

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

MP195 ‘Security Sub-Committee guidance on Device Assurance’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP195 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
EDMI Europe Ltd	Other SEC Party	Yes	Manufacturers need assurance that the detailed guidance they are working to is ratified by industry	-
E.ON and E.ON Next	Large Supplier	Yes	This modification provides the security that SEC parties need when implementing the contents of the current guidance documents.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The inclusion of the additional clause in the SEC will confirm that this is the appropriate documentation that should be referenced when developing a working solution to triage and any other necessary action that is reliant on a clear understanding of the Security Characteristics of devices. The wording will also create the requirement that the SSC will maintain this document so it continues to be relevant.	-

Question 2: Do you agree that the legal text will deliver MP195?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Yes	We believe this will deliver the required solution	-
E.ON and E.ON Next	Large Supplier	Yes	-	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The addition of both definition and text in section G covers the new requirements of the SSC to provide and maintain this document.	-

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Yes	We believe this will deliver the required solution	-
E.ON and E.ON Next	Large Supplier	Yes	June 2022 would benefit all. Industry needs to have Use Case 4 written into the guidance document before the modification is approved, while the modification sets out the expectations to have it in the document before approval, industry would need a statement released from the NCSC (or via the SSC) that manufacturers can proceed with implementing the Use Case 4 functionality into their meters without risk if it is not in the document before approval. This is because with further delays, the number of assets that are being scrapped because of the lack of functionality will grow.	This modification is separate to the ongoing work on Use Case 004. It is expected that the Use Case 004 work shall be resolved in advance of this modification and that NCSC will provide appropriate advice to Test Labs.
Northern Powergrid Metering Limited	Other SEC Party	Yes	As there is a facility to carry out device triage for use cases excluding use case 004, the sooner this change is approved, the better.	-

Question 4: Does the proposed document title of ‘Device Security Assurance and Triage’ make it clear what the purpose of the documentation is?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Yes	We agree with the rationale documented in the proposal	-
E.ON and E.ON Next	Large Supplier	Yes	-	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	-	-

Question 5: Will there be any impact on your organisation to implement MP195?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	No	This change should reduce impact in the CPA process by providing greater definition of requirements for security impacting features	-
E.ON and E.ON Next	Large Supplier	Yes	Manufacturers can incorporate changes in line with the Device Security Assurance and Triage documents with confidence they can do so with the document written into the SEC. This delivery means we will be able to retain and reuse new devices through the delivery of triage capabilities, meaning less assets are scrapped because of the lack of functionality.	-
Northern Powergrid Metering Limited	Other SEC Party	No	-	-

Question 6: Will your organisation incur any costs in implementing MP195?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	No	This change should reduce impact in the CPA process by providing greater definition of requirements for security impacting features	-
E.ON and E.ON Next	Large Supplier	No costs	Although potentially there will be costs associated with Triage activities depending on what options there are available for Suppliers.	-
Northern Powergrid Metering Limited	Other SEC Party	No	-	-

Question 7: How long from the point of approval would your organisation need to implement MP195?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	None	The development of the document is independent of this change. EDM I have already aligned their development with the current content of the guidance document	-
E.ON and E.ON Next	Large Supplier	3 months	We will be reliant on the manufacturer implementing the guidance from the documents and submitting devices to us for testing and acceptance	This modification is a legal text change only. Manufacturers can work to the existing guidance as it stands.
Northern Powergrid Metering Limited	Other SEC Party	N/A	-	-

Question 8: Do you believe that MP195 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Yes	By providing clarity and consistency to manufacturers and better facilitating support for a secure triage option	-
E.ON and E.ON Next	Large Supplier	Yes	We agree with the proposer that this modification will support objectives (a) and (f)	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The inclusion of the legal text will provide clarity on device triage, which will lead to a more efficient provision and installation of smart metering equipment, which is in line with General SEC Objective A.	-

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP195 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Yes	Indirectly, reduced costs due to reduced waste	-
E.ON and E.ON Next	Large Supplier	No	Although reduced costs on suppliers through redundant assets and scrappage will mean this has a neutral impact on consumers bills.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The inclusion of the legal text will provide clarity on device triage, and this will help reduce the cost of the SMIP to the consumer.	-

Question 10: Noting the costs and benefits of this modification, do you believe MP195 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Yes	We believe this change is necessary to support manufacturers in the implementation of triage functionality	-
E.ON and E.ON Next	Large Supplier	Yes	-	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	-	-

Question 11: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
EDMI Europe Ltd	Other SEC Party	-	-
E.ON and E.ON Next	Large Supplier	Reiteration of our point in Q3 that while the modification sets out the expectations to have it in the document before approval, industry would need a statement released from the NCSC (or via the SSC) that manufacturers can proceed with implementing the Use Case 4 functionality into their meters without risk if it is not in the document before approval. This is because with further delays, the number of assets that are being scrapped because of the lack of functionality will grow.	This modification is separate to the ongoing work on Use Case 004. It is expected that the Use Case 004 work shall be resolved in advance of this modification and that NCSC will provide appropriate advice to Test Labs.
Northern Powergrid Metering Limited	Other SEC Party	-	-