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Stage 01: Initial Modification Report

SECMP0040:

Changes to how DCC Users Schedule & carry out User Security Assessments after completed of the User Entry Process

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
04	Decision

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Summary

This Modification seeks to ensure that, Security Assurance Assessments (also referred to in this report as User Security Assessments) for Data Communications Company (DCC) Users are scheduled 12 months following completion of the User Entry Process and initial Full User Security Assessment (FUSA).

Proposed Progression

This Modification Proposal is recommended to be:

P3

- progressed as a Path 3: Self-Governance Modification Proposal; and
- submitted for Modification Report Consultation.

Potential Impacts

!

- All SEC Parties that wish to become a DCC user
- There are no impacts on DCC Central Systems and/or Party interfacing systems.

SECMP00XX
Initial Modification
Report

4 August 2017

Version 1.0

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About this Document

This is an Initial Modification Report (IMR). This document contains details of the issue, solution, potential impacts and costs as well as the proposed progression for SECMP0040.

This document has four attachments:

- Attachment A contains the SECMP0040 Modification Proposal Form;
- Attachment B contains the draft legal text changes to support this modification;
- Attachment C contains the Draft Modification Report;
- Attachment D contains the Modification Report Consultation (MRC); and
- Attachment E contains the Draft Modification Report Consultation response form

The Panel considered this IMR at its meeting on 11th August 2017. The Panel agreed that this Modification should be submitted to Modification Report Consultation.

1. Summary

What is the issue?

This modification seeks to amend how Security Assurance Assessments for DCC Users are scheduled following completion of the User Entry Process.

What is the Proposed Solution?

The outcome of this Modification is to ensure that, following the initial FUSA, a DCC User has taken the necessary steps to schedule their next assessment within 12 months of the SEC Panel setting an assurance status of either 'approved' or 'approved subject to Party'.

Potential impacts

Party

Large Supplier Parties	X	Small Supplier Parties	X
Electricity Network Parties	X	Gas Network Parties	X
Other SEC Parties	X		

System

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

Potential implementation costs

The cost to implement SECMP0040 will be limited to SEC time and effort to deliver the necessary process changes.

Proposed progression

The Proposer recommends that this modification be progressed as a Path 3: Self-Governance Modification Proposal. It is also recommended that SECMP0040 be submitted for MRC.

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2. What is the issue?

Background

Currently, the SSC and the SEC Panel are responsible for reviewing the User Security Assessment Report and User Security Assessment Responses for each SEC Party that undertakes an initial FUSA prior to becoming a DCC User (as part of their wider User Entry Process requirements and as per SEC Section H1.10 (c)).

This review allows the SSC to provide an assurance status recommendation to the Panel. The Panel then consider this recommendation and set an agreed assurance status (as per [SEC Section G8.36](#)).

At their June 2017 meeting, the SSC agreed that a change should be made to the SEC regarding how Security Assurance Assessments are scheduled by DCC Users after the completion of the User Entry Process.

The SSC considered the need to introduce a requirement on DCC Users to take steps to schedule their next User Security Assessment (following completion of their initial FUSA) within 12 months of the SEC Panel setting an 'approved' or 'approved, subject to Party' assurance status.

The SSC considered that this 12-month timescale provides DCC Users with sufficient time to complete their next User Security Assessment and ensures that each DCC User has booked their next assessment within 12 months.

The SSC also considered that making such a change will help SECAS to more efficiently manage the scheduling of User Security Assessments and assess demand for the User Independent Security Assurance Service Provider (UISASP) (also referred to as the User CIO).

What is the issue?

Currently, [SEC Section G8.42](#) to [G8.50](#) requires a DCC User to schedule and carry out its 'next User Security Assessment' "the first year after the year of the Initial User Security Assessment". This means that, if a DCC User has their initial FUSA in January 2018, their next User Security Assessment will not need to be scheduled and completed until December 2019.

The current wording in SEC Section G means that some DCC Users may have a longer window in which to schedule and complete their next User Security Assessments than others. Ultimately leading to an accumulation of DCC users requiring a reassessment at the end of the calendar year. Thus, impacting the capacity of the User Competent Independent Organisation (User CIO) and SECAS' ability to manage user assessments.

3. Solution

Proposed solution

Scheduling Security Assurance Assessment

SECMP0040 will require DCC Users to take the necessary steps to schedule their next assessment within 12 months of the SEC Panel setting an assurance status of either 'approved' (as per SEC Section G8.36 (a)) or 'approved, subject to Party' (as per SEC Section G8.36 (b)).

This means that every DCC User will have 12 months to schedule their next User Security Assessment.

