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Stage 04: Modification Report Consultation Responses

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

What stage is this document in the process?

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

About this document

This document contains the collated responses to the SECMP0057 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on 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 0207 090 1072 or email SEC.Change@gemserv.com.

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0057.

The Change Board will consider these responses at its meeting on 19 December 2018, where it will determine whether SECMP0057 should be approved or rejected.

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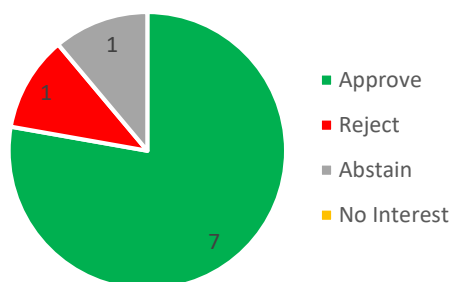
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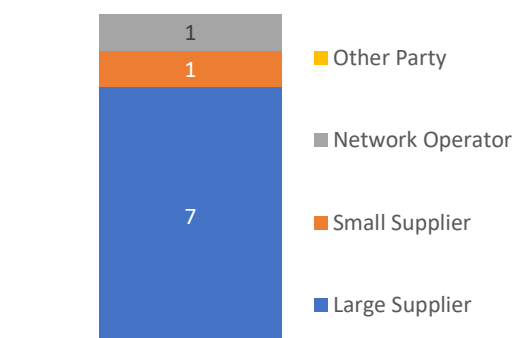
Summary of Responses

This section summarises the responses received to the SECMP0057 MRC.

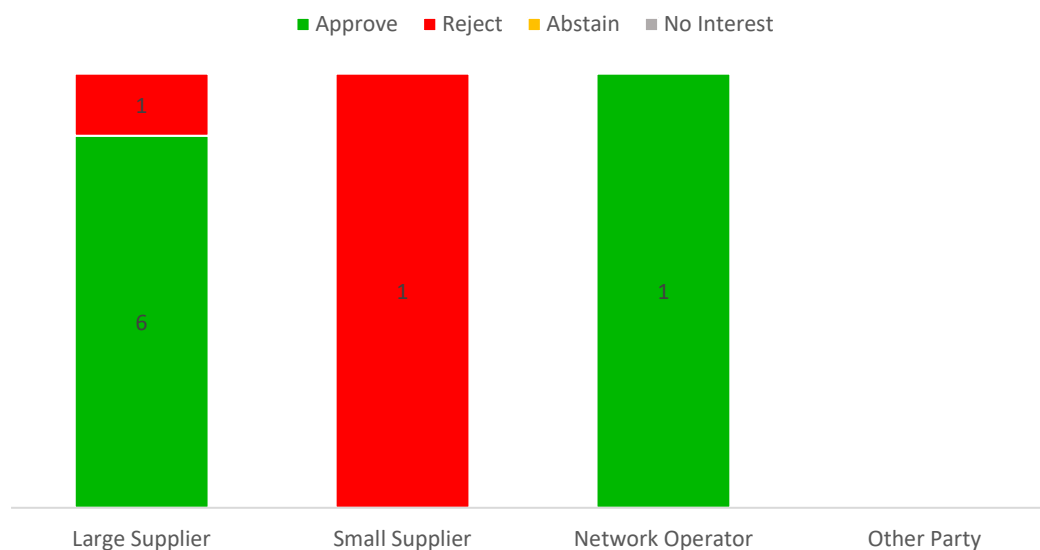
Respondents Views



Number of Respondents
(by Party Type)



Views by Party Type



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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/ Neutral	Comments
Utilita Energy	Large Supplier	Yes	<p>Overall, we believe this Modification better facilitates General SEC Objectives (a), (e) and (g) and should be approved. This Modification protects the market, Users and Consumers against the subsequent systems being utilised by DCC Users that may have not undergone prior Security Assessments and enables the SSC to decide the most appropriate steps to mitigate potential security risks.</p> <p>We believe thought should be given to whether a User who has already undergone Security Assessment is able to submit a self-assessment to the SSC as an interim measure until the Users next annual Security Assessment. Where the SSC is not content with the self-assessment, the SSC may decide a full Security Assessment is required before a User can utilise a subsequent User System.</p>
Western Power Distribution	Network Operator	Yes	<p>We believe that this Modification better facilitates SEC Objectives (a), (e) and (g) as it will provide clarity around the process should a User wish to utilise a second or subsequent User System, and will ensure that the security risks are fully considered to ensure a stable and secure end to end smart metering system.</p>
Utility Warehouse Ltd	Large Supplier	Yes	<p>We believe the solution better facilitates SEC Objectives (e) and (g) as it allows the SSC to promptly assess any security risks as a result of introducing new User Systems and provides clarity on how the User Security Assessment will apply.</p>

