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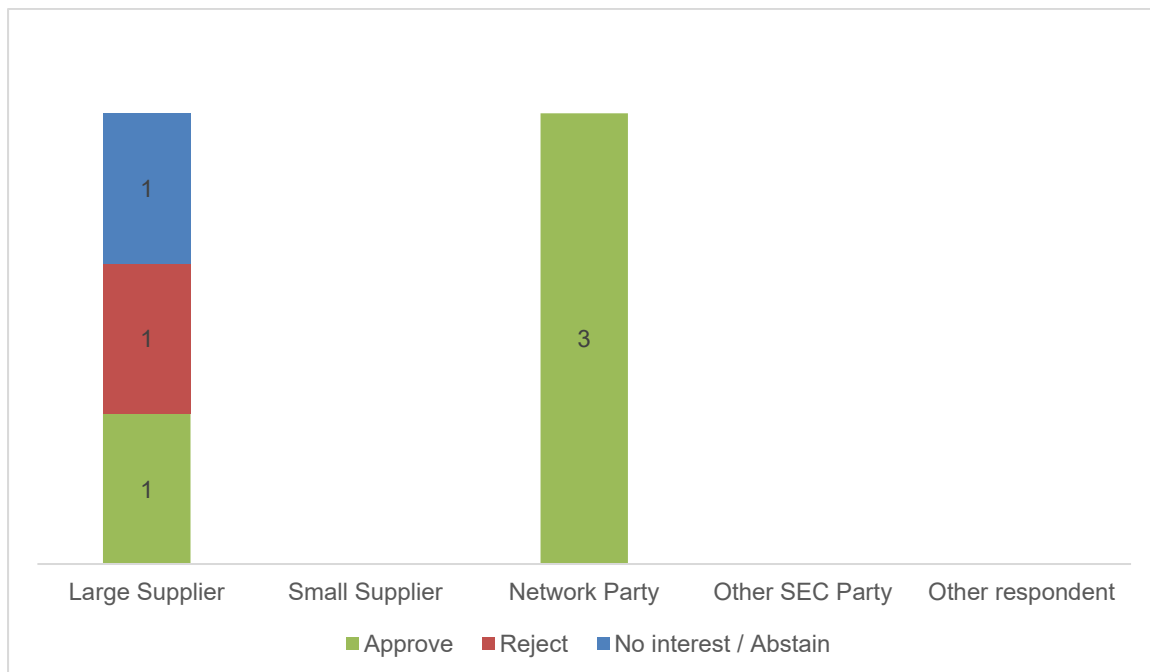
MP268 ‘Certificate rotation and expired Certificates’

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP268 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP268 should be approved or rejected?

Question 1			
Respondent	Category	Response	Rationale
ENWL	Network Party	Approve	This approach is sensible and targeted for security assurance and is an appropriate and proportionate
National Grid Electricity Distribution	Network Party	Approve	-
UK Power Networks	Network Party	Approve	We believe that MP268 would better facilitate provisions of the General SEC Objectives, in particular: Section C1, Paragraph (f): To ensure the protection of Data and the security of Data and Systems in the operation of this Code Implementing MP268 will help improve the safety and reliability of devices on the smart metering network by ensuring Organisation Certificates are updated to reduce the risk of unauthorised access. MP268 formalises the requirement for DCC to replace Organisation Certificates within specified timescales enabling DCC to develop an automated process.
Octopus Energy Ltd	Large Supplier	Reject	The cost of this modification is too high for something which is already implicit within SEC. Whilst we appreciate the necessity to ensure Security is maintained appropriately throughout the extended life of device certificates, we do not believe this costly Sec Modification is required to meet this.
EDF	Large Supplier	Approve	This change is a prudent approach to ensuring both security and compliance.
British Gas	Large Supplier	-	We think MP268 is required, but that it needs more work to understand timing requirements and whether anything could be done to reduce costs.

Question 2: In the latter stages of MP268, a question has arisen as to whether this change is already implicit in the SEC, and whether this needs to be explicit in the SEC. Do you believe this change should remain implicit or be made explicit in the SEC?

Question 2			
Respondent	Category	Response	Rationale
ENWL	Network Party	Explicit	Industry parties plan and spend resources against 'explicit' codified requirements. Implicit requirements are open to interpretation by Code Mangers, code parties, central bodies, code panels and their sub committees and any third party auditors. Making this requirement explicit would remove any unnecessary ambiguity between stakeholders; and would be good code practice for requirements which are subject to audit and performance assurance scrutiny.
National Grid Electricity Distribution	Network Party	Explicit	It will be vital that this is incorporated into SEC Governance as an 'explicit' obligation – we cannot be held to account (nor other parties) against something which is only implied.
UK Power Networks	Network Party	Explicit	The DCC obligations to manage and update Organisation Certificates is currently implicit within the SEC, with MP268 updating the requirements to make explicit in the SEC. UK Power Networks agrees with the changes to make the requirement explicit, however we propose that a thorough review is conducted to identify if there are any other implicit DCC activities in the SEC that would benefit in being made explicit.
Octopus Energy Ltd	Large Supplier	Implicit	If the cost to make this Explicit in the SEC is £289,000 plus £169,800 regression testing (£458,000 total) then this does not seem a worthwhile change to be made. As has been raised by SSC and TABSC it is not felt to be required and therefore is an unnecessary cost to the industry. Increased industry costs are ultimately borne by the end consumer and therefore we do not think this is a worthwhile use of the money when the security obligation is already covered in the SEC.
EDF	Large Supplier	Explicit	The SEC is a legal document and therefore should be explicit on security impacting obligations.

Question 2			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Currently implicit – would help to make it explicit	We think the requirement <u>is</u> already implicit in the SEC, but it would help avoid confusion of it could be made explicit in the SEC wording.

Question 3: Please provide any further comments you may have.

Question 3		
Respondent	Category	Comments
ENWL	Network Party	n/a
National Grid Electricity Distribution	Network Party	-
UK Power Networks	Network Party	None
Octopus Energy Ltd	Large Supplier	A cost of close to Half a million Pounds to effectively establish guidelines seems unreasonable. Whilst we accept the necessity to maintain Smart Meter Security we do not believe this requires such excessive costs when the SEC already implies
EDF	Large Supplier	-
British Gas	Large Supplier	The current cost estimates seem high, and we think it is important to understand if these could be reduced – for example by incorporating the change into the new DSP, or introducing it in a later release with one or more other change. We are not clear on when any changes to the DCC would actually become required. We don't think MP268 is necessarily urgent, but we do think it needs addressing at some point, from a security point of view, especially with the increased threat posed by quantum etc in the future.