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Stage 03: Modification Report Consultation

SECMP0065:

SMETS1 Security Obligations

What stage is this document in the process?

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

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Summary

This modification seeks to align Smart Energy Code (SEC) Section G with the original intent of the Smart Metering Equipment Technical Specifications 1 (SMETS1) policy so that security obligations in G3.26 to G3.28 only apply from the date on which SMETS1 Devices start to be enrolled into the Data Communications Company (DCC). This will avoid the potential for Supplier Parties to be unnecessarily in breach of SEC obligations.

Impacts



- Large and Small Supplier Parties
- There are no impacts on Data Communications Company (DCC) Central Systems or Party interfacing systems.

Response Deadline



- This Consultation closes at **5pm** on **Friday 19th October 2018**.

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About this Document

This is the Modification Report Consultation (MRC) for SECMP0065. This document provides a high-level summary of the issue, solution, impacts and costs, implementation date and Panel views on the Modification Proposal;

This document has three attachments:

- **Attachment A** contains the Final Modification Report (FMR) which provides a detailed explanation of the issue, solution, impacts, costs, implementation as well as the Panel discussions and conclusions;
- **Attachment B** contains the draft legal text changes to support this modification; and
- **Attachment C** contains the MRC response form.

As part of this consultation SEC Parties will be asked to provide their views on SECMP0065. The information provided will help us to better understand the benefits and drawbacks of the modification and assist the Change Board in its determination.

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Summary of SECMP0065

What is the issue?

In March this year the Department for Business, Energy and Industrial Strategy (BEIS) issued a [consultation letter](#) seeking views on proposals to amend the SEC, the DCC Licence and energy supply licences to enable the provision of a SMETS1 Service by the DCC. The Consultation document made it clear that the obligations were only intended to apply post enrolment of SMETS1 Devices. BEIS published its conclusions on 4 June 2018 and laid the regulatory changes before Parliament in line with the procedure under Section 89 of the Energy Act 2008, with the changes coming into legal effect on 18 July 2018 in [SEC v5.20](#).

SEC Sections G3.26 to G3.28 outline the security obligations for SMETS1 Smart Metering Systems and changes were made to these paragraphs in order to implement the obligations as a result of the BEIS consultation. The wording introduced into the SEC could however be interpreted to apply to pre-enrolment meters as it does not specify that the obligations only apply post enrolment. The legal effect is that the obligations apply now and do not allow time for the necessary planning by Users, the Security Sub-Committee (SSC) and the User Independent Security Assurance Service Provider.

What is the Proposed Solution?

The SSC proposes that to meet the original policy intent for the SMETS1 security obligations in [SEC Section G](#), and particularly those in SEC Sections G3.26 to G3.28, that they be altered so that they apply only from the date on which SMETS1 Devices start to be enrolled into the DCC. This will avoid the potential for Parties to be in breach of SEC obligations.

Impacts – Proposed Solution

Party

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

System

There are no impacts on DCC Central Systems or Party interfacing systems.

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Implementation Costs

The total estimated implementation cost to deliver SECMP0065 is approximately £1,200 and consists of SEC Administration effort.

Implementation Date

The Panel has agreed an implementation date of:

- **8th November 2018**, if a decision to approve is made by 24th October 2018.

Where can you find further information?

A full description of the issue, solution, impacts, costs, implementation date and Panel views on the merits of SECMP0065 can be found in the FMR (Attachment A).

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