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Stage 02: Working Group Consultation Responses

What stage is this document in the process?

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

SECMP0057 ‘Users to notify SSC of a second or subsequent User System’

About this document

This document contains the collated responses to the SECMP0057 Working Group Consultation (WGC). The Working Group will review these responses and consider them as part of the solution development for this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Cordelia Grey on 020 7090 1072 or email SEC.Change@gemserv.com.

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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives and should therefore be approved?			
Party Name	Party Category	Yes/No	Comments
British Gas	Large Supplier	Yes	We agree this modification better facilitates SEC objectives a), e) and g).
SSE Retail	Large Supplier	Yes	
Western Power Distribution	Electricity Networks	No	<p><i>The legal text provided to support the proposal is not in line with the intention of the solution proposed in the Draft Modification Report.</i></p> <p><i>Whilst we are supportive of the Modification Proposal to ensure appropriate formal consideration of the security risks is taken if a second or subsequent User System is introduced, the legal text proposed goes beyond this requiring that any new or materially changed components are also notified to the SSC for consideration for assessment.</i></p> <p><i>The Draft Modification Report solution proposes that</i></p> <p><i>“...all Users will be required to notify the SSC before they begin to utilise a second or subsequent User System”.</i></p>

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			<p>However, the Draft Legal Text has placed an additional obligation which has not been part of the Modification work group discussions:</p> <p><u>“G3.9 Each User shall ensure that:</u></p> <p>(a) <u>In respect of any new or materially changed component or functionality of its User Systems which comprises (or includes) a System that is being incorporated into its user Systems for the first time:</u></p> <p>Whilst we are supportive of the principles of ensuring the integrity of systems, we have concerns that the inclusion of “new” would cause unreasonable constraints on Users. For example,</p> <p>If a User is undertaking a like for like replacement for a faulty component or undertaking a HSM replacement which would be a “new” component this should not trigger an obligation for a User to notify the SCC. Likewise, if a User were adding an additional node to a cluster to improve performance and the additional node is performing the same function as existing nodes this again should not trigger an obligation to notify the SSC.</p>
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			<p><i>We do agree that any materially changed components should be assessed and notified to the SSC. However a definition of what is material should be included, for example if a User switched from one HSM type to a completely different type then there would be a reasonable expectation that an assessment would be undertaken.</i></p> <p><i>We believe that the Workgroup should further consider the legal text and remove “new” from section G3.9(a) as this is in conflict with SEC Objectives (a), and (g) as to obligate Users to notify SSC for every new component and await for their assessment is not efficient and does not facilitate transparent administration and implementation of this code.</i></p>
EDF Energy Customers Ltd	Large Supplier	Yes	<p>We agree that this modification should be approved, on the basis that it better facilitates SEC Objectives (f) and (g):</p> <p>(f) as this change will ensure that second and subsequent User systems are subject to appropriate security controls.</p> <p>(g) as this makes the requirements around the need to seek approval of second and subsequent User systems clear within the legal text.</p> <p>We do not believe that this modification better facilitates objectives (a) or (e) as noted in the report.</p>

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Question 2

Q2: Will your organisation be impacted due the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
British Gas	Large Supplier	Yes	We could be impacted in the event that an ad-hoc User Security Assessment is required ahead of scheduled annual User Security Assessments.
SSE Retail	Large Supplier	Yes	Yes, in the event that any future activities fall within its scope and require us to notify SSC.
Western Power Distribution	Electricity Networks	Yes	<i>If this modification is implemented with the legal text as proposed, every time we require to replace a component on our User System we would be obligated to notify the SSC and await their assessment before the System can be operational.</i>
EDF Energy Customers Ltd	Large Supplier	No	The implementation of this modification will not have an impact on us at this time, but will obviously do so should we choose to use any second or subsequent User systems in the future – in which case the obligations seem appropriate.

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Question 3

Q3: Will your organisation incur any costs due to the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
British Gas	Large Supplier	XXXXX	We could incur additional costs in terms of time and resources required to support ad-hoc User Security Assessments in addition to scheduled annual User Security Assessments.
SSE Retail	Large Supplier	No	No, not directly however any second User Assessment during a year would result in additional costs.
Western Power Distribution	Electricity Networks	Yes	<i>Cost to implement this modification would be minimal. However potential cost implications on time and resource should we be required to notify the SSC and await their assessment before the System can be operational could become significant.</i>
EDF Energy Customers Ltd	Large Supplier	No	No, aside from our share of the implementation costs. As above, we may incur some costs in the future should we choose to use any second or subsequent User systems – in which case the costs are unlikely to be significant, or disproportionate.