Completing Security Assurance Assessments

For the avoidance of doubt, SECMP0040 does not introduce timescales for the completion of a User's next Security Assessment. However, the default timescale defined in the [Security Controls Frameworks](#) state that Security Assurance Assessment must be scheduled 12 weeks prior the start of the Assessment.

This (combined with SECMP0040) will effectively provide a maximum of 15 months between the assurance status being set and the start of the next User Security Assessment.

Draft legal text changes

The SSC proposes amendments to the **Security Assurance Assessment: Post-User Entry Process** clauses within **SEC Section G: Security**. Specifically, to SEC Sections G8.41, G8.42, G8.44, G8.45, G8.47 and G8.50. These Sections refer to **Supplier Parties, Network Parties, Other Users** and the **User Security Self-Assessment** process.

The proposed draft legal text changes to SEC Section G: Security are provided in Attachment B.

Views against the General SEC Objectives

The Proposer believes that this Modification Proposal better facilitates General SEC Objectives f)1.

The Proposer believes that SECMP0040 better facilitates Objective f) because it will ensure that each DCC User has booked their next User Security Assessment

¹ Objective f): the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code.



within 12 months of the Panel setting an assurance status of 'approved' or 'approved subject to Party'. This in turn will allow SECAS to more efficiently manage User Security Assessment and the demand for the User CIO.

For the avoidance of doubt, the Proposer believes that this modification is neutral against Objectives a), b), c), d), e), g) and h).

Please note that detailed descriptions of all the General SEC Objectives can be found in [SEC Section C 1.1](#).

Potential Impacts

The following section sets out the initial assessment of likely impacts and costs should SECMP0040 be approved and implemented.

SEC Party impacts

Large Supplier Parties	X	Small Supplier Parties	X
Electricity Network Parties	X	Gas Network Parties	X
Other SEC Parties	X		

All SEC Parties that are/wish to become a DCC User will be impacted as this modification will affect how SEC Parties schedule the User Security Assessment following initial FUSA.

Central System impacts

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

Testing

There will be no testing required.

SEC and Subsidiary Document impacts

SECMP0040 will impact SEC Section G: Security as changes are required to the clauses set out in G8.41, G8.42, G8.44, G8.45, G8.47 and G8.50.

Impacts on other industry codes

This modification will not impact other Energy Codes.

Greenhouse Gas Emission impacts

This modification will not impact Greenhouse Gas Emissions.

4. Potential Costs

Potential implementation costs

The potential costs to implement SECMP0040 will be limited to the Code Administration time and effort for:

- Making the necessary amendments to the SEC;
- Releasing a new version of the SEC to SEC Parties; and
- Publication of it on the SEC website.

SECAS implementation costs		
Implementation activities	Effort	Cost
Application of approved changes to the SEC. Publication of new version of the SEC on the SEC Website and issuance to SEC Parties. Review and updated any impacted SEC guidance materials.	Two Man Days maximum	£1,200 ²

² SEC man day effort based on a blended rate of £600 per day.

5. Proposed Progression

Modification Path

The Proposer and SECAS recommend to the Panel that SECMP0040 be progressed as a Path 3: Self-Governance Modification Proposal.

As per SEC Section G7.20 (a), the Proposer considers that it is appropriate to raise this modification to ensure effective Assurance Arrangements within the Code. As per SEC Section D2.7, SECAS considered that this Modification is a not material change nor a Fast Track Modification and therefore Path 3 is the most appropriate.

The Panel agreed that this Modification should be progressed as Path 3: Self-Governance Modification Proposal.

Proposed progression

The Panel agreed the following progression timetable.

Activity	Date
Modification Proposal raised	26 Jul 17
IMR presented to Panel	11 Aug 17
Panel reviews Modification Report	11 Aug 17
Modification Report Consultation	18 Aug - 11 Sep 17
Change Board vote	20 Sep 17



6. Implementation

Recommended implementation date

SECAS recommends an implementation date of:

- 10 Working Days (WDs) following the end of the 10 WD referral period, which commences after the Change Board vote.

7. Recommendations

The Panel:

- **AGREED** that SECMP0040 should be progressed as a Path 3: Modification Proposal;
- **AGREED** the progression timetable set out in Section 4;
- **AGREED** that this modification be submitted to Modification Report Consultation;
- **AGREED** that the draft legal text delivers the intention of the modification; and
- **AGREED** with the recommended implementation date of 10 WDs following the end of the 10 WD referral period, which commences after the Change Board vote.



Please note that the progression plan shown below is subject to change.

[illegible]

Appendix 2: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Defined Term
DCC	Data Communications Company
FUSA	Full User Security Assessment
IMR	Initial Modification Report
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSC	Security Sub-Committee
UISASP	User Independent Security Assurance Service Provider
User CIO	User Competent Independent Organisation
WD	Working Day