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Stage 04: Modification Report Consultation Responses

SECMP0065 'SMETS1 Security Obligations'

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 SECMP0065 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 Joe Hehir on 020 7770 6874 or email SEC.Change@gemserv.com.

SECMP0065

Working Group
Consultation
Response Form

22nd October 2018

Version 1.0

Page 1 of 12

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Content

Summary of Responses	3
Question 1	4
Question 2	7
Question 3	9
Question 4	11

About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0065.

The Change Board will consider these responses at its meeting on Wednesday 24th October 2018, where it will determine whether SECMP0065 should be approved or rejected.

SECMP0065

Modification Report
Consultation
Responses

22nd October 2018

Version 1.0

Page 2 of 12

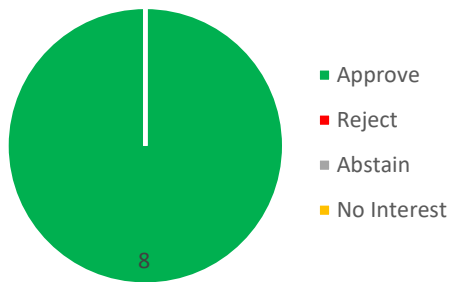
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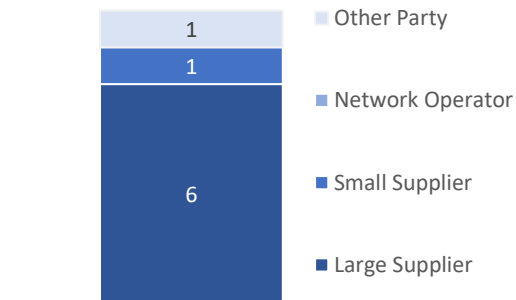
Summary of Responses

This section summarises the responses received to the SECMP0065 MRC.

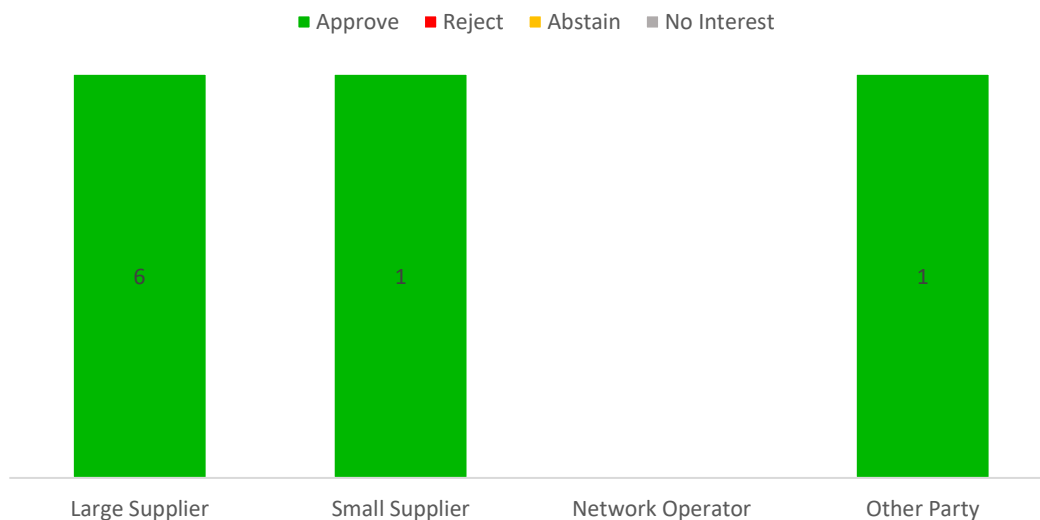
Respondents Views



Number of Respondents (by Party Type)



