



DCUSA CONSULTATION

DCP 260- TRAS Incident Single Point of Contact

Executive Summary: DCP260 was raised following discussions by the TRAS Working Group Security Subgroup to address concerns regarding potential information security breaches which may impact TRAS data provided by Suppliers.

The Security Subgroup proposed that a 24 hour information security single point of contact should be provided to the TRAS Service Provider so that all Suppliers can be informed in the unlikely event that a security breach occurs.

Respondents are invited to submit comments using the form attached to dcusa@electralink.co.uk by **22 January 2016**.

1 PURPOSE

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This document is a Consultation issued to DNO, IDNO, Suppliers, any other interested Parties and the Authority in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 260 'TRAS Incident Single Point of Contact'. Parties are invited to consider the questions set out below and submit comments using the form attached as Attachment 2 to dcusa@electralink.co.uk by **22 January 2016**.

2 BACKGROUND OF DCP 260

- 2.1 The TRAS Schedules include an obligation on Suppliers to provide details of a single point of contact for the TRAS Service Provider to manage day to day interactions. DCP 260 was raised by E.ON UK following a recommendation from the TRAS Working Group Security Subgroup and proposes that an additional clause be added to introduce an obligation of Suppliers to provide an 'information security' single point of contact available on a 24hr basis to deal with data security issues e.g. security breach.
- 2.2 During discussions at the TRAS Security Sub-group, Suppliers and the TRAS Service Provider identified a requirement for a single point of contact for each Supplier to deal with TRAS information security related incidents. For example, if a breach occurs which impacts Supplier supplied TRAS data. Where a notification is received via the information security single point of contact, each individual Supplier will be responsible for determining what action should be taken, in line with its own data protection arrangements.
- 2.3 SPAA and DCUSA already include a requirement on Suppliers to provide details of an operational single point of contact, therefore it is proposed that this additional requirement be added alongside it to allow Suppliers to be notified promptly and directly

in the event of an information security incident occurring either during or outside standard business hours.

- 2.4 An equivalent SPAA CP has been raised to be progressed in parallel with DCP260 (Draft SPAA CPD 15/323).

3 WORKING GROUP ASSESSMENT

- 3.1 The DCUSA Panel acknowledged that a TRAS Working Group has already been established to oversee the implementation of the TRAS. Therefore it would be more efficient to use this TRAS Working Group to assess the DCP 260, rather than creating a new working group. DCUSA Parties were provided with information regarding DCP 260 and DCUSA Parties not represented on the TRAS Working Group could attend meetings.
- 3.2 The TRAS Working Group considered the draft DCUSA CP ahead of submission to the DCUSA Panel and agreed the draft legal text. It was therefore proposed that the CP should be issued straight out for consultation prior to further consideration at a TRAS Working Group meeting.

4 ASSESSMENT AGAINST THE DCUSA OBJECTIVES

- 4.1 The proposer considers that the following DCUSA Objective is better facilitated by DCP 260:

DCUSA General Objective 4 –The promotion of efficiency in the implementation and administration of this Agreement

- 4.2 The proposer believes that General Objective 4 is better facilitated as the CP will ensure that the TRAS Service Provider can contact each Supplier if an information security incident occurs outside standard business hours, which affects the TRAS arrangements.

5 DCP 260 – LEGAL DRAFTING

- 5.1 A new paragraph 8.8A has been added to Schedule 25 introducing an obligation on Suppliers to provide an information security incident single point of contact. In addition the wording in paragraph 8.8 of Schedule 25 has been revised to clarify the distinction

between the operational single point of contact and the information security incident single point of contact.

5.2 The Working Group agreed to consult on the draft legal text, this has been provided as Attachment 1.

5.3 Following a review of the consultation responses, the Working Group will update and finalise the legal text.

6 DCP 260 – IMPLEMENTATION

6.1 The proposed implementation date for DCP 260 is 30 June 2016.

7 DCP 260 – CONSULTATION QUESTIONS

7.1 The Working Group is seeking industry views on the following consultation questions:

Question Number	Question
1	Do you understand the intent of the CP?
2	Are you supportive of the principles of the CP?
3	Please provide your views on the scenarios you believe should lead to a notification being issued to the information security single point of contact and what you believe is a reasonable response from the notified party.
4	Do you agree with the proposed legal text?
5	Are you supportive of the proposed implementation date?
6	Do you consider that the proposal better facilitates the DCUSA Charging and General Objectives? Please give supporting reasons.
7	Is there anything further which has not been identified which you feel should be included?
8	Are you aware of any wider industry developments that may impact upon or be impacted by this CP?

7.2 Responses should be submitted using Attachment 1 to dcusa@electralink.co.uk no later than **22 January 2016**.

7.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

8 NEXT STEPS

8.1 Responses to the consultation will be reviewed by the TRAS Governance Working Group. The Working Group will then determine the progression route for the CP.

8.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA helpdesk by email to dcusa@electralink.co.uk or telephone 020 7432 3008.

9 ATTACHMENTS

Attachment 1 – Proposed Legal Text

Attachment 2 – Response Form

Attachment 3– DCP 260 Change Proposal