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DP087 ‘Correction to SEC Section G – User Responsibilities’

Problem statement – version 0.1

About this document

This document provides a summary of this Draft Proposal, including the issue or problem identified, the impacts this is having, and the context of this issue within the Smart Energy Code (SEC).

Proposer

This Draft Proposal has been raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC).

What is the issue or problem identified?

An error has been identified in the SEC Section G which compromises the security of the smart metering system.

Where did the error occur?

It was been observed that since SEC v5.20, an error has been present in SEC Section G – specifically G3.20. In the previous SEC versions, Section G had specified in both G3.17 and G3.20 that “a Communications Hub Function or Gas Proxy Function (GPF)” were noted as exclusions from User obligations. This was because, at the time the SEC excluded obligations relating to SMETS1 enrolled Devices and the Communication Hub security responsibility lay with the DCC, rather than the User.

When SEC version 5.20 was designated to include User obligations for enrolled SMETS1 Devices, a change was made to G3.17 to exclude the User from the obligation in respect of SMETS2+ Communications Hub Functions or Gas Proxy Functions which ensured that the Supplier would be responsible for a SMETS1 Communication Hub. G3.20, however, was left unchanged and should have contained the same exclusions relating to SMETS2 Communication Hub Functions and Gas Proxy Functions.

BEIS has agreed that G3.20 should be amended so that it can differentiate between obligations relating to the Communications Hub Function and GPF for SMETS1 and SMETS2+ Devices. This way, it will be explicitly defined that Users will be responsible for the SMETS1 Communication Hubs and GPF.

How does this issue relate to the SEC?

SEC Section G requires amendment. The following entries in SEC Section G have been requested to be altered to ensure consistency between G3.17 and G3.20:

G3.17 Where a User becomes aware of any material security vulnerability in, or likely cause of a material adverse effect on the security of:

- (a) any hardware, software or firmware which forms part of its User Systems; or SEC – Section G 322*
- (b) (where applicable) any Smart Metering System (excluding a Communications Hub Function or Gas Proxy Function which forms part of a SMETS2+ Device) for which it is the Responsible Supplier, it shall comply with the requirements of Section G3.18.*

G3.20 Each User shall, wherever it is practicable to do so, establish with:

- (a) the manufacturers of the hardware and developers of the software and firmware which form part of its User Systems; and*
- (b) (where applicable) any Smart Metering System (excluding a Communications Hub Function or Gas Proxy Function) for which it is the Responsible Supplier.*



With BEIS confirming that G3.20 will need to be altered to reflect the difference between SMETS1 and SMETS2+ for User responsibilities, this impacts the SEC.

What is the impact this is having?

Currently, by having the existing the G3.20 (b) line in place, this results in Users not having a security obligation to establish arrangements to be notified of security vulnerabilities in any SMETS1 Device. BEIS have confirmed that only SMETS2+ Devices should be the DCC's responsibility, meaning the SEC is currently not reflecting the original intended security obligations. For good practise, it's important that clear guidance is given so that Users understand which obligations belong to them and which belong to the DCC.

What are the views of the industry?

Views of the DCC

The views of the DCC will be gathered during the Development Stage.

Views of SEC Parties

The views of Parties will be gathered during the Development Stage.

Views of Panel Sub-Committees

The views of Panel Sub-Committees will be gathered during the Development Stage.

Views of the Change Sub-Committee

The views of the Change Sub-Committee will be gathered during the Development Stage.