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

November 2021 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Kev Duddy	SECAS
Joey Manners	SECAS
Chris Barlow	DCC
Jordan Cooper	DCC
Robbie MacIntosh	DCC
Sarah-Jane Russell	British Gas
Julie Geary	E.ON
Daniel Davies	ESG Global
Terry Jefferson	EUA
Alastair Cobb	Landis + Gyr
James Doyle	Outfox the Market
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Eric Taylor	SMETS Design Ltd
Matthew Alexander	SEN
Robert Johnstone	Utilita
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue, potential business requirements and solution options for discussion.

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

Impacts

- 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
- Slower innovation within smart metering
- Sub-optimal consumer experience of Devices and 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. Devices to be removed upon end of trial period, or receive firmware update to CPA compliant firmware
4. Supplier churn must not prevent removal of Device/upgrade
5. Minimum Viable Product guidelines clearly defined
6. Device Types to be limited to Type 1 and Type 2
7. Trial period and Device volumes must be defined
8. DCC to be able to report to the Security Sub-Committee (SSC) on the number of trial Devices on the DCC System

Working Group Discussion

SECAS (KD) provided an overview of the meeting objectives, the issue and potential business requirements. The business requirements were summarised, confirming those that requirements 1-4 had been discussed and agreed at the last Working Group, and requirements 5-8 were for further discussion today.

A Working Group member (MA) previously suggested that the Distribution Network Operator (DNO) would need to be informed of any trial Devices on the live network 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. The Proposer and SECAS confirmed this could be added as a requirement.

SECAS (JM) questioned whether Type 2 Devices would need to be included, noting that they do not require CPA certification. The Proposer acknowledged this and agreed it should be limited to Type 1 Devices.

SECAS asked the Working Group what level of evidence would be required to give confidence of a product's security in the absence of a full CPA certificate. The Proposer stated that the primary goal of the modification is to remove the requirement of CPA certification for trial Devices, so it would be acceptable for all other certification to be required. They noted however that Great Britain Companion Specification (GBCS) and Smart Metering Technical Specifications both follow a self-certifying methodology and suggested that meeting Zigbee requirements could be evidenced in the same way. The Proposer also suggested that only Device manufacturers who had previously brought a product to market that had achieved CPA certification be considered within the trial. This is because part of those requirements include confirmation that the manufacturer demonstrates the quality, security, and engineering processes and systems in place to ensure that secure development can take place.

A Working Group member (AC) commented that a limit of 100 Devices over 12 months was appropriate, as it mirrored previous trials by the Department for Business, Energy and Industrial Strategy (BEIS). They also noted that although this limit was suitable for a singular BEIS trial, there could be different impressions for multiple manufacturer trials and suggested BEIS should be made aware of any trials. The Proposer agreed that it would be of benefit for BEIS to be aware of trials. Another Working Group member (TJ) suggested that the wording on the requirement could be left ambiguous, allowing different Device types to have different trial numbers. This would allow the Security Sub-Committee (SSC) or BEIS to make final decisions that could take into account a wider range of variables that may be subject to change over time.

SECAS asked for feedback from the Working Group on how the process would manage Supplier churn and consumer contracts for premises to be included within any trial. The Working Group heard that with a previous BEIS trial for Home Area Network (HAN) Connected Auxiliary Load Control Switches (HCALCS) and Electric Vehicle (EV) Chargers, the Devices were not planned to be removed following the trial and had no specific project considerations of Supplier churn, other than the normal industry processes that protect consumers. The Proposer also highlighted that there have been over 2 million consumers affected by the Supplier of Last Resort (SoLR) process in the last few months and that possible churn in a trial of 100 Devices should relatively not even be considered an issue.

The DCC (CB) noted that issues with Devices would affect the DCC Operational Performance Regime (OPR) or internal processes and so would need to consider how this is managed, possibly with a system flag. The Proposer noted that they were keen for there to be no impacts required to the DCC's total system or processes to ensure the modification incurred as little cost as possible. They suggested the CPL submission be sent to SSC for approval, instead of SECAS, and that prior notification of Devices to the DCC and BEIS should be sufficient. The DCC stated that further analysis would need to be carried out by them to agree there was no impact.

SECAS commented that based on the discussions to date, it was apparent that the solution would involve a request to SSC to make final decision. The Proposer noted that SSC members may not have the bandwidth to manage the additional workload, and this could be delegated to a suitable third party consultant to review the evidence and documentation provided by a Device manufacturer.

Next Steps

The following actions were recorded from the meeting:

- SECAS to update business requirements based on discussions
- SECAS and DCC to assess the impacts from Proposed Solution upon the DCC total systems.