Working Group Consultation Responses: SECMP0021 – Increase the representation of the "Other SEC Party" category on the SSC and TABASC

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This document contains the collated responses to the SECMP0021 Working Group Consultation. The Working Group will review these consultation responses and consider them as part of the solution development for this modification. The Working Group's response to each of the consultation responses will be discussed and captured in the WG Consultation response document that will form part of the draft Modification Report that will be submitted to the SEC Panel at the end of the Refinement Process.

If you would like any further information, or if you have any questions, please contact **David Barber** on **020 7090 7755**.

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Q1. Do you have any comments on the proposed solution?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	No	-
Western Power Distribution	Electricity Network	No	-
Scottish and Southern Electricity Networks	Electricity Network	Yes	This proposal will inevitably change the working dynamic of the two groups. We do not have sufficient information or knowledge regarding the operation of these groups to determine whether this will be good for the development of the smart metering infrastructure or hinder its progress. We have not been advised that there is a problem with the current balance of the existing groups and therefore we are inclined to favour them continuing in their current format. As the WG consultation report points out “the Panel Sub-Committee chairs can invite attendees (per Section C5.13(c) ‘Attendance by Other Persons’) to attend meetings when additional knowledge and experience is required”. If this path had been chosen on a number of occasions by the respective chairs it would indicate that there is a shortage of knowledge or representation but given that this option has not been chosen it would indicate that current levels of representation are appropriate/ adequate.
Landis + Gyr	Other SEC Party	Yes	**Section 3.1**, I suggest that you add some clarification about the “Other User” seat, mainly to avoid the disqualification to the current representative. Perhaps, it is worth mentioning that in the event of not having a suitable Other User rep within the “Other SEC Party”, then an “Other Sec Party” can stand and represent this category. I am trying to avoid losing a seat on the technicality of the drafting. **Section 6.1 “Drawback**” Please note that to follow what is being suggested here will take time to be set up and running effectively, while increasing the representation, will only take 5 working days,

Q1. Do you have any comments on the proposed solution?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			and running the nomination and voting. Which in my opinion is much faster, effective and cheaper process. Please also note, the DCC has triggered the Go Live Release R1.2, so we need the industry involvement ASAP, hence we need to support and push for the most efficient solution, which is to increase the Other SEC Party seats for both SSC and TABASC, Having said that, I will still encourage SECAS to create these Technical Working Groups as an extra support to the smart metering community. **6.3 (g)** I suggest to delete the word "initially" as this implies that later they disagree, which is not the case. Also by deleting the word "initially", the document will be perfectly aligned with the associated table that summarises the view against the SEC objectives. **6.5 SSC views**, By changing the Other User seat to an Other Party seat without introducing what I suggested in comment 3.1 above, could prove to be ineffective and create other serious immediate questions and face serious issues when an Other User is identified. Hence, I suggest to disqualify this suggestion and proceed by keeping the Other User seat and add some clarification about the nominee as suggested in comment 3.1 above.
Itron Metering Solutions UK Limited	Other SEC Party	Yes	The proposed solution as described seems appropriate and proportionate in terms of achieving the required outcome.
University College London	Other SEC Party	Yes	UCL support this proposal.

Q1. Do you have any comments on the proposed solution?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Energy and Utilities Alliance	Other SEC Party	-	Any change that facilitates better inclusion of experts from Other Parties should be encouraged. As we move closer to the finer technical issues that roll out will undoubtedly generate we need the right people in the meetings to ensure adequate knowledge.
British Gas	Large Supplier	Yes	We do not support this modification as we believe the current SEC arrangements enable security experts, who are relevant to a specific issue, to attend the SSC and TABASC as required.
GLOBAL-365 PLC	Other SEC Party	Yes	I believe it should be adopted
DNV Kema Limited	Other SEC Party	Yes	We believe that this proposal has great merit – increasing the breadth of representation can only be of benefit to both the 2 committees identified and the wider smart metering programme.
Generis Technology Limited	Other SEC Party	No	-
EDF Energy	Large Supplier	Yes	We do not agree with the proposed solution. While we recognise the concerns that the proposer has raised around ensuring that a variety of views and a depth of expertise is available to the relevant sub-committees, we do not believe that it has been proven that a change to the membership requirements is necessary to deliver that outcome. The current governance within the SEC provides access to a wide range of technical expertise, and enables further subject-specific expertise to be obtained if necessary. This is especially the case for the Technical Architecture and Business Architecture Sub-Committee which does not have a fixed membership under the SEC, but is determined by the Panel 'having regard to the need to provide an appropriate level of technical and business architecture expertise'. We believe that this flexibility meets the