Views by Party Type



SECMP0065

Modification Report
Consultation
Responses

22nd October 2018

Version 1.0

Page 3 of 12

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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
Association of Meter Operators	Other SEC Party	Yes	
EDF Energy Customers Ltd	Large Supplier Party	Yes	We agree that this change better facilitates SEC Objective (g) as it makes clear that the Security obligations for SMETS1 Smart Metering Systems set out in Section G of the SEC only apply to enrolled Smart Metering Systems. This aligns the legal text with the original policy intent, and ensures that unnecessary or burdensome actions are not taken in regards to SMETS1 Smart Metering Systems prior to their enrolment in DCC.
First Utility	Large Supplier Party	Yes	The current wording of the SEC could be interpreted that the security obligations could apply pre-enrolment to the DCC. We support this change proposal to reword the SEC to indicate that security obligations take effect once enrolled to the DCC which is the original policy intention of BEIS. This change proposal better facilitates SEC Objective g by providing clear guidance for all Parties on the nature of their security assessments.
Spark Energy Ltd	Small Supplier Party	Yes	Spark believe that the solution proposed in SECMP0065 does facilitate the SEC objective and it should be approved.

SECMP0065

Modification Report
Consultation
Responses

22nd October 2018

Version 1.0

Page 4 of 12

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Utilita Energy	Large Supplier Party	Yes	Utilita agree that this modification will facilitate the efficient and transparent administration of the SEC (Objective (g)).
E.ON Energy Solutions	Large Supplier Party	Yes	<p>We believe that this Modification will better facilitate the implementation of SEC and consequently supports objective g because the Policy intent will be clear within Code.</p> <p>However, we would request clarification concerning the intent of this proposal with regard to the date by which Full User Security Assessments ought to be undertaken post-enrolment for DCC Users that become subject to the requirement for a Full User Security Assessment once their SMETS1 assets are enrolled. We believe that there may be some unintended consequences of this Modification with regard to SEC Section G clauses G8.41 and G8.42: as a consequence of delays to the delivery of the DCC's SMETS1 and SMETS2 Programmes it is believed likely that a range of medium and large Suppliers will not trigger the criteria for a Full, or Verification, User Security Assessment where their SMETS1 portfolio is not considered within the 250,000 domestic consumer threshold.</p> <p>Where such DCC Users are utilising the same systems for their SMETS1 and SMETS2 assets, and/or are undertaking significant changes to their DCC User Systems to prepare for their Enrolment and/or Release 2.0 activities, there is risk that any consequent non-compliance with SEC Section G will only become apparent once a Full, or Verification, User Security Assessment has been undertaken by the User CIO (which as given, is believed likely to be post enrolment into the DCC).</p> <p>Thus, by allowing medium and large Suppliers to request a User Security Self-Assessment, this modification may result in delays in the identification and remediation of Supplier activities that are non-compliant with SEC Section G requirements. - If these non-compliances transpire to be</p>

SECMP0065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 5 of 12

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			significant they could pose risks to the DCC and/or to the reputation of the Smart Metering Implementation Programme. Consequently we would urge the Security Sub-Committee to review and respond to this point as a matter of urgency.
British Gas	Large Supplier Party	Yes	We agree with the proposer that this Modification Proposal better facilitates General SEC Objective (g) as this change would provide clear guidance for all Supplier Parties on the nature of their SEC User Security Assessments. This will in turn prevent unnecessary and costly assessment being carried out when not required / justified.
Npower	Large Supplier Party	Yes	We are supportive of this modification as it provides clarification around the original policy intent for the SMETS1 security obligations and therefore It better facilitates SEC objective G

SECMP0065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 6 of 12

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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 SECMP0065 should be approved?

