

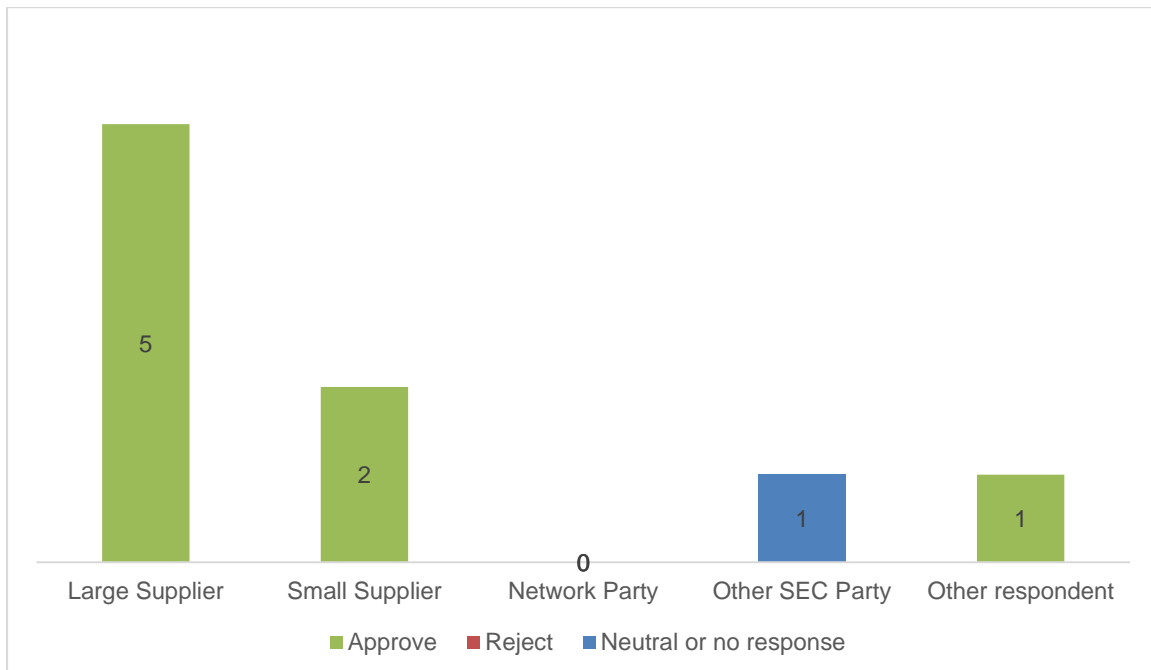
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SECMP0059 ‘Amendments to SEC Security Assessments for Non-Domestic Suppliers and Other Users’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the SECMP0059 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that SECMP0059 should be approved?

Question 1			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Approve	<p>We agree that the SECMP0059 proposed solution better facilitates the SEC objectives as follows:</p> <p>(f) as the change will ensure that the SEC obligations relating to Security Assurance Assessments cater appropriately for the risk posed by Suppliers with non-domestic meters in their portfolio.</p> <p>(g) as the change will clarify the SEC obligations relating to Security Assurance Assessments for all Users.</p>
Bryt Energy Limited	Small Supplier	Approve	We approve the MOD and welcome the clarifications and its aims to improve transparency to SEC Users on their obligations
Smart DCC	Other respondent	Approve	The proposed modification enhances the levels of assurance across the non-domestic and other users who connect to the DCC Total System and therefore it is considered as beneficial to all SEC parties and consumers.
Haven Power Limited	Small Supplier	Approve	<p>While we agree with the intent of this change, as highlighted in our response to the working group consultation, we do not agree with the threshold for determining the types of User Security Assessments a Supplier is subject to being specific to the number of non-domestic premises. We appreciate the desire to align the wording already in the SEC, but business premises are not always clearly defined and asking suppliers to determine a threshold by number of premises could be open to interpretation leading to inconsistent, unreliable calculations that do not reflect the number of Smart Metering Systems served by a supplier. Non-domestic premises are very different to domestic premises as a number of separate businesses may operate from one premises, each with their own energy supply. In our view, a</p>

