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Paper Reference:	**SECP_78_1303_19**
Action:	**For Decision**

DP109 progression

1. Purpose

Draft Proposal DP109 'ADT and Exit Quarantine file delivery mechanism' is ready to be converted to a Modification Proposal and we recommend it progress to the Refinement Process. This paper sets out our proposed approach for progressing this modification for the Panel's approval.

The Draft Modification Report setting out the detail of the Proposal can be found in Appendix A.

2. Summary of the issue

Smart Energy Code (SEC) Appendix AA 'Threshold Anomaly Detection Procedures' currently requires the Anomaly Detection Threshold (ADT) File and Exit Quarantine files to be provided to the DCC by email. The DCC believes that it would be a more secure process to provide this information via the Self-Service Interface (SSI) using a normal SSI process, albeit retaining the ability to invoke email as a delivery method in a disaster recovery situation.

The DCC believes that sending ADT Files and related updates via email, rather than the SSI means the delivery method will continue to be less secure than the SSI alternative. It further believes the current delivery method is susceptible to Security breaches through either deliberate malicious activity or erroneous activity.

3. Proposed progression

We believe that this modification should be progressed to the Refinement Process to allow for the development and assessment of a solution. Below we have set out the proposed approach to progress the modification.

Work package and timetable

Business requirements will be agreed with the DCC to suggest how to amend the ADT and Exit Quarantine file mechanism delivery method. These requirements will then be placed online for industry members to comment and brought to the next available Security Sub-Committee (SSC) meeting to ensure they are fit for purpose before requesting a Preliminary Assessment. The Preliminary Assessment will then be discussed at the next Working Group meeting.

Activity	Date
Business requirements agreed with the Proposer	16 Mar 2020
Business requirements discussed at SSC	8 Apr 2020
Request Preliminary Assessment	13 Apr 2020
Discuss at Working Group meeting	1 Jul 2020
Update Panel	17 Jul 2020

Areas of assessment

We do not believe there are any further questions that need to be considered in addition to the standard assessment areas.

4. Recommendations

The Panel is requested to:

- **AGREE** that DP109 should be converted to a Modification Proposal;
- **AGREE** that DP109 should be progressed to the Refinement Process; and
- **AGREE** the first package of work and timetable as set out in this paper.

Harry Jones

SECAS Team

6 March 2020

Attachments:

- **Appendix A:** DP109 draft Modification Report

SEC
Smart Energy Code

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Smart Energy Code

DP109

‘ADT and Exit Quarantine file delivery mechanism’

Modification Report

Version 0.3

About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

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1. Summary

This Draft Proposal was raised by Gary Fairclough of the Data Communications Company (DCC).

Smart Energy Code (SEC) Appendix AA 'Threshold Anomaly Detection Procedures' currently requires the Anomaly Detection Threshold (ADT) File and Exit Quarantine files to be provided to the DCC by email. The DCC believes that it would be a more secure process to provide this information via the Self-Service Interface (SSI) using a normal SSI process, albeit retaining the ability to invoke email as a delivery method in a disaster recovery situation.

The DCC believes that sending ADT Files and related updates via email, rather than the SSI means the delivery method will continue to be less secure than the SSI alternative. It further believes the current delivery method is susceptible to Security breaches through either deliberate malicious activity or erroneous activity.

2. Issue

What are the current arrangements?

The SEC explicitly states that email is the delivery method required for ADT files. The following sections in SEC Appendix AA either state email as the only delivery method, or refer to an action required prior to an email being sent:

- Section 3.1
- Section 3.4
- Section 3.4(a)
- Section 4.7
- Section 4.7(a)
- Section 4.13
- Section 4.13(a)
- Section 6.1

What is the issue?

The SEC details that ADT and Exit Quarantine files can only be sent via email, which prevents alternative methods of delivery being used. Users are obligated to do this, for example in SEC Appendix AA Section 4.7 it states “Each User shall investigate and resolve the ADT exceeded event. Each User shall provide an email to the Service Desk indicating the action to be taken on each of the quarantined communications”. With the current arrangements, this results in emails being the single means of sending ADT and Exit Quarantine files.

The DCC believes there are more secure methods available to send these files. The ADT and Exit Quarantine files must be securely delivered due to these being data records that contain information private to both a User and the DCC. Failure to do so would be a classed as a data breach. Additionally, ADTs provide protection to the electricity network by specifying the maximum number of Critical commands expected. This ensures there are no unexpected or malicious surges or reductions in power on the National Grid.

What is the impact this is having?

The DCC believes that using email to provide ADT Files and subsequent updates is not as secure as the SSI and there are potential scenarios where this process could result in a breach of Security, either by malicious activity or human error. If the ADT and Exit Quarantine files aren’t securely delivered, then it allows the potential for unauthorised persons being able to access private data. If these data breaches occur, it could undermine the security and commercial image of DCC’s business processes. The suggested additional benefits by the Proposer are a single system for the delivery of files, resulting in less effort for end Users and DCC.

3. Assessment of the proposal

Observations on the issue

The views of the Panel Sub-Committees were sought during the Development Stage. Only the Security Sub-Committee (SSC) confirmed it had an interest in the progress of this Draft Proposal. It agreed that this was an issue and requested further involvement as the solution develops so that it can remain updated on its progress and ensure that it would be fit for purpose.

The Change Sub-Committee (CSC), on its initial viewing of the Draft Proposal, was supportive of the issue and agreed that it was clear in what was looking to be addressed. It requested that the Panel Sub-Committees be consulted before returning for decision, which only the SSC acknowledged as an issue. When it was returned to the CSC for decision, they only noted that it should be taken to the Refinement Process as the recommended progression before agreeing it should be taken to Panel for conversion to a Modification Proposal. SECAS and the SSC agreed that if converted to a Modification Proposal, it should proceed to a decision under Self-Governance.

Applicable Objectives

Proposer's views

The Proposer believes that this Draft Proposal would help better facilitate SEC Objective (f)[1]. This is due to any solution that provides a more secure delivery method than the current email system for providing ADT and Exit Quarantine files being beneficial to the protection of data that is required in the SEC.

[1] Ensure the protection of data and the security of data and systems in the operation of the SEC.

Appendix 1: Progression timetable

This Draft Proposal will be taken to the next Panel meeting for conversion and progression to the Refinement Process.

Following this, business requirements will be agreed with the DCC to suggest an approach of how to amend the ADT and Exit Quarantine file mechanism delivery method. These requirements will then be placed online for industry members to comment and brought to the next available SSC meeting to ensure they are fit for purpose before requesting a Preliminary Assessment. Following the return of the Preliminary Assessment, it will then be discussed at the next Working Group meeting.

Timetable	
Action	**Date**
Business requirements agreed with the Proposer	16 Mar 2020
Business requirements discussed at SSC	8 Apr 2020
Request Preliminary Assessment	13 Apr 2020
Discuss at Working Group meeting	1 July 2020
Update Panel	17 Jul 2020

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
ADT	Anomaly Detection Threshold
CSC	Change Sub-Committee
DCC	Data Communication Company
SEC	Smart Energy Code
SECAS	Smart Energy Code Administration and Secretariat
SSC	Security Sub-Committee
SSI	Self-Service Interface