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MP205

‘Updating terminology to align with the NCSC’

Modification Report

Version 0.5

9 July 2024



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 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 Joe Hehir from the Data Communications Company (DCC).

The Proposer has highlighted a recent [article](#) published by National Cyber Security Centre (NCSC) highlighting an issue with terminology which is deemed not inclusive and suggested other organisations consider aligning with the NCSC. The Proposer believes that the SEC should align with the NCSC suggestion, 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.

The Proposed Solution to this modification is add definitions of “allow list and deny list” into SEC Section A – Definitions and Interpretations. This will enable all new documents created by the DCC going forward to use the new terms instead as the definition still links to white list and black list.

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), the 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 the NCSC highlighted an issue with terminology which is deemed not inclusive. The NCSC has determined it will no longer use these terms. In order to align with the NCSC, the Proposer believes the terms “blacklist/black-list” and “whitelist/white-list” within the SEC should be replaced with “deny list” and “allow list”.

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 as a modification.

What is the impact this is having?

If no changes are made, the SEC documents will no longer align with the NCSC terminology.

Impact on consumers

There is no impact on consumers.

3. Assessment of the proposal

Areas for assessment

Sub-Committee input

SECAS has engaged 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. the Chairs of the Sub-Committees and concluded that the TABASC and the SSC would be required to provide views on the modification.

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

Sub-Committee input	
Sub-Committee	Input sought
OPSG	None – legal text change only and therefore no impact on Operational processes
SMKI PMA	None – no impacts
SSC	Yes, there will be impacts on the security arrangements
TABASC	Yes, there will be architecture changes resulting from this modification

Potential DCC System changes

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. This will be investigated and assessed as part of the Refinement Process.

Instances within the SEC Documents

SECAS has identified two instances of 'blacklist/black-list' and 96 instances of 'whitelist/white-list' within the SEC.

Instances of black/white list	
SEC Document	Number of instances
Section A 'Definitions and Interpretation'	1
Section H 'DCC Services'	1

Instances of black/white list	
SEC Document	Number of instances
Schedule 8 'Great Britain Companion Specification'	5
Appendix R 'Common Test Scenarios Document'	9
Appendix AB 'Service Request Processing Document'	1
Appendix AC 'Inventory, Enrolment and Withdrawal Procedures'	2
Appendix AD 'DCC User Interface Specification'	40
Appendix AL 'SMETS1 Transition and Migration Approach Document'	35
Appendix AM 'SMETS1 Supporting Requirements'	3
Appendix AP 'Secure S1SP Certificate Policy'	1

The redlined instances within the SEC can be found in Annex A.

Observations on the issue

Views of the Change Sub-Committee

SECAS noted that there will be a DCC system impact as 'whitelist' is a flag on some messages sent from the DCC to Suppliers regarding the status of Devices. A Change Sub-Committee (CSC) member noted that many internal documents had references to the Device status and the cascade of impacts from this change would require a lot of work; this would likely be the same for other Parties. SECAS acknowledged this and stated that there would need to be a much wider conversation around the potential impact of this modification and ways to mitigate it.

Solution development

Views of the Requirements Workshop

Members noted that v0.1 of the business requirements were based on a specific solution and should need to be reworked to allow the outcomes to be achieved in the most appropriate way.

Members suggested that options be drafted for what the solution would look like on different levels and depths of changes. They also queried if it would be acceptable for internal facing aspects and coding levels to remain unchanged, and only any outward facing instances and reporting aspects were to show the new term.

A member also noted that NSCS's article was only a suggestion and guidelines for the removal of non-inclusive language used, therefore it should be taken into account when weighing up the need to change every instance of 'black/white-list' and the cost required to make the changes especially given the current energy and economic situation.

Appendix 1: Progression timetable

Following the Requirement Workshop, SECAS and the Proposer updated the business requirements. SECAS will seek the feedback from the Working Group, the SSC and the TABASC before requesting a Preliminary Assessment.

Timetable	
Event/Action	Date
Draft Proposal raised	10 May 2022
Presented to CSC for initial comment	17 May 2022
CSC agrees this Proposal is placed on the waiting list	17 May 2022
Proposal removed from waiting list	19 Jul 2022
CSC converts Draft Proposal to Modification Proposal	16 Aug 2022
Business requirements developed with Proposer and DCC	16 Aug – 21 Aug 2022
Business requirements discussed at Requirements Workshop	22 Aug 2022
Business requirements re-developed with Proposer	22 Aug – 31 Aug 2022
<i>Business requirements discussed with Working Group</i>	<i>7 Sep 2022</i>
<i>Business requirements discussed with SSC</i>	<i>14 Sep 2022</i>
<i>Business requirements discussed with TABASC</i>	<i>6 Oct 2022</i>
<i>DCC Preliminary Assessment requested</i>	<i>10 Oct 2022</i>
<i>DCC Preliminary Assessment expected to be returned</i>	<i>31 Oct 2022</i>
<i>Update provided to CSC</i>	<i>15 Nov 2022</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
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
DUIS	DCC User Interface Specification
GBCS	Great Britain Companion Specification
NCSC	National Cyber Security Centre
S1SP	SMETS1 Service Provider
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrators and Secretariats
SMETS1	Smart Metering Equipment Technical Specifications 1
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSIRS	Technical Specification Issue Resolution Subgroup