Party Name	Party Category	Yes/No	Comments
Association of Meter Operators	Other SEC Party	Yes	
EDF Energy Customers Ltd	Large Supplier Party	Yes	We agree that this change should be approved, in order to align the legal text within the SEC to the original policy intent.
First Utility	Large Supplier Party	Yes	There will be minimal costs to our organisation as a result of implementing this modification.
Spark Energy Ltd	Small Supplier Party	Yes	Spark have assessed the potential impact of this modification and we agree that SECMP0065 should be approved.
Utilita Energy	Large Supplier Party	Yes	Yes. This modification will bring the legal text into line with industry's current working assumption. We will not incur any additional costs because of this modification. The estimated implementation activity (2 man days) and associated cost (£1,200) are reasonable.
E.ON Energy Solutions	Large Supplier Party	Yes	We highlighted the very issue that this Modification is attempting to resolve in our response to BEIS, for their consultation on regulatory changes related to the provision of a DCC SMETS1 Service, provision of communications hubs and production proving capability. We would note however that we are disappointed that this issue was not addressed as part of the BEIS consultation, and that we are consequently having to

SECMP0065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 7 of 12

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			pay for an amendment to the SEC that could have been avoided. We believe that lessons ought to be learned from this instance of inefficiency and applied to the remaining SMETS1 SEC document changes.
British Gas	Large Supplier Party	Yes	Without the modification suppliers would be required to have Full User Security Assessments despite having a low number of meters enrolled within the DCC. The cost of one FUSA is significantly greater than the estimated cost of implementation.
Npower	Large Supplier Party	Yes	

SECMPO065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 8 of 12

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Question 3

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

Party Name	Party Category	Yes/No	Comments
Association of Meter Operators	Other SEC Party	Yes	
EDF Energy Customers Ltd	Large Supplier Party	Yes	We have not identified any issues with the draft legal text changes.
First Utility	Large Supplier Party	Yes	
Spark Energy Ltd	Small Supplier Party	Yes	Spark agree that the proposed legal text changes clarify the intent of the obligation outlined in G3.26 – G3.28.
Utilita Energy	Large Supplier Party	Yes	<p>We believe that the proposed legal text will achieve the intent of the modification, for Section G requirements to only apply to SMETS1 devices enrolled with the DCC.</p> <p>Given the time constraints of the Urgent Mod process, Utilita have not been able to fully assess the impact (if any) of these sections being excluded from this mod nor has Utilita been able to identify all areas of the SEC which are not captured by this mod but would benefit from clear, unambiguous governance. We note that there are SEC clauses outside of Section G which reference SMETS1 SMS (multiple in F4, such as F4.17).</p>

SECMP0065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 9 of 12

This document is
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E.ON Energy Solutions	Large Supplier Party	No	<p>Not entirely:</p> <p>Whilst we agree that the legal text provided in G1.10 (a) and (b) reflects the intent of this Modification we do not believe that (c) can exist and thus does not reflect the intent of this modification. That is to say that a Device cannot include a Device, by its very definition a Device simply is a Device. Thus we would rather that this clause was clarified to reflect the intention of the Modification.</p> <p>We would also note that we believe that G1.10 (b) ought to read “as including a SMETS1 SMS”, rather than “as including an SMETS1 SMS”.</p>
British Gas	Large Supplier Party	Yes	n/a
Npower	Large Supplier Party	Yes	

SECMP0065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 10 of 12

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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Association of Meter Operators	Other SEC Party	Yes	This should be implemented as soon as the change is approved
EDF Energy Customers Ltd	Large Supplier Party	Yes	We agree with the proposed implementation date, and that this change should be made at the earliest possible opportunity.
First Utility	Large Supplier Party	Yes	We agree that this modification should follow Urgent timescales and be implemented as soon as possible.
Spark Energy Ltd	Small Supplier Party	Yes	As the changes relate to additional clarification of the obligation Spark feels that the proposed date is appropriate.
Utilita Energy	Large Supplier Party	Yes	8th November appears to be as early an implementation date as possible, given that the SSC and Change Board will presumably need to approve the modification on 24th October. We therefore support this target date.
E.ON Energy Solutions	Large Supplier Party	Yes	
British Gas	Large Supplier Party	Yes	The 8th November 2018 seems an appropriate timescale for implementation (subject to timely approval decision).
Npower	Large Supplier Party	Yes	

SECMP0065

Working Group
Consultation
Responses

22nd October 2018

Version 1.0

Page 11 of 12

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