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# MP249

## ‘Housekeeping Changes for the November 2023 SEC Release’

### Modification Report

Version 1.0

19 September 2023



## About this document

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This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, 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.

## Contact

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## 1. Summary

This proposal has been raised by David Walsh from the DCC (Data Communications Company).

This modification addresses 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 Smart Energy Code Administrator and Secretariat (SECAS) are placed on a log to be amended at an appropriate point. The Proposed Solution to this modification aims to address all the outstanding issues that are currently identified.

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 the November 2023 SEC Release. This is being progressed as a Fast-Track Modification.

## 2. Issue

### What are the current arrangements?

The current SEC Documents have some minor errors which were either in the SEC from inception and have recently been discovered, introduced via various changes over the years since it was created or where references have changed due to external factors. SECAS maintains a log of these errors, which are either identified by SECAS or notified to SECAS by other parties.

### What is the issue?

These errors make the document harder to understand and potentially lead to confusion or misinterpretation.

As well as reported housekeeping changes, the Security Sub-Committee (SSC) has reviewed and considered issues surrounding User CIO and DCC CIO, as well as outdated standards with nationally mandates one. The changes aim to streamline the qualifications process and ensure compliance with up-to-date security procedures.

The housekeeping changes are listed below along with the specific amendments that are needed in this modification:

| Summary of error                                                                                                                                                                                                                 | Sections affected           | Proposed change                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The certification bodies referenced for clauses G8.4 – G8.6 and G9.5-G9.7 are no longer valid.</p> <p>National Cyber Security Centre (NCSC) qualification that is referenced in SEC Section G5.7 is no longer maintained.</p> | <b>Section G – Security</b> | <p>Update equivalent body for Certification of DCC CIO and User CIO.</p> <p>2021 Telecommunications (Security) Act (TSA) is suitable to replace the HMG Security Procedures in Section G5.7</p> |

|                                                                                                                                                                                                                                           |                                                              |                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| Misalignment between Users obligations & the DCC obligations over which organisations can carry out vulnerability assessments.                                                                                                            |                                                              | Align obligations on Users and the DCC for vulnerability assessments                                                     |
| Typographical error in SEC Section H3.25                                                                                                                                                                                                  | <b>Section H – ‘DCC Services’</b>                            | Update Clause H3.25 to read in present tense                                                                             |
| Clause I1.7(m) has been incorrectly split and requires amending                                                                                                                                                                           | <b>Section I – ‘Data Privacy’</b>                            | Amend clause (n) to rejoin to previous clause                                                                            |
| ‘Self Service Interface’ referenced throughout document with no hyphen                                                                                                                                                                    | <b>Appendix AG – ‘Incident Management Policy’</b>            | Update references to ‘Self-Service Interface’                                                                            |
| There is a typographical error in the interpretation of Final Operating Capability (FOC) (SMETS1 Service Provider Certification Authority (or FOC S1SPCA) in SEC Appendix AP2 which incorrectly references the defined term ‘Secure S1SP’ | <b>SEC Appendix AP2 - ‘Secure S1SPKI Certificate Policy’</b> | Correct the definition of ‘FOC S1SP Certification Authority’ by replacing the defined term ‘Secure S1SP’ with ‘FOC S1SP’ |

## What is the impact this is having?

If these corrections are not resolved, the SEC Documents will contain inconsistencies. Leaving these in could cause confusion for Parties when reading these documents and increases the chances 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 correct the minor errors and inconsistencies identified in the SEC Documents.

The legal text 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 DCC Systems.

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'
- Section H 'DCC Services'
- Section I 'Data Privacy'
- Appendix AG 'Incident Management Policy'
- Appendix AP2 'Secure S1SPKI Certificate Policy'

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

### Technical specification versions

This modification does not include any technical specifications.

### 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

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### 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 £600. 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

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### Recommended implementation approach

SECAS is recommending an implementation date of:

- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received on or before 12 October 2023; or
- **29 February 2024** (February 2024 SEC Release) if a decision to approve is received on or before 15 February 2024

The modification needs to be implemented as soon as reasonably practicable to clarify any ambiguities. The November 2023 SEC release is next scheduled release this modification could be targeted for.

## 7. Case for change

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### Business case

This modification will only incur the costs for SECAS time and effort and will address multiple 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 (a)<sup>1</sup> 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.

### Final conclusions

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

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<sup>1</sup> Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

## Appendix 1: Progression timetable

| Timetable                                             |             |
|-------------------------------------------------------|-------------|
| Event/Action                                          | Date        |
| Draft Proposal raised                                 | 12 Sep 2023 |
| Presented to CSC for initial comment                  | 19 Sep 2023 |
| CSC converted Draft Proposal to Modification Proposal | 19 Sep 2023 |
| Fast-Track Modification approved by CSC               | 19 Sep 2023 |

*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                                                                                      |
| CIO      | Competent Independent Organisation                                                             |
| DCC      | Data Communications Company                                                                    |
| FOC      | Full Operating Capacity                                                                        |
| NCSC     | National Cyber Security Centre                                                                 |
| SEC      | Smart Energy Code                                                                              |
| SECAS    | Smart Energy Code Administrator and Secretariat                                                |
| SISPCA   | Smart Metering Equipment Technical Specification 1 Security Policy and Certification Authority |
| SISPKI   | Smart Metering Equipment Technical Specification 1 Public Key Infrastructure                   |
| SMETS    | Smart Metering Equipment Technical Specification                                               |
| SSC      | Security Sub-Committee                                                                         |
| TSA      | Telecommunications (Security) Act                                                              |