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MP127 ‘SMKI RAPP Security Screening clarification’

Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation.

Summary of conclusions

Change Board

The Change Board voted to **approve** MP127. It believed the modification better facilitated Smart Energy Code (SEC) Objective (g)¹. One member believed it better facilitated SEC Objective (f)² as well, but it believed this was only marginal.

Modification Report Consultation

The Smart Energy Code Administrator and Secretariat (SECAS) received four responses to the Modification Report Consultation. Three believed the modification should be approved. They considered the modification better facilitated SEC Objectives (f) and (g) for the reasons noted in the Modification Report.

One respondent believed the modification should be rejected, although they agreed that the intent better facilitated SEC Objectives (f) and (g). This was because they did not believe the legal text achieved this.

¹ To facilitate the efficient and transparent administration and implementation of this Code.

² To ensure the protection of Data and the security of Data and Systems in the operation of this Code.

Modification Report Consultation responses

Summary of responses

Respondents in favour of approval

Three respondents believed the modification should be approved. They considered the modification better facilitated SEC Objectives (f) and (g) for the reasons noted in the Modification Report. However, one of the three respondents did not believe it better facilitated SEC Objective (f) and thought it better facilitated SEC Objective (g) only. The respondent believed it did not amend or enhance the security screening obligations for Authorised Responsible Offices (AROs) (which would improve the level of security protection afforded); it just ensured that the current obligations are clearly set out in the SEC.

Respondents in favour of rejection

One respondent believed the modification should be rejected, although they agreed that the intent better facilitated SEC Objectives (f) and (g). This was because they did not believe the legal text achieved this. They advised that a User's system could be designed with restrictions in place that mean an ARO is not capable of the activities in Section G4.2 and therefore Section G4.3 would not apply. They advised that the legal text should explicitly state that all AROs are screened to the standards set out in G4.3 if that is the intent.

The Proposer advised that the respondent's comments were not correct. They further advised that it was not a new requirement for AROs to be screened to British Standard (BS) 7858:2019; it is a clarification in the SEC that the Data Communications Company (DCC) and Users use when nominating AROs.

The Proposer believed the legal text enacts the intent of the modification. Further information is classified and documented in the confidential minutes of the Security Sub-Committee (SSC) meetings.

SECAS subsequently facilitated a discussion between the Proposer and the respondent. As a result, the Proposer agreed with the respondent's suggestion that the Smart Metering Key Infrastructure Registration Authority Policies and Procedures (SMKI RAPP) explicitly state that AROs be subject to security screening to a standard that is compliant with BS 7858:2019 or an equivalent standard. The legal text has been updated to reflect this.

Change Board vote

Change Board vote

The Change Board voted to **approve** MP127 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	6	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	2	0	0	Approve
Other SEC Parties	2	0	0	Approve
Consumer Representative	0	0	0	-
Overall outcome:				APPROVE

The Consumer Representative was not present for the vote.

Views against the General SEC Objectives

Objective (f)

One Change Board member believed that MP127 would better facilitate SEC Objective (f), but only marginally. This is because failure to comply with the security screening obligation in Section G4.3 will result in a non-compliance being raised during a User Security Assessment. This modification would ensure all Parties understand that AROs must be subject to BS 7858:2019 or equivalent.

Objective (g)

The Change Board believes that MP127 will better facilitate SEC Objective (g) as this would give Parties clarity that AROs are subject to BS 7858:2019 or equivalent, as stated under Section G4.3.

Change Board discussions

The Change Board had no further comments on this modification.