This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

# MP268 'Certificate rotation and expired Certificates'

# December 2024 Working Group – meeting summary

## Attendees

| SEC Party Category | Working Group Members | Representing |
|---|---|---|
| Large Suppliers | Julie Brown (JB) | British Gas |
| | Emma Johnson (EJ) | British Gas |
| | Amy Cox (AC) | EDF |
| | Alex Hurcombe (AH) | EDF |
| | Francesca Scott (FS) | EDF |
| | Sharon Armitage (SA) | E.ON Next |
| | Ralph Baxter (RB) | Octopus Energy |
| | Joey Manners (JM) | Octopus Energy |
| | Emslie Law (EL) | OVO |
| | Mahfuzar Rahman (MR) | Scottish Power |
| | Kevin Clark (KC) | Utilita |
| Small Suppliers | Steve Blackler (SB) | E Org |
| Other SEC Parties | Patricia Massey (PM) | BEAMA |
| | Rob Heath (RH) | Calisen |
| | Daniel Davies (DD) | ESG Global |
| | Michael Snowdon (MS) | Secure Meters |
| | James Murphy (JMu) | Stark |
| | Nik Wills (NW) | Stark |
| Network Parties | Kirsty Maddock (KM) | National Grid |
| | Jamie Lowe (JL) | Northern Power Grid |
| | Matthew Alexander (MA) | SSEN |

| Other Participants | | |
|---|---|---|
| **DCC** | | |
| Bradley Baker (BB)<br>*Proposer* | David Walsh (DW) | Stuart Drinan (SD) |
| **Ofgem** | | |
| Cristina Ullastre (CU) | | |
| **SECAS** | | |
| Simon Grimwood (SG)<br>*Working Group Chair* | Abi Obadan (AO)<br>*Meeting Secretary* | Elizabeth Woods (EW)<br>*Lead Analyst* |

| Other Participants | | |
|---|---|---|
| Alison Beard (AB) | Georgiana Severin (GSe) | Marc Rhodes (MRh) |
| Sophia Master (SM) | Rainer Lischetzki (RL) | |

## Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue, impact, Proposed Solution and the Impact Assessment summary.

### 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

- Clear guidelines within the SEC mandating Post-Commissioning replacement of Organisation Certificates by the DCC.
- 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.
- Automatic Organisation Certificate replacement, including backlog
- Additional reporting will be part of the existing monthly Post Commissioning Obligations
- Will exclude:
    - Prepayment Interface Devices (PPMID) will be excluded from automatic ACB Organisation Certificate replacement due to known limitations.
    - Many legacy firmware versions of PPMIDs do not support Certificate rotation. In addition, there are a large number of PPMIDs not supported by SECMP0007.

### Impact Assessment Summary

The overall cost for the implementation of MP268 is £289,000.

- £204,500 in Design, Build & PIT
- £84,500 in Implementation, including integration testing and deployment

Implementation

- 9 months to complete
- Targeting the November 2025 SEC Release
- Will be included into the new DSP

## Working Group Discussion

SECAS (EW) provided an overview of the issue, Proposed Solution, DCC Impact Assessment and feedback gained to date.

A Working Group member (MR) queried if the Proposed Solution would target the Supplier Anchor Slot or replacing an expired ACB Certificates. They also queried if this would happen in the Install and Commission (I&C) phase. The DCC (SD) confirmed that the Proposed Solution is targeting the TSOC and ACB Anchor Slots, and it can replace expired ACB Certificates, however the main goal is to prioritise expired, expiring or revoked Certificates. They added that the I&C will have an opportunity to be completed before the automatic rotation kicks in.

The DCC (DW) noted there is no UIT recommended for MP268, however the six weeks of testing costs are taking into consideration and ensuring UIT testing facilities are in place. A Working Group member (MR) queried if the costs would be less if the UIT period is reduced and where is the six weeks derived from. The DCC (DW) noted the quoted length of UIT is derived from previous SEC Release related testing and for MP268 it could be less than the six weeks, however this would be ultimately determined by the Testing Advisory Group (TAG).

## Next Steps

The following actions were recorded from the meeting.

- SECAS will present the Impact Assessment to TABASC, SSC, SMKI PMA and TAG for feedback; and
- SECAS to request CSC to progress to Report Phase.
- SECAS to issue Modification Report Consultation.