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Stage 02: Working Group Consultation Responses

SECMP0044 'User Security Assessment of a Shared Resource'

What stage is this document in the process?

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

About this document

This document contains the collated responses to the SECMP0044 Working Group Consultation (WGC). The Working Group (WG) will review these responses and consider them as part of the solution development for 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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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives?

Party Name	Party Category	Yes/No	Comments
Opus Energy Limited	Small Supplier	Yes	<p>This is a sensible change and would reduce our workload and that of our shared provider.</p> <p>This 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; and</p> <p>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; and</p> <p>General SEC Objective (g) to facilitate the efficient and transparent administration and implementation of this Code.</p>
Haven Power Limited	Small Supplier	Yes	<p>We believe 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>G) Facilitates the efficient and transparent administration and implementation of this Code.</p>

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TMA Data Management Ltd	Other SEC Party	Yes	-
ENGIE	Small Supplier	Yes	ENGIE agrees that SECMP0044 better facilitates the SEC Objectives as requiring Shared Resource Providers to go through a single User Security Assessment is far more efficient than requiring Shared Resource Providers to go through multiple security assessments with different suppliers. As noted in the modification proposal, significant time and money is being unnecessarily invested into the current process, with the User CIO having to review the same documentation several times. This stretches the resource of the User CIO, Shared Resource Providers, SECAS and the SSC, and energy suppliers.
Utiligroup	Other SEC Party	Yes	Yes – the modification better facilitates a, e and g of the SEC objectives. Specifically C1.1.g as it improves the efficiency of administration of the SEC in relation to section G and objective C1.6.b, as the modification will lower the financial barrier to entry for new market entrants choosing to partner with an accredited shared service provider.
Npower	Large Supplier	Yes	Npower support this modification and believe it meets the SEC objectives outlined within the modification
Utilita Energy Ltd	Large Supplier	Yes	<ul style="list-style-type: none"> Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. <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</p>

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			<p>key elements of said operation. We believe that efficiency is facilitated by removing duplication of effort whilst still maintaining an effective assessment regime.</p> <ul style="list-style-type: none"> • (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>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> <ul style="list-style-type: none"> • (g) Facilitate the efficient and transparent administration and implementation of this Code. <p>This modification will remove significant inefficiencies which exist in the current processes. This should facilitate efficient administration for SECAS, the SSC, the User CIO and for any SEC Party who choose to employ a Shared Resource.</p>
Spark Energy Supply Ltd	Small Supplier	Yes	<p>The obligation to complete a User Security Assessment is an important objective of the SEC, however Spark's view is that implementation should be proportionate. Where a supplier has engaged the services of a Shared Resource, it's important that the Shared Resource be assessed, but assessing a Shared Resource separately for every user of their service will put a strain on resource and have a cost implication. Spark considers that where a Shared Resource provides the same solution to multiple SEC parties, the completion of a single assessment is sufficient to comply with the obligations as set out in the SEC.</p>

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SmartestEnergy Ltd	Small Supplier	Yes	Yes. We found that our Shared Service Provider was getting picked up on different aspects that weren't a problem (or weren't noticed) in previous audits with other customers. This led me to believe that the User CIO either didn't have the time or the available expertise to best assess the Shared Service Provider in each audit instance. If the User CIO was able to set aside its best auditors for the Shared Service Provider's audit, there will be greater opportunity to find flaws in the highest risk area to the DCC and make serious efficiency savings at the same time.
EDF Energy	Large Supplier	Yes	<p>We agree that the proposed solution better facilitates SEC Objectives (a) and (g):</p> <ul style="list-style-type: none"> (a) The proposed solution will remove the need for unnecessary duplication of security assessments by Users and will deliver a more efficient and less costly User Security Assessment process. (g) The proposed solution will reduce the administrative burden on SECAS, Users and the SSC by removing unnecessary duplication of effort. <p>We believe the proposed solution is neutral against the other SEC objectives.</p>
Green Network Energy	Network Party	Yes	<p>This modification will reduce the burden, and therefore cost, relating to the completion of Security Assessments. It therefore better facilitates the SEC objectives to:</p> <ul style="list-style-type: none"> • Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain

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			<ul style="list-style-type: none"> Ensure the protection of data and the security of data and systems in the operation of the SEC;
SSE	Large Supplier	Yes	We believe that the solution better facilitates Objective E as this will ensure security obligations are met, however we disagree with the workgroup's view that Objective A is better facilitated by this proposal 'by reducing the duplication and achieving a more efficient and less costly User Security Assessment process'. As explained in our subsequent responses, the current drafting will result in new instances of duplication and therefore greater costs.
E.ON	Large Supplier	Yes	We agree that this Modification better facilitates SEC objectives a, e, and g for the reasons presented within the Draft Modification Report.
Bristol Energy Ltd	Small Supplier	Yes	-

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Question 2

Q2: Will your organisation be impacted due the implementation of this modification?

