



This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

Modification Decision

SECMP0044:

User Security Assessment of a Shared Resource

Summary

This modification seeks to make changes to the User Security Assessment process to improve efficiency and lower the impact on SEC Parties, Shared Resource Providers, the User Competent Independent Organisation (User CIO), Smart Energy Code Administrator and Secretariat (SECAS) and the Security Sub-Committee (SSC).

Change Board Decision



- The Change Board believes that SECMP0044 better facilitates the SEC Objectives. It therefore **approved** this Modification Proposal under Self-Governance.

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

SECAS Contact:

Name:

Talia Addy

Number:

020 7090 1010

Email:

SEC.Change@gemserv.com

SECMP0044
Modification
Decision

26th July 2018

Version 1.0

Page 1 of 7

This document is
classified as **White**

© SECCo 2018



Content

1. Change Board discussions	3
2. Change Board Vote	5
3. Change Board decision	7

About this Document

This is the Modification Decision document for SECMP0044. This document provides a summary of the Change Board discussions and final determination on this modification.

SECMP0044

Modification
Decision

26th July 2018

Version 1.0

Page 2 of 7

This document is
classified as **White**

© SECCo 2018

1. Change Board discussions

The **unanimous** view of the Change Board is that SECMP0044 does facilitate General SEC Objectives (a), (e) and (g) and should be **approved**.

Change Board discussions

The Change Board noted views raised by respondents to the Modification Report Consultation (MRC), focusing mainly on the concerns raised by E.ON.

The Large Supplier Change Board Member for E.ON reiterated the views expressed in the consultation response advising that their main concern was related to the definition of a Shared Resource and Shared Resource Provider. They believe that the combination of SEC Sections G5.25, G10.1 and G10.3 would mean that any Shared Resources that make up a User System must be provided by a Shared Resource Provider. This means there is a risk that any User who has Shared Resources as part of its User System that are not provided by a Shared Resource Provider may be in breach.

SECAS assured the Change Board that the E.ON response had been heavily considered internally with the Proposer (the Security Sub-Committee (SSC) Chairman) and with the SEC Lawyers. All were of the view that the legal text in its current form does deliver the intention of the modification and believed that no changes are required. Other Change Board Members agreed with this view, and did not share E.ON's concerns over the legal text.

The Change Board Member also highlighted that this change could have unintended consequences if a User was to take on a Shared Resource Provider who was not a SEC Party. It was confirmed that all existing Shared Resource Providers are SEC Parties, so this would only be an issue if a new provider emerged and did not accede to the SEC.

Another Change Board Member raised a query over the proposed definitions of a Shared Resource. They were uncertain whether the definition was correct, or whether it could be misleading. They considered that the definition of a Shared Resource explained in the Final Modification Report (FMR) was correct but was unsure if the legal text delivered this. They also expressed a reservation about the solution only applying to a Shared Resource Provider who provided the entire package. It was highlighted that this was the intention of the modification and was the solution the Proposer had sought.

One member highlighted that they did not understand the concerns that had been raised. They considered that the legal text made it clear that a Shared Resource Provider is one that provides the entire system to another User, and that the various clauses linked together to achieve this.

Two Change Board Members voted that the modification should be returned to the Panel, believing the queries raised around the legal text meant that further work was needed to resolve these issues. All other Change Board Members, although they noted that concerns

SECMP0044
Modification
Decision

26th July 2018

Version 1.0

Page 3 of 7

This document is
classified as **White**

© SECCo 2018



had been raised, believed that the modification was clear enough and that sufficient assurances had been provided by the SEC Lawyers over the legal text for them to be able to proceed to the vote.

Views against the General SEC Objectives

Objective (a)¹

The **majority** view of the Change Board is that SECMP0044 would better facilitate Objective (a). They considered that this change would reduce the duplication that currently exists with assessments and would achieve a more efficient and less costly User Security Assessment process.

The remaining Change Board Members considered SECMP0044 to be neutral with respect to Objective (a).

Objective (e)²

The **majority** view of the Change Board is that SECMP0044 would better facilitate Objective (e). They considered that this change would ensure compliance with SEC security obligations through an improved and proportionate process for Suppliers and Shared Resources.

The remaining Change Board Members considered SECMP0044 to be neutral with respect to Objective (e).

Objective (g)³

The **unanimous** view of the Change Board is that SECMP0044 would better facilitate Objective (g). They believed that this would remove the current duplication in administration that arises by SECAS being required to repeat dozens of similar management responses from a Shared Resource and from the SSC having to review repeated assessments of the same Shared Resource. This would ensure the process is more efficient and would be fit for purpose.

For the avoidance of doubt, the Change Board believes that SECMP0044 is neutral against the remaining Objectives.

