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SSC Guidance on applying for approval of Trial Devices for Field Trials without CPA Certification (SEC Section F2.18)

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1. Change Record

Date	Author	Version	Change Reference
23/02/2023	SECCo	1.0	Approved following SSC meeting on 22 February 2023
28/06/2023	SECCo	1.1	Updated to include a template for an application for a Trial Device Certificate and re-classification as 'CLEAR'.
20/02/2004	SECCo	1.2	Updated to replace the template for an application for Trial Device Approval.

SSC Guidance on applying for Approval of Trial Devices for Field Trials without CPA Certification

Purpose

This SSC Guidance document outlines the SSC process to support applications from Manufacturers for SMETS2+ Device Models to be added to the Central Products List (CPL), on a limited trial basis, without a CPA Certificate needing to be issued.

If approved by the Security Sub-Committee, the relevant SMETS2+ Device Model will be known as a "Trial Device Model" for the duration set out in the approval (the "Trial Device Approval"). The Security Sub-Committee shall have sole discretion in deciding whether to grant a Trial Device Approval.

The relevant SEC regulations are set out in SEC Section F2.18 to F2.32. The SSC has set out a number of principles as conditions to be applied and an outline process to support the SEC requirements.

Background

CPA Certification provides a minimum level of security assurance for all Parties that Devices with the capability to affect energy supply meet a set of Security Requirements set out in the CPA Security Characteristics (SCs) which mitigate security risks.

Trial Devices connected to the live DCC systems without CPA Certification may therefore present some security risks that need to be assessed and mitigated. The SSC therefore requires assurance that good industry practice has been followed in the development of the Devices and may place a number of conditions on the deployment to mitigate any security risks.

Security Principles for Trial Devices

The SSC agreed the following security principles should apply to Trial Devices as a condition of approval:

- The SSC will require assurance that consumers will be fully informed about the purpose and length of the Trial in advance and must consent to the Trial before Trial Devices are installed;
- All proposed Trials will need a supporting Minimum Viable Product (MVP) guideline and a Use Case with business rationale i.e. what the Trial is trying to achieve;
- All proposed Trials will need to explain the participants in the Trial and their role e.g. the Manufacturers and Suppliers and any other parties involved;
- All proposed Trials will need to explain the technical and security architecture of a Trial Device and its interaction with existing technical and security architecture or any changes to an existing Device that has been CPA Certified;

- All proposed Trials will require a risk assessment to be provided to and reviewed by the SSC;
- All Trial Devices are expected to have been previously tested (with evidence provided) with DCC systems prior to submission of the MVP, Use Case and business rationale. This is to ensure that there is no risk to the DCC systems and other DCC Users. If a Trial Device has not been tested against the DCC systems e.g. using 'DCC in a Box' or equivalent, then the rationale and risk assessment must be provided;
- All Trials must be time limited with limits placed on Device volumes and proposed volumes and Trial lengths approved by the SSC;
- Trials must be about proving technology, business rationale or consumer experience and not used as a shortcut testing route to live;
- The DCC will provide regular reporting on Devices in Trials to the SSC;
- The SSC will track the number of Trials and Trial Devices and assess the aggregated risk at any point in time;
- In the event that a Change of Supplier occurs during a Trial, the SSC will notify the new Supplier to ensure that any security risks are communicated;
- Trial Devices will either be required to be removed at the end of the Trial, given an extension to remain on the CPL for a defined period or removed from the CPL until CPA Certification has been achieved;
- The SSC may request advice from an accredited CPA Test Laboratory and / or NCSC may be requested to provide risk advice to the SSC;
- The SSC will ultimately decide whether the security risk is acceptable for each Trial;
- Trial Devices may be placed on the CPL under limited circumstances for the duration of the Trial but will require CPA certification before wider deployment is permitted;

