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MP268 ‘Certificate rotation and expired Certificates’

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP268 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	
British Gas	Large Supplier	Yes	
Utilita	Large Supplier	Yes	We agree that the solution proposed will resolve the issue, however, we question the scale of costs presented as part of the PIA, as we are being forced to pay a relatively large sum of money to resolve a problem that was caused by the implementation of MP261, which was also raised by the DCC
UK Power Networks	Network Party	Yes	UK Power Networks agrees with the Proposed Solution because it established a standard procedure for updating Smart Meter security Certificates that have a Validity Period longer than ten years. If the Certificate is revoked or is expired to ensure ongoing network security and compliance.
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	By developing clear guidelines within the SEC, we believe that SEC MP268 will reduce the risk of unauthorised access thereby mitigating data being compromised by proactively investing in security measures in turn resulting in a reliable Smart Metering Network.
Electricity North West Limited	Network Party	Yes	This approach is sensible and targeted for security assurance and is an appropriate and proportionate.

Question 2: Do you agree that the legal text will deliver MP268?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
E.ON	Large Supplier	Yes	In the legal text, should the time periods shown in 5.20 and 5.21 be the same, i.e., after 48 hours but before 7 days? Subject to the correct time periods being shown, the changes to the legal text clearly address the DCC's obligations which this modification introduces.	Initially a seven-day window was set based on DCC's design which is not mandated but followed as good practice by the DSP. After the DCC's consulting with SSC and SMKI PMA, a 48-hour window was deemed to prevent longer life Certificates remaining on Devices.
British Gas	Large Supplier	-	Not reviewed	
Utilita	Large Supplier	Yes	-	
UK Power Networks	Network Party	Yes	We agree that the legal text will deliver MP268 because it has been updated to provide guidance on Certificate Validity Periods and the requirement to update Certificates.	
National Grid Electricity Distribution	Network Party	Yes	-	
Scottish and Southern Electricity Networks	Network Party	Yes	We agree the legal text on Section G 'Security' will deliver MP268.	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	-	

Question 3: Do you agree with the proposed implementation approach?

Question 3			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	-
British Gas	Large Supplier	Yes	From a purely Supplier perspective, this is a beneficial change. It increases the time before Certificate expiry, and therefore reduces the risk of loss communications to a Device, were an expired Certificate to result in a meter becoming non comms.
Utilita	Large Supplier	Yes	The proposed approach makes sense.
UK Power Networks	Network Party	Yes	We agree with the proposed implementation approach because it ensures the modification is implemented soon after it is approved and before expiry of the original Certificates.
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	We agree with the proposed implementation approach that is aimed to be implemented at latest in November 2025, as part of the SEC Release including DCC System changes before the original Certificates expire.
Electricity North West Limited	Network Party	Yes	-

Question 4: Will there be any impact on your organisation to implement MP268?

Question 4			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	This change relates to the Organisation Certificates which the DCC is responsible for managing and has no direct effect on Suppliers.
British Gas	Large Supplier	No	This change will not place any extra requirements on Suppliers. It will also reduce the frequency of future Certificate replacements, which will have a longer-term reduction on Supplier workload.
Utilita	Large Supplier	No	As this modification is being implemented on DCC's side, there would be no impact to us.
UK Power Networks	Network Party	Yes	UK Power Networks will be required to assess which meters will require replacement of a Certificate and then to apply a new Certificates. We are already aware that Certificates will need to be updated ahead of their expiry dates and had been planning for this situation. As we approach the ten-year period from the original date of 2015, we will develop a process for the regular review of Certificate expiry dates and update of those requiring replacement.
National Grid Electricity Distribution	Network Party	No	-
Scottish and Southern Electricity Networks	Network Party	No	n/a
Electricity North West Limited	Network Party	Yes	As a network operator we will have 3 areas of responsible for delivery under the business requirements.

Question 5: Will your organisation incur any costs in implementing MP268?

