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Stage 03: Modification Report

SECMP0021: Increase the representation of the "Other SEC Party" category on the SSC and TABASC

This Modification Proposal seeks to Increase the "Other SEC Party" membership on the Technical Architecture and Business Architecture Sub-Committee (TABASC) and add "Other SEC Party" membership to the Security Sub-Committee (SSC).

Impacts on:

- Other SEC Parties
- SEC Panel, Security Sub-Committee (SSC) and Technical Architecture and Business Architecture Sub-Committee (TABASC)

What stage is this document in the process?

- 01 Initial Modification Report
- 02 Refinement Process
- 03 Report Phase
- 04 Final Modification Report

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About this document

This document is the Final Modification Report for SECMP0021. The Change Board will consider this report as part of their deliberations on whether to approve or reject the Modification Proposal.

This Final Modification Report has three attachments:

- Attachment A: Legal Text;
- Attachment B: Working Group Consultation Response; and
- Attachment C: Modification Report Consultation Responses.

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1. Summary

This section provides an overview of SECMP0021. For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this document are listed in the Glossary (Appendix B) of this document.

1.1 Why Change?

The Proposer (Landis and Gyr) believes the current membership structure of the Security Sub-Committee (SSC) and Technical Architecture and Business Architecture Sub-Committee (TABASC) should be increased to ensure that both Sub-Committees have sufficient knowledge and experience to aid the discharging of each respective Sub-Committee's duties.

1.2 Solution

There are two parts to the proposed solution:

- add two 'Other SEC Party' voting member seats to the membership structure of the SSC; and
- increase the number of 'Other SEC Party' voting member seats on the TABASC from two to four.

In addition, the Modification Proposal will amend SEC Section F1 to include the TABASC membership structure, to ensure consistency across how Panel Sub-Committee membership is captured within the SEC.

1.3 Impacts and Costs

SECMP0021 will primarily impact Other SEC Parties in relation to the additional member seats on the SSC and TABASC. There may be a secondary impact on other party categories due to effect on Sub-Committee structure.

The Modification Proposal will also impact the SEC Panel, SSC and TABASC due to the changes to the membership structure.

As the changes to deliver the Modification Proposal are limited to amending the SEC, the only cost impact is the time and effort required to make the necessary SEC amendments.

1.4 Implementation

As this Modification Proposal only involves changes to SEC Section F1 and G7, it is proposed that SECMP0021 is implemented 5 Working Days (WD) following the end of the 10 WD referral period following the Change Board Vote.

This is subject to the modification continuing to be progressed as a Path 3 'Self Governance' Modification Proposal.

1.5 Progression Path

This modification only impacts the governance structure of the Panel Sub-Committees. It does not meet any of the criteria of a Path 2 Modification. Therefore, SECMP0021 is being progressed as a Path 3 Modification (Self-Governance).

1.6 Working Group and Proposer's Views

The Proposer and Working Group (WG) identified benefits in relation to SEC Objective (g), if the Modification Proposal were approved.

In addition, the Proposer and a Working Group Member has identified benefits against SEC Objectives (d) and (e).

While benefits against the above objectives have been identified, specifically SEC Objective (g), the views on whether SECMP0021 should be approved were broadly split. This mirrored the views submitted through the Working Group Consultation.

Those in favour of the modification, recognised and agreed with the Proposer the need for additional Other SEC Party Membership to aid transparency of discussions and to get a wider coverage of knowledge on the TABASC and SSC.

Those who did not agree the modification should be approved, expressed the view that the need for the change was not proven. They argued there was no evidence available to suggest that the current membership is not sufficient. In addition, there was a concern that, due to the members from the Other SEC Party category being driven by nominations and subsequent votes, you would not be able to guarantee that a wide range of knowledge will necessarily be added to the two Sub-Committees.

The WG Members noted that the Sub-Committee Chairs have the ability to invite interested parties to be involved in workshops and specific TABASC and SSC discussions to aid decision making in specific areas where wider knowledge and experience might be required. It was noted that this could achieve the same benefits as the proposed modification.

SSC and TABASC views

The SSC and TABASC also considered SECMP0021 and expressed the views that they do not see a need for the Modification Proposal. Full details of their views are in section 7.2.

1.7 Modification Report Consultation Responses

21 SEC Voting Groups (representing a total of 25 SEC Parties) responded to the Modification Report Consultation, consisting of five Large Suppliers, one Small Supplier, four Network Parties (three electric and one gas) and eleven Other SEC Party.

2. Why Change?

2.1 Background

The SSC membership structure and nominations process is set out within SEC Section G7 ‘Security Sub-Committee’. The membership of the SSC was developed by the Department for Business, Energy and Industry Strategy (BEIS) (then the Department of Energy and Climate Change (DECC)) through consultation as part of the New SEC content (Stage 4) consultation work. The SSC structure was then designated within the SEC on 14th January 2015.

In the case of the TABASC, SEC Section F1 sets out that the Panel determines the membership structure of this Panel Sub-Committee. The rationale for this approach was based on the need to provide the appropriate level of technical expertise within the structure of the TABASC in the most flexible way. This approach was consulted on as part of the New SEC Content (stage 2) consultation. The approach for the TABASC (then known as the Technical Sub-Committee) membership was concluded on and was then designated within the SEC on 31st July 2014.

The existing TABASC membership structure was subsequently put in place by the Panel in September 2015, as part of the establishment of the TABASC.

The current SSC (SEC defined) and TABASC (Panel determined) membership structure is summarised in Table 1.

Party Category	Number of voting SSC Members	Number of voting TABASC Members
Large Supplier	6	6
Small Supplier	2	2
Electricity Network	1	1
Gas Network	1	1
Other SEC Party	-	2
Other User	1	-

Table 1: SSC and Table TABASC membership composition

2.2 What is the issue?

The Proposer (Landis and Gyr) raised SECMP0021 following discussions with other parties within the Other SEC Party category, who believe that the current membership structure of the SSC and TABASC is not sufficient. The Proposer's rationale for this is:

- that the limited level of membership means that the SSC and TABASC may not have all the necessary industry knowledge to contribute to making an informed decision, in relation to the respective remits of the two Sub-Committees; and
- the current membership structures favour certain stakeholders involved in the Smart Metering Implementation Programme (SMIP) over others.