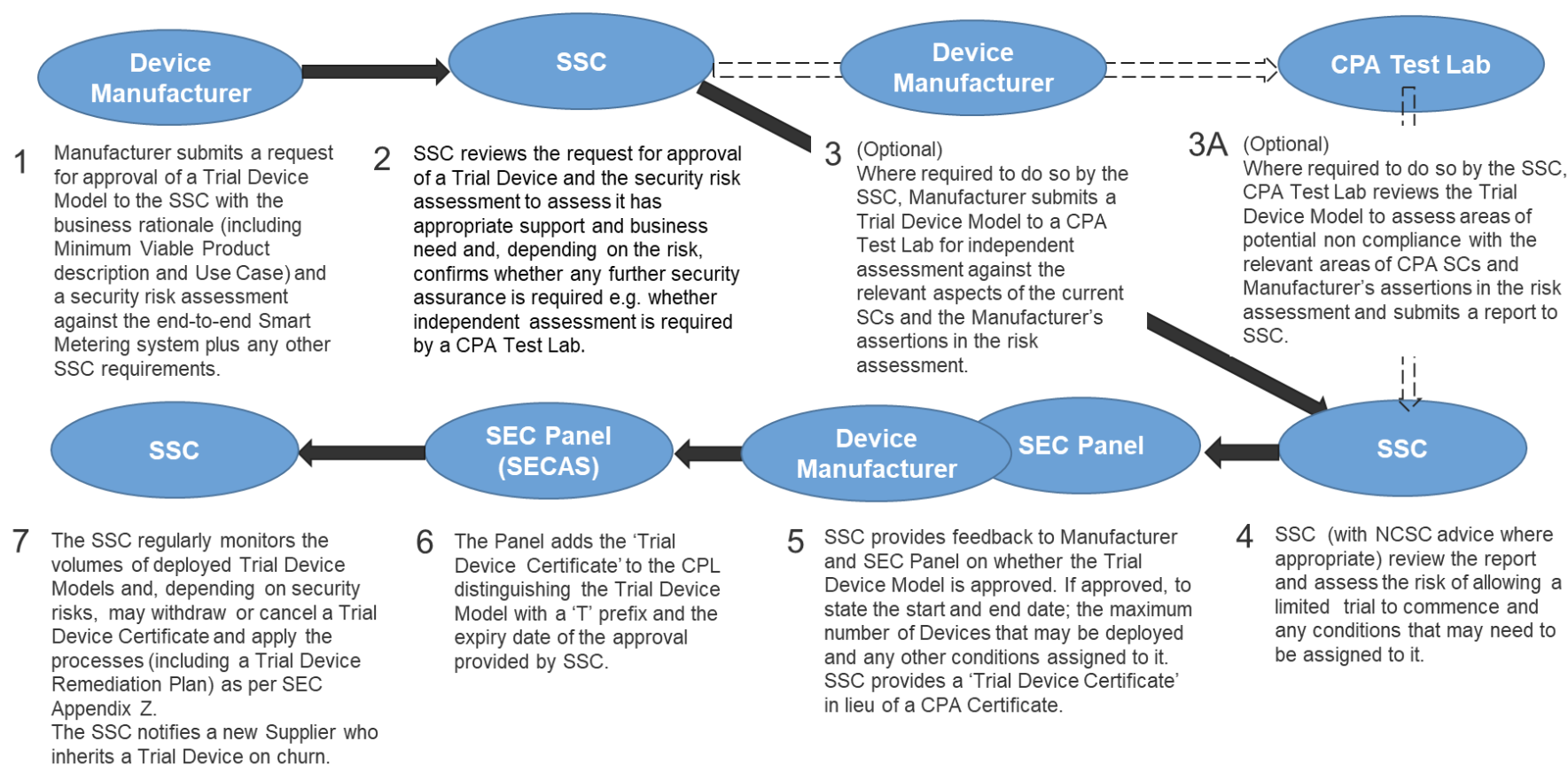
Process to obtain Trial Device Approval from the SSC

The SSC has agreed a process to support field trials without the need for CPA Certification in limited volumes and for limited periods set out in Annex 1. A template of a Trial Device Certificate has been provided at Annex 2.

