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DP135

‘Correcting equivalence in Security Standards’

Modification Report

Version 0.1

10 July 2020

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

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

The Data Communications Company (DCC) is currently carrying out enrolment and adoption of installed Smart Metering Equipment Technical Specification (SMETS) 1 meters. The Middle Operating Capability phase (MOC) is due to go live on 26 July. During the Live Service Criteria review, an independent review by the Competent Independent Organisation (CIO) has shown that the SMETS1 Communication Service Providers (CSPs) involved in MOC have not used the security standards set out in SEC Sections G5.8 and G5.10 but have used equivalent international standards. However, Sections G5.8 and G5.20 are not included in Section G1.13 allowing 'equivalence'. The DCC will therefore be in breach of the SEC once MOC has taken place. This is due to an oversight during the original drafting of the SEC.

The standards used are recognised international standards. The Proposed Solution is therefore to include Sections G5.8 and G5.10 in Section G1.13. There will be no costs or impacts to any SEC Party. This is a text only change and implementation is recommended for one Working Day following a decision.

2. Issue

What are the current arrangements?

The DCC is currently carrying out enrolment and adoption of installed SMETS1 meters. MOC is due to go live on 26 July.

The DCC CSP solution for MOC adoption and enrolment has been subject to independent review by a CIO. The CIO has examined compliance with the standards in G5.8 and G5.10 as set out below:

- G5.8 The DCC Information Security Management System shall incorporate procedures that comply with:
- a) the appropriate standards of the International Organisation for Standards with respect to network security, comprising ISO/IEC 27033-1:2009, ISO/IEC 27033-2:2012 and ISO/IEC 27033-3:2010 (Information Technology – Security Techniques – Network Security); or
 - b) any equivalents to those standards of the International Organisation for Standards which update or replace them from time to time.
- G5.10 The DCC Information Security Management System shall incorporate procedures on the management of information security incidents which comply with:
- a) the standard of the International Organisation for Standards in respect of security incident management known as ISO/IEC 27035:2011 (Information Technology – Security Techniques – Information Security Incident Management); or

- b) any equivalent to that standard of the International Organisation for Standards which updates or replaces it from time to time.

This requires the CSPs to be compliant with the International Organisation for Standards (ISO) standards ISO27033 and ISO27035.

What is the issue?

The SSC has reviewed the live service criteria for MOC, including the CIO review.

The two SMETS1 MOC CSPs are based in Sweden and the Isle of Man. The CIO has noted that the CSPs are not compliant with the ISO standards set out within Section G5.8 and G5.10 but are compliant with an equivalent international standard (X 805 ITU and X 800 ITU).

The DCC had been under the impression that the equivalence would satisfy the SEC. However, Section G1.13 omits Sections G5.8 and G5.10 in the scope of 'equivalence':

G1.13 The provisions listed in this Section G1.13 are the provisions at Sections G2.13, G2.18, G2.26, G2.27, G4.6 and G5.7.

This means the DCC will be in breach of the SEC when MOC goes ahead on 26 July 2020.

What is the impact this is having?

As the SEC is currently written the DCC will be in breach of the SEC in respect of these standards.

3. Solution

Proposed Solution

The Proposed Solution is to add Sections G5.8 and G5.10 to Section G1.13 to ensure the equivalent standards are acceptable.

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 |

The implementation of this modification will ensure the DCC is compliant with the SEC. There will be no impacts to other SEC Parties.

DCC System

There is no impact to DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'

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

Consumers

There is no impact to consumers.

Other industry Codes

There is no impact to other industry Codes.

Greenhouse gas emissions

There is no impact to greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs to implement this change.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There will be no costs to SEC Parties.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **One Working Day** following decision.

If this modification is approved under Self-Governance, it will be implemented one Working Day after the end of the Self-Governance referral period.

MOC is due to go live on 26 July 2020. If this correction to the SEC is not made the DCC will be in breach of the SEC. Therefore, this modification should be implemented as soon as possible.

7. Assessment of the proposal

Support for Change

The SSC supports the implementation of this change as soon as possible.

Views against the General SEC Objectives

Proposer's views

Objective (b)¹

The Proposer believes that this change will better facilitate General SEC Objective (b) by ensuring the DCC is compliant with the SEC obligations and therefore the DCC Licence.

Objective (f)²

The Proposer believes that this change will better facilitate General SEC Objective (f) by ensuring the DCC is compliant with the SEC obligations around security.

Appendix 1: Progression timetable

Due to the need to expedite this change, this Modification Report will be presented directly to the Panel for approval by email and issued for a five Working Day Modification Report Consultation on 15 July 2020. The Change Board will then vote at the scheduled meeting on 22 July 2020. SECAS proposes this modification be progressed as Self-Governance.

| Timetable | |
|---|----------------------|
| Event/Action | Date |
| Draft Proposal raised | 10 Jul 2020 |
| Panel converts Draft Proposal to Modification Proposal (by email) | 14 Jul 2020 |
| Modification Report approved by Panel | 14 Jul 2020 |
| Modification Report Consultation (5 Working Days) | 15 Jul – 21 Jul 2020 |
| Change Board Vote | 22 Jul 2020 |

Appendix 2: Glossary

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

| Glossary | |
|----------|--------------------------------------|
| Acronym | Full term |
| CIO | Competent Independent Organisation |
| CSP | Communication Service Provider |
| DCC | Data Communications Company |
| ISO | International Standards Organisation |
| MOC | Middle Operating Capability |

¹ (b) Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

² (b) Ensure the protection of data and the security of data and systems in the operation of the SEC.

| Glossary | |
|----------|--|
| Acronym | Full term |
| SEC | Smart Energy Code |
| SMETS1 | Smart Metering Equipment Technical Specification 1 |
| SSC | Security Sub-Committee |