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Stage 04: Modification Report Consultation Responses

SECMP0044 'User Security Assessment of a Shared Resource'

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

About this document

This document contains the collated responses to the SECMP0044 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Talia Addy on 020 7090 1010 or email SEC.Change@gemserv.com.

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0044.

The Change Board will consider these responses at its meeting on 25th July 2018, where it will determine whether SECMP0044 should be approved or rejected.

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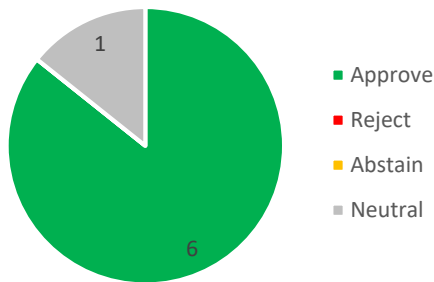
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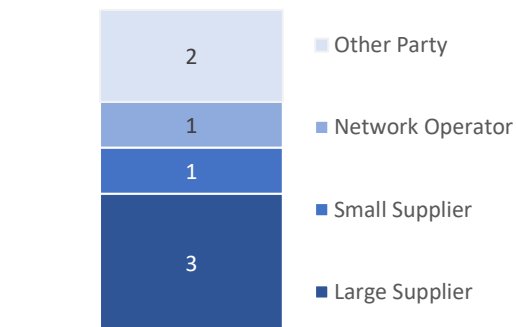
Summary of Responses

This section summarises the responses received to the SECMP0044 MRC.

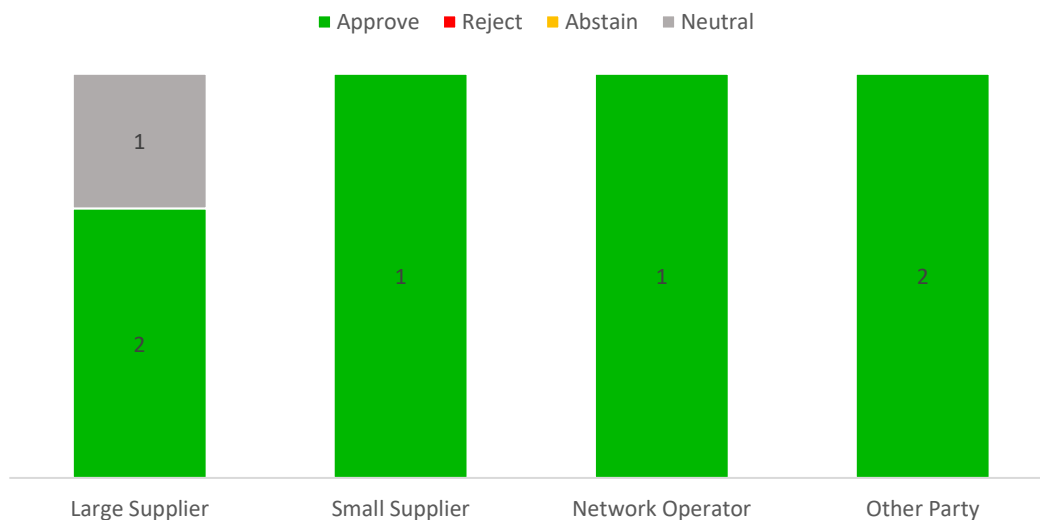
Respondents Views



Number of Respondents (by Party Type)



Views by Party Type



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Question 1

Q1: Do you believe that the SECMP0044 proposed solution better facilitates the SEC Objectives and should therefore be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
Opus Energy Ltd	Small Supplier	Yes	<p>We agree this modification better facilitates General SEC objectives;</p> <p>A) Facilitates the efficient provision, installation and operation, as well as interoperability, of Smart Metering Systems at energy consumers' premises.</p> <p>E) Facilitates such innovation in the design and operation of energy networks as will best contribute to the delivery of a secure and sustainable energy supply.</p> <p>F) Facilitates the efficient and transparent administration and implementation of this Code.</p>
TMA Data Management Ltd	Other SEC Party	Yes	<p>This solution better facilitates SEC Objectives a), e), g). In particular g) as ensures as a Shared Resource we do not have to undergo multiple assessments, and our customers will be able to view our reports providing transparency of our compliance with the code</p>
E.ON	Large Supplier	Neutral	<p>We agree that the intended solution for this Modification better facilitates SEC objectives a, e, and g for the reasons presented within the Modification Report. We do not however support the legal text of this Modification as outlined in our response to Question 3. Consequently we will accept the</p>