Q1. Do you have any comments on the proposed solution?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			requirements that the proposer has presented, and that the proposed change could actually be a backward step. The implication of the proposal is that the current members of the sub-committees, and particularly Suppliers, do not have sufficient technical expertise, and are not sufficiently motivated to seek that expertise from other parties. We do not believe that this is the case, and there is no evidence that the current membership structure of the sub-committees has meant that incorrect or ill-informed decisions have been made. The recent SSC workshop on IEPFR was a good example of SSC proactively reaching out to SMSOs and meter manufacturers to contribute to the analysis. Smart metering is reliant on the effective and efficient operation of a communications infrastructure that is shared by all Users – who then all have a vested interest in making sure that it operates as efficiently as possible. The implication is also that current members, and especially Suppliers, operate in their own self-interest rather than that of the wider User community. Section C6 requires any member of a sub-committee to 'act independently, not as a delegate'; if it is the case that any member is not adhering to these requirements it is the role of the relevant chair to intervene. It should be noted that the current composition of the sub-committees is broadly reflective of the funding arrangements for the SEC and for the DCC. Suppliers are currently liable for the majority of the costs, and it is therefore appropriate that they have a proportionate say in any decisions which may have a material impact on those costs, or which may materially affect them in other ways. As the composition of DCC Users changes over time and Other Users become a more significant user community it may be appropriate to reflect that change in the composition of the sub-committees. We do not believe that now is the right time to make that change.
Npower	Large Supplier	Yes	We do not believe that this solution is necessary nor justified.

Q1. Do you have any comments on the proposed solution?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			The SEC already allows provision for 'any persons that the Security Sub-Committee (SSC) determines is appropriate to invite in order to be provided with expert advice on security matters'. Similarly, the Technical Architecture and Business Architecture Sub-Committee (TABASC) have access to further knowledge and expertise via the Technical and Business Expert Community (TBEC). Additionally, we question the value that can be added to the SSC by the addition of two members under the new category 'Other SEC Party'. The membership of the SSC already includes security experts from those users who are able to add value because of their knowledge and experience in implementing the SEC Section G security obligations. The value the reviews of the user Security Assessments that could be provided by Other SEC Parties to whom these obligations do not apply will be limited. Within the TABASC, we believe that the two member seats for the Other SEC Party Category provides sufficient knowledge and expertise for the TABASC business, and provides the right balance with the other SEC Party Category Seats.
SSE	Large Supplier	Yes	We note that the membership structures set out in the consultation reflects those members that are able to vote, rather than the complete membership. We believe that the proposed SSC membership structure to introduce 2 new seats for Other SEC Party is disproportionate, when taken into consideration alongside the existing seat for Other User. Our assessment is based on the purpose of SSC, the responsibilities, risk and liabilities under SEC and utilisation of DCC Services, where the Other SEC Party is not an Other User. We consider that this increase is not reflective of the number of Other SEC Party members who would have involvement in the End-to-End trust model, where they were not an Other User. We consider the proposed TABASC membership structure of increasing from the existing 2 seats to 4 seats of Other SEC Party as being an over representation. Our assessment is based on the purpose of TABASC, its output providing support and advice to SEC Panel and that elements of the views from TABASC could have a direct

Q1. Do you have any comments on the proposed solution?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			impact to DCC Service Users along with responsibilities, risk and liabilities under SEC. Noting that these considerations are not equivalently applied to this increased Party Category.