Party Name	Party Category	Yes/No	Comments
Opus Energy Limited	Small Supplier	Yes	This change which would have the positive impact of reducing our workload and that of our shared provider.
Haven Power Limited	Small Supplier	Yes	Yes. As a small supplier, who has elected to use a shared resource, the implementation of this modification will have a positive impact for Haven Power.
TMA Data Management Ltd	Other SEC Party	Yes	As a Shared Services Provider we are impacted by SECMP0044. The impact is positive and we welcome SECMP0044
ENGIE	Small Supplier	Yes	This modification has a positive impact on ENGIE as, like most small suppliers, we use a Shared Resource Provider. We have already been through an initial Full User Security Assessment for our domestic supply business and are due to undergo a second Full User Security Assessment for our non-domestic supply business at the end of June. If this change is implemented, it will benefit both ENGIE and our Shared Resource Provider for future User Security Assessments.
Utiligroup	Other SEC Party	Yes	Yes – as a shared service provider we will see a positive impact by the implementation of the modification, as our engagement in the User Security Assessment process across all of our clients will be simplified and more efficient.

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Npower	Large Supplier	Neutral	-
Utilita Energy Ltd	Large Supplier	Yes	<p>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.</p> <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>
Spark Energy Supply Ltd	Small Supplier	Yes	<p>Spark anticipates that it will be impacted positively by the implementation of this modification, as it will enable Spark to evidence the functions carried out by the Shared Resource as part of their assessment, without the need to have them on-site.</p>
SmartestEnergy Ltd	Small Supplier	Yes	<p>With the User CIO assessing the Shared Service Provider instead of Small Suppliers, Shared Service Providers will be able to focus their efforts in answering 1 set of questions instead of 15. From a Small Supplier perspective, this also makes things a lot easier for us as Small Suppliers often don't have the resource to trawl through 150+ documents in an ISMS and collate against requirements of the SEC, then request evidence of each process being completed correctly. Being able to rely on the User CIO will take a lot of pressure off and free up resource to focus on processes/audits/issues/assess risk within the Small Supplier's organisation instead. Hopefully the User CIO audit for the small supplier won't take as long as a result and reduce cost/improve efficiency there as well. Also being able to have a verification assessment in year 2 and</p>

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			self-assessment in year 3 better supports the original intention of the SEC.
EDF Energy	Large Supplier	No	This modification will have no direct impact on EDF Energy; however we would expect to see the costs in the SEC budget reduce as a result of implementation.
Green Network Energy	Network Party	Yes	Green Network Energy use a Shared Resource Provider that communicates with more than 250,000 domestic premises across it's different customers. Without this change we would need to complete a Full User Security Assessment every year. The proposed change means we will only be required to undertake a Verification Assessment in year two and can place reliance on a review conducted on our Shared Service Resource. This will provide us with a more efficient way of ensuring the security of our smart metering user system.
SSE	Large Supplier	Yes	CONFIDENTIAL RESPONSE PROVIDED
E.ON	Large Supplier	No	There are no known impacts at this time, but we believe the way in which DCC manage potential breaches for Shared Resource Providers with significant consumer/premises numbers ought to be considered more fully.
Bristol Energy Ltd	Small Supplier	Yes	We are a small supplier using a shared resource

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Question 3

Q3: Will your organisation incur any costs due to the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
Opus Energy Limited	Small Supplier	No	No
Haven Power Limited	Small Supplier	Yes	We anticipate this change will result in a cost saving to us in the long term.
TMA Data Management Ltd	Other SEC Party	Yes	We are impacted by the cost of the User Security Assessments.
ENGIE	Small Supplier	No	-
Utiligroup	Other SEC Party	Neutral	-
Npower	Large Supplier	Neutral	-
Utilita Energy Ltd	Large Supplier	No	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.
Spark Energy Supply Ltd	Small Supplier	Yes	Spark has yet to receive an indication of the level of cost that a Shared Resource may pass on, but expects that any additional cost would be offset against the savings made

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			through not having the Shared Resource on-site during the assessment process.
SmartestEnergy Ltd	Small Supplier	No	No. If anything it'll reduce our cost as stated above.
EDF Energy	Large Supplier	No	We will not incur any costs as a result of this modification.
Green Network Energy	Network Party	No	Our Security assessment costs will reduce.
SSE	Large Supplier	Yes	The extent of the costs incurred will depend on whether two separate Annual User Security Assessments are required, based upon our other responses.
E.ON	Large Supplier	Yes	Our portion of the implementation costs, but no more.
Bristol Energy Ltd	Small Supplier	No	-

