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Modification Decision

SECMP0065:

SMETS1 Security Obligations

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.

Change Board Decision



- The Change Board believes that SECMP0065 does better facilitate the SEC Objectives. The Change Board therefore **approved** this modification under Self-Governance.

What stage is this document in the process?

| | |
|----|---------------------|
| 01 | Initial Assessment |
| 02 | Refinement Process |
| 03 | Modification Report |
| 04 | Decision |

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SECMP0065
Modification
Decision

24th October 2018

Version 0.1

Page 1 of 5

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Content

| | |
|-----------------------------|---|
| 1. Change Board discussions | 3 |
| 2. Change Board Vote | 4 |
| 3. Change Board decision | 5 |

About this Document

This is the Modification Decision document for SECMP0065. This document provides a summary of the Change Board's discussions, conclusions and final determination on SECMP0065 under Self-Governance.

SECMP0065
Modification
Decision

24th October 2018

Version 0.1

Page 2 of 5

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1. Change Board discussions

The **majority** view of the Change Board is that SECMP0065 does facilitate General SEC Objective (g) and should be **approved**.

Change Board discussions

The Change Board were satisfied with the modification's intent overall. However, there was debate around a spelling error in the legal text which had been proposed to be rectified prior to the Change Board meeting. One member of the Change Board advised that this spelling correction could not be approved as it had not been consulted upon prior to the Change Board. Other members disagreed and felt it would be pragmatic to make this correction now. However, the Change Board agreed to use the original legal text that was consulted on and presented to them, and for the spelling error to be rectified as part of a future modification that impacts SEC Section G.

A Change Board member believed that this modification should have been progressed as a Path 2 'Authority Determination' modification, rather than Path 3 'Self-Governance' modification.

The consultation responses were discussed, and a Large Supplier representative advised they were not satisfied with the responses they had received in regard to their concerns. Another Large Supplier representative also echoed their own feedback in the consultation, advising that given the short timeframe of the consultation period, they had not had enough time to sufficiently review whether this modification could have contributed to clearer governance in other sections of the SEC.

Views against the General SEC Objectives

Objective (g)¹

The **majority** view of the Change Board is that SECMP0065 does better facilitate SEC Objective (g) as it provides clarity over the SMETS1 security obligations and confirms that they only apply to post enrolment of SMETS1 Devices.

Two members of the Change Board chose to abstain on giving their views on this modification.

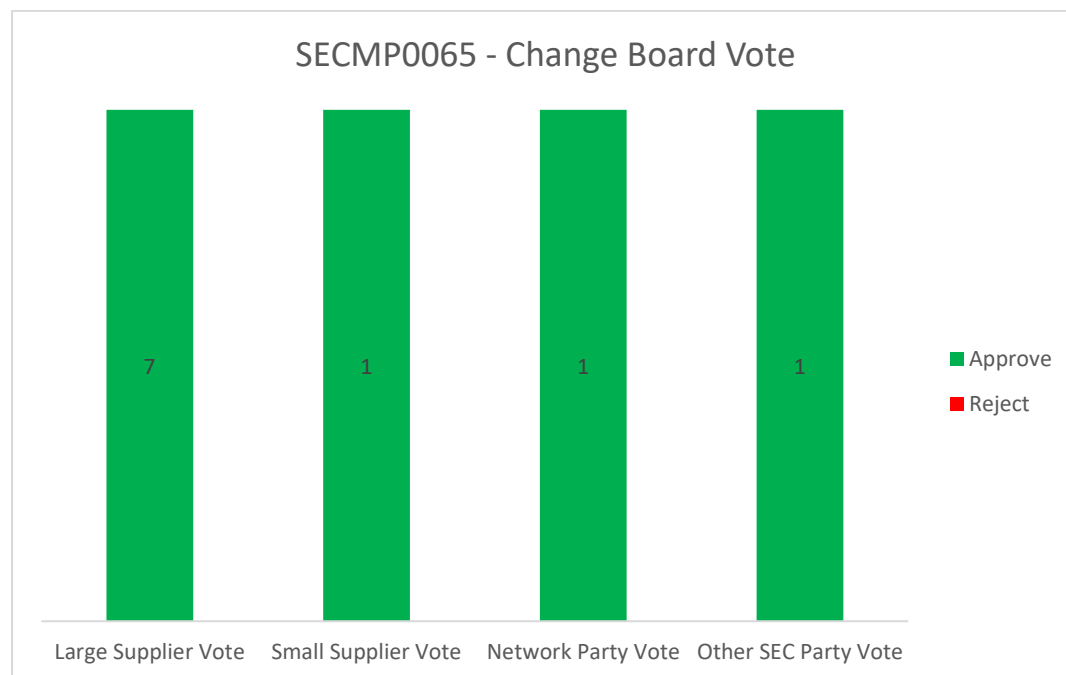
For the avoidance of doubt, the Change Board believe that SECMP0065 is neutral against the remaining SEC Objectives.

¹ To facilitate the efficient and transparent administration and implementation of this Code.

2. Change Board Vote

This section sets out the breakdown of the Change Board’s vote.

The Change Board voted to approve SECMP0065.



One Large Supplier member abstained from the vote as, while they appreciate that non-compliances could materialise if the modification was rejected, they believed SECMP0065 would have a material enough impact to warrant an Authority determination.

One Networks Party member abstained as this modification would have no impact on Gas Transporters.

SECMP0065
Modification
Decision

24th October 2018

Version 0.1

Page 4 of 5

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3. Change Board decision

The Change Board:

- **CONSIDERED** the Final Modification Report and Modification Report Consultation responses for SECMP0065;
- **AGREED** not to send the Final Modification Report back to the Panel for further clarification;
- **APPROVED** SECMP0065 under Self-Governance for implementation on 8th November 2018 (one Working Day following the close of the Self-Governance referral window); and
- **PROVIDED** rationale as to why SECMP0065 better facilitates the General SEC Objectives.

SECMP0065
Modification
Decision

24th October 2018

Version 0.1

Page 5 of 5

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