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			decision of Industry with regard to the implementation of this Modification, but we cannot support it.
Landis+Gyr	Other SEC Party	Yes	As it better facilitate SEC objectives a, e and g.
Utilita	Large Supplier	Yes	<p>(a) Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.</p> <p>Utilita believe that the crux of this implementation is to alleviate inefficiencies in the current processes. With regards to objective (a), this modification will primarily assist with the efficient operation of Smart Metering Systems, given that the security arrangements and associated assessment regime are key elements of said operation. We believe that efficiency is facilitated by removing duplication of effort whilst still maintaining an effective assessment regime.</p> <p>(e)Facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.</p> <p>This modification should alleviate unnecessary duplication of effort and the associated administrative burden on many industry participants. This should encourage innovation in system design and remove unintended disincentives from certain infrastructure designs.</p> <p>(g) Facilitate the efficient and transparent administration and implementation of this Code.</p> <p>This modification will remove significant inefficiencies which exist in the current processes. This should facilitate efficient</p>

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			administration for SECAS, the SSC, the User CIO and for any SEC Party who choose to employ a Shared Resource.
Scottish and Southern Electricity Networks	Network Party	Yes	SSEN is supportive of this modification as it ensure smaller player are not penalised. No further comments.
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	We agree that, if approved, SECMP0044 will better facilitate SEC Objectives A, E and G.

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Question 2

Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0044 should be approved?

Party Name	Party Category	Yes/No	Comments
Opus Energy Ltd	Small Supplier	Yes	Yes. As a small Supplier, using a shared response, this change will be positive for Opus Energy as it should simplify processes and save costs.
TMA Data Management Ltd	Other SEC Party	Yes	Whilst we will be charged for the cost of the assessment and will now be accountable in addition to responsible, the mod will have a large positive impact on both ourselves (in terms of time, and cost due to time spent going through multiple audits), and will have a positive impact on our customers, reducing the cost of their own assessment.
E.ON	Large Supplier	Neutral	As above.
Landis+Gyr	Other SEC Party	Yes	-
Utilita	Large Supplier	Yes	We are a Large Supplier Party who currently make use of a Shared Resource to deliver elements of our User System. This Modification will lighten the administrative burden of having to co-ordinate our assessment with both the User CIO and the Shared Resource Provider.

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			<p>Implementation of this Modification would require us to update our User Information Security Management System and all associated security documentation to ensure that they reflect the revised assessment processes.</p> <p>We will incur costs from having to update processes and procedures to accommodate the new assessment process. The extent of this cost is not yet clear.</p>
Scottish and Southern Electricity Networks	Network Party	Yes	-
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	-

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Question 3

Q3: Do you agreed that the draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No/Neutral	Comments
Opus Energy Ltd	Small Supplier	Neutral	No comments.
TMA Data Management Ltd	Other SEC Party	Yes	No comment
E.ON	Large Supplier	No	<p>We understand that the Final Modification Report has been amended to respond to our comments, however it is our view that the legal text does not reflect the fact that it must be a single organisation providing Shared Resources which constitute the entirety of a User's System, to qualify as a Shared Resource Provider. Thus our original comments still apply and are copied below, for clarity the crux of this issue is that the legal text is currently drafted such that a User's System that is made up of entirely Shared Resources* can only receive said services from Shared Resource Providers who must be a SEC Party (G25, G10.1** and G10.3). To that end, we cannot support the legal text as representing the intent of the Modification.</p> <p>*e.g. A User's System is entirely comprised of Oracle, Paypoint, DCC Adaptor, Juniper, Microsoft, Linux, HP/IBM, JBoss, IIS, Redis and Chrome etcetera. – These providers are utilised by multiple organisations and are therefore Shared Resources (G25 and G10.1**), because they comprise the entire System of a User the User must consequently ensure the Resources are provided by a Shared</p>