While the Proposer recognises that SEC Party involvement beyond the membership of Panel Sub-Committees is obtained through consultation, they believe that appropriate input through consultation is not always obtained as:

- the timing of consultations, particularly during busy periods, affects the ability for SEC Parties and other interested parties to respond; and
- consultation responses can contain conflicting views, that may then, in the view of the Proposer, cancel each other out.

While the Proposer notes that many decisions take into account the views of SEC Parties and other interested parties through consultation, this is not a sufficient substitute for the greater involvement of the Other SEC Party category through SSC and TABASC membership; this enables earlier opportunities to be involved in discussions and to help inform the direction and approach taken.

2.3 Scope of the Modification

The scope of this modification is limited to the SSC and TABASC membership. The Proposer is of the view that the membership structure of the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and the Change Board is suitably balanced and requires no changes in relation to Other SEC Party membership.

3. Solution

3.1 Proposed solution

The Proposer’s solution involves changes to the membership structure of the SSC and the TABASC. The changes associated with each Sub-Committee are set out below.

Changes to the SSC Membership

The current SSC membership structure, within SEC Section G7, will be amended to add two ‘Other SEC Party’ Member seats to the SSC. The existing Other User seat (which is voted on by Other Users from the Other SEC Party category) is retained to ensure that there is one Other SEC Party on the SSC that uses DCC Services.

Table 2, highlights the change to the existing SSC membership structure:

Party Category	Number of SSC Members
Large Supplier	6
Small Supplier	2
Electricity Network	1
Gas Network	1
Other SEC Party	2
Other User	1

Table 2: Proposed SSC Membership structure changes

Associated changes are required to Section G7, to capture how the voting process will work for appointing the members into the two additional SSC ‘Other SEC Party’ seats.

Changes to the TABASC Membership

The current TABASC membership structure will be amended to increase the number of ‘Other SEC Party’ Member seats from two to four. Table 3, highlights the change to the existing TABASC membership structure:

Party Category	Number of TABASC Members
Large Supplier	6
Small Supplier	2
Electricity Network	1
Gas Network	1
Other SEC Party	~~2~~4

Table 3: Proposed TABASC Membership structure changes

In addition to increasing the 'Other SEC Party' member seats from two to four, changes to Section F1 are required to capture the membership structure outlined above, with associated voting mechanisms for each seat. The rationale for removing the existing Panel ability to set the membership structure of the TABASC is to ensure consistency within the SEC on how the SEC required Panel Sub-Committee membership is captured.

3.2 Legal Text for the SECMP0021

The draft legal text changes, which capture the necessary changes to deliver the proposed solution, are provided in **Attachment A - SECMP0021 Legal Text**.

Note that in addition to the changes required to deliver the proposed solution, two minor housekeeping changes have been included to correct references to the Technical Sub-Committee to the Technical Architecture and Business Architecture Sub-Committee.

This Modification Proposal (if approved and implemented) is a prospective change and will not alter existing members of the SSC and TABASC. These existing seats will undergo the nomination process once the current terms of those members come to an end.

3.3 Path 3: Self-Governance

SECMP0021 is being progressed as a Path 3: Self-Governance Modification Proposed as it is a SEC only change, with no associated impacts on SEC Sections C or D and has no associated system impacts.

The changes only affect the membership structure of the SSC and TABASC.

4. Impacts and Costs

The following section sets out the impacts of SECMP0021.

4.1 Party Impacts

SECMP0021 will have no direct impacts on the SEC Party categories of Large Supplier, Small Supplier or Network Party, beyond the effect on Sub-Committee structure.

The Other SEC Party category be the primary impact and **will be impacted**, only in so far that there will be an:

- additional two TABASC seats that the Other SEC Parties would vote on to appoint members into these two member seats; and
- two SSC seats that the Other SEC Parties would vote on to appoint members into these two member seats.

4.2 Other Impacts

The following section sets out an overview of the likely impacts arising from SECMP0021, as identified by the Working Group.

Impacts of SECMP0021	
Impact on Consumers	
There are no identified direct impacts on Consumers arising from this Modification Proposal.	
Systems	
DCC Systems	No identified impact, the modification changes the SEC governance of Panel Sub-Committees only.
User Systems	
Smart Metering Systems	
Other	
SEC changes	
SEC Section A	Addition of TABASC membership role definitions**.**
SEC Section F	**SEC Section F1 'Technical Sub-Committee'** requires amendment to capture the TABASC membership and nominations process, which includes amending the existing 'Other SEC Party' seats from the current Panel set number of two to four. Please note that two minor housekeeping changes have been included in the proposed legal text to replace incorrect references to Technical Sub-

	Committee with Technical Architecture and Business Architecture Sub-Committee.
SEC Section G	**SEC Section G7 'Security Sub-Committee'** - requires amendment to include the additional two Other SEC Party member seats to the membership structure and to include details of the nomination process.
SEC Subsidiary Documents	
Subsidiary Documents	No SEC Subsidiary Documents are impacted by this modification.
Other SEC documentation	
Terms of Reference	If approved, both the SSC and TABASC Terms of Reference will be amended to reflect the changes that SECMP0021 would put in place.
Other Industry Codes and Documents	
None.	
Greenhouse gas emissions	
No impact	

4.3 Potential costs

The estimated central cost to implement this change will be limited to the Code Administrator time and effort to make the necessary amendments to the SEC and guidance documents, to release a new version of the SEC to all SEC Parties, and the publication of it on the SEC Website. This is estimated at a maximum of **2 Man Days** effort equating to **£1,200**[1].

Note that there is no additional ongoing time and effort associated with managing the nominations process for the SSC and TABASC.

[1] Based on a blended rate of £600 per day

5. Implementation

5.1 Recommended Implementation approach

As this Modification Proposal 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, the following implementation approach is recommended:

- **5 Working Days** following the end of the 10 Working Day referral period that applies after the Change Board vote.

Note this is subject to SECMP0021 being treated and voted on by the Change Board as a Path 3 Self-Governance Modification Proposal.

If approved and implemented, action would then be taken to seek nominations for and if necessary, a vote to fill the additional seats on the SSC and TABASC per the SEC Sub-Committee membership nomination processes. Note that any existing members (e.g. the current Other User member of the SSC) will remain in place until such time that the seat is due for re-nomination following the end of the 2-year period they were appointed for.

6. Working Group Discussions

This section contains a summary of the Working Group's discussions on SECMP0021, which helped shape the proposed solution and supporting rationale for the modification.

