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SEC Modification Proposal Form – SECMP0057

Mod Title

Users to notify SSC of a second or subsequent User System

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1. What issue are you looking to address?

Background

The Security Sub-Committee (SSC) has recently been made aware that some Users[1], who already have an existing User System[2] in place that has been 'approved subject to steps…' following the initial Full User Security Assessment (FUSA), are seeking to procure a second User System which may or may not be provided or operated by a Shared Resource Provider.

In the scenario described to the SSC, both User Systems (existing and additional) will be completely separate systems with different end-to-end architecture. They are expected to be operated in the same User Role with the same Information Security Management System (ISMS), security controls and processes.

With increasing competition in the energy supply market, there is increased motivation for Users to investigate innovative operational processes (such as on-line services to consumers, that are likely to be cheaper and more accessible using web portal links). There can be no simple assumptions on the combination of which architectures, technology, processes and Shared Resource Providers (or other providers) may be used in the future.

What is the issue?

At present, there is no SEC requirement for a second or subsequent User System to go through a User Security Assessment before starting live operations and there is no obligation to notify the SSC when a second or subsequent User System is to be procured or developed. The current SEC arrangements assume that a User will have a single User System which may be provided in-house or by a Shared Resource Provider and the whole of the User Security Assessment process is based on that assumption.

Due to the interconnected nature of systems supporting smart metering, there could be a risk to the overall security of smart metering if a second or subsequent User System is introduced without any formal consideration of the security risks.

A further issue for consideration is around a potential scenario whereby a User may find themselves in the 'Event of Default' should their second or subsequent User System be found to be non-compliant at their annual review and to determine whether this second or subsequent User System should be assessed earlier.

As a short-term measure, the SSC have amended the Security Controls Framework (SCF) to request Users to notify the SSC before they begin to employ a second or subsequent User Systems, but this Modification will make the obligation clear and enforceable in the SEC.

2. Why does this issue need to be addressed? *(i.e. Why is doing nothing not an option?)*

[1] DCC User who has undergone a pre-defined assessment cycle set out in the SEC Section G: Security and the Security Assessment Process.
[2] 'User System' agreed interpretation found at https://smartenergycodecompany.co.uk/download/3497/

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At present:

a) due to the interconnected nature of systems supporting smart metering, there could be a risk to other Users and / or to the overall security of smart metering if a second or subsequent User Systems is introduced without any formal consideration of the security risks;

b) there is no obligation on Users to notify the SSC or any other party before they begin to employ a second or subsequent User System;

c) there is no SEC requirement for a User Security Assessment of a second or subsequent User System.

3. What is your Proposed Solution?

This modification seeks to clarify the User Security Assessment process where a User may be in the process of beginning to employ a second or subsequent User System after having already satisfactorily completed the initial Full User Security Assessment.

Under the proposed solution, all Users will be required to notify the SSC before they begin to employ a second or subsequent User System. This will enable the SSC to consider the security risks and to advise the User accordingly.

In the scenario where a second or subsequent User System being considered by a User has already completed a User Security Assessment (e.g. as part of the assessment of a Shared Resource Provider), the SSC may consider that no additional User Security Assessments are necessary until the next annual review is due. However, in the scenario where the second or subsequent User System has never been assessed, the SSC may require a User Security Assessment using the obligation in SEC Section "G8.13 Each User shall do all such things as may be reasonably requested by the Security Sub-Committee...for the purposes of facilitating an assessment of that User's compliance with its obligations under Sections G3 to G6."

4. What SEC objectives does this Modification better facilitate?

This modification supports **General SEC Objective (a**) to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain by:

- enabling consideration of any new or additional security risks to the end to end smart metering system that could impact on other Users and on Consumers and inter-operability.

This modification supports **General SEC Objective (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 by:

- ensuring that any innovative developments in the use of any second or subsequent User Systems are properly assessed for security risks in delivering secure and sustainable energy supply.

This modification supports **General SEC Objective (g)** to facilitate the efficient and transparent administration and implementation of this Code by:

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- providing clarity in the SEC about how the User Security Assessment process will apply to Users intending to employ a second or subsequent User System and enable SECAS to advise Users and the User CIO accordingly.

5. What is the requested Path type?	Path 3

We do not believe this change will result in a material impact on competition or create undue discrimination between classes of Party, as per the requirements in SEC Section D2.6 for needing an Authority determination.

We therefore believe this modification can be progressed through Self-Governance.

6. Are you requesting that the Modification Proposal be treated as Urgent?	No

The SSC do not believe that this Modification Proposal should be treated as urgent.

7. What is your desired implementation date?

As soon as possible with no fixed date. At present, we are relying on Users having seen the request in the SCF. However, Users that have already been through the User Security Assessment process are unlikely to re-read the SCF and may go ahead and develop a second User System with no formal consideration of the wider security risks. Therefore, it would be helpful to implement the amendment as soon as possible.

8. Which SEC Parties are expected to be impacted? (Please mark with an X)

Large Supplier Parties	X	Small Supplier Parties	X
Electricity Network Parties	X	Gas Network Parties	X
Other SEC Parties	X		

The Modification could affect any Users with a User System who decide to employ a second or subsequent User System to conduct their business.

9. Which parts of the SEC will be impacted?

SEC Section G8. Additional paragraph to require Users to notify the SSC before they begin to employ a second or subsequent User Systems.

10. Will there be an impact on Central Systems? (Please mark with an X)

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	

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Other systems	
There are no system impacts.	
11. Will there be any testing required?	
No testing is required.	
12. Will this Modification impact other Energy Codes?	No
No impact on any other Energy Codes.	
13. Will this Modification impact Greenhouse Gas Emissions?	No
No impact on Greenhouse Gas Emissions.	

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