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Question 4

Q4: 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 Limited	Small Supplier	Yes	This is a sensible change and would reduce our workload and that of our shared provider.
Haven Power Limited	Small Supplier	Yes	This is a sensible change which we believe will benefit small suppliers using a shared resource as the level of assessment in the second and third years will be reduced. This is a more proportionate approach and will also remove duplication of observations of the shared resource, ultimately reducing their workload and that of the supplier
TMA Data Management Ltd	Other SEC Party	Yes	We are fully supportive of SECMP0044
ENGIE	Small Supplier	Yes	This modification will benefit suppliers, Shared Resource Providers, SECAS, Security Sub-Committee and the User CIO.
Utiligroup	Other SEC Party	Yes	Yes – The modification will be a welcome change to the SEC. We believe it will bring SEC back in line with the original intention in relation to section G, given the unexpected reality we find ourselves in of the proliferation of Users engaging Shared Service Providers, which has made following the current process unduly challenging.

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Npower	Large Supplier	Yes	-
Utilita Energy Ltd	Large Supplier	Yes	<p>All Parties who make use of Shared Resource will have to institute a change procedure so that SEC Parties who are relying on aligning their documentation with the Shared Resource can easily track versions.</p> <p>Shared Resource documentation tends to be dynamic and they will be assessed based on one version of said documentation. If changes have been made, users of the Shared Resource will have to show how they have monitored and accommodated said change.</p> <p>We do not believe that this should prevent implementation of the Modification however we do believe that the specifics of how this will impact requirements on Parties should be considered. We believe that clear guidance should be made available as to how Shared Resource and their Users should align processes and documentation under the new assessment regime.</p>
Spark Energy Supply Ltd	Small Supplier	Yes	As we have noted above, the potential costs are yet to be determined, but Spark considers that the proposal will make the assessment process less onerous in terms of planning, management and assessment, thus reducing the operational and financial burden on Spark.
SmartestEnergy Ltd	Small Supplier	Yes	Absolutely. There's a lot of efficiency savings to be made in the User CIO audit process and this is the biggest and best 'common sense' thing that can be done to address the biggest issues.
EDF Energy	Large Supplier	Yes	We have not identified any reason why SECMP0044 should not be approved.

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Green Netowrk Energy	Network Party	Yes	This modification provides a more efficient way for small suppliers to provide assurance that their User System is secure.
SSE	Large Supplier	Yes	Our response is based on the understanding that only one assessment would be necessary, however we have concerns that current legal drafting has not sufficiently clarified the requirements for SEC Parties that are both Large Suppliers and Shared Resources Providers.
E.ON	Large Supplier	Yes	We believe that this 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.
Bristol Energy Ltd	Small Suppliers	Yes	We agree wholeheartedly with the documented rationale for this modification.

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Question 5

Q5: Do you believe that the draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
Opus Energy Limited	Small Supplier	Yes	-
Haven Power Limited	Small Supplier	Yes	-
TMA Data Management Ltd	Other SEC Party	Yes	-
ENGIE	Small Supplier	Yes	ENGIE does not have any comment on the draft legal text changes.
Utiligroup	Other SEC Party	Yes	-
Npower	Large Supplier	Yes	-
Utilita Energy Ltd	Large Supplier	Yes	is not clear from the SEC drafting if it was amended to allow for a SEC Party to declare themselves as a Shared Resource Provider, as was discussed at one of the working groups. Utilita asked this question to SECAS but did not leave sufficient time to receive an answer prior to submission of this response. We would like to know if this amendment was made and what drafting was added, if any.

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			Aside from this, we believe the legal text delivers the intent of the modification.
Spark Energy Supply Ltd	Small Supplier	Yes	-
SmartestEnergy Ltd	Small Supplier	Neutral	Neutral – As far as I can see on the change proposal documentation page on the SECAS website, the draft legal text hasn't been published.
EDF Energy	Large Supplier	Yes	We have not identified any issues with the draft legal text.
Green Network Energy	Network Party	Neutral	-
SSE	Large Supplier	No	We understand the intention of this modification to be to simplify the current requirements, and reduce the risk of unnecessary duplication of work. However, we have concerns that the current legal drafting does not clarify the requirements for SEC Parties that are both Large Suppliers and Shared Resources Providers, and therefore could for those parties double the work and costs required, which could undermine the intention of this modification.
E.ON	Large Supplier	No	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