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Question 1			
Respondent	Category	Response	Rationale
			threshold based on the number of meters or metering points would be a more accurate measure.
Npower	Large Supplier	Approve	We are supportive of this modification and welcome the clarification around the security assessments for the second and subsequent years and therefore meets the SEC objectives outlined within the proposal.
N3rgy Limited	Other Party	Neutral	Modifications SECMP0059 raises a number of concerns with regards to the approach by SEC to further expand and protect and ever expanding security perimeter of the Smart Metering System ecosystem. n3rgy believe this approach is ultimately unenforcable as greater numbers of organisation become users of the system and will eventually fail to provide any benefit. We strongly suggest that an alternative approach be taken to better protect the critical components within the smart meter system, such as DoS protection of the DCC interfaces. Preparatory work for this has already be completed by the DCC for this situation and should be reviewed and, if appropriate, accelerated to implementation. We appreciate this modification maybe required as an interim measure but strongly suggest that it be used only while more sustainable measures are implemented.
British Gas	Large Supplier	Approve	We believe implementation will support relevant objectives (a), (f) and (g). Implementation will help to ensure the protection and security of systems in the operation of the Code and of Smart Metering Systems through ensuring that any security issues are identified and resolved and offer the appropriate and proportionate protection to the Total System and Parties' User Systems. The modification also adds necessary clarification to the SEC and is therefore also furthers relevant objective (g).
SSE	Large Supplier	Approve	
E.ON	Large Supplier	Approve	This Modification will better ensure the protection and security of Systems in the operation of the Code and of Smart Metering Systems through ensuring that any Security issues are

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Question 1			
Respondent	Category	Response	Rationale
			identified and resolved within such a timeframe as befits the risk to Systems and Smart Meters, thus we believe this Modification better facilitates SEC objectives a and f. We further believe that the clarification made to the legal text will enable more efficient administration of this Code, therein facilitating SEC objective g.

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
EDF Energy	Large Supplier	
Bryt Energy Limited	Small Supplier	<p>The SEC previously stated that where a Domestic supplier used a shared resource and the aggregate Domestic meter count of that shared resource exceeded 250,000 then all suppliers on that platform were required to undergo a full assessment each year.</p> <p>However, SECMP0044 (https://smartenergycodecompany.co.uk/modifications/user-security-assessment-of-a-shared-resource/) has now been approved which removes this wording and means that all Domestic suppliers will be assessed against their own individual meter count rather than that of the Shared Service Provider.</p> <p>The SEC SCF V1 V1.15 is still unclear on the case of a Non-Domestic Supplier, that has less than 50,000 Smart Metering Systems, which is using a shared resource that houses greater than 250,000 Domestic supplies. At present the guidance states that domestic shared resources are exempt from an audit rotation changes where they are less than 250,000.</p> <p>Now we can only assume that as non-domestic is not mentioned in this scenario, only Full, Verification and Self is the order until Smart Metering System portfolio becomes greater than 50,000 regardless of the Shared Resource Volume of domestic or non-domestic other SEC Users.</p>
Smart DCC	Other respondent	

Question 2		
Respondent	Category	Comments
Haven Power Limited	Small Supplier	We routinely monitor the number of relevant meter points (MPANs) and the number of meters we supply through a Smart metering system. Determining the threshold by premises would be particularly onerous for smaller suppliers whose non-domestic portfolios do not comfortably exceed 50,000. From our perspective, a threshold determined by premises would introduce the need for an additional report and manual intervention to identify businesses operating from shared premises.
Npower	Large Supplier	
N3rgy Limited	Other Party	
British Gas	Large Supplier	
SSE	Large Supplier	It is unclear to us from the modification what would be expected of a non-domestic supplier who could also be an Other User? Would two security assessments be required?
E.ON	Large Supplier	We note that G8.41 seems to multiple the number of Non-Domestic Premises by five, ahead of adding these to the number of Domestic Premises. We would seek clarification that this is the intent, and where it is, we would ask for the detail pertaining to the rationale for this multiplication to be shared. G8.44C contains a double space between 'User' and 'Security' which we believe ought to be removed.