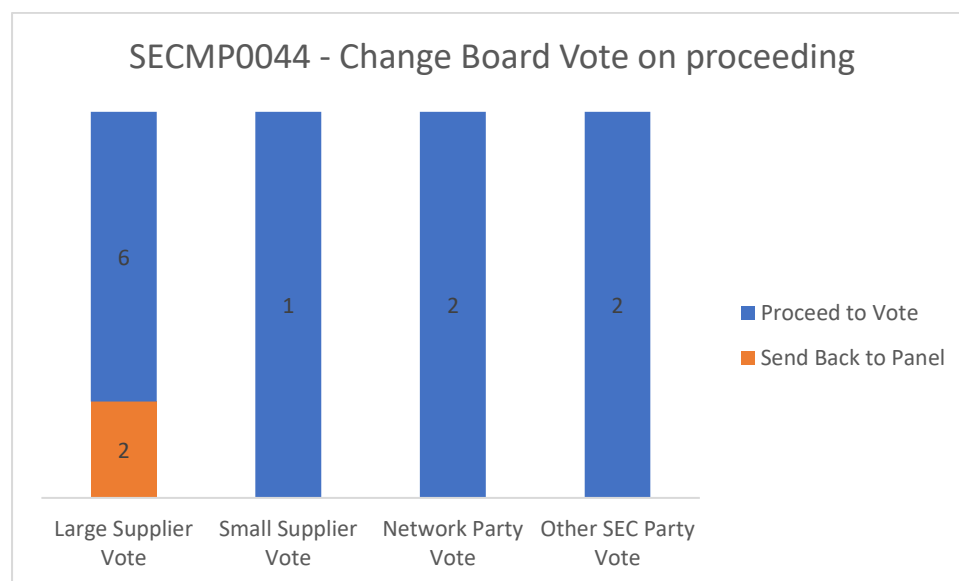
¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² 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.

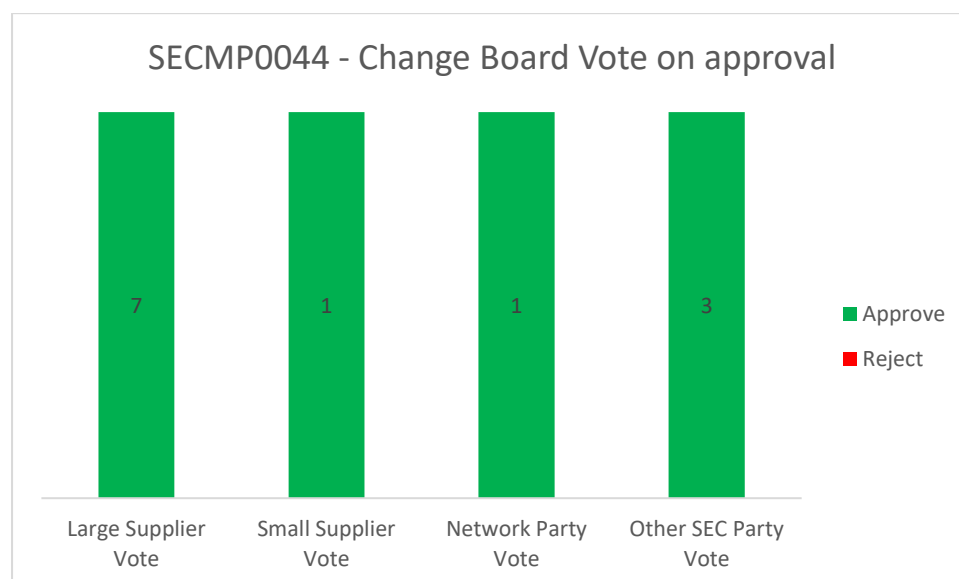
³ Facilitate the efficient and transparent administration and implementation of this Code.

2. Change Board Vote

This section sets out the breakdown of the Change Board’s vote. The Change Board voted to approve SECMP0044.



One Other SEC Party member was absent for this vote but was present for the subsequent vote on approval.



One Large Supplier member abstained from the vote as, while they supported the intent of the modification, they did not believe the legal text fully delivered this, and therefore they

SECMP0044
Modification
Decision

26th July 2018

Version 1.0

Page 5 of 7

This document is
classified as **White**

© SECCo 2018



could not make a determination. They noted that they would accept the overall outcome of the vote.

One Network member abstained from the vote, preferring to leave the decision up to those Parties who would be more impacted by the Modification Proposal.



3. Change Board decision

The Change Board:

- **CONSIDERED** the Final Modification Report and Modification Report Consultation responses for SECMP0044;
- **AGREED** not to send the Final Modification Report back to the Panel for further clarification;
- **APPROVED** SECMP0044 under Self-Governance for implementation on 22nd August 2018 (10 working days following the close of the Self-Governance referral window); and
- **PROVIDED** rationale as to why SECMP0044 better facilitates the General SEC Objectives.

SECMP0044
Modification
Decision

26th July 2018

Version 1.0

Page 7 of 7

This document is
classified as **White**

© SECCo 2018