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MP205 'Updating terminology to align with the NCSC'

November 2024 Working Group – Meeting Summary

Attendees

SEC Party Category	Working Group Members	Representing
Large Suppliers	Julie Brown (JB)	British Gas
	Emma Johnson (EJ)	British Gas
	Alex Hurcombe (AH)	EDF
	Francesca Scott (FS)	EDF
	Sharon Armitage (SA)	E.ON
	Ralph Baxter (RB)	Octopus Energy
	Joey Manners (JM)	Octopus Energy
	Emslie Law (EL)	OVO
	Mahfuzar Rahman (MR)	Scottish Power
	Kevin Clark (KC)	Utilita
Other SEC Parties	Patricia Massey (PM)	BEAMA
	Ian Lovatt (IL)	Chameleon
	Daniel Davies (DD)	ESG Global
	Martin Bell (MB)	EUA
	Michael Snowdon (MS)	Secure Meters
	Jeff Studholme (JS)	Smart Meter Assets
Network Parties	Jamie Lowe (JL)	Northern Power Grid
	Shuba Khatun (SK)	SSEN

Other Participants		
DCC		
Bradley Baker (BB)	Chris Barlow (CB)	Paul McShane (PM)
Rajorshi Nag (RN)	Robin Seaby (RS)	Sumit Singh Thakur (SST)
David Walsh (DW)		
SECAS		
Simon Grimwood (SG) *WG Chair*	Rachel Black (RBl) *Meeting Secretary*	Elizabeth Woods (EW) *Lead Analyst*
Mo Sumro (MS) *Lead Analyst*	Georgiana Severin (GSe) *Lead Analyst*	Alison Beard (AB) *Releases Manager*
Marc Rhodes (MR) *Lead Analyst*	Rainer Lischetzki (RL) *Technical Consultant*	

Overview

Issue

- An article published by the National Cyber Security Centre (NCSC) highlighted an issue with terminology utilised within the Smart Energy Code (SEC) which is deemed non-inclusive and suggested amending the terminology to align with the NCSC.

- In order to align with the NCSC, it has been suggested the Smart Energy Code Administrator & Secretariat (SECAS) consider replacing the terms "*blacklist/black-list*" and "*whitelist/white-list*" within the SEC. and have them replaced with "deny list" and "allow list".

Impacts

- If no changes are made, the SEC documents will not align with the NCSC terminology potentially leaving misalignment and confusion amongst the industry.

Proposed Solution

- The Proposed Solution to this modification is to remove "*blacklist/black-list*" and "*whitelist/white-list*" from the SEC, and replace them with the suggested terms of "*allow list*" and "*deny list*"
- In addition to the changes, the new terms would also be defined within SEC Section A – 'Definitions and Interpretations'.
- The Proposed Solution will be applied to all Smart Metering Equipment Technical Specification (SMETS) Devices and will impact all Service Providers (SP).
- Alternative Proposed Solutions were considered however they were discarded due to potential inconsistencies and confusion of the contradictory statements.

Working Group Discussion

The Working Group (WG) Chair gave an overview of the modification for the benefit of attendees.

DSP Re-Procurement

JM noted that the upcoming Data Service Provider (DSP) re-procurement is out of scope for the MP205 Proposed Solution. JM asked if there was any indication as to what the cost would be if the Proposed Solution were to only be implemented in the '*new*' DSP system. The Data Communication Company (DCC) (DW) advised that costs would be associated with that change however an accurate figure was not attainable at this time. DW noted that whilst the DSP would be impacted, there would be a more significant impact to the Communication Service Provider (CSP).

MP205 Background

AB confirmed the DCC had raised the Modification in May of 2022, but due to various reasons during its lifespan, it had been placed on hold to enable more understanding to be gathered on the Issue and potential costs associated with the Proposed Solution. AB noted that the previous Working Group discussion has been summarised and is available on the MP205 webpage. AB confirmed that there will be a significant amount of industry impact due to changes required to multiple technical specifications.

