SEC
Smart Energy Code

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

Smart Energy Code

DP177

‘Replacement CPA Evaluation Assurance and Certification Provider’

Modification Report

Version 0.1

9 July 2021

Corporate member of Plain English Campaign
Committed to clearer communication
592

About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

Contents

1. Summary 3
2. Issue 3

Appendix 1: Progression timetable 5

Appendix 2: Glossary 5

Contact

If you have any questions on this modification, please contact:

Kev Duddy

020 3574 8863

kev.duddy@gemserv.com

1. Summary

This proposal has been raised by Eric Taylor from SMETS Design Ltd.

The Data Communications Company (DCC) can only communicate with Devices that have been listed on the Central Products List (CPL). For a Device to be placed on the CPL, it needs to have achieved all relevant certification. The Commercial Product Assurance (CPA) Certificate scheme is one of the certifications and is run by the National Cyber Security Centre (NCSC).

The current CPA Certificate scheme causes delays, is costly and a is source of frustration for many Device Manufacturers.

2. Issue

What are the current arrangements?

Central Products List

The DCC uses the CPL to manage the Devices it can communicate with. If a Device is not listed on the CPL, the DCC cannot add it to the Smart Metering Inventory (SMI) and therefore cannot communicate with it. Only once a Device has met the requirements set out in SEC Appendix Z 'CPL Requirements Document' can it be added to the CPL.

The CPL lists all Device Models that are either:

- Smart Metering Equipment Technical Specifications (SMETS) 2 Devices which have received all relevant Assurance Certificates; or
- SMETS1 Devices which have been notified by the DCC and have been included as entries on the SMETS1 Eligible Products Combination list.

Smart Metering Assurance Certificates

There are three types of Assurance Certificates which might be needed before a Device can be added to the CPL, each issued by a different Assurance Certification Body. The technical specifications of each product relevant to that Physical Device Type determines which Assurance Certificates are required to add the Device to the CPL. These are: Zigbee Alliance Certificates; Device Language Message Specification (DLMS) Certificates; and CPA Certificates.

The Assurance Certification Body for the CPA Certificate scheme is the National Cyber Security Centre (NCSC).

The NCSC CPA Certificate scheme

Currently, the NCSC is the CPA Certificate scheme administrators and the authors of the Security Characteristics (SC) for Smart Metering. The CPA Certificate scheme was set up to help companies demonstrate that their products meet defined NCSC standards, known as CPA SCs. The scheme gives companies a way of having their Devices tested to show that the product meets the

requirements of the SC. The NCSC uses Assured Service Providers to conduct product testing and assessment, known as CPA Test Houses.

The NCSC sets the standards which the independent test laboratories use to assess the Device. These standards are published on the NCSC website.

If the evaluation of a Smart Meter or recognised smart metering product is successful, it is listed on the NCSC website and it is issued with a certificate which is valid for six years.

The role of the Security Sub-Committee

The Security Sub-Committee (SSC) works closely with the NCSC on matters of security for smart metering products. The SSC is responsible for the ongoing review of the CPA Certificate scheme and ensuring it meets the needs of Smart Energy Code (SEC) Parties. The SSC responsibilities are defined in SEC Section G 'Security', and SEC Section G7.20 states:

The Security Sub-Committee shall:

d) keep under review the NCSC CPA Certificate scheme in order to assess whether it continues to be fit for purpose in so far as it is relevant to the Code, and suggest modifications to the scheme provider to the extent to which it considers them appropriate.

What is the issue?

The CPA Certificate scheme was previously available to a wider range of industries, but the NCSC has now withdrawn this scheme, apart from Smart Metering which remains the sole user of the CPA scheme. Other SEC Parties have recognised that the scheme is not meeting the needs of Device Manufacturers and SEC Parties.

What is the impact this is having?

The current NCSC service causes unnecessary costs to SEC Parties and Device Manufacturers. These additional costs can prevent Device Manufacturers from securing investment for their products, which in turn restricts innovation.

Over several years the CPA Certificate scheme has contributed to delays in the mass rollout of Devices that would improve the consumer experience. This can lead to a lack of confidence in the Smart Metering Implementation Programme (SMIP).

Impact on consumers

New Devices that are designed to improve the consumers experience are taking longer than necessary to be able to be deployed. This is often a direct result of the delays within the CPA certification process.

Appendix 1: Progression timetable

This proposal was raised on 9 July 2021. SECAS will present this Draft Proposal to the Change Sub-Committee (CSC) on 27 July 2021 for initial comment, before presenting it to the other relevant Sub-Committees.

Timetable	
Event/Action	**Date**
Draft Proposal raised	9 Jul 2021
Presented to CSC for initial comment	27 Jul 2021
Modification discussed with Sub-Committees	Early Aug 2021

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
BEIS	Department for Business, Energy & Industrial Strategy
CPA	Commercial Product Assurance
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
NCSC	National Cyber Security Centre
SC	Security Characteristics
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specifications
SMIP	Smart Metering Implementation Plan
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee