

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.



MP091 'Updating Security Assurance Status'

Modification Report Version 0.1

About this document

This document is the Modification Report for [MP091 'Updating Security Assurance Status'](#). 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.

Contents

1. Summary.....	3
2. Background.....	4
3. Solution	5
4. Impacts	6
5. Costs	7
6. Implementation approach	8
7. Conclusions	9
Appendix 1: Glossary	10

This document also has one annex:

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

1. Summary

Once a Party completes their Full User Security Assessment (FUSA) the SEC Panel assigns 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 Data Communications Company (DCC), that the significant deficiencies have been addressed.

This modification will not directly impact any SEC Parties and cost will be limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort in updating the SEC. If approved, this modification will be implemented in the February 2020 SEC Release.

2. Background

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 the 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

3. Solution

Proposed Solution

MP091 will amend the titles of the Security Assurance Status in Section G8.36 as follows:

- “Provisionally Approved” will be amended to “Deferred”; and
- “Deferred” will be amended to “Rejected”

Additionally, where a Party is set a status of “Rejected” the SSC will require a second FUSA to be 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

There will be no direct impacts on Parties in implementing this modification. However, all Parties may be affected if they are subsequently given a status of “Rejected” and need to undergo a subsequent FUSA.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G ‘Security’

Other industry Codes

There will be no impact on any other codes.

Greenhouse gas emissions

There will be no impact on greenhouse gas emissions.

5. Costs

DCC costs

There will be no DCC costs in implementing this modification.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

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

SEC Party costs

There will be no SEC Party costs to implement this modification.

6. Implementation approach

Recommended implementation approach

It is recommended this Modification Proposal 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 SEC Release to prepare for the changes. There will only be two potential SSC meetings where the change could be in effect. However, including this change as part of a scheduled SEC Release will provide clarity and certainty over obligation changes and provide a more efficient implementation approach.

7. Conclusions

Benefits and drawbacks

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

Benefits

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

Drawbacks

No drawbacks have been identified.

Proposer's rationale against the General SEC Objectives

Objective (g)¹

The Proposer believes that MP091 will better facilitate SEC Objective (g) as it allows for 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 its meeting on 9 October 2019.

¹ Facilitate the efficient and transparent administration and implementation of the SEC

Appendix 1: Glossary

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

Glossary	
Acronym	Full term
DCC	Data Communications Company
FUSA	Full User Security Assessment
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSC	Security Sub Committee



If you have any questions on this modification, please contact:

Adam Lattimore

020 7770 6921

adam.lattimore@gemserv.com

Smart Energy Code Administrator and Secretariat (SECAS)

8 Fenchurch Place, London, EC3M 4AJ

020 7090 7755

sec.change@gemserv.com