Applicants for Trial Device Approval should contact SECAS (ssc@gemserv.com) using the template provided at Annex 3.

Annex 1: Process for SSC Review and Approval of Trial Devices

(Aligned with the requirements of SEC Section F2.18 et seq)



Annex 2: Trial Device Certificate Template



Trial Device Certificate

This is to certify that
[Name of Manufacturer]
[Name of Trial Device Model]
[Identifier code of Trial Device Model]
has been awarded 'Trial Device Approval'
by the SEC Security Sub-Committee
in line with SEC Section F2.25

This certificate award is in lieu of the CPA Certificate that would ordinarily be issued by NCSC

Authorised at SSC Meeting [insert number and date]	DATE AWARDED [Insert date] DATE EXPIRES [Insert date]
Conditions that apply to this certificate: [Insert as appropriate]	

Managed by



Annex 3: Template Application for a Trial Device Certificate

Note: This template is classified as 'Clear' until it is completed when it becomes 'Amber-Strict' as below

This document is classified as **Amber-Strict**. Limited disclosure and restricted to SSC Members and those who have a need to know in order to provide advice or take action to provide assurance of security risks and to protect and prevent harm.

Smart Metering: Application for a Trial Device Certificate

This template aims to assist applications for a Trial Device Certificate by setting out the information that the SSC will need to consider in reaching a decision on whether to issue a Trial Device Certificate in line with SEC Sections F2.18 to F2.32. The information you provide within this form will be made available to the SSC.

1.	Name of manufacturer:	
2.	Contact name & e-mail of individual submitting form:	Contact Telephone number:
3.	General background to the proposed Trial (e.g. is it part of a DESNZ or other pilot scheme):	
4.	Business Rationale (what the Trial is trying to achieve):	
5.	Device Type proposed for Trial: e.g., ESME / GSME / SAPC / HCALCS / Other	
6.	Device Model Name: In the Data Group 'Device_Model' the 'CPL – New Entry' tab lists five Data Attributes. Please list these below and then provide a concatenated Device Model:	
7.	manufacturer_identifier	
8.	model_identifier	
9.	hardware_version.version	
10.	hardware_version.revision	
11.	firmware_version	

12.	Concatonated version: The information in rows 7 to 11 can be concatenated together e.g. “12:67 34:67 01 01” with or without the colons; the “ ” could be replaced by “_”.	
13.	Device Derivation e.g. Derived from previous CPA Certified Device Model, version, CPL entry / completely new design.	
14.	SMETS / GBCS alignment e.g., SMETS 2 / GBCS v4.1	
15.	‘ZSE_Certificate’: (if appropriate) identification_number ZSE_version	
16.	DLMS_Certificate’ (if appropriate) identification_number DLMS_version	
17.	Explain the proposed volume of Devices to be used in the Trial and the proposed period of the Trial:	
18.	Description of the Minimum Viable Product (what is the minimum functionality to achieve the Trial results):	
19.	Explain the technical and security architecture: [Note: separate diagrams or technical documents can be provided]	
20.	Provide a separate risk assessment to highlight any CPA security requirements that are not included together with likelihood and business impact: [Note SSC can help to provide latest likelihood and smart metering business impact levels (SMBILS) in use.]	

21.	Confirm if the intention is for the Device to be either be removed at the end of the Trial or, subject to CPA Certification, to be upgraded to a CPA Certified version subject to SSC agreement:
22.	Confirm that consumers will be informed about the purpose and length of the Trial and provide consent:
23.	Confirm the arrangements for consumer changes during the course of the Trial e.g. change of tenancy / address and returns policy for Trial Devices:
24.	Confirm that the proposed Trial Device has been tested with DCC Systems and provide testing evidence: [Note a separate document can be provided with details of any defects and severity and remediation]
25.	Confirm if the intention is for the Device to be either be removed at the end of the Trial or, subject to CPA Certification, to be upgraded to a CPA Certified version subject to SSC agreement:
26.	Any additional information: