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MP268 ‘Certificate rotation and expired Certificates’

Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

SECAS received six responses to the Modification Report Consultation. Four respondents believed that the modification should be approved and for the change to be explicit in the SEC. One respondent believed that the modification should be rejected and that this change is already implicit in the SEC. One respondent was undecided. One respondent considered the modification better facilitated SEC Objectives (f)¹.

¹ ensure the protection of Data and the security of Data and Systems in the operation of this Code.

Modification Report Consultation responses

Summary of responses

Approval

Four respondents (three Network Parties and one Large Supplier) agreed that MP268 should be approved, with one respondent (Network Party) noting that it would better facilitate SEC Objective (f) and added that 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.

One respondent (Network Party) stating that the approach is sensible and targeted for security assurance and is an appropriate and proportionate. Another respondent (Network Party) believed that MP268 formalises the requirement for the Data Communications Company (DCC) to replace Organisation Certificates within specified timescales enabling the DCC to develop an automated process. Another respondent (Large Supplier) noted that this change is a prudent approach to ensuring both security and compliance.

Rejection

One respondent (Large Supplier) cited that the cost to effectively establish guidelines seemed unreasonable for something which is already implicit within the SEC. They added that they appreciate the necessity to ensure Security is maintained appropriately throughout the extended life of Device Certificates, however they do not believe this costly SEC Modification is required to meet this.

Undecided

One respondent (Large Supplier) noted that they believe the modification is required; however needed more work to understand the timing and requirements, including whether any cost reductions can be achieved. They added that they did not believe MP268 is an urgent modification, but noted it needs to be addressed from a security point of view, especially with the increased threat posed by quantum computing in the future.

Explicit

One respondent (Network Party) noted that industry Parties' plan and spend resources against 'explicit' codified requirements, therefore any 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.

Another respondent (Network Party) noted it will be vital that this is incorporated into SEC Governance as an 'explicit' obligation, as they (or other Parties) cannot be held to account against something which is only implied.

Another respondent (Network Party) agreed with the changes to make the requirement explicit, however they proposed 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.

Another respondent (Large Supplier) noted that the SEC is a legal document and therefore should be explicit on security impacting obligations.

Another respondent (Large Supplier) agreed making the requirements explicit would help avoid confusion.

Implicit

One respondent (Large Supplier) noted that the large cost to make this explicit in the SEC does not seem a worthwhile change to be made. They added that discussions at Security Sub-Committee (SSC) and the Technical Architecture and Business Architecture Sub-Committee (TABASC) showed that members believed that MP268 was not required and therefore is an unnecessary cost to the industry. They concluded by stating that increased industry costs are ultimately borne by the end consumer, and therefore they did not believe this was a worthwhile use of the money when the security obligation is already covered in the SEC.

Additional discussions

During the Modification Report Consultation, SECAS, the Department for Energy Security and Net Zero (DESNZ), the TABASC Chair, the SSC Chair and the DCC discussed post-commissioning replacement of Organisation Certificate information by the DCC, and where it was possible for the DCC to provide alternative reduced cost solution. It was decided to remove the DCC Total Systems impacting portions from MP268 and go ahead as a text-only change to the SEC, with some changes to the legal text needed to incorporate the new direction. The result of this would be for MP268 to be sent back to Change Sub-Committee for the Solution changes to be agreed before returning to Change Board for the final vote.