Q2. Are there any alternative solutions that the Working Group have not yet considered?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	No	-
Western Power Distribution	Electricity Network	No	-
Scottish and Southern Electricity Networks	Electricity Network	No	We have not identified any.
Landis + Gyr	Other SEC Party	No	-
Itron Metering Solutions UK Limited	Other SEC Party	-	No comments
University College London	Other SEC Party	No	-
Energy and Utilities Alliance	Other SEC Party	No	-

Q2. Are there any alternative solutions that the Working Group have not yet considered?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
British Gas	Large Supplier	No	-
GLOBAL-365 PLC	Other SEC Party	No	-
DNV Kema Limited	Other SEC Party	No	This would seem the most effective way of widening the range of views expressed at both SSC and TABASC. Inviting additional representation for specific meetings, or for specific items of discussion, is always possible, but such invitees will not have the background necessary, from regular attendance, to maximise the value of their contributions.
Generis Technology Limited	Other SEC Party	No	-
EDF Energy	Large Supplier	No	We have not identified any alternative solution – as noted above we believe that the current arrangements remain fit for purpose at this time.
Npower	Large Supplier	Yes	We are not currently aware of any alternative solutions that have not been considered by the working group.
SSE	Large Supplier	Yes	We note in Appendix 1 section 3 of the WG consultation, the statement regarding the ability of SSC and TABASC to invite attendees when additional knowledge and expertise is required, and that this representation had not been utilised by these sub-committees. This is incorrect. SSC has invited Other SEC Parties to attend where they are undertaking a review and seek subject matter expertise and views. A recent example of this was the review of IEPFR by SSC, and inviting SME's to assist with the CPA and Risk Assessment reviews. TABASC has invited subject matter experts to present on specialist subjects or where the existing group is seeking knowledge and expertise. It also draws on the TBEC

Q2. Are there any alternative solutions that the Working Group have not yet considered?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			knowledge and expertise by circulating questions to seek views, prior to discussing at subsequent meetings. This is administered by SECAS. In terms of alternative solutions, the working group could look at the Terms of Reference for TABASC and determine if these need to be re-visited, in terms of nomination process for representation by Party Categories to ensure that the relevant expertise is present. There is also the availability of Papers for TABASC (where classification is White) that would enable Other SEC Parties to keep abreast of subjects for discussion where there is an interest. Further consideration of whether the TBEC process and publically available information is working effectively and known/utilised by the Other SEC Party members may be another approach.

Q3. Do you agree that the proposed legal drafting delivers the intent of the proposed modification?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	Yes	The document clearly outlines the reasons for the modification and the changes that have been proposed.
Western Power Distribution	Electricity Network	Yes	-
Scottish and Southern Electricity Networks	Electricity Network	-	Not reviewed

Q3. Do you agree that the proposed legal drafting delivers the intent of the proposed modification?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Landis + Gyr	Other SEC Party	Yes	-
Itron Metering Solutions UK Limited	Other SEC Party	-	No comments
University College London	Other SEC Party	Yes	-
Energy and Utilities Alliance	Other SEC Party	Yes	-
British Gas	Large Supplier	Yes	The legal drafting delivers the intent of the proposed modification in our view.
GLOBAL-365 PLC	Other SEC Party	Yes	-
DNV Kema Limited	Other SEC Party	Yes	There are some typos to be fixed – but no material changes.
Generis Technology Limited	Other SEC Party	Yes	As far as I can see, yes, it reflects the change discussed.
EDF Energy	Large Supplier	Yes	We agree that proposed legal drafting delivers the intent of the proposed modification.
Npower	Large Supplier	Yes	We agree that the proposed legal drafting delivers the intent of the proposed modification
SSE	Large Supplier	-	-

