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MP183 ‘Post Commissioning Obligations Reporting’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP183 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	Yes	We consider this to be a beneficial change and will lead to greater accuracy in reporting and less time spent investigating devices which have the correct certificates installed. However, we would like to understand further what the proposed content of the weekly report will look like? Ideally, we would like to receive a real-life EON Next based sample report so we can view the format.	At the time of the consultation a sample report was unavailable, however SECAS has requested this from the DCC when it becomes available. The format should be largely the same as the existing reporting but with extra information.

Question 2: Do you agree that the legal text will deliver MP183?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	Yes	-	-

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	Yes	We request this change to be implemented as soon as possible. As the change is fast to implement by the SEC, low cost and thought to be fast to implement across industry, perhaps it could be delivered sooner than June 2023.	Implementation is currently targeted for the February 2023 SEC Release.

Question 4: Will there be any impact on your organisation to implement MP183?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	No	Minimal change to implement a new sharepoint issued report.	-

Question 5: Will your organisation incur any costs in implementing MP183?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	No	Minimal cost to implement a new sharepoint issued report.	-

Question 6: How long from the point of approval would your organisation need to implement MP183?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	1 month	-	-

Question 7: Do you believe that MP183 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	Yes	-	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP183 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	Yes	Reduced risk of asset replacement for the supplier due to a reduced risk that the PCO report contains invalid data.	-

Question 9: Noting the costs and benefits of this modification, do you believe MP183 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
EON	Large Supplier	Yes	-	-

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

Question 10			
Respondent	Category	Comments	SECAS Response
EON	Large Supplier	We have some questions: Where an SR6.17 was successful, but the subsequent SR6.15.2 failed to return a response, will the report indicate that a device certificate could be misaligned, or will it merely reflect a failed status for the KA or DS? Whilst the obligation is Post Commissioning for the installing supplier, it would be very beneficial for a separate report to help address the scenario where we gain a device where the device certificates are potentially misaligned? In this situation it is impossible to know if the reason for SR6.23 failure is due to poor WAN/HAN or device certificate misalignment.	The DCC investigated whether the reporting could be amended to differentiate between Service Requests 6.15.2 for digitalSignature and keyAgreement. However, to interrogate this level of Certificate data would require extensive system changes and so the Working Group agreed not to add to the scope of this modification. In the example scenario the User will see that the Service Request was not successfully executed. As the reporting covers the in-life Certificate health of a Device, a gaining Supplier will receive the reporting when it adopts the Device. This will show if there are unexpected Certificates present.