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Stage 04: Final Modification Report

# SECMP0026:

# Changes to the Security Sub-Committee Nomination Process

This modification seeks to alter the current Security Sub-Committee’s member nomination process in three areas to:

1. require that nominators must hold a relevant senior position within their organisation;
2. grant the SSC authority to reject nominees if they lack relevant security expertise; and
3. require that nominees undergo security vetting.



Modification Report Consultation respondents unanimously believe that this modification should be approved



Impacts on:  
SEC Panel and SSC.

What stage is this document in the process?

- 01 Initial Modification Report
- 02 Refinement Process
- 03 Report Phase
- 04 Final Modification Report

**Any questions?**

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## About this document

This document is the Final Modification Report for SECMP0026. The Change Board will consider this report as part of their deliberations on whether to approve or reject the Modification Proposal.

The SECMP0026 legal text can be found in **Attachment A**.

Responses to the Modification Report Consultation can be found in **Attachment B**.

## 1. Summary

This section provides an overview of SECMP0026. For further details on the Modification Proposal, please refer to the subsequent sections.

Defined terms and acronyms used in this document are listed in the Glossary (Appendix 1) of this document.

### 1.1 Why Change?

Consideration of this Modification Proposal was prompted in light of the Security Sub-Committee (SSC) noting they have insufficient mechanisms to select or reject candidates based on their relevant security expertise. Ensuring that the SSC maintains a high level of security expertise will be crucial to this Sub-Committee continuing to fulfilling its role effectively.

### 1.2 Solution

SECMP0026 proposes to alter the current SSC membership nomination process so that it:

1. requires that nominators must hold a relevant senior position within their organisation;
2. grants the SSC authority to reject nominees if they lack relevant security expertise; and
3. requires that nominees undergo security vetting.

### 1.3 Impacts and Costs

The impacts of this Modification Proposal are minimal, SECMP0026 will impact SSC membership. The costs to implement this change will be limited to the Code Administrator time and effort to making the necessary amendments to the SEC and release a new version to SEC Parties and the publication of it on the SEC Website. Associated amendments to the Terms of Reference will also be required and, per existing processes, will be actioned and agreed by the Panel following approval and implementation.

### 1.4 Implementation

As this Modification Proposal only involves minor changes to SEC Section G, it is proposed to implement this Modification Proposal five Working Days (WD) following the end of the ten WD referral period, if approved by the Change Board.

### 1.5 Path 3: Self-Governance

This Modification Proposal addresses a SSC identified issue with the current nomination process. The changes are non-material and require minimal changes to the SEC. Therefore, this Modification Proposal is being progressed as a Path 3 Modification (Self Governance).

### 1.6 Modification Report Consultation Responses

Seven SEC Voting Groups (representing a total of 16 SEC Parties) responded to the Modification Report Consultation, consisting of four Large Suppliers, two Electricity Network Parties and one Other SEC Party. All of the respondents supported the approval of SECMP0026.

## 2. Why Change?

### 2.1 Background

Security expertise is essential for SSC Members to be able to review and comment on User Security Assessments, and when considering security incidents and vulnerability reports that are required by the SEC. As the Smart Metering Implementation Programme (SMIP) develops and continues to transition to an enduring mechanism, the SSC will continue to play a vital role in maintaining a secure environment, and its decisions will impact more Parties as they accede to the SEC.

### 2.2 What is the issue?

The current SSC membership nomination process does not offer protection to ensure that appropriate security expertise is held by those nominated to be on this Sub-Committee. Consideration of this Modification Proposal was prompted in light of the SSC noting they have insufficient mechanisms to review nominations, and if required, reject candidates, based on their relevant security expertise. The consideration arose in recognition that security expertise is essential to review and comment on User Security Assessments and in considering reports of security incidents and vulnerabilities that are required by the SEC.

### 3. Solution

#### 3.1 Proposed solution

To ensure a more thorough selection process for SSC membership, and following the SSC's input, the Proposer aims to alter the current membership process in the following three ways:

- mandating that the nominator holds a senior position within their organisation and is satisfied that the nominee has the security expertise relevant to represent the Party Category being nominated;
- allowing the SSC to reject a nominee on the grounds of insufficient security expertise prior to any membership vote; and
- requiring that the nominee undergoes security vetting prior to being nominated, with an associated declaration included in the SSC membership nomination form. The vetting process would involve nominees undergoing basic BS7858 (Security screening of individuals employed in a security environment Code of Practice) security assessment or equivalent.

The modification is prospective and therefore, there is no expectation for existing members to undergo re-nomination.

#### 3.2 Proposers views against SEC Objectives

The Proposer believes SECMP0026 will better facilitate General SEC Objective (g) *“to facilitate the efficient and transparent administration and implementation of this Code”*.

As the SMIP develops and transitions to an enduring status, the SSC will continue playing a vital role in maintaining a secure environment. Ensuring that the SSC maintains a high level of security expertise is crucial for this Sub-Committee to fulfil its role.

