

APPENDIX AV Version ~~1~~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

~~2.1 While this CPATAD remains in force:~~

~~(a) In Section A1 (Definitions):~~

~~(i) The definition of "CPA Assurance Maintenance Plan" shall be replaced with the following—~~

~~"CPA Assurance Maintenance Plan" means the document agreed with the NCSC that describes the components of a device which, if changed, will require a new CPA Certificate to be issued.~~

~~(ii) The definition of "CPA Certificate" shall be replaced with the following—~~

~~"CPA Certificate" has the meaning given to that expression in Section F2.4 (Background to Assurance Certificates).~~

~~(iii) In the definition of "CPA Security Characteristics", the reference to the documents being maintained by the Security Sub-Committee shall be read as a reference to the documents being published from time to time on the NCSC website.~~

~~(b) In Section F2 (Central Products List) and in Appendix Z (CPL Requirements Document) any reference to the Scheme Operator with regard to the issuing, withdrawal, or cancellation of any Assurance Certificate (including, but not limited to, any CPA Certificate) shall be read as being a reference to the NCSC.~~

~~(c) In Section F2.7, the reference to the Security Sub-Committee shall be read as being a reference to the NCSC.~~

~~(d) In Section G7 (Security Sub-Committee), Section G7.20(d) shall be replaced with the following:~~

~~"(d) keep under review the NCSC CPA Certificate scheme in order to assess whether it continues to be fit for purpose in so far as it is relevant to the Code and suggest modifications to the scheme provider to the extent to which it considers them appropriate." [Not used]~~

3 Preparatory Work by the Security Sub-Committee

~~3.1 The Security Sub-Committee shall take such steps as it considers are requisite and expedient to take in order to prepare for the introduction and implementation of those aspects of the Revised CPA Arrangements which are not in effect pursuant to the provisions of paragraph 2.1 above. [Not used]~~

4 Application of Section G13.5

~~4.1 Section G13.5 shall apply on the basis that the CPA Scheme Operator will be treated as suitably independent either (1) if it satisfies the requirements of Sections G13.7 and G13.8 or (2) if it partly satisfies the requirements of Sections G13.7 and G13.8 and also satisfies such other requirements and complies with such arrangements as the Security Sub-Committee may require in order to deal with the consequences of Sections G13.7 and G13.8 not applying in full. [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).

4.25.5 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.