6.1 Working Group considerations of the issue

6.1.1 SSC membership discussions and specific questions

Other User Member vs. Other SEC Party members

The original Proposer solution sought to change the one 'Other User' seat on the SSC to three 'Other SEC Party' member seats. The Working Group discussed the different terminology in relation to 'Other SEC Parties' and 'Other Users' in the context of the SEC and the SSC membership.

It was noted that the SSC has an 'Other User' seat due to prior reasoning captured in the BEIS consultation that established the approach taken for the SSC membership as part of the 'New SEC Content (Stage 4) consultation'.

In summary, the rationale for the Other User seat was in recognition of Other (DCC) Users bringing a wider range of expertise and an additional perspective on security risk than otherwise represented on the SSC, prior to the addition of an Other User Member within the SSC membership structure. Therefore, as part of the designated SEC changes the provision of an Other (DCC) User was included, particularly in light of Other Users having to undergo a Security Assessment in order to become a DCC User, and their experience and knowledge in this area is beneficial.

When considering a replacement and increase of Other SEC Parties from the Other User Member seat, it was identified that by removing the Other User Member seat, there was a risk of losing the specific knowledge that Other Users would have. Therefore, and based on this discussion, the Proposer agreed that there was benefit in retaining the Other User Member seat and instead adding two separate Other SEC Party Member seats, recognising that the Other User Member seat is voted on by Other Users within the Other SEC Party category.

It was observed by the Proposer and Working Group when discussing this area that there are no Other (DCC) Users that have completed the Section H1 User Entry Process. Therefore, the existing 'Other User' member on the SSC was not an Other User. If SECMP0021 is approved, then the Other User member would not automatically take on one of the Other SEC Party Member seats, and would retain the Other User membership until their term of office expires.

Is the Proposed additional number of Other SEC Party member seats proportionate on the SSC compared to the membership voted on by other Party Categories?

When considering whether two Other SEC Party seats on the SSC was appropriate and proportionate, the Working Group considered that the SSC has involvement in the End-to-End trust model in that it affects all SEC Parties. Therefore, input is needed from the knowledge contained within the Other SEC Party category. Having two Other SEC Party member seats is a balanced approach taking into account the number of Small Supplier seats, which is also two.

What are the risks associated with increasing the membership of the SSC and is any mitigation required?

Following the discussions around retaining the Other User member seat on the SSC and adding two Other SEC Party member seats, the associated risk of losing specific Other User knowledge and experience within the SSC was mitigated.

The risk associated with reaching a consensus decision at the SSC versus a vote among members is still present. However, there is an existing risk that not all Sub-Committee decisions will always result in a consensus decision. The existing provisions associated with Sub-Committee votes are unchanged, and in the event of a 'dead-lock' the SSC chair has a casting vote in such situations.

Which areas of the SSC business would benefit from the presence of Other SEC Party members?

To obtain an understanding of which areas of the SSC roles and responsibilities would benefit from the addition of Other SEC Party members, the Duties and Responsibilities set out in Section G7.16 to G7.20 were reviewed and discussed.

It was identified that there may be two key areas that would benefit from Other SEC Party Member involvement, in the form of:

- SEC Section G7.16(d) in relation to the maintenance of the End-to-End Security Architecture to ensure that it is up to date; and
- SEC Section D7.17(d) in relation to keeping under review, the CESG (now National Cyber Security Centre (NCSC)) Certified Product Assurance (CPA) Certificate scheme in order to assess whether it continues to be fit for purpose in so far as it is relevant to the Code, and suggest modifications to the scheme provider to the extent to which it considers them appropriate.

The key rationale being that these two areas involve Parties from the Other SEC Party category, and knowledge and experience in this area could be beneficial.

It was reiterated that the TABASC and SSC chairs can invite interested parties to be involved in workshops and specific subject matters to aid decision making in specific areas where wider knowledge and experience might be required. It was noted that this could achieve the same benefits as the proposed modification within existing SEC provisions.

What was the SSC views on the Modification Proposal?

The SSC initial and subsequent considerations of SECMP0021 is set out in section 7.2. The initial considerations of the SSC were considered and addressed in the Proposer's solution taken forward, however the subsequent SSC feedback did not prompt any revisions to the proposed solution.

6.1.2 TABASC membership discussions and specific questions

Is the proposed additional number of Other SEC Party member seats proportionate on the TABASC compared to the membership voted on by other party categories?

Due to the greater degree of Other SEC Party involvement in the End-to-End Technical Architecture and Business Architecture, the WG noted the Proposer views that it would be beneficial to have a wider range of expertise, covering the different Other SEC Party involvement in the end-to-end management of smart metering aspects.

The WG noted that the increase in Other SEC Party member seats, in the view of the Proposer was a proportionate increase in light of this greater involvement. The Proposer noted that the solution did not seek to put in place specific seats for types of Other SEC Party (e.g. meter manufacturers) and that the nominations process to appoint Other SEC Party member seats would be unchanged.

What are the risks associated with increasing the membership of the TABASC and is any mitigation required?

The risk associated with reaching a consensus decision at the TABASC versus a vote among members is still present. However, there is an existing risk that not all Sub-Committee decisions will always result in a consensus decision. The existing provisions associated with Sub-Committee votes are unchanged, and in the event of a ‘dead-lock’ the TABASC chair has a casting vote in such situations.

Which areas of the TABASC business would benefit from the presence of Other SEC Party members?

The WG took a similar approach with the TABASC duties and responsibilities, as undertaken with the SSC duties and responsibilities, to identify which areas would benefit from the increased Other SEC Party membership.

The TABASC duties and responsibilities are set out in SEC Section F1.4 and F1.5. It was identified that an increase in Other SEC Party membership would be beneficial in relation to any TABASC duties that involve Other SEC Party involvement in the End-to-End Technical Architecture and Business Architecture.

Adding the TABASC membership structure into Section F1

The WG discussed the need to add the TABASC membership structure into Section F1. The rationale for this approach, was for consistency purposes and to provide clarity within the SEC itself on the membership structure of the TABASC.

In addition, it was noted that by not putting the TABASC membership structure, including the increased Other SEC Party membership, within Section F1 would mean that the change to the TABASC membership structure would still be subject to Panel agreement per the existing provisions in Section F1.

What was the TABASC views on the Modification Proposal?

The TABASC initial and subsequent considerations of SECMP0021 is set out in section 7.2. The TABASC feedback did not prompt any revisions to the Proposers solution.