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			<p>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> <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>G10.3 - 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>
Bristol Energy Ltd	Small Supplier	Neutral	-

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Question 6

Q6: Do you agree with the recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Opus Energy Limited	Small Supplier	Yes	-
Haven Power Limited	Small Supplier	Neutral	We would like to see this change implemented at the earliest opportunity.
TMA Data Management Ltd	Other SEC Party	Yes	We support the implementation of SECMP0044, 10WD after formal approval.
ENGIE	Small Supplier	Yes	ENGIE believes that if this modification is approved, the change should be implemented as soon as possible
Utiligroup	Other SEC Party	Yes	-
Npower	Large Supplier	Yes	-
Utilita Energy Ltd	Large Supplier	Yes	<p>The current arrangements will continue to create excess administrative burden on various Parties until the new drafting is implemented. It is of the interest of all Parties to have as expedient an implementation as possible.</p> <p>However, we wish to draw attention again to our answer to question 4. The clearer the communications on the impacts of this modification and the expectations on SEC Parties, the</p>

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			quicker this modification can be implemented without causing disruption.
Spark Energy Supply Ltd	Small Supplier	Yes	Spark believe that the proposal should be implemented as soon as reasonably practicable as it was noted in the proposal that there are suppliers who are already reaching their required date for their second year assessments. It should be implemented no later than the proposed date.
SmartestEnergy Ltd	Small Supplier	No	No, the date needs to be sooner. Our User CIO audit is only a few weeks after the change, and if there is a delay we will need to have done a full audit on the shared service provider. Currently it's a case of flipping a coin to see if we should invest in the resource to be able to do that, however if it's sooner it's more likely that we will not need to.
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date – we do not believe that this change would need to wait to be included in a SEC release.
Green Network Energy	Network Party	Yes	-
SSE	Large Supplier	Yes	-
E.ON	Large Supplier	Yes	We believe the proposed implementation is the fairest possible date for implementation.
Bristol Energy Ltd	Small Supplier	Neutral	We would ask that this modification be implemented at the earliest opportunity to ensure as few Parties as possible are impacted by the current requirements leading to what will later prove unnecessary FUSA's

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Question 7

Q7: Do you have any further comments on SECMP0044?

Party Name	Party Category	Yes/No	Comments
Opus Energy Limited	Small Supplier	No	-
Haven Power Limited	Small Supplier	No	-
TMA Data Management Ltd	Other SEC Party	No	-
ENGIE	Small Supplier	No	-
Utiligroup	Other SEC Party	Yes	<p>Yes - The modification has a few benefits that will make the Security Assessment process less costly and more efficient for all of our clients. Primarily:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The re-alignment of the Security Assessment schedule with the originally intended schedule for Small Suppliers, Registered Supplier Agents and Other Users. <input type="checkbox"/> A reduction in assessed obligations for each supplier that uses common services taken from a Shared Service Provider, where the obligation has already been assessed during the Shared Service Providers user security assessment.

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			<input type="checkbox"/> Inherent increase in efficiency for SECAS validation of CIO Report management responses, reducing the lead time between User Security Assessments and SSC Panel validation. We believe this modification is beneficial to all impacted parties and should be implemented at the nearest opportunity.
Npower	Large Supplier	No	
Utilita Energy Ltd	Large Supplier	Yes	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 and how it impacts on expectations and dependencies between Parties.
Spark Energy Supply Ltd	Small Supplier	Yes	Spark believe that the proposal should be implemented as soon as reasonably practicable as it was noted in the proposal that there are suppliers who are already reaching their required date for their second year assessments. It should be implemented no later than the proposed date.
SmartestEnergy Ltd	Small Supplier	Yes	This change is absolutely necessary to improve the smooth running and efficiency of the User CIO audits and to facilitate the maximum focus on risk reduction at the largest source of risk, then onto the small suppliers afterwards.
EDF Energy	Large Supplier	Yes	We are supportive of this change as it will simplify the process overall, and ensure we keep the costs to industry low. The only drawback is that this change only covers shared resources that deliver an entire user system on behalf of a Supplier. We recognise that dealing with cases where they only provide part of it (e.g. UTRN generation) introduces additional complexity, so it seems sensible to move forward

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			with the proposed changes as they are today, and potentially deal with other cases if and when they appear in the future.
Green Network Energy	Network Party	No	-
SSE	Large Supplier	Yes	CONFIDENTIAL RESPONSE PROVIDED
E.ON	Large Supplier	Yes	We note that the SSC convened to review this Modification 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.
Bristol Energy Ltd	Small Supplier	No	-

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