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MP177 ‘Replacement CPA Evaluation Assurance and Certification Provider’

Modification Report

Version 0.4

21 February 2022



About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

Contents

1. Summary.....	3
2. Issue.....	3
3. Assessment of the proposal	5
Appendix 1: Progression timetable	5
Appendix 2: Glossary	6

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1. Summary

This proposal has been raised by Eric Taylor from SMETS Design Ltd.

The Data Communications Company (DCC) can only communicate with Devices that have been listed on the Central Products List (CPL). For a Device to be placed on the CPL, it needs to have achieved all relevant certification. The Commercial Product Assurance (CPA) Certificate scheme is one of the certifications and is run by the National Cyber Security Centre (NCSC).

The current CPA Certificate scheme causes delays, is costly and is a source of frustration for many Device Manufacturers.

Following the work of the Security Sub-Committee (SSC), and the SSC Commercial Product Assurance Issue Resolution Sub-group (SCIRS), it is now believed that the objectives of this modification can be achieved without the need for a modification to the Smart Energy Code.

Therefore, the Proposer has decided to withdraw the modification.

2. Issue

What are the current arrangements?

Central Products List

The DCC uses the CPL to manage the Devices it can communicate with. If a Device is not listed on the CPL, the DCC cannot add it to the Smart Metering Inventory (SMI) and therefore cannot communicate with it. Only once a Device has met the requirements set out in SEC Appendix Z 'CPL Requirements Document' can it be added to the CPL.

The CPL lists all Device Models that are either:

- Smart Metering Equipment Technical Specifications (SMETS) 2 Devices which have received all relevant Assurance Certificates; or
- SMETS1 Devices which have been notified by the DCC and have been included as entries on the SMETS1 Eligible Products Combination list.

Smart Metering Assurance Certificates

There are three types of Assurance Certificates which might be needed before a Device can be added to the CPL, each issued by a different Assurance Certification Body. The technical specifications of each product relevant to that Physical Device Type determines which Assurance Certificates are required to add the Device to the CPL. These are: Zigbee Alliance Certificates; Device Language Message Specification (DLMS) Certificates; and CPA Certificates.

The Assurance Certification Body for the CPA Certificate scheme is the NCSC.

The NCSC CPA Certificate scheme

Currently, the NCSC is the CPA Certificate scheme administrator and the author of the Security Characteristics for Smart Metering. The CPA Certificate scheme was set up to help companies

demonstrate that their products meet defined NCSC standards, known as CPA Security Characteristics. The scheme gives companies a way of having their Devices tested to show that the product meets the requirements of these Security Characteristics. The NCSC uses Assured Service Providers to conduct product testing and assessment, known as CPA Test Houses. The independent test laboratories assess the Device against the NCSC's standards. If the evaluation of a Smart Meter or recognised smart metering product is successful, it is then listed on the NCSC website and is issued with a certificate which is valid for six years.

The role of the Security Sub-Committee

The SSC works closely with the NCSC on matters of security for smart metering products. The SSC is responsible for the ongoing review of the CPA Certificate scheme and ensuring it meets the needs of Smart Energy Code (SEC) Parties. SEC Section G 'Security' defines the SSC responsibilities, and SEC Section G7.20 states:

The Security Sub-Committee shall:

- 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.*

What is the issue?

The CPA Certificate scheme was previously available to a wider range of industries, but the NCSC has now withdrawn this scheme across many industries, apart from Smart Metering which remains the sole user of the CPA scheme. Other SEC Parties have recognised that the scheme is not meeting the needs of Device Manufacturers and SEC Parties.

What is the impact this is having?

The current NCSC service causes unnecessary costs to SEC Parties and Device Manufacturers. These additional costs can prevent Device Manufacturers from securing investment for their products, which in turn restricts innovation.

Over several years the CPA Certificate scheme has contributed to delays in the mass rollout of Devices that would improve the consumer experience. This can lead to a lack of confidence in the Smart Metering Implementation Programme (SMIP).

Impact on consumers

New Devices that are designed to improve the consumers experience are taking longer than necessary to be able to be deployed. This is often a direct result of the delays within the CPA certification process.

3. Assessment of the proposal

Observations on the issue

Change Sub-Committee

The Change Sub-Committee (CSC) noted the proposal. A representative for Other SEC Parties mentioned that they had experienced the issue and agreed a solution needed to be found. They noted that the re-certification for Communications Hubs was due in 2022 and that this needed to be factored into the timelines of the work.

The CSC also noted that any recommendation to change current provisions would need to ensure there was adequate crossover with the existing provision to ensure that there was no gap in being able to Certify Devices.

A CSC member noted that the report states the Proposer is looking to replace the CPA scheme, whereas the SSC are looking to improve the current process. The issue is clear, however they were sceptical as to whether Industry would move away from a scheme led by NCSC without trying to improve the provision first. The CSC determined that this Draft Proposal should remain in development until the SSC has provided a recommendation that the scheme provider should be changed. The Proposer challenged this view and noted that SEC Parties who are the users of the scheme should have an alternative to an NCSC led scheme to choose between.

Security Sub-Committee

The SSC noted the new proposal and declared an interest in it. The SSC acknowledged the issue had been raised with it by multiple SEC Parties as well as the SEC Panel, and it was working with the Department for Business, Energy & Industrial Strategy (BEIS) and the NCSC to address this.

The SSC will continue its work to provide recommended improvements to scheme. The outcomes of this work will be accounted for by this modification.

Appendix 1: Progression timetable

This modification has been withdrawn.

Timetable	
Event/Action	Date
Draft Proposal raised	9 Jul 2021
Presented to CSC for initial comment	27 Jul 2021
Modification discussed with SSC	28 Jul 2021
Modification discussed with CSC	31 Aug 21
CSC converts Draft Proposal to Modification Proposal	28 Sep 2021
SECAS to develop solution with Proposer	Oct – Mar 2022
SSC to develop recommendation on CPA scheme changes	Oct – Mar 2022
Modification withdrawn	21 Feb 2022

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Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
BEIS	Department for Business, Energy & Industrial Strategy
CPA	Commercial Product Assurance
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
DLMS	Device Language Message Specification
NCSC	National Cyber Security Centre
SEC	Smart Energy Code
SECAS	Smart Energy Code Secretariat and Administrator
SMETS	Smart Metering Equipment Technical Specifications
SMIP	Smart Metering Implementation Plan
SSC	Security Sub-Committee
SCIRS	SSC Commercial Product Assurance Issue Resolution Sub-group