6.1.3 General discussions

SSC and TABASC membership structure

When discussing the existing SSC and TABASC membership structure, a WG member commented that the existing structures put in place through BEIS consultation (in the case of the SSC) and the Panel (when establishing the TABASC), is broadly reflective of the funding arrangements. They added that a majority of the DCC and SEC costs are covered by Suppliers (especially Large Suppliers) hence the number of Supplier seats on both Sub-Committees. They added that while increasing Other SEC Party membership may widen the knowledge base within the SSC and TABASC, it does also mean that the current decision making dynamic within the Sub-Committee might be unduly influenced by SEC Parties who might not be directly affected by those decisions.

SSC and TABASC Sub-Committee Quorum

A WG member questioned whether changes to the SSC and TABASC membership would have an impact on the necessary quorum for meetings to occur. It was clarified that the current quorum requirements for both the SSC and TABASC is one half of the appointed membership as a whole, rather than a specific number from each Party Category that makes up the membership of the SSC and TABASC.

It was noted that Sub-Committee members are expected to take reasonable endeavours to ensure they can attend meetings, which mitigates against the risk of the minimum of half attendance not being met, by increasing the membership of the SSC and TABASC by two members.

Other Approaches considered

While no Alternative Proposals were identified by the WG, there were discussions around the existing arrangements, in which 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.

The WG discussed whether this has been utilised since the establishment of the SSC and TABASC. At the time of the WG discussions in December 2016, it was noted that such representation had not been invited, primarily due to the subject matters considered at the two Sub-Committee meetings to date not prompting such additional attendance to be required. However, since the initial WG discussions a number of Business Architecture Document (BAD) workshops have been arranged and involve membership of the TBEC. In addition, a workshop arranged by the SSC to consider the work undertaken by the DCC in relation to the Initial Enrolment Project Feasibility Report (IEPFR) has taken place, to which invites were issued to relevant

SMETS1 organisations, such as meter manufacturers and Smart Metering System Operators (SMSOs). It was noted that subsequent sessions, workshops and invites would be issued as and when required.

As noted elsewhere, it was questioned by the Proposer and some WG members whether this provision was being used enough.

6.2 Working Group Consultation responses and Working Group views against SEC Objectives

A summary of the responses received from the Working Group Consultation and the WG's discussions in relation to these responses, can be found in section 7 of this document. The detailed responses and discussions can be found in **Attachment B – Working Group Consultation Responses.**

The WG's final views against the SEC Objectives can be found in section 7.6 of this document.

7. Views on SECMP0021

This section contains the views of the Proposer and the WG regarding the modification's benefits against the SEC Objectives.

7.1 Working Group's and Proposer initial views

7.1.1 Working Group's initial views on benefits/drawbacks

The Proposer and WG have identified the below benefits and drawbacks to SECMP0021.

Benefits

- Greater transparency across the Party Categories in relation to the activities undertaken by both Panel Sub-Committees.
- Ensures that there is sufficient continuous involvement from Other SEC Parties in the two Panel Sub-Committees, in light of prior involvement during the transitional phase.
- In relation to the SSC, increased involvement of Other SEC Party input into certain key areas of the SSC remit, specifically SEC Section G7.16(d) in relation to maintaining the End-to-End Security Architecture and Section G7.17(d), in relation to reviewing the CESG CPA Certification Scheme.
- In relation to the TABASC, capturing the membership structure within the SEC, ensures consistency with how the other required SEC Panel Sub-Committee membership is captured.

Drawbacks

- WG members observed that increased involvement could be better achieved through other mechanisms, e.g. involvement via the Technical and Business Expert Community (TBEC) beneath the TABASC which is utilised to consider specific matters of a Technical or Business Architecture matter and via the Chair inviting relevant experts from the Other Party Category when required.
- A WG member observed that increasing the Other SEC Party membership may alter the decision making dynamic within the Sub-Committees. This is due to the current membership, in the WG member's view, being broadly reflective of the DCC and SEC funding arrangements.

7.1.2 Proposer's initial views against SEC Objectives

Objective (d)

The Proposer's views prior to the WG consultation were unchanged from when the Modification Proposal was first submitted and believes SECMP0021 better facilitates SEC Objective (d). This is because the change will increase membership from the wider sector of the industry that work with, and alongside, Energy Suppliers. A better and stronger involvement from this sector would be beneficial to both the energy suppliers and the industry as a whole.

Objective (e)

In addition to SEC Objective (d) and (g), the Proposer expressed a view that SEC Objective (e) is also better facilitated due to the Other SEC Party involvement in the SSC and TABASC aiding innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.

Objective (g)

The Proposer's views prior to the WG consultation remain unchanged from when the Modification Proposal was first submitted. The Proposer's view is that SECMP0021 better facilitates SEC Objective (g) because having a greater level of Other SEC Party membership on the TABASC and adding it to the SSC will bring extra knowledge and expertise to address the views of that sector of the market. This will strengthen the SEC Objective and avoid any potential disagreements.

7.1.3 Working Group's initial views against SEC Objectives

Prior to the Working Group consultation, the following initial views were made by the Proposer and Working Group members.

Objective (d)

Prior to the consultation, the WG ruled out any major impact around SEC Objective (d), indicating the main focus of this objective was commercial competition in relation to the Supply of Energy.

Objective (e)

Prior to the consultation, the Working Group ruled out any major impact around SEC Objective (e), indicating there could be a future benefit against this objective, however in relation to the current baseline it is too early to comment with confidence.

Objective (g)

Prior to the consultation, the Working Group agreed 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.

7.1.4 Summary of initial views against the SEC Objectives

The following table provides a summary view of the Proposer's and WG's initial views against the SEC Objectives:

Summary of Working Groups initial views against the SEC Objectives		
General SEC Objective	Proposer views	Working Group
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	N/A	N/A
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently	N/A	N/A

Summary of Working Groups initial views against the SEC Objectives		
General SEC Objective	Proposer views	Working Group
discharge the other obligations imposed upon it by the DCC Licence.		
c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	N/A	N/A
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	Proposed - ✓	
e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.	Proposed - ✓	
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	N/A	N/A
g) To facilitate the efficient and transparent administration and implementation of this Code.	Proposed - ✓	Proposed - ✓

7.2 Sub-Committee views

7.2.1 SSC Views

Initial views

The SSC advised against changing the existing Other User seat to an Other SEC Party seat. Having an Other User seat on the SSC provides experience from the perspective of an Other SEC Party who is directly involved in taking DCC Services, including undergoing Security Assessments, in accordance with SEC Section G, to achieve DCC User status.