Q4. Do you agree that SECMP0016 should continue to follow Path 3 'Self Governance'?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	Yes	As it is a SEC only change I feel that they should continue with 'Path 3' as there is no actual impact on the project itself.
Western Power Distribution	Electricity Network	Yes	-
Scottish and Southern Electricity Networks	Electricity Network	Yes	This is appropriate.
Landis + Gyr	Other SEC Party	Yes	As this will help us delivering the solution swiftly and at a much reduce cost,
Itron Metering Solutions UK Limited	Other SEC Party	Yes	This would seem appropriate if it only involves changes to the SEC membership structure of the SSC and TABASC and has no immediate direct impacts on SEC Parties or the DCC.
University College London	Other SEC Party	Yes	-
Energy and Utilities Alliance	Other SEC Party	-	Yes as it is working well now.
British Gas	Large Supplier	Yes	We agree that SECMP0021 should continue to follow Path 3 'Self Governance' as this Modification would have no material impact on competition.
GLOBAL-365 PLC	Other SEC Party	Yes	-
DNV Kema Limited	Other SEC Party	Yes	The would seem the appropriate choice.
Generis Technology Limited	Other SEC Party	Yes	It's a 'contained' change and needs no further external input I don't believe.

Q4. Do you agree that SECMP0016 should continue to follow Path 3 'Self Governance'?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
EDF Energy	Large Supplier	Yes	We agree that SECMP0021 meets the requirements of a Path 3 'Self Governance' change and should continue to follow that modification path.
Npower	Large Supplier	Yes	As this modification will only have an effect on the membership structure of the SSC and TABASC and there are no associated impacts on the SEC section C or D as well as no associated system impacts, we agree that SECMP0021 should continue to follow Path 3 'Self Governance'.
SSE	Large Supplier	-	-

Q5. Do you agree with the proposed implementation date?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	Yes	I agree the date is fair and provides a clear timescale.
Western Power Distribution	Electricity Network	Yes	-
Scottish and Southern Electricity Networks	Electricity Network	Yes	This is appropriate
Landis + Gyr	Other SEC Party	Yes	This will only be possible provided we continue to allow this modification to follow path 3,"Self-Governance".
Itron Metering Solutions UK Limited	Other SEC Party	Yes	The implementation date seems appropriate.

Q5. Do you agree with the proposed implementation date?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
University College London	Other SEC Party	Yes	-
Energy and Utilities Alliance	Other SEC Party	Yes	-
British Gas	Larger Supplier	Yes	-
GLOBAL-365 PLC	Other SEC Party	Yes	-
DNV Kema Limited	Other SEC Party	Yes	The earlier this is implemented the better, I feel, given that the intent is to improve the operation of the 2 sub-committees.
Generis Technology Limited	Other SEC Party	Yes	It's a reasonable timeframe.
EDF Energy	Large Supplier	Yes	We agree with the proposed implementation date.
Npower	Large Supplier	Yes	We agree that setting the proposed implementation date as 5 Working Days following the end of the 10 Working Day referral period that applies after the Change Board vote is appropriate.
SSE	Large Supplier	-	-

Q6. Are there any additional benefits or drawbacks for the proposed solution that have not already been identified by the Working Group?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	No	N/A
Western Power Distribution	Electricity Network	No	-
Scottish and Southern Electricity Networks	Electricity Network	No	We are not aware of any additional benefits or drawbacks
Landis + Gyr	Other SEC Party	Yes	section 6.1 "Drawbacks", please note that to follow what is being suggested here will take time to be set up and running effectively, while increasing the representation, will only take 5 working days, and running the nomination and voting. Which in my opinion is much faster, effective and cheaper process. Please also note, the DCC has triggered the Go Live Release R1.2, so we need the industry involvement ASAP, hence we need to support and push for the most efficient solution, which is to increase the Other SEC Party seats for both SSC and TABASC, Having said that, I will still encourage SECAS to create these Technical Working Groups.
Itron Metering Solutions UK Limited	Other SEC Party	-	No comments
University College London	Other SEC Party	No	-
Energy and Utilities Alliance	Other SEC Party	-	-