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Question 4

Q4: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0057 should be approved?

Party Name	Party Category	Yes/No	Comments
British Gas	Large Supplier	Yes	XXXXXX
SSE Retail	Large Supplier	Yes	Yes, we are supportive of the intent of this Modification Proposal.
Western Power Distribution	Electricity Networks	No	<p><i>We do not agree that the modification with the current legal text should be approved.</i></p> <p><i>The inclusion of the additional obligation to notify SSC of any new or materially changed component or functionality would cause unreasonable constraints on Users.</i></p> <p><i>We believe that the Workgroup should further consider the legal text and remove “new” from section G3.9(a) as this is in conflict with SEC Objectives (a), and (g) as to obligate Users to notify SSC for every new component and await for their assessment is not efficient and does not facilitate transparent administration and implementation of this code.</i></p>
EDF Energy Customers Ltd	Large Supplier	Yes	We agree that SECMP0057 should be approved.

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Question 5

Q5: Do you believe that the draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
British Gas	Large Supplier	Yes	XXXXXX
SSE Retail	Large Supplier	Neutral	Generally we believe this is the case however, the inclusion of “materially changed component” in SEC Section G3.9a gives rise to questions on the interpretation. We believe this would benefit from guidance being provided in the Security Controls Framework.
Western Power Distribution	Electricity Networks	No	<p><i>The legal text provided to support the proposal is not in line with the intention of the solution proposed in the Draft Modification Report.</i></p> <p><i>Whilst we are supportive of the Modification Proposal to ensure appropriate formal consideration of the security risks is taken if a second or subsequent User System is introduced, the legal text proposed goes beyond this requiring that any new or materially changed components are also notified to the SSC for consideration for assessment.</i></p> <p><i>We believe that the Workgroup should further consider the legal text and remove “new” from section G3.9(a) as this is in conflict with SEC Objectives (a), and (g) as to obligate Users to notify SSC for every new component and await for their assessment is not efficient and does not facilitate transparent administration and implementation of this code.</i></p>

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EDF Energy Customers Ltd	Large Supplier	Yes	We have not identified any issues with the legal text.
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Question 6

Q6: Do you agree with the recommended implementation date?

Party Name	Party Category	Yes/No	Comments
British Gas	Large Supplier	Yes	XXXXX
SSE Retail	Large Supplier	Yes	The implementation date seems reasonable.
Western Power Distribution	Electricity Networks	Neutral	<i>The modification is silent on "in flight" Second or subsequent User Systems and material changes.</i>
EDF Energy Customers Ltd	Large Supplier	Yes	We agree with the recommended implementation date.

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Question 7

Q7: Are you aware of any valid reasons why a User would not wish to disclose to the SSC how they are intending to utilise a second or subsequent User System?

Party Name	Party Category	Comments
British Gas	Large Supplier	We do not currently believe there are any valid reasons why a User would not wish to disclose how they are intending to utilise a second or subsequent User System.
SSE Retail	Large Supplier	We are not aware of any other valid reasons at this time other than those set out as the considerations of the Working Group in the Draft Modification Report.
Western Power Distribution	Electricity Networks	<i>We are unaware of any valid reason why a User would not wish to disclose to the SSC how they are intending to utilise a second or subsequent User System</i>
EDF Energy Customers Ltd	Large Supplier	No – as SSC members are bound by confidentiality requirements and non-disclosure agreements.

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Question 8

Q8: Do you think, as an organisation, you could be utilising a second or subsequent User System in the future and are you aware of what this architecture might look like? If so, would you be willing to share this information on future architecture with the SSC?

Party Name	Party Category	Comments
British Gas	Large Supplier	Yes, however, designs and architecture are still to be determined.
SSE Retail	Large Supplier	There is the potential for SSE to have a second system however this is unknown at this time.
Western Power Distribution	Electricity Networks	<i>We have no current plans to utilise a second or subsequent User System in the future, however, should this change we would be willing to share this information with the SSC.</i>
EDF Energy Customers Ltd	Large Supplier	We have no current plans to utilise a second or subsequent User System.

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Question 9

Q9: Do you have any further comments?		
Party Name	Party Category	Comments
British Gas	Large Supplier	No
SSE Retail	Large Supplier	No
Western Power Distribution	Electricity Networks	<i>None</i>
EDF Energy Customers Ltd	Large Supplier	The report raises the question of what would happen in an event of default on one of the User Systems. Currently the consequences of such event are left at the appreciation of SEC Panel and therefore there is no need to answer this scenario in the SEC, as this can be left to SEC panel decision. However this aspect should be discussed in the next steps of the Modification prior to the FMR being issued.

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