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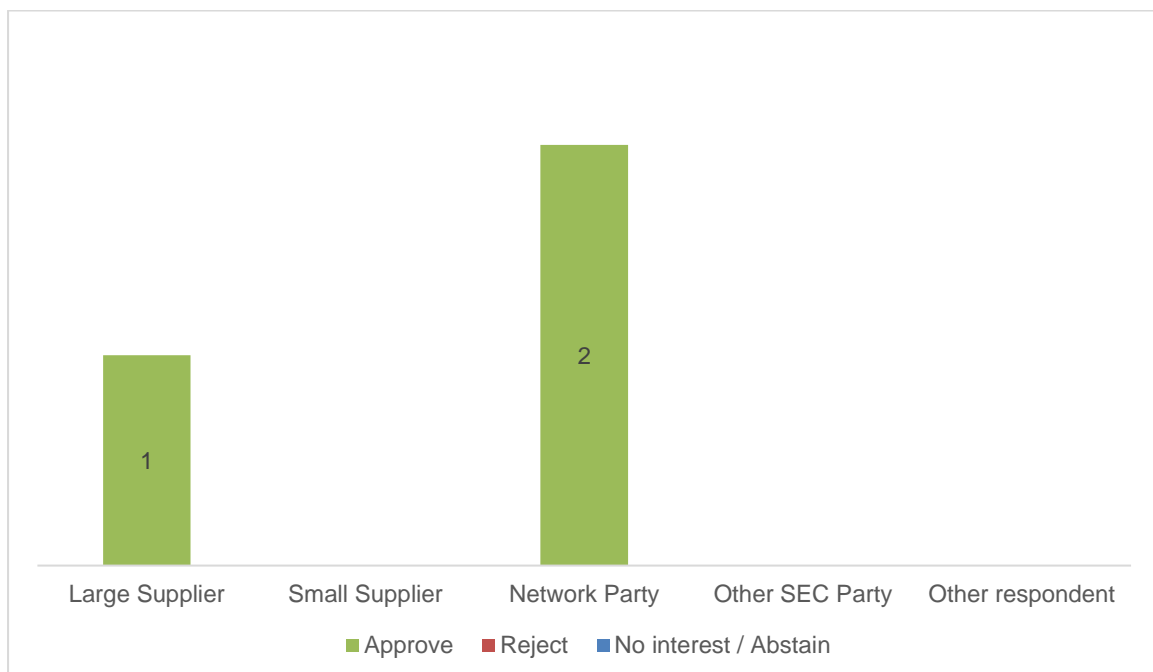
MP091 ‘Updating Security Assurance Status’

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP091 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP091 should be approved?

Question 1			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	We agree that SECMP091 better facilitates SEC Objective (g) as it provides clarity to Parties around the meaning of the Assurance Status and the requirements on them if the Status is set to 'Rejected'.
Western Power Distribution	Network Party	Yes	We believe that this modification provides clarity around the Security Assessment process and we agree that should a party be issued with a 'rejected' status it is appropriate for them to complete another FUSA to provide assurance that the User's deficiencies have been fully addressed. We believe that this modification better facilitates SEC Objective (h) as it will ensure the protection of Data and the security of Data and Systems in the operation of this code.
NGN	Network Party	Yes	We support this proposal as the changes should further General SEC Objective g) to facilitate the efficient and transparent administration and implementation of the SEC. We believe the amendments to the Security Assurance Statuses in Section G8.36 should make them more transparent for Parties and that the requirement for a second Full User Security Assessment (FUSA) where an assessment has been rejected is appropriate as it should ensure that any material changes made as a result of the issues identified by the SEC Panel are fully re-assessed. This should provide assurance that there are no adverse consequential impacts as a result of the updates made. We feel this is supported by the existence of two statuses, 'Approved Subject To' and 'Deferred' ('Provisionally Approved Subject To' under current drafting), which should still allow for minor changes to be addressed via an amendment to the existing User Security Assessment Response.

Question 2: Please provide any further comments you may have

Question 2		
Respondent	Category	Comments
Western Power Distribution	Network Party	<p>Overall we believe that the red lined legal text delivers the intent of this modification, however we have the following comments:</p> <p><i>G8.36 (c) deferred, and;</i></p> <p><i>(i) the Party having first taking such steps...</i></p> <p>We don't believe that this reads correctly and perhaps should read:</p> <p><i>G8.36 (c) deferred, and;</i></p> <p><i>(i) the Party having first <u>takening</u> such steps</i></p> <p>We also believe that:</p> <p><i>G8.36(d) (ii) upon completes of the second Full User Assessment</i></p> <p>Should read:</p> <p><i>G8.36(d) (ii) upon completes of the second Full User <u>Security</u> Assessment</i></p> <p>Whilst not necessarily part of this specific modification, we have noticed that the SEC details the Panel setting an assurance status on a Full User Security Assessment but we cannot see details of the assurance status that s set following a Verification User Security Assessment or Self-Assessment. Having been through the process we are aware that the status is either 'Compliant' or 'Non-Compliant', however we don't feel that this is clear within the SEC and wonder if clarification should be added at the same time as this clarification around the assurance statuses for the FUSA.</p>