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			<p>We note that this question that was issued on the response form hadn't been amended from the SECAS template and asked if the '[proposed/alternative]' solution '[does / does not]' better facilitate the SEC Objectives.</p> <p>As a result, some parties may have been answering 'Yes' or 'No' to different questions. Please SECAS ensure that any potential misinterpretation is clarified ahead of presenting the consolidated responses to the Change Board.</p>
EDF Energy	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>For the avoidance of doubt we believe the proposed solution is neutral against the other SEC Objectives.</p> <p>Solution We do not believe that this modification better facilitates objectives (a) or (e) as noted in the report – in fact the reference to objective (e) appears to be a typo.</p>
npower	Large Supplier	Yes	<p>We are in support of the proposed modification as it better facilitates the SEC objectives as outlined within the modification.</p>
Bryt Energy	Small Supplier	Neutral	<p>While we understand the intent of making the guidance into legal SEC binding regulation, guidance within the SCF clearly convey the intent of second User Systems. If SSC believes</p>

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			<p>users are not following the Framework Guidance, then those parties should be identified through SSC and SSC to use its powers using the obligation in SEC Section G8.13 and request that individual SEC User be targeted for another Full Audit.</p> <p>At present, we would observe this inclusion into the legal text, puts unnecessary burden and costs both on the User and SSC and especially those who have followed the intent in the SCF Pt1 User Assessment Methodology 7.1.</p> <p>“7.1 Additional User Systems If, following an initial Full User Security Assessment, a User decides to employ any new and/or additional User Systems compared with those which were in use when a User Security Assessment was last carried out, they are required to promptly notify the SSC (in practice to notify SECAS). This will enable the SSC to meet its SEC obligations to monitor any new or changed security risks to the End-to-End Smart Metering System and to advise Users in respect of User Security Assessments.”</p> <p>We find it unlikely that Users do not know in advance their intended “TO BE” architecture and plans for system integration in advance.</p> <p>Users should also have an option to be able to minimise Audit costs by presenting at each Full User Security Assessment (If they so wish) their intended “TO BE” architecture and User System implementation timeline and integration stack, to avoid a second costly audit, until their next full audit or integration of a not documented “User System”.</p>
E.ON	Large Supplier	No	<p>We believe that the intent of the Modification better facilitates SEC objectives a and g as per the WG comments, however it is our view that the proposed solution extends beyond intent and could negatively impact SEC objective g with regard to efficient</p>

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			administration of the Code. For clarity, we are supportive of the intent of this Modification.
Centrica	Large Supplier	Yes	We agree with the Working Group that SECMP0057 better facilitates General SEC Objectives (a), (e) and (g) and should be approved.
SSE	Large Supplier	Yes	

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Question 2

Q2: 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
Utilita Energy	Large Supplier	Yes	<p>We believe the industry and consumer benefits of this Modification outweigh the potential costs to our organisation however the SSC must be pragmatic when deciding on the appropriate steps to take against Users looking to utilise subsequent User Systems.</p> <p>As highlighted above consideration should be given to whether a User who has already completed a Security Assessment is able to submit a self-assessment to the SSC as an interim measure until the Users next annual Security Assessment. Where the SSC is not content with the self-assessment, the SSC may decide a full Security Assessment is required before a User can utilise a subsequent User System.</p>
Western Power Distribution	Network Operator	Yes	Having considered the potential impacts and costs to our organisation, as well as the cost to deliver this modification we believe that SECMP0057 should be approved.
Utility Warehouse Ltd	Large Supplier	Yes	Yes, we believe this should be approved. This modification will provide clarity to Users on their obligations around second and subsequent User Systems.
EDF Energy	Large Supplier	Yes	We agree that SECMP0057 should be approved.

