



Draft Legal Text

SECAS Contact:

Name:

Joe Hehir

Number:

020 7770 6874

Email:

SEC.change@gemserv.com

SECMP0065:

SMETS1 Security Obligations

Summary

This modification seeks to enable the Smart Energy Code (SEC) to meet the original policy intent for the Smart Metering Equipment Technical Specifications 1 (SMETS1) security obligations in SEC Section G, and particularly those in SEC Sections G3.26 to G3.28, to apply only 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 in breach of SEC obligations.

About this document

This document contains the draft SEC legal text that will deliver the intent of SECMP00065.

SECMP0065 - Draft
Legal Text

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Version 0.1

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This document is
classified as **White**

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1. Draft Legal Text

This section sets out the draft Legal Text Changes for SECMP0065. These changes have been drafted against the Smart Energy Code (SEC) version 5.22¹.

Section G ‘Security’

Add Section G1.10 after Section G1.9

SECTION G - SECURITY

G1 SECURITY: GENERAL PROVISIONS

Interpretation

G1.1 Sections G2 to G9 shall be interpreted in accordance with the following provisions of this Section G1.

Transitional Period for Updated or Replacement Standards

G1.2 Section G1.3 applies where:

- (a) the DCC or any User is required, in accordance with any provision of Sections G2 to G9, to ensure that it, or that any of its policies, procedures, systems or processes, complies with:
 - (i) any standard, procedure or guideline issued by a third party; and
 - (ii) any equivalent to that standard, procedure or guideline which updates or replaces it from time to time; and
- (b) the relevant third party issues an equivalent to that standard, procedure or guideline which updates or replaces it.

¹Note that if a new version of the SEC is designated before the submission of the Final Modification Report to the Change Board or Authority, the drafting will be checked to make sure there are no consequential impacts. Our current understanding is that the specifications that SECMP0006 is amending are not expected to change as part of any forthcoming designations.

G1.3 Where this Section G1.3 applies, the obligation on the DCC or User (as the case may be):

- (a) shall be read as an obligation to comply with the updated or replaced standard, procedure or guideline from such date as is determined by the Panel (having considered the advice of the Security Sub-Committee) in respect of that document; and
- (b) prior to that date shall be read as an obligation to comply (at its discretion) with either:
 - (i) the previous version of the standard, procedure or guideline; or
 - (ii) the updated or replaced standard, procedure or guideline.

G1.4 Any date determined by the Panel in accordance with Section G1.3 may be the subject of an appeal by the DCC or any User to the Authority (whose decision shall be final and binding for the purposes of this Code).

Obligations on Users

G1.5 Obligations which are expressed to be placed on a User shall, where that User performs more than one User Role, be read as applying to it separately in respect of each of its User Roles.

G1.6 For the purposes of Section G1.5, where any Network Party is deemed to have nominated itself as a Registration Data Provider (in accordance with the definition of Registration Data Provider), its role as a Registration Data Provider shall be treated as if it were an additional category of User Role.

Exclusion for Export Suppliers and Registered Supplier Agents

G1.7 Where a User acts in the User Role of 'Export Supplier' or 'Registered Supplier Agent', it is not to be subject to any of the obligations expressed to be placed on Users except for those obligations set out at:

- (a) Sections G3.2 to G3.3 (Unauthorised Activities: Duties to Detect and Respond);
- (b) Sections G3.8 to G3.9 (Management of Vulnerabilities);
- (c) Sections G5.14 to G5.18 (Information Security: Obligations on Users), save that for this purpose the reference:
 - (i) in Section G5.18(b)(i) to "Sections G3 and G4" shall be read as if it were to "Sections G3.2 to G3.3 and G3.8 to G3.9"; and
 - (ii) in Section G5.18(b)(iii) to "Sections G5.19 to G5.24" shall be read as if it were to "Section G5.19(d)"; and
- (d) G6 (Anomaly Detection Thresholds: Obligations on the DCC and Users).

Disputes

G1.8 Where, in any dispute between a Party and a User, a question arises as to whether that User has complied with any of its obligations under Sections G3 to G6:

- (a) that question may be referred by either of them to the Panel for its determination; and
- (b) where either of them disagrees with any such determination of the Panel, then it may refer the matter to the Authority in accordance with Section M7 (Dispute Resolution).

G1.9 Section G1.8:

- (a) shall be without prejudice to the provisions of Section M8.2 (Notification of an Event of Default); and
- (b) shall not apply in respect of any other question in dispute between a Party and a User relating to or arising from the question of whether the User has complied

with any of its obligations under Sections G3 to G6.

SMETS1 Smart Metering Systems

G1.10 Any reference in Sections G2 to G9 to:

- (a) a SMETS1 SMS shall be treated as being a reference to an Enrolled SMETS1 SMS only;
- (b) a Smart Metering System shall be treated as including an SMETS1 SMS only if it is an Enrolled SMETS1 SMS;
- ~~(a)~~(c) a Device shall be treated as including a SMETS1 Device only if it forms part of or is ancillary to an Enrolled SMETS1 SMS.