SEC
Smart Energy Code

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Modification Proposal Form

Mod Title

Changes to how DCC Users schedule and carry out User Security Assessments after completion of the User Entry Process

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1. What issue are you looking to address?

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

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 Full User Security Assessment (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. Further, it could also lead to 'bunching' at the end of the calendar year which will affect the capacity of the User Competent Independent Organisation (User CIO) and SECAS' ability to manage user assessments.

2. Why does this issue need to be addressed? *(i.e. Why is doing nothing not an option?)*

The Security Sub-Committee (SSC) and the SEC Panel review 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 and for the Panel to then agree and set an 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 (after their initial FUSA) within 12 months of the SEC Panel setting an 'approved' or 'approved, subject to the party' assurance status.

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

This modification will also 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).

3. What is your Proposed Solution?

The intention 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' (as per SEC Section G8.36 (a)) or 'approved, subject to the Party taking steps' (as per SEC Section G8.36 (b)). The means that every DCC User will have 12 months to schedule their next User Security Assessment and, at present, the default timescale defined in the Security Controls Framework to schedule the assessment is 12 weeks before the start of the Assessment. This would effectively provide a maximum of 15 months between the assurance status being set and the start of the next User Security Assessment.

For the avoidance of doubt, this modification does not seek to define a date for the DCC User to complete next assessment. The process associated with completing a User Security Assessment, and the timescales associated with that, are those set out in the Security Controls Framework.

The SSC proposes the following 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:

G8.41

Where a User is a Supplier Party and the number of Domestic Premises supplied with electricity and/or gas through one or more Smart Metering Systems for which it is the Responsible Supplier exceeds 250,000, it shall take necessary steps to schedule a Full User Security Assessment by 12 months after their initial Full User Security Assessment has completed and the SEC Panel has set an assurance status of:

a) approved; or

b) approved, subject to the Party:

(i) taking such steps as it proposes to take in its User Security Assessment response in accordance with SEC G8.26(b); or

(ii) both taking such steps and being subject to a Follow-up Security Assessment by such date as the Panel may specify.

And 12 months thereafter after for each Full User Security Assessment.

G8.42

Where a User is a Supplier Party and the number of Domestic Premises supplied with electricity and/or gas through one or more Smart Metering Systems for which it is the Responsible Supplier is equal to or less than 250,000, it shall take necessary steps to schedule a Full User Security Assessment by 12 months after their initial Full User Security Assessment has completed and the SEC Panel has set an assurance status of:

a) approved; or

b) approved, subject to the Party:

(i) taking such steps as it proposes to take in its User Security Assessment response in accordance with SEC G8.26(b); or

(ii) both taking such steps and being subject to a Follow-up Security Assessment by such date as the Panel may specify.

The User must also take necessary steps:

a) 12 months after the Verification Security Assessment to schedule a User Security Self-Assessment;
b) 12 months after the User Security Self-Assessment to schedule a Full User Security Assessment; and
c) 12 months thereafter, to schedule a category of security assurance assessment which repeats the same annual sequence as that of paragraphs (X) to (X).

G8.44

Where a User is a Network Party and the number of Domestic Premises supplied with electricity and/or gas through one or more Smart Metering Systems for which it is the Electricity Distributor and/or the Gas Transporter exceeds 250,000, it shall take necessary steps to schedule a Full User Security Assessment by 12 months after their initial Full User Security Assessment has completed and the SEC Panel has set an assurance status of:

a) approved; or

b) approved, subject to the Party:

(i) taking such steps as it proposes to take in its User Security Assessment response in accordance with SEC G8.26(b); or

(ii) both taking such steps and being subject to a Follow-up Security Assessment by such date as the Panel may specify.

The User must also take necessary steps:

a) 12 months after the Verification Security Assessment to schedule a User Security Self-Assessment;
b) 12 months after the User Security Self-Assessment to schedule a Full User Security Assessment; and
c) 12 months thereafter, to schedule a category of security assurance assessment which repeats the same annual sequence as that of paragraphs (X) to (X).