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npower	Large Supplier	Yes	-
Bryt Energy	Small Supplier	Yes	Yes, any implementation would require extra effort to manage requests into SSC to determine if a further User Security Audit Assessment. At present, the modification gives no evidence of audit costs.
E.ON	Large Supplier	No	As above and below.
Centrica	Large Supplier	Yes	We agree with the benefits outlined in the Modification Report.
SSE	Large Supplier	Yes	

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Question 3

Q3: Do you agree that draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	Yes	We have no concerns with the proposed legal drafting.
Western Power Distribution	Network Operator	Yes	Yes believe that the draft legal text, with the amendment to the Agreed Interpretations, deliver the intention of this modification.
Utility Warehouse Ltd	Large Supplier	Yes	We have no comments on the draft legal text.
EDF Energy	Large Supplier	Yes	While we agree that the wording of the new legal text delivers the intention of the modification, we believe that the way that this has been positioned within the text, and indeed within an existing and seemingly unrelated obligation, is inelegant and could lead to confusion.
npower	Large Supplier	Yes	-
Bryt Energy	Small Supplier	No	At present, the draft legal text provides no detail on the following primarily to the SCF which needs to be understood and agreed before being implemented: <ul style="list-style-type: none"> • How the User is to submit a request? • What detail does the User is to submit in a request? • How can a User Determine if a User System has been audited before?

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			<ul style="list-style-type: none"> • Timeline for presenting a request before a system is to go live? • How a User can dispute a decision for a second audit? • What are the defined costs for this audit as it is clearly targeted at a particular system and a full audit is not required? <p>What service providers are responsible for this audit?</p>
E.ON	Large Supplier	No	<p>We understand the intent of this Modification to be the introduction of a requirement on DCC Users to notify the Security Sub-Committee (SSC) before they employ a second or subsequent User System. We note however that the draft legal text provided actually requires DCC Users to notify the SSC of any new component that is being incorporated into its User System (G3.9 (a)). We do not believe that this meets the intent of the Modification and do not support this requirement.</p> <p>We are concerned with the inclusion of the word “new” and the impacts this may have for DCC Users. For any “new” component (for example replacing a faulty component or improving performance), Users would be obligated to notify the SSC and wait up to eight weeks for a response and we believe that this contravenes rather than facilitates SEC objective g.</p> <p>We believe that the word “new” ought to be removed from the solution, or that the relevant clause (G3.9 (a)) be refined in such a manner as to clarify when DCC Users are required to notify SSC of changes to its User Systems. We believe that further guidance from SSC concerning materiality of changes that invoke notification requirements would also be beneficial.</p>
Centrica	Large Supplier	Yes	n/a

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SSE	Large Supplier	Yes	We are satisfied with the clarification of the interpretation of “materially changed component” and we support the legal text.
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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	Yes	To prevent risks to Users and Consumers, this Modification should be implemented as soon as reasonably practical.
Western Power Distribution	Network Operator	Yes	-
Utility Warehouse Ltd	Large Supplier	Yes	-
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date, and that this change should be made at the earliest possible opportunity.
npower	Large Supplier	Yes	-
Bryt Energy	Small Supplier	No	<p>No, there is a high risk that with the industry that Suppliers implementing pre-payment and third-party pre-payment solutions, which could be viewed as a "second" User System in Q1/Q2 next year, with this proposed modification going live at the proposed Feb 19 implementation date could mean that suppliers are in breach. This in turn creates backlogs of requests into SSC.</p> <p>As a number of small users enter the market who are in the process of using shared resources initially, then implementing</p>

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			<p>integration into their preferred CRM solutions, this puts massive risk onto small suppliers in terms of cost, implementation time, additional resource, with no clear benefit to the larger eco-system as a whole.</p> <p>As there is no clear defined process or cost or detail of the SCF amendments, we cannot agreed to the implementation date.</p>
E.ON	Large Supplier	Neutral	-
Centrica	Large Supplier	Yes	n/a
SSE	Large Supplier	Yes	

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Question 5

Q5: Do you have any further comments?

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	n/a	-
Western Power Distribution	Network Operator	No	-
Utility Warehouse Ltd	Large Supplier	No	-
EDF Energy	Large Supplier	No	-
npower	Large Supplier	No	-
Bryt Energy	Small Supplier	Yes	Marked as Confidential.
E.ON	Large Supplier	No	-
Centrica	Large Supplier	No	n/a

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SSE	Large Supplier	Yes	We are satisfied that the information added to the change report addresses the concerns we raised in the working group consultation.
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