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DP145

‘Charging of Random Sample Privacy Assessments’

Modification Report

Version 0.2

28 September 2020

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Terry Jefferson on behalf of the Energy and Utilities Alliance (EUA). The methodology for carrying out Random Sample Privacy Assessments has evolved since originally being written into the Smart Energy Code (SEC). The SEC currently states that all Random Sample Privacy Assessment costs will be socialised. This means all Users are being charged for the cost of these assessments which are undertaken only by Other Users.

2. Issue

What are the current arrangements?

A Random Sample Privacy Assessment is an assessment carried out by an Independent Privacy Auditor (IPA) to identify the extent to which an Other User is compliant with each of its obligations. The methodology for carrying out Random Sample Privacy Assessments has evolved since originally being written into the SEC. The emphasis is on the Other User to ensure that they are compliant and are assessed every year. An Other User is a User who does not operate as a Supplier or Network Party, such as a Device Manufacturer or a Meter Installer. Any costs which are incurred in the completion of Random Sample Privacy Assessments are then socialised across all Users.

What is the issue?

The SEC currently states that all Random Sample Privacy Assessments will be socialised under SEC Section I2.41:

“Expenditure incurred in relation to Other Users in respect of the matters described in Section I2.40, and in respect of Random Sample Privacy Assessments, shall be treated as Recoverable Costs in accordance with Section C8 (Panel Costs and Budgets).”

Because these costs for the Random Sample Privacy Assessments are treated as Recoverable Costs, it results in the industry as a whole paying for assessments which only Other Users undertake.

What is the impact this is having?

It would be more appropriate for these costs to be apportioned to the Other Users directly. The only exception to this should be if the assessment is conducted at the request of the SEC Panel, in which case the costs should be socialised.

Appendix 1: Progression timetable

The Draft Proposal will be taken to the Change Sub Committee (CSC) for initial comment via verbal update on 29 September 2020. From there, it will proceed to be discussed at the Panel Sub Committees of the Technical Architecture and Business Architecture Sub Committee (TABASC), Security Sub Committee (SSC) and the Operations Group. Following this input, it will then be returned

to the CSC to decide whether it should proceed to conversion to a Modification Proposal at the next Panel meeting on 13 November 2020.

Timetable	
Event/Action	Date
Draft Proposal raised	28 Sep 20
Presented to CSC for initial comment	29 Sep 20
Sub Committee input given	1 Oct – 9 Oct 20
Presented to CSC for decision	27 Oct 20
Presented to Panel for conversion to Modification Proposal	13 Nov 20

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
CSC	Change Sub Committee
EUA	Energy and Utilities Alliance
SEC	Smart Energy Code
SSC	Security Sub Committee
TABASC	Technical Architecture and Business Architecture Sub Committee