Q6. Are there any additional benefits or drawbacks for the proposed solution that have not already been identified by the Working Group?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
British Gas	Large Supplier	Yes	The current SEC arrangements provide a greater opportunity to achieve the listed benefits. The SSC membership already includes security experts from Large and Small Suppliers, Network Operators and Other Users Parties who are able to add value because of their detailed knowledge and experience of conducting the risk assessments and implementing the necessary security controls and mitigations to meet the SEC Section G security obligations
GLOBAL-365 PLC	Other SEC Party	No	-
DNV Kema Limited	Other SEC Party	No	The proposal does a comprehensive job of identifying the benefits.
Generis Technology Limited	Other SEC Party	Yes	If parties do not have to be invited on an 'as and when required for specialist input' basis, I think it leads to more continuity, likelihood that people who would have been invited to meetings anyway (but possibly couldn't because of clashes) will already be in attendance. Should also lead to more consistency balanced input into decision making process.
EDF Energy	Large Supplier	Yes	While it is noted as a risk we believe that Increasing the membership will make it more difficult for the sub-committees to achieve a consensus on any matter that is being discussed. While it should be ensured that a variety of views are considered when making any decision that decision should be based on a consensus which is more easily achieved under the current arrangements.
Npower	Large Supplier	Yes	In addition to the drawbacks identified by the Working Group, we believe that the addition of members to both sub-committees is unjustified at this point in time and will negatively impact the current distribution amongst the SEC Party Categories.
SSE	Large Supplier	Yes	We have reviewed the information provided in the WG consultation and believe that there is insufficient justification and rationale of the identified benefits. Noting our response to Q2, there are several mechanisms in place for both Sub-Committees to

Q6. Are there any additional benefits or drawbacks for the proposed solution that have not already been identified by the Working Group?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			draw in further knowledge and expertise, and that these are being utilised and are effective and efficient. We would question the perceived benefit of greater transparency. SSC by its very nature deals with confidential material that dependent on classification is not shared across all Parties. As to TABASC, the meeting papers for this Sub-Committee are publically available on the SEC website. Other SEC Parties may arrange with SECAS to join the TBEC and therefore be engaged with TABASC matters through that route to have visibility of discussions and provide views. We find that the information in the consultation is not reflective of the processes and engagement to date. We would seek further evidence that the Sub-Committees are not meeting the Terms of Reference or adding value in their existing structures, to understand where there may be risk. In identification of potential risks, we would be able to assess how a proposed solution may mitigate these risks.

Q7. Do you agree with the Proposer and/or WG's initial views against the SEC Objectives?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	Yes	-
Western Power Distribution	*Western Power Distribution (South Wales); Western*	Yes and No	Agree with the Working Group's initial views that this modification better facilitates General SEC Objective (g) as increasing the number of Other SEC Party members will

Q7. Do you agree with the Proposer and/or WG's initial views against the SEC Objectives?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
	Power Distribution (South West); Western Power Distribution (West Midlands); Western Power Distribution (East Midlands)		provide additional expertise and breadth of knowledge to the panel and would therefore increase efficiency and transparency in relation to the implementation of the Code. Do not agree with the proposer's view that this modification better facilitates General SEC Objectives (d) and (e) and support the views of the Working Group.
Scottish and Southern Electricity Networks	Scottish Hydro Electric Power Distribution plc. Southern Electric Power Distribution plc.	Yes	We are in agreement with the WG's views on this matter
Landis + Gyr	Other SEC Party	Yes	Regarding section 6.3 Objective (g), I suggest we delete the word "initially" as this implies that later they disagree, which is not the case. Also by deleting the word initially, will align with the associated table that summarises the view against the SEC objectives.
Itron Metering Solutions UK Limited	Other SEC Party	Yes	-
University College London	Other SEC Party	Yes	-
Energy and Utilities Alliance	Other SEC Party	-	-

