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# SECMP091

## ‘Updating Security Assurance Status’

### Modification Report

#### Version 1.0

## About this document

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This document is the Modification Report for SECMP091 ‘Updating Security Assurance Status’ ([webpage](#)). It provides detailed information on the background, issue, solution, costs, impacts and implementation approach. It also summarises the discussions that have been held and the conclusions reached with respect to this Modification Proposal.

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This document also has one annex:

- **Annex A** contains the redlined changes to the SEC required to deliver the proposed solution.

## 1. Summary

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Once a Party completes their Full User Security Assessment (FUSA) the SEC Panel assign them one of four assurance statuses. Two of these, “Provisionally Approved” and “Deferred”, indicate significant security deficiencies that require substantial remediation, the severity of which are not reflected in the current SEC terminology.

The Security Sub Committee (SSC) believes that the assurance status set should be clear to Parties and accurately reflect the situation. As such it proposes to amend these assurance status as follows:

- “Provisionally Approved” to “Deferred”; and
- “Deferred” to “Rejected”.

Additionally, there is no current provision for the SSC to require a Party to undertake a second FUSA if they are set a status of “rejected”. The SEC only allows for updates to the original User Security Assessment Response.

The SSC believe where a Party is set a status of “Rejected” a second FUSA is more appropriate than an updated User Security Assessment Response. A second FUSA would provide assurance for all Parties, and the DCC, that the significant deficiencies have been addressed.

## 2. Background

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### Unclear Assurance Status

SEC Section G 'Security' states that once a Party has completed their Full User Security Assessment (FUSA) the SEC Panel shall assign them an assurance status.

Section G8.36 sets out four potential assurance statuses:

1. **Approved**;
2. **Approved subject to** the Party taking the mitigating steps outlined in FUSA;
3. **Provisionally approved** subject to the Party taking the mitigating steps outlined in FUSA, undertaking a Follow-up Security Assessment and the Panel approving the results of this; and
4. **Deferred** subject to the Party amending its User Security Assessment Response to resolve issues that are inadequately addressed, resubmitting their User Security Assessment Response and the Panel reconsidering that Party's assurance status.

The first two assurance statuses allow the Party to complete the User Entry Process. However, the latter two assurance statuses do not and indicate significant security deficiencies that require substantial remediation.

Having reviewed over 150 User Assessments the SSC believes the current wording to be potentially confusing as to what the statuses actually mean. It would like the wording to be clear and obvious to Parties. It is proposing to amend "Provisionally Approved" to "Deferred" and amend "Deferred" to "Rejected" as that more accurately reflects the situation and is in line with original policy intent.

### Instructing a second FUSA

Currently, if a Party is set a status of "Rejected" ("Deferred" under the current drafting) the SSC requires them to amend their User Security Assessment Response. The SSC believe that where a Party is set a status of "Rejected" a second FUSA is more appropriate than an updated User Security Assessment Response. A second FUSA would provide assurance for all Parties, and the DCC, that the significant deficiencies have been addressed

SECMP091 was raised by the Security Sub Committee on 22 October 2019 to resolve this issue.

### 3. Solution

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#### Proposed Solution

The titles of the Security Assurance Status in Section G8.36 will be amended as follows:

- “Provisionally Approved” to “Deferred”; and
- “Deferred” to “Rejected”

Additionally, where a Party is set a status of “Rejected” the SSC require a second FUSA is undertaken.

#### Legal text

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

## 4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

### SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
	Other SEC Parties		DCC

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'

### Other industry Codes

No impact.

### Greenhouse gas emissions

No impact.

## 5. Costs

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### SECAS costs

The estimated SECAS implementation costs to implement this modification is 2 days of effort, amounting to approximately £1200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.
- Aligning guidance documentation

## 6. Implementation approach

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### Recommended implementation approach

It is recommended this Modification be implemented on **27 February 2020** (February 2020 SEC Release) if a decision to approve is received on or before 20 December 2019.

This will allow Parties time from any potential approval at the December Change Board to implementation as part of the February 2020 release. There will only be two potential SSC meetings where the change could be in effect. However, including this change as part of a scheduled release will provide clarity and certainty over obligation changes.