This feedback was taken on board as part of the Working Group discussions, prompting the retention of the Other User seat on the SSC, and adding two specific Other SEC Party seats. As noted elsewhere, SECMP0021 is a prospective change and if approved it would not affect current SSC members. More specifically, when the term of office for the Other User seat ends, a person with suitable Other User experience should be nominated on to the SSC, noting that they may not necessarily be a formal Other User at that point in time.

Further views provided during the Working Group consultation

SECMP0021 includes a proposed increase to the SSC membership to include two 'Other SEC Parties' and the SSC were asked to provide a specific view on the proposals at their meeting on 25th January 2017.

Following a short discussion, the matter was put to a vote, the outcome of which was five voting members against the modification, one member in favour and one abstention. The Change Board should take into account the following considerations:

- <u>There is insufficient justification detailed in the Modification Proposal</u>: The justification in the Modification Proposal is *"existing SSC members not having all the necessary industry knowledge to contribute to making an informed decision and that the current membership structures favour certain stakeholders involved in the SMIP over others".*

  The SEC Section G7.13 (b) already allows for "the *Security Sub-Committee Chair shall invite to attend Security Sub-Committee meetings any persons that the Security Sub-Committee determines it appropriate to invite in order to be provided with expert advice on security matters*".". This SEC facility has been used recently to invite relevant meter manufacturers and SMSOs to a SSC meeting to discuss IEPFR security proposals. It is intended to be used in future to invite experts in CADs and Internet of Things (IoT) devices to consider emerging security risks from such devices and it is also intended to be used to invite CSPs, DSP, TSP, meter manufacturers and other relevant external organisations when undertaking the seventh security risk assessment.

  The current SEC arrangements enable security experts who are relevant to a specific issue to attend the SSC as required depending on the issues to be considered and these will not necessarily be Other SEC Parties (e.g. CSP, DSP, TSP, CAD and IoT vendors, NCSC, Penetration Test Experts etc are unlikely to be Other SEC Parties). **The Modification Proposal does not therefore meet the proposed justification of providing "the necessary industry knowledge" from Other SEC Parties and the current arrangements provide for greater industry knowledge than could be achieved by the proposal;**

- <u>The assumptions about benefits are incorrect</u>: The WG's initial views on benefits include the *"involvement of Other SEC Party input into certain key areas of the SSC remit, specifically SEC Section G7.16(d) in relation to maintaining the End-to-End Security Architecture and Section G7.17(d), in relation to reviewing the CESG (now NCSC) CPA Certification Scheme".*

  The SSC already has the capability under SEC Section G7.13 (b) to invite appropriate security experts, who may or may not be Other SEC Parties, to contribute to the maintenance of the Security Architecture document and to review the CESG CPA Scheme. The latter responsibility relating to CPA has not yet been transitioned from BEIS to the SSC and, when it is, then the SSC is likely to invite NCSC, CPA Test Laboratories and meter manufacturers – several of whom may not be Other SEC Parties - to any review of the CPA Scheme. **The Modification Proposal does not therefore ensure that the listed benefits will be realised and the current arrangements provide a greater opportunity to achieve the listed benefits.**

The majority of the SSC workload in the year ahead is to review the User Security Assessments and to make a recommendation to the SEC Panel to set the assurance status of Users to one of the status options defined in SEC Section G8.36. The User Security Assessments apply to Large and Small Suppliers, Network Operators and Other Users. The SSC membership already includes security experts from these 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. The potential value to the reviews of the User Security Assessments that could be provided by Other SEC Parties to whom these obligations do not apply is very limited and it is difficult to justify Other SEC Parties being able to vote on the appropriate assurance status of Supplier Parties, Network Parties and Other User Parties. **The modification will add little, if any, value to the review of User Security Assessments.**

Proposer and Working Group consideration of further SSC views

The Proposer and the WG discussed the further SSC views. The Proposer sought to clarify that the intent of SECMP0021 was to not imply that the current SSC membership was inadequate, or lacking in knowledge, but to expand the membership to get wider experience and continuity of experience from areas that the current membership structure does not necessarily cover, e.g. device manufacturers. The Working Group agreed that the Proposer rationale for the Modification Proposal, within the Modification Report was to be made clearer on this point as set out in section 2.2.

On consideration of the existing ability to invite interested persons to meetings and workshops to get wider input on Sub-Committee matters (per Section G7.13(b)), the WG felt it is not being used enough and that it is reliant on the setting up of such sessions and going out for interest. Instead, by having the additional member seats on the Sub-Committee the involvement is there from the outset. The SSC feedback did not prompt revisions to the proposed solution.

7.2.2 TABASC Views

Initial views

The TABASC did not express any views against the change in membership, but observed that any increase in membership could impact the ability of the TABASC to make consensus decisions, relying more on the Sub-Committee having to vote on any matters.

The TABASC also made observations around potential increased meeting running costs associated with needing larger facilities to accommodate a larger TABASC membership.

Further views provided during the Working Group consultation

At their meeting on 19th January 2017, the TABASC were invited to provide additional views and comments on SECMP0021.

The TABASC held a vote on feedback to be provided to the Working Group, on whether they agreed with the Modification Proposal. The Other SEC Party members on the TABASC agreed to be excluded from the vote. All the remaining TABASC Members voted that an increase in membership of the Other SEC Party Category on the TABASC from two to four members was not necessary. It was noted that the two member seats for the Other SEC Party Category provide sufficient knowledge and expertise for the TABASC business, and provide the right balance with the other SEC Party Category seats. It was further noted that the TABASC have access to further knowledge and expertise via the Technical and Business Expert Community (TBEC) should a specific topic require it.

Proposer and Working Group consideration of further TABASC views

The WG considered the further TABASC feedback. The Proposer and WG members agreed that the views were in line with some of the WG consultation responses and the SSC, that the additional seats were not necessary. The Proposer, following WG discussions of the TABASC feedback, did not change the proposed solution.

7.2.3 Change Board Views

SECMP0021 does not impact the Change Board as the proposed solution does not alter the Change Board Membership.

7.2.4 SMKI PMA Views

SECMP0021 does not impact the SMKI PMA as the proposed solution does not alter the SMKI PMA Membership.

7.3 Summary of the Working Group Consultation views

SECMP0021 was issued for Working Group Consultation on 9th January 2017. A total of 14 responses were received.