Q7. Do you agree with the Proposer and/or WG's initial views against the SEC Objectives?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
British Gas	Large Supplier	No	We do not believe the proposed changes would benefit objective g) To facilitate the efficient and transparent administration and implementation of this Code. The current arrangements are satisfactory.
GLOBAL-365 PLC	Other SEC Party	Yes	-
DNV Kema Limited	Other SEC Party	Yes	No further comment, beyond that which is identified in the proposal.
Generis Technology Limited	Other SEC Party	Yes	-
EDF Energy	Large Supplier	Yes	We agree with the Working Group's view that the only SEC Objective that would be applicable to this change would be objective (g) – facilitation of the efficient and transparent administration and implementation of this Code. This is because this change only affects the composition of the sub-committees, it does not actually deliver any specific changes to systems and/or processes that would better facilitate objectives (d) and (e) as suggested by the proposer. As noted in our response above we do not believe that the proposed change would actually better facilitate objective (g) as we do not believe that it would be an improvement on the current arrangements.
Npower	Large Supplier	No	We agree with the Proposers and the WG's initial views against the SEC objectives that there may be benefit against SEC Objective (g) due to increased efficiency and transparency in relation to the activities undertaken by the SSC and TABASC. However, we do not agree with proposer's initial views that there may be benefit against SEC Objectives (d) and SEC Objective (e)
SSE	Large Supplier	No	On assessment of the information provided in the consultation, we do not agree that SEC Objectives (d) and (e) are better facilitated by this Modification. The existing

Q7. Do you agree with the Proposer and/or WG's initial views against the SEC Objectives?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
			mechanisms to draw in greater involvement for subject matter experts and interested parties have been successfully utilised. On assessment of the information provided in the consultation, we do not find sufficient evidence that increasing membership would better facilitate SEC Objective (g). As noted previously, SSC requires confidentiality where the Security classification requires it. It has appropriate representation of SEC Parties and works well inviting SME's in to sessions when required, such as the CPA and Risk Assessment reviews. There is insufficient evidence set out in the consultation to demonstrate that the existing approach is not facilitating SEC Objective (g) in an efficient and effective way, or that increasing representation of one Party Category would increase transparency or efficiencies. Noting that the Proposer's rationale is to increase knowledge and expertise and yet it is not quantified in the consultation as to what this pertains to in terms of subject matter expertise. As the range of Other SEC Party types is diverse, it is conceivable that a representative could be voted in that does not bring any of the expertise that is suggested by the consultation to be lacking.

Q8. Do you have any other comments?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Yu Energy	Small Suppliers	No	-
Western Power Distribution	Electricity Network	No	-

Q8. Do you have any other comments?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
Scottish and Southern Electricity Networks	Electricity Network	No	No further comment.
Landis + Gyr	Other SEC Party	No	-
Itron Metering Solutions UK Limited	Other SEC Party	Yes	We are in support of increasing the Other SEC Party membership on the TABASC and SSC as it will bring additional expertise and support to both groups. For SSC this would assist with the ongoing maintenance of the End-to-End Security Architecture and review of the NCSC CPA scheme. For TABASC the additional Other SEC Party involvement will provide increased support and a broader range of industry knowledge and input from the wider smart metering ecosystem.
University College London	Other SEC Party	No	-
Energy and Utilities Alliance	Other SEC Party	-	-
British Gas	Large Supplier	No	-
GLOBAL-365 PLC	Other SEC Party	No	-
DNV Kema Limited	Other SEC Party	No	No further comments.
Generis Technology Limited	Other SEC Party	No	-

Q8. Do you have any other comments?			
Party Name	**Party Category**	**Response**	
		Yes/No	Comments
EDF Energy	Large Supplier	No	We have no comments additional to those already provided.
Npower	Large Supplier	No	We have no further comments .
SSE	Large Supplier	No	-