## 7. Conclusions

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### Benefits and drawbacks

The Proposer has identified the following benefits and drawbacks in implementing this modification:

#### Benefits

- Provides clarity to Parties by making Assurance Status clear and obvious
- Provides flexibility to SSC to require the most appropriate actions where significant defects have been identified.

#### Drawbacks

- Non identified

### Proposer's rationale against the General SEC Objectives

#### Objective (g) - Facilitate the efficient and transparent administration and implementation of the SEC

The Proposer believes that SECMP091 will better facilitate SEC Objective (g) as it allows for the more efficient processing of User Security Responses, whilst providing greater transparency and clarity to Parties.

### Sub-Committee views

The SSC discussed and supported this Proposal at their meeting on 9 October 2019.

## Appendix 1: Glossary

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This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
FUSA	Full User Security Assessment
SSC	Security Sub Committee
DCC	Data Communications Company



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# MP091 ‘Updating Security Assurance Status’

## Legal text – version 1.0

### About this document

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This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

These changes have been drafted against SEC Version 6.17.

## Section G 'Security'

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### Amend Sections G8.19, G8.36, G8.37 and G8.38 as follows:

G8.19 A "Follow-up Security Assessment" shall be an assessment carried out by the User Independent Security Assurance Service Provider, following a User Security Assessment, in accordance with the provisions of Section G8.29~~8~~.

#### Panel: Setting the Assurance Status

G8.34 Following the completion of that initial Full User Security Assessment, the Security Sub-Committee shall ensure that copies of both the User Security Assessment Report and User Security Assessment Response are provided to the Panel.

G8.35 Following the receipt by it of the User Security Assessment Report and User Security Assessment Response, the Panel shall promptly consider both documents and (having regard to any advice of the Security Sub-Committee) set the assurance status of the Party, in relation to its compliance with each of its obligations under Sections G3 to G6 in the relevant User Role, in accordance with Section G8.36.

G8.36 The Panel shall set the assurance status of the Party as one of the following:

- (a) approved;
- (b) approved, subject to the Party:
  - (i) taking such steps as it proposes to take in its User Security Assessment Response in accordance with Section G8.26(b); or
  - (ii) both taking such steps and being subject to a Follow-up Security Assessment by such date as the Panel may specify,
- (c) ~~provisionally approved~~~~deferred~~, ~~subject to~~ and:
  - (i) the Party having first taking such steps as it proposes to take in its User Security Assessment Response in accordance with Section G8.26(b) and been subject to a Follow-up Security Assessment; and

- (ii) the Panel having determined that it is satisfied, on the evidence of the Follow-up Security Assessment, that such steps have been taken; or
- (d) ~~deferred~~~~rejected~~, and subject to:
  - (i) the Party shall have a second Full User Security Assessment amending its User Security Assessment Response to address any issues identified by the Panel as being, in the opinion of the Panel, not adequately addressed in that response as submitted to the Security Sub-Committee; and
  - (ii) upon completion of the second Full User Assessment the Panel will reconsidering the assurance status in accordance with Section G8.35 ~~in the light of such amendments to the User Security Assessment Response.~~

#### Approval

G8.37 For the purposes of Sections H1.10(c) and H1.11 (User Entry Process Requirements):

- (a) a Party shall be considered to have successfully demonstrated that it meets the applicable security requirements of this Section G8 when:
  - (i) the Panel has set its assurance status to 'approved' in accordance with either Section G8.36(a) or (b); or
  - (ii) the Panel has set its assurance status to ~~'provisionally approved'~~'deferred' in accordance with Section G8.36(c) and the requirements specified in that Section have been met; and
- (b) the Panel shall notify the Code Administrator as soon as reasonably practicable after the completion of either event described in paragraph (a)(i) or (ii).

#### Obligations on an Approved Party

G8.38 Where the Panel has set the assurance status of a Party to 'approved' subject to ~~'one of the requirements'~~ specified in Section G8.36(b), the Party shall take the steps to which

that approval is subject in accordance with that section.