G8.45

Where a User is a Network Party and the number of Domestic Premises supplied with electricity and/or gas through one or more Smart Metering Systems for which it is the Electricity Distributor and/or the Gas Transporter is equal to or less than 250,000, it shall take necessary steps to schedule a Full User Security Assessment by 12 months after their initial Full User Security Assessment has completed and the SEC Panel has set an assurance status of:

a) approved; or

b) approved, subject to the Party:

(iii) taking such steps as it proposes to take in its User Security Assessment response in accordance with SEC G8.26(b); or

(iv) both taking such steps and being subject to a Follow-up Security Assessment by such date as the Panel may specify.

The User must also take necessary steps:

a) 12 months after the Verification Security Assessment to schedule a User Security Self-Assessment;
b) 12 months after the User Security Self-Assessment to schedule a Full User Security Assessment; and
c) 12 months thereafter, to schedule a category of security assurance assessment which repeats the same annual sequence as that of paragraphs (X) to (X).

G8.47

Where a User is neither a Supplier Party nor a Network Party, it shall take necessary steps to schedule a Full User Security Assessment by 12 months after their initial Full User Security Assessment has completed and the SEC Panel has set an assurance status of:

c) approved; or

a) approved, subject to the Party:

(v) taking such steps as it proposes to take in its User Security Assessment response in accordance with SEC G8.26(b); or

(vi) both taking such steps and being subject to a Follow-up Security Assessment by such date as the Panel may specify.

The User must also take necessary steps:

a) 12 months after the Verification Security Assessment to schedule a User Security Self-Assessment;
b) 12 months after the User Security Self-Assessment to schedule a Full User Security Assessment; and
c) 12 months thereafter, to schedule a category of security assurance assessment which repeats the same annual sequence as that of paragraphs (X) to (X).

G8.50

Where, in accordance with the requirements of this Section G8, a User is subject to a User Security Self-Assessment in any year, that User shall:

(a) have taken necessary steps to schedule the User Security Self-Assessment within 12 months of their previous assessment;

(b) do so in accordance with the User Security Assessment Methodology that is applicable to User Security Self-Assessments; and

(c) ensure that the outcome of the User Security Self-Assessment is documented and is submitted to the User Independent Security Assurance Service Provider for review by no later than the date which is 12 months after the date of the commencement of the previous User Security Assessment or (if more recent) User Security Self-Assessment.

4. What SEC objectives does this Modification better facilitate?

The General SEC Objective that this modification will better facilitate is General **SEC Objective (f)**, which states:

The sixth General Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code.

The reason why is General SEC Objective is better facilitated by this modification is because this modification will ensure that each DCC User has booked and carried out their next User Security Assessment within 12 months of their previous User Security Assessment.

5. What is the requested Path type?	Path 3

The SSC considers that this modification should be raised as **Path 3: Self Governance** because it is not a Path 1: Authority Led or Path 2: Authority Determined modification. In addition, it does not meet or satisfy the requirements of a Fast-Track Modification. As per SEC Section G7.20 (a), the SSC considers that it is appropriate to raise this modification to ensure effective Assurance Arrangements within the Code.

6. Are you requesting that the Modification Proposal be treated as Urgent?	No

The SSC do not consider this Modification Proposal should be treated as urgent.

7. What is your desired implementation date?
The SSC considers that this modification should be implemented within three months of the Modification Proposal being submitted. The SSC considers that this modification does not require a Refinement Process and should be progressed directly to the Modification Report stage of the modification process. Further, there are currently 11 DCC Users that are at risk of being caught between current arrangements and the arrangements proposed under this modification. Therefore, the sooner the modification is implemented the more manageable the risk to DCC Users.

8. Which SEC Parties are expected to be impacted? (Please mark with an X)

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

All SEC Parties that wish to become a DCC User will be impacted. This is because it will affect the way in which they schedule and carry out the User Security Assessment following initial FUSA.

9. Which parts of the SEC will be impacted?
The part of the SEC that shall be impacted is **SEC Section G: Security**.

10. Will there be an impact on Central Systems? (Please mark with an X)

DCC Systems		Party interfacing systems	

Smart Metering Systems		Communication Hubs	
Other systems			

There will be no impact on Central Systems. This is because this modification will only change the ways in which DCC Users schedule and carry out their User Security Assessments after their initial Full User Security Assessment.

11. Will there be any testing required?

There will be no testing required.

12. Will this Modification impact other Energy Codes?	No

This modification will not impact other Energy Codes.

13. Will this Modification impact Greenhouse Gas Emissions?	No

This modification will not impact Greenhouse Gas Emissions.