



Department for  
Energy Security  
& Net Zero

Department for Energy Security & Net Zero  
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The Authority (Ofgem), the SEC Panel, SEC Parties  
and other interested parties

7 March 2025

Dear Colleague,

**SMART METERING IMPLEMENTATION PROGRAMME: RESPONSE TO  
CONSULTATION ON A REVISED DATE TO DESIGNATE THE SECOND VERSION OF  
THE CPA TRANSITION APPROACH DOCUMENT.**

1. Following consultation and completion of the parliamentary process required by section 89 of the Energy Act 2008, on 25 October 2024 DESNZ introduced changes to the Smart Energy Code (SEC) that took legal effect on the same date to create new arrangements for the device security assurance scheme (the Commercial Product Assurance (CPA)) and provide for device manufacturers to become SEC Parties. Pending appointment of the new CPA Scheme Operator, these CPA-related changes were temporarily disapplied by the new SEC Appendix AV-CPA Transition Approach Document (CPA TAD) that was designated and introduced into the SEC on 25 October 2024<sup>1</sup>. The new CPA TAD also provided the SEC Panel's Security Sub-Committee (SSC), as new CPA Scheme Owner, with flexibility in applying the independence requirements to the CPA Scheme Operator.
2. On 15 November 2024, DESNZ consulted on the updated version of the CPA TAD that superseded the version of the CPA TAD from 25 October 2024. It also recognised that there will be "in flight" CPA evaluations for Device Models that entered the CPA evaluation process before the responsibility for it was transferred to the new CPA Scheme Operator and sets out arrangements to support their completion.<sup>2</sup> The respondents to the consultation were supportive of the proposals set out in the updated CPA TAD that can be found in Annex 2.
3. Designating the updated version of the CPA TAD was subject to a short delay whilst DESNZ received confirmation that there were no material objections to the framework agreement between the relevant test lab and the new CPA Scheme Operator. Given that this delay was not expected to cause any material impact on industry and/or device evaluations, DESNZ consulted on a proposed revised date for designating the updated version of the CPA TAD of 24 February 2025 (or as soon as practicable within one month thereafter). The consultation on this, which ran between 5 February 2025 and 19 February 2025, received only one response, and that response was supportive.

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<sup>1</sup><https://smartenergycodecompany.co.uk/department-for-energy-security-net-zero-desnz-cpa-related-changes-to-the-sec-and-designation-of-the-initial-version-of-the-cpa-transition-approach-document-2/> The changes enable CPA TAD to be developed by the Secretary of State and included into SEC as per DCC Licence Condition 22 and SEC Section X5.

<sup>2</sup><https://smartenergycodecompany.co.uk/department-for-energy-security-net-zero-desnz-consultation-on-the-second-version-of-sec-appendix-av-cpa-transition-approach-document-cpa-tad/>

4. DESNZ has now received confirmation that there are no material objections to the framework agreement between the relevant test lab and the new CPA Scheme Operator which means the Government is content to re-designate the second version of the CPA TAD on 7 March 2025. It should be noted that on 27 February 2025, SEC Modification MP280<sup>3</sup> was implemented. The effect of this modification was to make enduring changes to the SEC to afford flexibility to the SSC in its application of the independence requirements to the CPA Scheme Operator. Consequently, we have removed Clause 4.1 in this second version of CPA TAD as it is no longer necessary.
5. The direction to give effect to the incorporation of the second version of CPA TAD can be found in Annex 1 below. This direction is being notified to the SEC Administrator and an updated version of the SEC will be issued to reflect these changes and will be available on the SEC website in due course.

Yours faithfully,



**James Cosgrove**  
Deputy Director  
Smart Metering Implementation Programme

(An official of the Department for Energy Security & Net Zero authorised to act on behalf of the Secretary of State).

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<sup>3</sup> <https://smartenergycodecompany.co.uk/modifications/cpa-scheme-transition-to-ssc/>

## Annex 1 – Direction to Designate the CPA TAD v2.0

*This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).*

*Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.*

*Pursuant to Part G of Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 7 March 2025, the CPA Transition Approach Document (CPA TAD), is hereby re-designated and incorporated into the SEC as Appendix AV in the form set out in Annex 2 to this direction.*

*For the avoidance of doubt, any re-designation of the CPA TAD shall be without prejudice to anything done under the DCC Licence or SEC on or after the document first being designated, or to the continuing effectiveness of anything done under that document prior to its re-designation (which shall have effect as if done under the relevant re-designated document).*

## **APPENDIX AV Version 2.0**

### **CPA Transition Approach Document**

## **1 Introduction**

- 1.1 This Appendix is the CPA Transition Approach Document (**CPA TAD**) 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.