Proposed Solution

EL noted that the costs associated with the Proposed Solution are very high for what is essentially a change of wording within the SEC and DCC Total System. AB advised that as the wording is hard coded within the DCC Total System and Smart Metering Systems, changing the terminology is not a straightforward change.

JS noted everyone involved with this Modification wants to do the right thing in removing any non-inclusive language where possible, even when not intended in an offensive manner. JS queried what the overall impact is of this Modification in terms of risk to reputation of the Smart Metering Implementation Programme (SMIP).

JB advised the main issue with the Proposed Solution is the associated costs, which will not remove the entirety of the issue from the SMIP ecosystem as there are many aspects that are out of scope for the Proposed Solution. JB asked if there was a more organic and less costly way to make these changes. AB noted that this had been discussed with the DCC and there was concern about potential confusion if new systems or changes implement the proposed terminology alongside the existing terminology.

Potential Future Impacts

SK noted that there may be a case to implement the change and therefore accept the associated costs sooner rather than later to avoid any future issues or enhanced costs. AB confirmed the NCSC only issued a suggestion to make the amendments and is not yet mandatory but noted this may change in the future. The DCC (DW) noted that the DSP, which is out of scope for MP205, has 6400 instances of the term "*whitelist/white-list*" across 600 impacted files. DW also noted other providers will have similar numbers of impacted files.

DD advised that in addition to the potential offensive impacts, there is the question of consumer perception of spending between £5,500,000 and £7,500,000 on the changing of two words within the SEC and DCC Total System. AB confirmed that the SEC and DCC Total System are not visible to consumers. AB noted there is a potential for consumer bills to rise as a result of this modification.

MB asked if the out-of-scope elements to MP205 were to be included in the Proposed Solution, what costs would be associated. The Working Group Chair (SG) advised it would need to be assessed but is likely to be another large cost in addition to the already established costs. MB advised they believe the public may not be comfortable with the level of spend associated with the Proposed Solution.

EL noted that the NCSC have not issued anything further since their suggestion was made, but if reasoning was required in the future, industry would need to explain that potential reputational damage to the SMIP was assessed against the potential costs. JB noted that if a costly change is to be made that will have no material or functional benefit to consumers, the Proposed Solution should ensure the industry eco-system is flexible for future change to be accommodated. DD noted the meaning and understanding of words evolves regularly, meaning similar issues may arise in the future with similar levels of cost associated to make changes.

SK stated that if industry is not open to change, the SMIP could be perceived to be turning a blind eye to non-inclusive and potentially racist terminology. SK noted if changes are not made it could set a precedent for the future.

Out of Scope Changes

JB advised even with nearly £8million spent on this change, there are other areas of industry utilising non-inclusive terms that will not be fixed. JS noted that not all areas identified are governed by the SEC and cannot be instructed to make the proposed changes. JS also noted that those who could make the changes without cost should be actively looking into the issue. IL asked if future systems and procurements are future proofing against this issue. The DCC (DW) advised that as this is not a mandatory requirement for change, and MP205 may not even be approved for implementation. The Working Group Chair (SG) acknowledged this and said there may be some technical debt to be addressed in the future to resolve this issue.

AB advised that the SEC Panel should be consulted in relation to this Issue, and SECAS could suggest that the Panel to issue instruction to ask Industry to remove the non-inclusive terminology from their processes and future development. The DCC (DW) acknowledged this but advised as the terms are still hard coded within the DCC Total System, phasing out the terms, as opposed to complete removal and replacement, is an unviable approach.

Industry Approach

PM asked how other industries are approaching the NCSC suggestion. The Working Group Chair (SG) advised this could be looked into.

JS advised their opinion is the reputational damage associated with paying between £5.5-£7.5 million for the changing of two words would be greater than that of the risk of reputational damage to the SMIP. AH advised they believe the terms should be removed, but noted this won't resolve the overall problem, and that wider scope and context would need to be considered. AH believes it would be wrong to request a DCC Full Impact Assessment (IA), costing £250,000 to complete, at this time. DD seconded this, adding they feel the IA won't highlight anything that is not already known.