## 4. Impacts and Costs

### 4.1 Impacts

SECMP0026 will have no impacts on SEC Parties, the DCC or any systems (including DCC Systems, User Systems and/or Smart Metering Systems).

There are also no identified impacts on other Energy Codes, Greenhouse Gas Emissions or Consumers.

Potential Impacts of SECMP0026	
Smart Energy Code Parties	
Suppliers	No Impact
Networks	
DCC	
Other	
Systems	
DCC Systems	No Impact
User Systems	
Smart Metering Systems	
Other	
Impact on Consumers	
No Impact	
SEC and subsidiary documents	
SEC Sections	SEC Section G (Security) will require amendment, primarily Section G1.11. These changes are detailed in Attachment A to this document.
Subsidiary Documents	None
Other Industry Codes and Documents	
No Impact	
Greenhouse gas emissions	
No Impact	

## 4.2 Costs

The costs to implement this change will be limited to the Code Administrator time and effort to making the necessary amendments to the SEC and release a new version to SEC Parties and the publication of it on the SEC Website. The associated amendments to the Terms of Reference will also be required and, per existing processes, will be agreed by the Panel following implementation.

The table below sets out the estimated working day effort to implement this change:

Implementation activities, cost and effort		
Implementation activities	Effort	Cost
<ul style="list-style-type: none"> <li>Application of approved changes to the SEC</li> <li>Publication of new version of the SEC on the SEC Website and issuance to SEC Parties</li> <li>Review and update any impacted SEC guidance materials</li> </ul>	2 Man Days maximum	£1200 <sup>1</sup>
<ul style="list-style-type: none"> <li>Ongoing costs</li> </ul>	N/A	N/A

## 4.3 Sub-Committee Views on SECMP0026

As the modification does not impact the Technical or Business Architecture or SMKI matters, neither the TABASC nor SMKI PMA remits are impacted by this change.

The SSC unanimously support SECMP0026.

<sup>1</sup> Based on a blended rate of £600 per day

## 5. Implementation

### 5.1 Recommended Implementation approach

As this Modification Proposal only involves a documentation only change to SEC Section G, and should have no impact on SEC Parties or the DCC, the following implementation approach is proposed:

- **Five Working Days** following the end of the 10 Working Day referral period that applies after the Change Board Vote.

On this basis, subject to no referrals, SECMP0026 would be implemented on 15<sup>th</sup> March 2017.

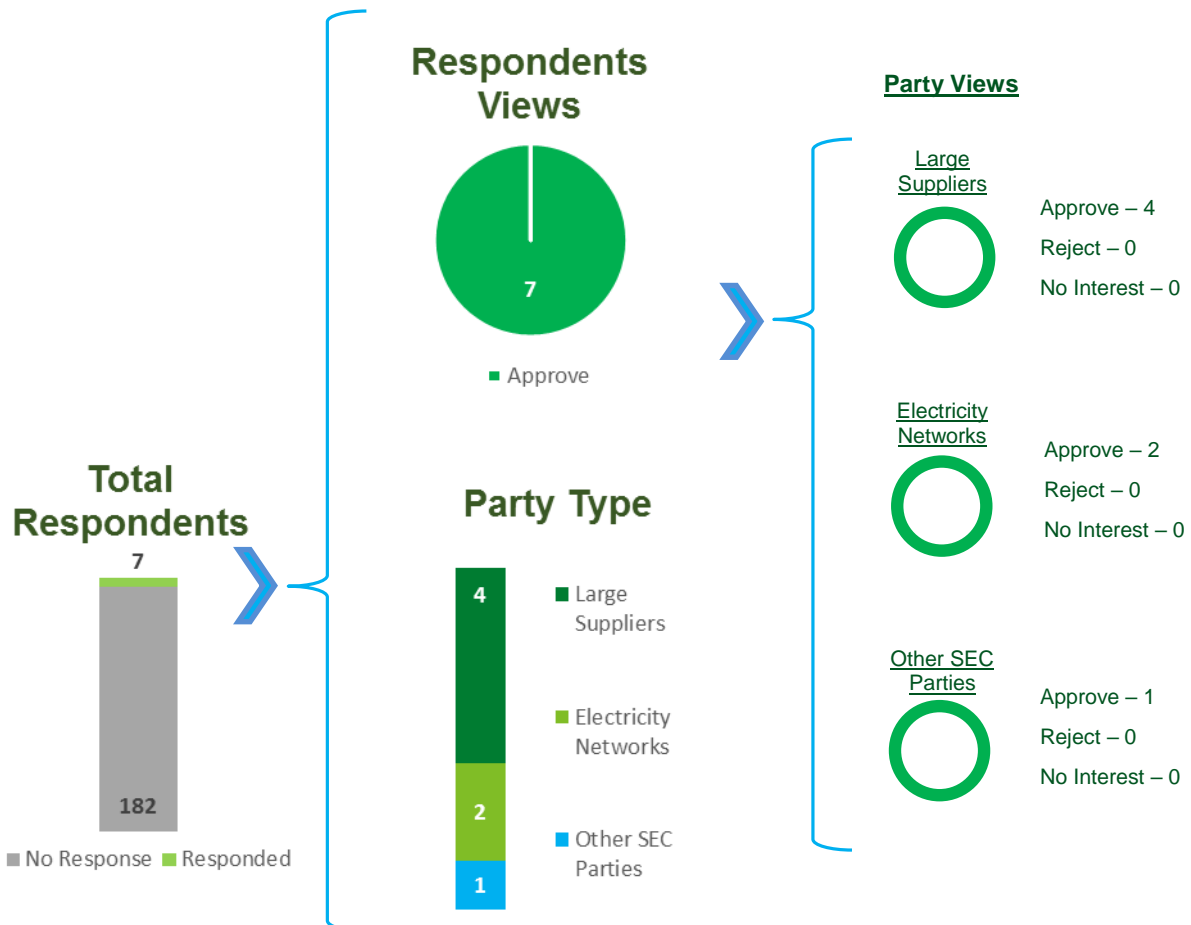
Note this implementation approach is subject to SECMP0026 being progressed and voted on, by the Change Board, as a Path 3 Self-Governance Modification Proposal.