The full collated WG Consultation responses are included in Attachment B – Working Group Consultation Responses. A summary of the Parties' views is below.

Large Supplier Parties

4 Responses

The four Large Supplier responses to the consultation did not support the Modification Proposal. The Large Suppliers shared similar views that it was not clear why the modification was required based on a lack of evidence to indicate the current membership structures were insufficient or failing. The Large Suppliers commented that the existing arrangements by which interested parties (even beyond those that are Other SEC Parties) could be invited to meetings and workshops per the provisions in SEC Section C5.13(c).

The four respondents did not identify any alternative solutions beyond options already available within the current SEC provisions (i.e. inviting interested persons to meetings and workshops or requesting the Panel change the TABASC Terms of Reference), nor did they provide comments on the legal text.

The respondents agreed with the use of Path 3, and the implementation approach as set out in section 5.

One Large Supplier commented, in relation to the benefits and drawbacks, that the current SSC membership is already sufficient with the current structure having the knowledge and experience to review security assessments and follow and implement the SEC Section G security arrangements. Three Large Supplier respondents disagreed with the view that the modification would better facilitate SEC Objective (g) as the current arrangements in place are satisfactory. In addition, the Large Suppliers disagreed with the applicability of and the benefits identified against SEC Objectives (d) and (e).

Small Supplier Parties

1 Responses

The one Small Supplier to respond to the WG Consultation expressed support for the Modification Proposal for the reasons outlined in the consultation document. The respondent agreed that it should continue to proceed as a Path 3 Self-governance Modification Proposal and be implemented (if approved) in the manner set out in the WG consultation document.

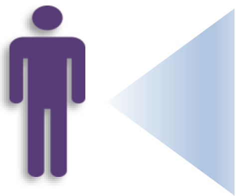
The respondent did not identify any additional benefits or drawbacks and agreed with the Proposer and WG's initial views on the SEC Objectives.

Network Parties

2 Responses

Out of the two Network Party responses, one did not express a specific view on whether the modification should be approved or not. The second had the view that there was not sufficient evidence to support this change. The reasoning for this was that it was not obvious at this time whether the current arrangements were failing or insufficient. The two Network Party respondents did not identify any alternative solutions or provide any specific comments on the legal text. They both agreed the modification should continue to proceed as Path 3, Self Governance modification, and be implemented in line with the approach in section 5. Neither respondent identified any additional benefits or drawbacks with the proposed solution and agreed with the Working Group's views regarding the solution better facilitating SEC Objective (g).

Other SEC Parties



7 Responses

The seven Other SEC Party responses all indicated support for SECMP0021. Views ranged from re-iterating the reasons already captured by the Proposer and the WG. Some observations were made on the content of the consultation document. The seven respondents did not identify any alternative solutions, nor did they provide comments on the legal text. The respondents agreed with the use of Path 3, and the implementation approach as set out in section 5. A respondent commented that the modification provided a quicker way for Other SEC Parties to be involved in the SSC and TABASC discussions, over additional sub-groups or workshops convened as and when required. No additional views were provided on the applicable SEC Objectives, beyond those identified by the Proposer and the Working Group.

7.4 Summary of Working Group's considerations of the consultation responses

The final Working Group meeting was held on 6th February 2017. The detailed discussions on the consultation responses are included in in **Attachment B – Working Group Consultation Responses.**

General observations were that no new comments or observations were raised during the Working Group consultation of the modification, that had not been previously discussed prior to the consultation. The views provided were broadly split on the benefit of the modification compared with the options and existing current mechanisms being available.

A Working Group member did challenge the view of a respondent who mentioned that the structure of the SSC and TABASC broadly reflected the funding model for the SMIP. They expressed the view that Sub-Committee members must act independently. Thus, the funding arrangement in their view was something of a misnomer, and further pushed the case for the modification being needed to prevent any questions of the Sub-Committee being accused of not acting independently of the respective members' organisations. This view was echoed by the Proposer.

No changes to the proposed solution arose from the Working Group discussions of the consultation responses.

7.5 The Proposer and Working Group's final views

The final views of the Proposer and Working Group are set out below.

7.5.1 Working Group's final views on benefits/drawbacks

Following the consultation, no additional drawbacks were identified by the WG.

An additional benefit identified by a consultation respondent was reiterated by a minority of Working Group members and the Proposer, namely that the Modification Proposal would aid continuity of knowledge and experience between the regular Sub-Committee meetings.

7.5.2 Proposer's final views against SEC Objectives

The Proposer's views on the SEC Objectives were unchanged from those provided prior to the WG consultation as set out in section 7.1.2. The Proposer provided an additional view in respect of SEC Objective (g), that the proposed solution would enable better more informed discussions on matters discussed at the TABASC and SSC ensuring a better operational system.

7.5.3 Working Group's final views against SEC Objectives

Overall, the WG views on the SEC Objectives were unchanged from those that were provided prior to the consultation as set out in section 7.1.3.

However, one WG member did expand their views on the SEC Objectives to agree with the Proposer views in relation to SEC Objective (d) and (e), citing the same rationale as the Proposer as captured in section 7.1.2.

7.4.4 Summary of Proposer's and Working Group's final views against the SEC Objectives

The following table provides a summary view of the Proposer's and WG's final views against the SEC Objectives.

Summary of Working Groups final views against the SEC Objectives		
General SEC Objective	Proposer views	Working Group
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	N/A	N/A
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	N/A	N/A

Summary of Working Groups final views against the SEC Objectives		
General SEC Objective	Proposer views	Working Group
c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	N/A	N/A
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	Proposed - ✓	Proposed - ✓ (View of one WG member)
e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.	Proposed - ✓	Proposed - ✓ (View of one WG member)
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	N/A	N/A
g) To facilitate the efficient and transparent administration and implementation of this Code.	Proposed - ✓	Proposed - ✓ (Unanimous view)

Should SECMP0021 be approved?

