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MP172 ‘Reduced CPA & CPL requirements for innovation and Device field trials’

October 2021 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Khaleda Hussain	SECAS
Bradley Baker	SECAS
Joey Manners	SECAS
Anik Abdullah	SECAS
Tim Newton	SECAS
Sasha Townsend	DCC
David Walsh	DCC
Sarah-Jane Russell	British Gas
Lucy Hogarth	EDMI
Julie Geary	E.ON
Alex Hurcombe	EDF Energy
Daniel Davis	ESG Global
Matt Hallchurch	Honeywell
Alastair Cobb	Landis + Gyr
Ralph Baxter	Octopus Energy
Ashton Pearson-Child	Outfox the Market
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Eric Taylor	SMETS Design Ltd
Matthew Alexander	SSEN
Robert Johnstone	Utilita
Gemma Slaney	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified and asked for comments.

Issue

- Commercial Product Assurance (CPA) certificates are a requirement for Devices to be added to the CPL (Central Products List)
- CPA requirements are based on mass rollout of Devices
- Products have to be fully developed to be rolled out to the field
- There is no leeway to support limited number trials on the live Data Communications Company (DCC) network
- The DCC Production Proving Environment is not representative of real world.

Impacts to Device Manufacturers

- Additional initial costs to develop products to a higher threshold
- Potential for secondary costs to fix faults that could have been identified
- Additional risk for investors
- Delays bringing innovative products to market

Impacts to Consumers

- Slower innovation within smart metering
- Sub-optimal consumer experience of Devices
- Inconvenience of potential multiple site visits

Business Requirements

1. Able to place limited numbers of trial Devices on the DCC Network without them going through a CPA certification
2. CPL format/detail must be unaffected
3. Minimum Viable Product guidelines clearly defined
4. Device Types to be limited to Type 1 and Type 2
5. Trial period and Device volumes must be defined
6. DCC to be able to report to the Security Sub-Committee (SSC) on the number of trial Devices on the DCC System
7. Devices to be removed upon end of trial period, or receive firmware update to CPA compliant firmware
8. Supplier churn must not prevent removal of Device/upgrade

Working Group Discussion

SECAS (AB) provided an overview of the meeting objectives, the issue and business requirements.

The Proposer (ET) clarified that there would remain a significant level of security in place, even though the proposal was to add these Devices to the DCC live network. He stated that the Department for Business, Energy and Industrial Strategy (BEIS) have done these types of trials previously. A Working Group member (AC) asked if there would be a limited timescale on the trials. The Proposer (ET) noted that the BEIS trials had been for 12 months. He agreed that the SSC could ensure there was a control over these Devices by granting a limited trial period. The DCC could then 'suspend' the Devices from its network once the trial had ended or alternatively, the SSC could require that the Devices have the appropriate CPA requirements applied to ensure they are compliant to remain on the network. One Working Group member asked what the situation would be if the Supplier failed during the trial period. The Proposer (ET) stated that this would always be a concern for BEIS and anyone else.

The Proposer (ET) stated that a company that produces a CPL compliant product are considered as CPL compliant or capable of making CPL compliant Devices. A Working Group member (EH) disagreed saying that a company is not approved by CPL as they can produce one Device that is compliant but another that they produce may not be.

The Proposer suggested the Devices would have to go through testing that is currently available via the DCC (GB Companion Specification (GBCS) for Industry (GFI), User Integration Testing (UIT), production proving etc.) and that the SSC would need to see these test results regarding the following:

- GB Companion Specification (GBCS) compliance;
- Zigbee compliance;
- if the architecture has been previously used; and
- rationale as to why it should be considered safe.

Based on this information the SSC could decide to approve the Device for a trial. The Proposer further said that the trial would be for a small number of Devices adding that one never knows what users (consumers) are going to do with the Devices and there was 'always a surprise' in the way Devices were treated by consumers. He suggested approximately 100 live Devices be included in any trial. SECAS (AA) summarised that he believed these Devices would have around 70% of the security wrapper that is currently expected.

A Working Group member suggested that the Distribution Network Operator (DNO) would need to be informed as the Devices would need DNO and Supplier Smart Metering Key Infrastructure (SMKI) Certificates added. He added that the Post-Commissioning obligations would also need to be met.

Next Steps

The following actions were recorded from the meeting:

- SECAS to schedule this for further discussion at a Working Group meeting.