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SECMP091

'Updating Security Assurance Status'

Modification Report

Version 1.0

About this document

This document is the Modification Report for SECMP091 'Updating Security Assurance Status' (webpage). It provides detailed information on the background, issue, solution, costs, impacts and implementation approach. It also summarises the discussions that have been held and the conclusions reached with respect to this Modification Proposal.

Contents

This document also has one annex:

- **Annex A** contains the redlined changes to the SEC required to deliver the proposed solution.

Smart Energy Code

1. Summary

Once a Party completes their Full User Security Assessment (FUSA) the SEC Panel assign them one of four assurance statuses. Two of these, “Provisionally Approved” and “Deferred”, indicate significant security deficiencies that require substantial remediation, the severity of which are not reflected in the current SEC terminology.

The Security Sub Committee (SSC) believes that the assurance status set should be clear to Parties and accurately reflect the situation. As such it proposes to amend these assurance status as follows:

- “Provisionally Approved” to “Deferred”; and
- “Deferred” to “Rejected”.

Additionally, there is no current provision for the SSC to require a Party to undertake a second FUSA if they are set a status of “rejected”. The SEC only allows for updates to the original User Security Assessment Response.

The SSC believe where a Party is set a status of “Rejected” a second FUSA is more appropriate than an updated User Security Assessment Response. A second FUSA would provide assurance for all Parties, and the DCC, that the significant deficiencies have been addressed.

2. Background

Unclear Assurance Status

SEC Section G 'Security' states that once a Party has completed their Full User Security Assessment (FUSA) the SEC Panel shall assign them an assurance status.

Section G8.36 sets out four potential assurance statuses:

1. **Approved**;
2. **Approved subject to** the Party taking the mitigating steps outlined in FUSA;
3. **Provisionally approved** subject to the Party taking the mitigating steps outlined in FUSA, undertaking a Follow-up Security Assessment and the Panel approving the results of this; and
4. **Deferred** subject to the Party amending its User Security Assessment Response to resolve issues that are inadequately addressed, resubmitting their User Security Assessment Response and the Panel reconsidering that Party's assurance status.

The first two assurance statuses allow the Party to complete the User Entry Process. However, the latter two assurance statuses do not and indicate significant security deficiencies that require substantial remediation.

Having reviewed over 150 User Assessments the SSC believes the current wording to be potentially confusing as to what the statuses actually mean. It would like the wording to be clear and obvious to Parties. It is proposing to amend "Provisionally Approved" to "Deferred" and amend "Deferred" to "Rejected" as that more accurately reflects the situation and is in line with original policy intent.

Instructing a second FUSA

Currently, if a Party is set a status of "Rejected" ("Deferred" under the current drafting) the SSC requires them to amend their User Security Assessment Response. The SSC believe that where a Party is set a status of "Rejected" a second FUSA is more appropriate than an updated User Security Assessment Response. A second FUSA would provide assurance for all Parties, and the DCC, that the significant deficiencies have been addressed

SECMP091 was raised by the Security Sub Committee on 22 October 2019 to resolve this issue.

3. Solution

Proposed Solution

The titles of the Security Assurance Status in Section G8.36 will be amended as follows:

- “Provisionally Approved” to “Deferred”; and
- “Deferred” to “Rejected”

Additionally, where a Party is set a status of “Rejected” the SSC require a second FUSA is undertaken.

Legal text

The changes to the SEC required to deliver the proposed solution 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

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'

Other industry Codes

No impact.

Greenhouse gas emissions

No impact.

5. Costs

SECAS costs

The estimated SECAS implementation costs to implement this modification is 2 days of effort, amounting to approximately £1200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.
- Aligning guidance documentation

6. Implementation approach

Recommended implementation approach

It is recommended this Modification be implemented on **27 February 2020** (February 2020 SEC Release) if a decision to approve is received on or before 20 December 2019.

This will allow Parties time from any potential approval at the December Change Board to implementation as part of the February 2020 release. There will only be two potential SSC meetings where the change could be in effect. However, including this change as part of a scheduled release will provide clarity and certainty over obligation changes.

7. Conclusions

Benefits and drawbacks

The Proposer has identified the following benefits and drawbacks in implementing this modification:

Benefits

- Provides clarity to Parties by making Assurance Status clear and obvious
- Provides flexibility to SSC to require the most appropriate actions where significant defects have been identified.

Drawbacks

- Non identified

Proposer's rationale against the General SEC Objectives

Objective (g) - Facilitate the efficient and transparent administration and implementation of the SEC

The Proposer believes that SECMP091 will better facilitate SEC Objective (g) as it allows for the more efficient processing of User Security Responses, whilst providing greater transparency and clarity to Parties.

Sub-Committee views

The SSC discussed and supported this Proposal at their meeting on 9 October 2019.

Appendix 1: Glossary

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

Glossary	
Acronym	**Full term**
FUSA	Full User Security Assessment
SSC	Security Sub Committee
DCC	Data Communications Company

If you have any questions on this modification, please contact:

Adam Lattimore

020 7770 6921

Adam.lattimore@gemserv.com

Smart Energy Code Administrator and Secretariat (SECAS)

8 Fenchurch Place, London, EC3M 4AJ

020 7090 7755

sec.change@gemserv.com