



Smart Energy Code

Modification Report Consultation Responses: SECMP0026 'Changes to the Security Sub-Committee Nomination Process'

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This document contains the detailed responses for the SECMP0026 Modification Report Consultation.

A summary of the responses is contained within section 6 of the SECMP0026 Final Modification Report.

If you would like any further information, or if you have any questions, please do not hesitate to contact **Joana Esgalhado** on **020 7090 7755** or at **secas@gemserv.com**.

Contents

- 1. **Views of Large Suppliers** 2
- 2. **Views of Small Suppliers** 5
- 3. **Views of Networks** 5
- 4. **Views of Other SEC Parties** 7



1. Views of Large Suppliers

Summary of Large Supplier views against the SEC Objectives	
General SEC Objective	Proposed
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	N/A
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	N/A
c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	N/A
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	N/A
e) To 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.	N/A
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	N/A
g) To facilitate the efficient and transparent administration and implementation of this Code.	✓ All

Large Supplier Modification Report Consultation Responses - Proposed Modification Solution

SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
EDF Energy <ul style="list-style-type: none"> EDF Energy Customers plc 	Yes	We agree with the Proposer's view that this change better facilitates Objectives (g) and supports the efficient and transparent administration and implementation of this Code. The SSC has a critical role to play in assuring the security of the end to end smart metering system, and members should be suitably qualified and vetted as a result. We do not believe that this change would create any unnecessary or inappropriate barriers to membership of the SSC, or discriminate against any particular category of SEC Party.
British Gas	Yes	We agree with the proposer, that General SEC Objective (g) will be better facilitated by the approval of this modification, to ensure the SSC maintains a high level of security expertise. However, we would like to clarify the term 'senior position' in clause G7.11A (a)(i) to remove any ambiguity during the nomination or dispute process. 'the candidate must have been nominated by a company or other organisation, and the individual who submitted the nomination on behalf of the organisation must hold a senior position within the organisation'.
Npower <ul style="list-style-type: none"> Npower Yorkshire Supply Ltd; Npower Commercial Gas Ltd; Npower Direct Ltd; Npower Gas Ltd; Npower Ltd; Npower Northern Ltd; Npower Northern Supply Ltd; Npower Yorkshire Ltd 	Yes	We believe this mod would put some rigour around nominations. At present anyone, who may not have the appropriate skills, can be nominated by a SEC Party. This modification also facilitates the efficient and transparent administration and implementation of this Code.

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Page 3 of 8

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<p>SSE:</p> <ul style="list-style-type: none"> SSE Energy Supply Limited Southern Electric Gas Limited South Wales Electricity Ltd 	<p>Yes</p>	<p>Objectives (g): the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.</p> <p>We believe that the General SEC Objective (g) is better facilitated by this modification as it supports efficiency and clarity in the nominations process for SSC. As industry transitions to an enduring status, the SSC will perform an essential role in maintaining a secure environment. These additional elements will further reinforce that the SSC maintains a high level of security expertise as this is crucial for this Sub-Committee to fulfil its role.</p>
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2. Views of Small Suppliers

No responses were received from Small Suppliers for this Modification Report Consultation.

3. Views of Networks

Summary of Networks views against the SEC Objectives	
General SEC Objective	Proposed
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	N/A
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	N/A
c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	N/A
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	N/A
e) To 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.	N/A
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	N/A
g) To facilitate the efficient and transparent administration and implementation of this Code.	✓ All

SECMP0026 Modification Report Consultation Responses

Networks Modification Report Consultation Responses - Proposed Modification Solution

SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
Western Power Distribution: <ul style="list-style-type: none"> Western Power Distribution (South Wales); Western Power Distribution (South West); Western Power Distribution (West Midlands); Western Power Distribution (East Midlands) 	Yes	We agree with this proposed modification in principle, however, we feel that in line with General SEC Objective (g), the red-lining should be clear as to whether the new requirements should apply to an existing SSC member when they are seeking re-election on completion of their two year appointment to the SSC. We would suggest the red-lining should be amended to state under section G7.11A “The following shall apply in respect of all candidates nominated <u>or re-nominated</u> for election as a Security Sub-Committee (Supplier) Member, Security Sub-Committee (Network) Member or Security Sub-Committee (Other User) Member.”
Electricity North West	Yes	We believe SECMP0026 should be approved and support the changes to the Security Sub-Committee Nomination Process. We agree that this change supports the seventh General SEC Objective (g) to facilitate the efficient and transparent administration and implementation of this Code.

4. Views of Other SEC Parties

Summary of Other SEC Parties views against the SEC Objectives	
General SEC Objective	Proposed
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	N/A
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	N/A
c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	N/A
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	N/A
e) To 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.	N/A
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	N/A
g) To facilitate the efficient and transparent administration and implementation of this Code.	✓ All

Other SEC Parties Modification Report Consultation Responses - Proposed Modification Solution

SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
Itron Metering Solutions UK Limited	Yes	The SSC performs a vital role in maintaining a secure environment and therefore ensuring that the SSC maintains a high level of security expertise is crucial to this Sub-Committee fulfilling its role. We support the proposed solution as described in the Modification Report.