## 6. Modification Report Consultation Responses

This section summarises the responses received to the Modification Report Consultation. Seven respondents, representing a total of 16 SEC Parties<sup>2</sup>, replied to the Modification Report Consultation. The full list of represented SEC Parties and the responses are provided in Attachment B.

### 6.1 Summary of Responses



<sup>2</sup> Out of a total of 202 SEC Parties.

## 6.2 Summary of Modification Report Consultation respondent's views against the SEC Objectives

Summary of Large Suppliers' views for and against SECMP0026		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (g)	<ul style="list-style-type: none"> <li>All Large Suppliers agreed that SECMP0026 supports and better facilitates objective (g); efficient and transparent administration of the code.</li> <li>All Large Suppliers also agreed that this modification will ensure that the SSC maintains a high level of security expertise, which is crucial for the fulfilment of its role.</li> <li>One Large Supplier noted that the term 'senior position' should be clarified as to its meaning to ensure it is interpreted correctly.</li> </ul> <p><b>SECAS comment:</b> To clarify, the intent of the legal text is that the person in a 'senior position' means someone in a senior management position within the organisation who is able to attest that the nominee has the relevant security experience to be on the SSC. It is not intended that this must be a senior security role, as considered during the earlier stages of the modification being developed, as not all SEC Parties will necessarily have an 'in-house' security team or expert.</p>	None
Summary of Networks' views for and against SECMP0026		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (g)	<ul style="list-style-type: none"> <li>All Network Parties agreed that General SEC Objective (g) is better facilitated by SECMP0026, as it contributes towards the SSC carrying out its activities in an efficient and transparent manner.</li> <li>One Network Party suggested the legal text is amended to explicitly require vetting in the event of an existing member being re-nominated</li> </ul> <p><b>SECAS comment:</b> This suggestion has been added to the legal text in Attachment A.</p>	None
Summary of Other SEC Party views for and against SECMP0026		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (g)	<ul style="list-style-type: none"> <li>The Other SEC Party respondent agreed that General SEC Objective (g) is better facilitated by SECMP0026, because ensuring that the SSC maintains a high level of security expertise is crucial to this Sub-Committee fulfilling its role.</li> </ul>	None

## 7. Further Information

Further information is contained in the following two attachments:

- Attachment A: SECMP0026 Legal Text; and
- Attachment B: Consultation Responses.

## 8. Change Board Decisions

Each Change Board Member is requested to:

- **CONSIDER** the SECMP0026 Final Modification Report and the Modification Report Consultation Responses (Attachment B);
- **CONSIDER** whether or not the Final Modification Report should be returned to the SEC Panel with recommendation for further clarification and/or analysis;
- **VOTE or ABSTAIN** on the Modification Proposal; and
- **PROVIDE** rationale as to whether the Modification Proposal will or will not better facilitate the SEC Objectives.

## Appendix 1 – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
SSC	Security Sub Committee	The Sub-Committee established pursuant to Section G7 (Security Sub-Committee).
SMKI PMA	Smart Meter Key Infrastructure Policy Management Authority	The Sub-Committee of that name established pursuant to Section L1 (SMKI Policy Management Authority).
TABASC	Technical Architecture and Business Architecture Sub-Committee	Means the Sub-Committee established pursuant to Section F1 (Technical Architecture and Business Architecture Sub-Committee).

### References

The following table contains any useful links relevant to this change or referenced in this document.

Links and References	
Description	Link
Section G – Security	<a href="https://www.smartenergycodecompany.co.uk/sec/sec-and-guidance-documents">https://www.smartenergycodecompany.co.uk/sec/sec-and-guidance-documents</a>