

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; March 2024 Working Group – meeting summary

Attendees

Attendee	Organisation
Kev Duddy (KD)	SECAS
Mohammedanwar Sumro (MS)	SECAS
Rachel Black (RB)	SECAS
Georgiana Severin (GS)	SECAS
Elizabeth Woods (EW)	SECAS
William Marshall (WM)	SECAS
Ralph Baxter (RB)	SECAS
Baker, Bradley (BB)	DCC
David Walsh (DW)	DCC
Gary Stuart (GS2)	DCC
Rosie Davies (RD)	DCC
Julie Brown (JB)	British Gas
Rochelle Harrison (RH)	British Gas
Beth Tatton (BT)	Calisen
Carl Whitehouse (CW)	Calisen
Alex Hurcombe (AH)	EDF
Joey Manners (JM)	Octopus
Mahfuzar Rahman (MR)	Scottish Power
Emslie Law (EL)	SSE
Shuba Khatun (SK)	SSE
George MacGregor (GM)	Utilita
Kevin Clark (KC)	Utilita

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified, impact, potential solution, and the proposed business requirements.

Issue

- The new manufacturing pack will contain Organisation Certificates with Extended Validity Periods

- Increase security risk due to Devices containing Organisation Certificates with extended lifetimes.
- There is no requirement in the Smart Energy Code (SEC) for post-commissioning replacement of Organisation Certificates
- Devices using the current manufacturing pack Certificates will need replacement post 2026 due to expiry requiring installation of new Certificates after Install and Commission (I&C)

Potential Solution

- Introduction of an obligation on the Data Communication Company (DCC) to allow post commissioning replacement of Organisation Certificate information.

Business requirements

SECAS (MS) provided an overview of the business requirements. SECAS (KD) confirmed that business requirements 1 – 3 are the responsibility of the DCC as well as Service Providers.

Business Requirements		
Ref	Requirement	Responsible for delivery
1	The “transitionalCoS” Organisation Certificates with a Validity Period that exceeds ten years will be rotated within 21 days following Installation and Commission	DCC
2	The “wanProvider” Organisation Certificates with a Validity Period that exceeds ten years will be rotated within 21 days following I&C	DCC
3	The “accessControlBroker” Organisation Certificates with a Validity Period that exceeds ten years will be rotated within 21 days following I&C	DCC
4	In the case that a Certificate has been expired or been revoked, the Subscriber for the relevant Certificate will change the Certificate as soon as possible	Suppliers Network Parties DCC
5	Reporting on the number of Commissioned Devices with Organisation Certificates that have a Validity Period that exceeds 10 years will be provided	DCC

Working Group Discussion

SECAS (MS) provided an overview of the modification and noted the links with [MP261 'Extending the Organisation Certificate Validity Period'](#) which was implemented in February 2024.

Avoiding impacts to Installation & Commissioning

One Working Group Member (JB) noted that the Access Control Broker (ACB) Certificate and Wireless Area Network (WAN) provider Certificate should not be replaced until all Install and

commission (I&C) activities had been completed. They noted that when the Data Service Provider (DSP) began rotating Certificates in bulk any clashes with I&C activity caused multiple issues with communicating with the Device. They recommended any day within the 21 days is acceptable as long as all I&C activities had been completed. Another Working Group member (MR) informed that this scenario applies for decommissioning Devices too. The DCC (BB) advised that the requirements state 21 days to allow the initial seven-day period of I&C to complete. They expressed they were open to rewording the requirement to be more explicit.

Impacts on DNO Certificates

A Working Group member (SK) queried whether the Validity Period will have an impact on Electricity Network Party Certificates. SECAS (KD) advised that the first three business requirements will not as they are DCC Certificates. However, business requirement four may impact the DNO if their Certificate becomes expired or has been revoked.

Working Group members agreed that the modification is suitable to proceed to request for the Preliminary Assessment. Working Group members agreed that the solution will resolve the issue.

Next Steps

The following actions were recorded from the meeting:

- SECAS to present the modification to relevant Sub-Committees (SSC, SMKI PMA & TABASC); and
- SECAS to request the Preliminary Assessment