

APPENDIX AV Version 2.0

CPA Transition Approach Document

1 Introduction

- 1.1 This Appendix is the CPA Transition Approach Document (**CPATAD**) developed by the Secretary of State pursuant to Section G14 of the Code.

2 Transitional Application of Sections of the Code

[Not used]

3 Preparatory Work by the Security Sub-Committee

[Not used]

4 Application of Section G13.5

[Not used]

5 In-Flight Assurances

- 5.1 It is recognised that prior to the introduction of this version of CPA TAD, CPA Certificates were issued by the National Cyber Security Centre (NCSC) under the NCSC's Commercial Products Assurance Scheme (NCSC's CPA Scheme).

- 5.2 Where a Device Model began evaluation under the NCSC's CPA Scheme prior to the introduction of this version of CPATAD:

- (a) any certificate (that would have been a CPA Certificate had it been issued under the NCSC's CPA Scheme) that is awarded in relation to that Device Model by NCSC shall be treated as a CPA Certificate for the purposes of the Code;
- (b) where NCSC indicates to the Scheme Operator that it would have issued a certificate under the NCSC's CPA Scheme, the Scheme Operator shall be able to rely on this information when issuing a CPA Certificate in relation to the relevant Device Model; and
- (c) the results of any evaluation under NCSC's Commercial Products Assurance Scheme may be submitted to the CPA Scheme Operator in order for the CPA Scheme Operator to determine whether a CPA Certificate should be issued in respect of the relevant Device Model.

- 5.3 For clarity, Clause 5.2 shall apply where a Manufacturer is seeking a certificate for a new Device Model, is seeking to gain an assurance maintenance certification, or is in the process of a risk review.
- 5.4 In determining whether to issue a CPA Certificate pursuant to Clause 5.2(c), the CPA Scheme Operator shall evaluate any evidence submitted including the results of any testing or other outputs from the process followed under NCSC's Commercial Products Assurance Scheme, and shall do so in the manner that:
- (a) aligns with the relevant version of the published Security Characteristics; and
 - (b) does not result in a material increase in risk to the End-To-End Smart Metering System (including, where necessary, requiring such other evidence or additional testing to be carried out prior to making that determination).
- 5.5 Any Test Lab that is involved in the evaluation of a Device Model pursuant to Clause 5.2 shall be considered to be a CPA Test Lab for the purposes of the Code, subject to any additional requirements or limitations which the SSC may choose to impose in relation to that Test Lab.