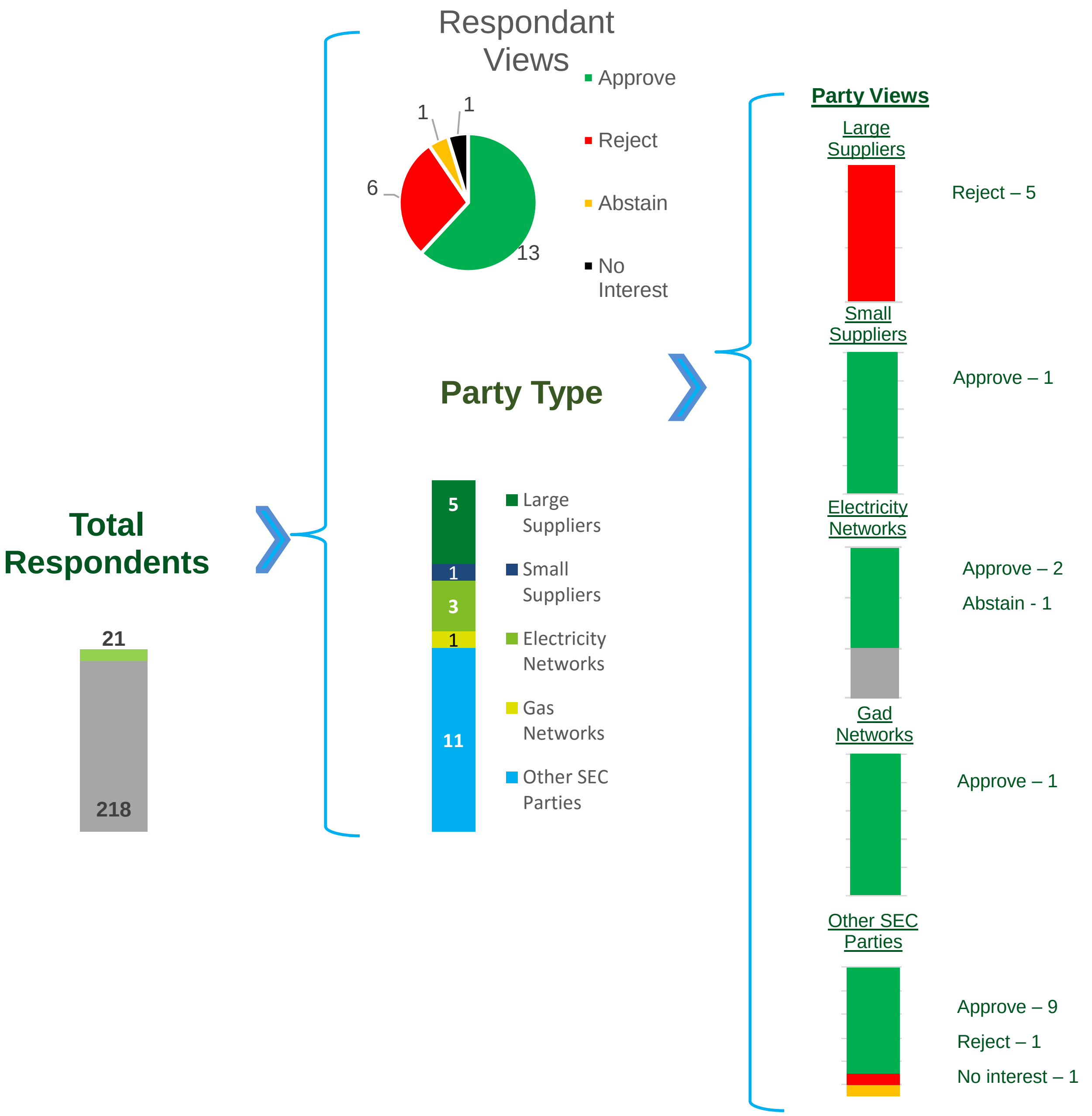
Following the Refinement Process, the WG Consultation and the WG's consideration of the consultation responses received, the views of the WG were that there was an overall benefit against SEC Objective (g). However, the WG were **broadly split on** whether the Modification Proposal should be approved, based on the views summarised above and the input from the SSC and TABASC. Some WG members, along with the Proposer felt overall it was better to put in place the change now, to mitigate against the concerns and observations covered above, i.e. continuity of knowledge and experience on the SSC and TABASC.

Some WG members echoed the views of the consultation responses indicating that while there were benefits against SEC Objective (g) it was deemed to be too soon for the modification. It was noted that it would be better to wait until there was clearer evidence of the membership structures not being sufficient and the mechanism of inviting interested parties when required proven to be ineffective. A Working Group member summarised that the issue the modification was seeking to address was challenging and that while the Modification Proposal was one approach to resolve it, it may be better to continue to utilise the current arrangements.

8. Modification Report Consultation Responses

This section summarises the responses received to the Modification Report Consultation. 21 respondents, representing a total of 25 SEC Parties, replied to the Modification Report Consultation. The full list of represented SEC Parties and the responses are provided in Attachment C.

8.1 Summary of Responses



8.2 Summary of Modification Report Consultation respondent's views against the SEC Objectives

Summary of Large Suppliers' views for and against SECMP0021		
SEC Objectives	**Benefit(s)**	**Drawback(s)**
Objective (a)	None identified	One respondent provided a view that General SEC Objective (a) is detrimentally impact by SECMP0021, for reasons relating to the impacts it may have with respect to Security.
Objective (d)	None identified	One respondent provided a view that General SEC Objective would be detrimentally impacted, because it would increase regulatory risk (i.e. the risk that the code is changed in a manner that prejudices the interests of suppliers),which manifests as a barrier to entry. One respondent provided a view that they disagree with the Proposer's view that SECMP0021 has benefits against General SEC Objective (d).
Objective (e)	None identified	One respondent provided a view that they disagree with the Proposer's view that SECMP0021 has benefits against General SEC Objective (e).
Objective (g)	One respondent provided a view 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.	One respondent indicated that they do not believe the proposed changes would benefit General SEC Objective (g) To facilitate the efficient and transparent administration and implementation of this Code, and indicated they believe the current arrangements are satisfactory.