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			<p>Resource Provider (G25, G10.1** and G10.3), thus these providers must become SEC Parties (G10.5).</p> <p>We do not believe that with the current definitions, there is scope for any organisation to provide Shared Resources without constituting a Shared Resource Provider. We do not believe that this was the intent of the Modification. Further, we don't believe that the optionality of SEC Membership has been made explicitly clear within the Legal text, and would note that the current legal text appears to obligate any provider of Shared Resources to undergo an individual Security Assessment (e.g. G10.1, G10.2** and G8.63 and G8.40).</p> <p>For ease of reading it would be more efficient if the definitions for Shared Resources and Shared Resource Providers were to precede their first use (i.e. inserted in the legal text prior to G5.25, rather than being provided at G10).</p> <p>G8.30 (b) – we are not sure that this can exist. With the way in which Shared Resources and Shared Resource Providers have been defined (G10), it doesn't appear as though Shared Resources can be provided by anyone other than a Shared Resource Provider. To clarify, if a resource is provided to one or more Users as part of their User System, this qualifies as a Shared Resource and the provider of Shared Resources in accordance with an agreement or arrangement made with a User is a Shared Resource Provider. Consequently, Shared Resources can only be provided by Shared Resource Providers. We therefore believe that this passage should be removed or redefined for its intended purpose.</p> <p>G8.43 – as with G8.30 (b), we don't believe this section can exist and should therefore be removed or refined for its intended purpose.</p>
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			<p>G10.2 – we believe that “to one or more” should be removed from this passage because the definition of a Shared Resource requires that the provision be to more than one Users.**</p> <p>** we note that G10.1 and G10.2 are missing from the legal text circulated for the Final Modification Report Consultation and have consequently relied on the drafting provided within the Working Group Consultation for these sections.</p> <p>Based on the above comments, we believe that G10.3 should be rewritten to something along the lines of “A User may not employ Shared Resources from a single entity where (a) those Shared Resources are made available to it by another person; and (b) those Shared Resources constitute the entirety of its User Systems, unless those Shared Resources are provided by a Shared Resource Provider”.</p>
Landis+Gyr	Other SEC Party	Yes	-
Utilita	Large Supplier	No Interest	<p>We would appreciate the code administrator highlighting to us the legal drafting which achieves the following (taken from the FMR):</p> <p>“Scope of SECMP0044</p> <p>The Working Group considered whether the modification should be more open to ensure that it can be applied to all SEC Parties that may choose to use a Shared Resource Provider. The Working Group and the Proposer agreed that it would be pragmatic to broaden the scope of the modification to ensure that it is applicable to all Users, i.e. Large Suppliers, Small Suppliers, Network Operators and Other Users.”</p>

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Scottish and Southern Electricity Networks	Network Party	Yes	-
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	-

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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Opus Energy Ltd	Small Supplier	Yes	This change is beneficial to Industry participants.
TMA Data Management Ltd	Other SEC Party	Yes	Although were it possible an earlier implementation date would have a larger positive impact on all SEC parties who are using a Shared Resource provider, in particular those who are looking to undergo Year 2 assessments around the implementation date.
E.ON	Large Supplier	Neutral	As previously given we feel that this is a pragmatic date, however we note that only Panel may move Modifications to different Releases under the Release Management Policy, with which the proposed date does not accord.
Landis+Gyr	Other SEC Party	Yes	-
Utilita	Large Supplier	No Interest	We support the target implementation date of 10 Working Days following a decision to approve the Modification.
Scottish and Southern Electricity Networks	Network Party	Yes	-

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ScottishPower Energy Retail Ltd.	Large Supplier	Yes	-
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Question 5

Q5: Do you have any further comments on SECMP0044?

Party Name	Party Category	Yes/No	Comments
Opus Energy Ltd	Small Supplier	No	-
TMA Data Management Ltd	Other SEC Party	No	No further comments.
E.ON	Large Supplier	Yes	<p>We note that the SSC meeting convened to review this Modification was ahead of the Utiligroup/Aprose take over. We believe there may be some merit in the SSC undertaking another review of the proposed solution in light of this and potential future take overs to ensure that they believe the security arrangements are sufficiently robust for the scale of consumers/premises serviced by Shared Resource Providers.</p> <p>We believe that the intended change is beneficial for Shared Resource Providers, SECAS and the User CIO but again we note that it would be beneficial to understand how DCC will manage Shared Resource Provider breaches.</p>
Landis+Gyr	Other SEC Party	No	-
Utilita	Large Supplier	No Interest	As mentioned above, we believe clear guidance should be issued to Shared Resource and their users as to how to manage this new assessment process. We specifically request guidance on how processes/documentation should be aligned

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			and how it impacts on expectations and dependencies between Parties.
Scottish and Southern Electricity Networks	Network Party	No	-
ScottishPower Energy Retail Ltd.	Large Supplier	No	-

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