Question 5			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	N/A	
British Gas	Large Supplier	No	
Utilita	Large Supplier	No	As there are no changes required, there will be no costs to us
UK Power Networks	Network Party	Less than £100k	As mentioned in response to question four. UK Power Networks will develop a process to review and replace Certificates, therefore we can only provide an approximated estimate of likely costs to be incurred for the initial effort and ongoing work.
National Grid Electricity Distribution	Network Party	No	-
Scottish and Southern Electricity Networks	Network Party	No costs	-
Electricity North West Limited	Network Party	-	-

Question 6: How long from the point of approval would your organisation need to implement MP268?

Question 6			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	n/a	-
British Gas	Large Supplier	-	-
Utilita	Large Supplier	None	As there are no changes required, there would be no lead time required
UK Power Networks	Network Party	1 Year	Currently, there are 4.6 million Smart Meters in UK Power Network's' regions. UK Power Networks have initiated a project to schedule and plan the replacement of the ten year Certificates. Activities include: • Develop project plan • Procurement of resource from third party support • A schedule of the work to update the Certificates associated with 460,000 meters per month, taking into consideration DCC approval/awareness of increased Service Request Variant traffic • Testing of changes • Deployment of new Certificates into production
National Grid Electricity Distribution	Network Party	n/a	-
Scottish and Southern	Network Party	n/a	-

Question 6			
Respondent	Category	Response	Rationale
Electricity Networks			
Electricity North West Limited	Network Party	-	-

Question 7: Do you believe that MP268 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	Better facilitates General SEC Objective (f). The Proposed changes address the potential security and obligation gap which currently exists
British Gas	Large Supplier	-	
Utilita	Large Supplier	Yes	We believe this modification will better facilitate objective (f), as these Certificates not being rotated could pose a security risk
UK Power Networks	Network Party	Yes	We agree with the proposer's view that the modification will support the General SEC Objective (f) to ensure the protection of Data and the security of Data and Systems in the operation of this Code.
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	We believe MP268 will better facilitate General SEC Objective (f) as the Proposed Solution mitigates data being compromised.
Electricity North West Limited	Network Party	Yes	We agree the modification supports SEC Objective (f)

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP268 is implemented?

Question 8			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	The benefit is the enduring security of data and smart meter systems.
British Gas	Large Supplier	No	-
Utilita	Large Supplier	Yes	This modification would potentially prevent unauthorised access to Smart equipment which could be of benefit to consumers, but we do not believe there would be any direct and tangible benefits.
UK Power Networks	Network Party	Yes	We do not believe there will be any direct impact on consumers other than to benefit the consumer by providing improved network security and to reduce the risk of unauthorised access to the consumer's Smart Meter.
National Grid Electricity Distribution	Network Party	Yes	We believe consumers will benefit for the reasons stated in the Modification Report.
Scottish and Southern Electricity Networks	Network Party	Yes	We believe MP268 will benefit the consumer as the Proposed Solution looks to mitigate data being compromised thereby improving safety and reliability of devices on the Smart Metering network.
Electricity North West Limited	Network Party	-	-

Question 9: Noting the costs and benefits of this modification, do you believe MP268 should be approved?

Question 9			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	For reasons previously given.
British Gas	Large Supplier	Yes	We would expect expert opinions from the various sub-groups (TABASC, SMKI PMA, SSC) to make the recommended decision, but from a Supplier-only perspective, we would support this.
Utilita	Large Supplier	Yes	Given the potential security concerns and the risk of unauthorised access, we believe this modification should be implemented. However, we note that this has only become an issue because of a previous modification raised by the DCC and must once again call out the fact that we are being forced to pay to fix an issue created by another party.
UK Power Networks	Network Party	Yes	Please see response to question 8.
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	We believe the benefits around risk mitigation in the long term outweigh the costs that will be undertaken to implement MP268.
Electricity North West Limited	Network Party	Yes	Refer to response to Q1.

Question 10: Please provide any further comments you may have.

Question 10		
Respondent	Category	Comments
E.ON	Large Supplier	-
British Gas	Large Supplier	-
Utilita	Large Supplier	-
UK Power Networks	Network Party	-
National Grid Electricity Distribution	Network Party	-
Scottish and Southern Electricity Networks	Network Party	-
Electricity North West Limited	Network Party	-