General views summary: With the exception of the views summarised above, the views of many of the Large Supplier respondents were that the impact of SECMP0021 was neutral against the General SEC objectives and no benefits could be identified at this time.		
Summary of Small Suppliers' views for and against SECMP0021		
SEC Objectives	**Benefit(s)**	**Drawback(s)**
Objective (e)	The Small Supplier respondent indicated that SEC Objective (e) could be better facilitated (albeit to a lesser extent, than SEC Objective (g)) by SECMP0021	None identified
Objective (g)	The Small Supplier respondent indicated that they believe the objective (g) could be better facilitated by SECMP0021	None identified
Summary of Networks' views for and against SECMP0021		
SEC Objectives	**Benefit(s)**	**Drawback(s)**
Objective (g)	One respondent provided the view that they agree with the Working Group's views that this modification better facilitates General SEC Objective (g) on the grounds that increasing the number of Other SEC Party members will 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.	None identified
General views summary: • Two respondents provided no views against the SEC Objectives • One respondent indicated they were unable to provide a view of whether the Modification Proposal better facilitates the SEC Objectives. • The respondent who provided views on how SEC Objective (g) is better facilitated, did not believe SEC Objectives (d) and (e) are better facilitated by SECMP0021 in line with the views expressed by the Working Group		
Summary of Other SEC Party views for and against SECMP0021		

SEC Objectives	Benefit(s)	Drawback(s)
Objective (a)	One respondent expressed the view that they believe SEC Objective (a) is better facilitated by SECMP0021	None identified
Objective (g)	One respondent indicated SECMP0021 may better facilitate SEC Objective (g), but caveated that it may be better to see how things develop further, to provide a greater rationale for the change at a later time, hence the view to reject at this time.	None identified

General views summary:

Nine respondents do not provide specific views against the SEC Objectives, however three of these did provide views in support of their support of the change.

9. Change Board Decisions

Each Change Board Member is requested to:

- **CONSIDER** the Final Modification Report and the Modification Report Consultation Responses (Attachment C);
- **CONSIDER** whether or not the Final Modification Report should be returned to the SEC Panel with recommendation for further clarification and/or analysis;
- **VOTE or ABSTAIN** on the Modification Proposal; and
- **PROVIDE** rationale as to whether the Modification Proposal will or will not better facilitate the SEC Objectives.

Appendix A – Working Group Details

Working Group Membership

The following table contains a list of the SECMP0021 Working Group Members and the Working Group meetings they each attended to discuss SECMP0021.

Working Group Membership and Attendance			
WG Member	Meeting 1 – 30th November 2016	Meeting 2 – 13th December 2016	Meeting 3 – 6th February 2017
Elias Hanna (Landis and Gyr) (Proposer)	✓	✓	✓
Paul Saker (EDF Energy)	✓	✓	
William Wilson (Global-365)	✓	✓ **(part)**	✓
Tim Newton (E.ON)		✓	✓
Cissy Edathanal (npower)	✓		✓
Gavin O'Neill	✓		
Simon Trivella			
Observers			
Rob Thornes (BEIS)	✓	✓	

Working Group Terms of Reference

To meet the requirements of the Refinement Process set out in SEC Sections D6.8 - D6.14, the Panel agreed standard Terms of Reference (ToR).

The below table contains these questions and highlighted the subsequent sections in this document where they have been addressed.

Working Group ToR – supplementary matters to consider	
Question	Section(s) of this document
What was the drivers behind the current SEC defined membership structures, particularly the SSC?	Section 2.1 on the current arrangements and Section 6.1.1 in relation to the SSC membership, particularly the Other User vs. Other SEC Party member discussions

Appendix B – Glossary and References

Glossary		
Acronym	Term	Description
BEIS		Department for Business, Energy and Industrial Strategy
	Change Board	has the meaning given to that expression in Section D8.1 (Establishment of the Change Board).
DCC	Data and Communications Company	Means the holder from time to time of the DCC Licence.
DECC		Department of Energy and Climate Change (former name of BEIS)
	Electricity Network Party	means a Party that holds an Electricity Distribution Licence.
	Gas Network Party	means a Party that holds a Gas Transporter Licence
	General SEC Objectives	The SEC Objectives are those objectives that the SEC has been designed to achieve.
	Large Supplier	means a Supplier Party which supplies electricity and/or gas to more than 250,000 (two hundred and fifty thousand) Domestic Premises.
	Other SEC Party	means a Party that is not the DCC, is not a Network Party, and is not a Supplier Party
	Other User	means, for a Smart Metering System or a Device and any period of or point in time, a User that is not acting in the User Role of Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor, Gas Transporter or Registered Supplier Agent (regardless of whether in fact that User is a Responsible Supplier or the Electricity Distributor or the Gas Transporter or the Registered Supplier Agent during that period of or at that point in time).
	Party Category	Means one of the following Categories: (a) the Large Supplier Parties collectively; (b) the Small Supplier Parties collectively; (c) the Electricity Network Parties collectively; (d) the Gas Network Parties collectively; or the Other SEC Parties collectively.

Glossary		
Acronym	Term	Description
	Small Supplier	means a Supplier Party which supplies electricity and/or gas to fewer than 250,000 (two hundred and fifty thousand) Domestic Premises.
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority	means the Sub-Committee of that name established pursuant to Section L1 (SMKI Policy Management Authority).
SSC	Security Sub-Committee	means the Sub-Committee established pursuant to Section G7 (Security Sub-Committee).
TABASC	Technical Architecture and Business Architecture Sub-committee	Means the Sub-Committee established pursuant to Section F1 (Technical Architecture and Business Architecture Sub-Committee).
TSC	Technical Sub-Committee	Former name for the TABASC

References

The following table contains any useful links relevant to this change or referenced in this document.

Links and References	
Description	Link
New SEC Content (Stage 2) consultation	https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2
New SEC Content (Stage 4) consultation	https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-4
SECMP_24_1109_04 – Establishment of the Technical Sub-Committee	Link to folder containing the paper: https://www.smartenergycodecompany.co.uk/docs/default-source/meetings/panel/secp_24/secp_24_1109---panel-papers.zip?sfvrsn=2
SECMP0021 – Modification Proposal Form v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0021/secmp0021---modification-proposal-form.pdf?sfvrsn=0
SECMP0021 – Initial Modification Report v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0021---initial-modification-report-1-1.pdf?sfvrsn=0
SECMP0021 – Working Group Consultation v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0021/secmp0021---working-group-consultation.pdf?sfvrsn=0

Links and References	
Description	Link
SECMP0021 – Draft Modification Report	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secp_42_1003_14---secmp0021---draft-modification-report.pdf?sfvrsn=0
SECMP0021 – Draft Modification Report Attachment A - Legal Text	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secp_42_1003_14---secmp0021--draft-mr-attachment-a---legal-text-v0-1.pdf?sfvrsn=0
SECMP0021 – Draft Modification Report Attachment B - WG Consultation Response	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secp_42_1003_14---secmp0021---draft-mr-attachment-b---wg-consultation-response-v0-2.pdf?sfvrsn=0
SECMP0021 – Draft Modification Report Attachment C - MR Consultation Response Form	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secp_42_1003_14---secmp0021---dmr-attachment-c---mr-consultation-response-form.pdf?sfvrsn=0