with this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone 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 are no SEC Party costs associated with this modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **Ad hoc SEC Release** 15 Working Days following decision.

As this is a Fast-Track Modification the decision to approve will be made by the Change Sub-Committee. SECAS is targeting this modification for inclusion in an ad hoc SEC Release before October 2025. It is essential these changes are implemented by October 2025 to ensure the ISO is implemented within three years of the update. Without this being included in the SEC there is a risk

the User CIO could raise a non-compliance if a User has not implemented the updated ISO standards by October 2025.

7. Case for change

Business case

This modification will only incur the costs for SECAS time and effort and will address inconsistencies and points of potential confusion or misinterpretation.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that the modification will better facilitate SEC Objective (g)¹ as it will correct errors in the SEC and lead to less confusion or interpretation.

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on safety and reliability.

Lower bills than would otherwise be the case

This modification will have a neutral impact on consumer bills.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will have a neutral impact on quality of service.

Benefits for society as a whole

This modification will have a neutral impact on benefits for society.

¹ To facilitate the efficient and transparent administration and implementation of this Code.

Final conclusions

This modification addresses inconsistencies and points of potential confusion or misinterpretation. There are no DCC costs and only a minimal SECAS cost to implement.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	4 Jul 2025
<i>CSC converted Draft Proposal to Modification Proposal</i>	<i>15 Jul 2025</i>
<i>Modification Report approved by CSC</i>	<i>15 Jul 2025</i>
<i>CSC Decision</i>	<i>15 Jul 2025</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
ISO	International Standardisation Organisation
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS1	Smart Metering Equipment Technical Specifications
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority