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MP268 ‘Certificate rotation and expired Certificates’

August 2024 Working Group – meeting summary

Attendees

SEC Party Category	Working Group Members	Representing
Large Suppliers	Emma Johnson (EJ)	British Gas
	Alex Hurcombe (AH)	EDF Energy
	Amy Cox (AC)	EDF Energy
	Francesca Scott (FS)	EDF Energy
	Clare Manning (CM)	EON
	Sharon Armitage (SA)	EON
	Ralph Baxter (RB)	Octopus Energy
	Emslie Law (EL)	OVO
	Mahfuzar Rahman (MR)	Scottish Power
	Joanne Rush (JR)	SSE
	Kevin Clark (KC)	Utilita
Small Suppliers	Simon Moore (SM)	Bryt Energy
	Steve Blackler (SB)	E Gas & Electricity
Other SEC Parties	David Jones (DJ)	Alt Han Co
	Patricia Massey (PM)	BEAMA
	Beth Tatton (BT)	Calisen Metering
	Rob Heath (RH)	Calisen Metering
	Daniel Davies (DD)	ESG Global
	Craig Biffen (CB)	EUA
Network Parties	Kelly Kinsman (KK)	NGED
	Stuart Blair (SB)	Northern Power Grid
	Shuba Khatun (SK)	SSEN
	James Murphy (JM)	Stark

Other Participants		
DCC		
Bradley Baker (BB)	David Rollason (DR)	
David Walsh (DW)	Rosie Davies (RD)	
Citizens Advice		
Emily Stone (ES)		

Other Participants		
SECAS		
Simon Grimwood (SG) <i>Meeting Chair</i>	Alexandra Scott (AS) <i>Meeting Secretary</i>	Elizabeth Woods (EW) <i>Lead Analyst</i>
Mo Sumro (MS) <i>Lead Analyst</i>	Georgie Severin (GS) <i>Lead Analyst</i>	Ben Giblin (BG) <i>Lead Analyst</i>
Rainer Lischetzki (RL) <i>SECAS Consultant</i>		

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified, impact, Proposed Solution, and the Preliminary Assessment summary for [MP268 'Certificate rotation and expired Certificates'](#).

Issue

- The new manufacturing Certificates will have a 17-year Validity Period to align with the existing Organisation Certificate Authority Certificate which expires in 2041
- Smart Metering Key Infrastructure Policy Management Association (SMKI PMA) deems that Certificates with a Validity Period longer than ten years are an increased security risk
- There are implicit requirements for the Data Communications Company (DCC), Suppliers and Network Parties to replace revoked and expired Organisation Certificates

Proposed Solution

The Proposed Solution aims to address the security risks associated with using Organisation Certificates with extended Validity Periods in Devices installed after the 2024 manufacturing pack release.

The solution involves developing clear guidelines within the Smart Energy Code (SEC) mandating post-commissioning replacement of Organisation Certificates by the DCC. These guidelines will provide explicit instructions and timelines for replacing any Organisation Certificate which has a Validity Period longer than ten years or is revoked or expired. This is to ensure ongoing network security and compliance. Additionally, monitoring mechanisms will be established to ensure compliance with SEC guidelines and stakeholder collaboration will be key in communicating and enforcing the new guidelines effectively.

Preliminary Assessment Summary

- Total cost to implement MP268 'Certificate rotation and expired Certificates' stands at £10,000 - £160,000 which includes Design, Build and Pre-Integration Testing (PIT) costs
- Timescale of three months to implement

Working Group Discussion

SECAS (MS) provided an overview of the current arrangements, the issue, detail of the Proposed Solution and summary of the Preliminary Assessment.

Certificate replacement after Installation and Commission

A Working Group member (BT) questioned if Certificate replacement cannot take place what would happen. The DCC (BB) highlighted that the DCC are aware of the difficulties with Prepayment Interface Devices (PPMIDs) Certificate replacement, and to address this difficulty the DCC had opted to word the legal text with “all reasonable steps”. They stated that they will investigate internally as to what issues would present themselves if Certificate replacement does not take place. They highlighted when the legal text was being created it was reviewed by the Department for Energy Security and Net Zero (DESNZ).

Legal text

MS asked the Working Group if the draft legal text will effectively deliver the Proposed Solution. All Working Group members who responded agreed that the draft legal text delivers the Proposed Solution.

Impact Assessment

MS asked the Working Group if the DCC Full Impact Assessment (FIA) should be requested. All Working Group members who responded agreed that the FIA should be requested.

Next Steps

The following actions were recorded from the meeting.

- DCC to investigate what happens if Certificates are not replaced after Install and Commission (I&C)
- SECAS to issue the Refinement Consultation