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

## Annex A

## Business requirements – version 0.5

### About this document

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This document contains the business requirements that support the solution for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

## 1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	Device Manufacturers, that have previously produced a Smart Metering Device that has Commercial Product Assurance (CPA) certification shall be able to place limited numbers of trial Devices on the Data Communications Company (DCC) Network without that Device going through CPA certification.
2	Trial Devices shall undergo all other certification required under the SEC and Device Manufacturers shall provide statements of compliance of this, with evidence made available upon request.
3	All trials shall be limited in terms of duration, Device quantity and frequency which shall be determined by the Security Sub-Committee (SSC).
4	The Central Products List (CPL) format must be unaffected.
5	At the end of the trial period Devices shall either be removed or receive firmware update to CPA certified firmware.
6	All relevant organisation Smart Metering Key Infrastructure (SMKI) certificates shall be placed on the trial Devices, and those organisations notified.
7	The DCC shall provide an extract of the SMI to enable the SSC to monitor the number of Trial Devices on the DCC network.

## 2. Considerations and assumptions

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This section contains the considerations and assumptions for each business requirement.

### 2.1 General

This solution will be applied where Device Manufacturers wish to undertake a trial of any Device that would usually require CPA certificates. All trials will be subject to approval by the SSC.

### 2.2 Requirement 1: Device Manufacturers, that have previously produced a Smart Metering Device that has Commercial Product Assurance (CPA) certification shall be able to place limited numbers of trial Devices on the Data Communications Company (DCC) Network without that Device going through CPA certification.

Part of the CPA certification requires a Device Manufacturer's to show that it has the quality, security, and engineering processes and systems in place to ensure that secure development can take place. This is covered in the CPA Build Standard requirements. Therefore, to be eligible for a trial, the Device Manufacturer must have previously brought a SMETS2 Device product to market that had achieved CPA certification.

### 2.3 Requirement 2: Trial Devices shall undergo all other certification required under the SEC and Device Manufacturers shall provide statements of compliance of this, with evidence made available upon request.

The SEC specifies the certification that each Device Type needs. Manufacturers of trial Devices would need to demonstrate compliance with all certifications specified in the SEC except for CPA certification.

It is noted that Great Britain Companion Specification (GBCS) and Smart Metering Equipment Technical Specifications (SMETS) both follow a self-certifying methodology, the Device Manufacturer would need to provide statements of compliance with these specifications and be able to provide evidence of compliance if requested.

### 2.4 Requirement 3: All trials shall be limited in terms of duration, Device quantity and frequency which shall be determined by the SSC.

Individual trials should be planned to be limited to 100 Devices over a period not exceeding 18 months. Device Manufacturers should also only be eligible to be involved in one Device trial per Device Type (e.g. ESME, GSME, HCALCS) and Device Variant (e.g. ESME Single Phase, ESME Polyphase) at any one time. However, it is noted there may be circumstances where defining specific limits could be prohibitive and the SSC should have the ability to approve trials of differing limits if there is a justified reason to do so. This would allow the SSC to make final decisions that could consider a wider range of variables that may be subject to change over time.

## **2.5 Requirement 4: The Central Products List (CPL) format must be unaffected.**

The CPL is used by the DCC to verify the Devices that can be used on the DCC Network. It is envisaged that the Device Manufacturer, supported by the Device Operator (e.g., Energy Supplier) would apply to the SSC for approval to use a Device in a trial. If the SSC is satisfied with the application, a “Trial” CPA certificate reference would be provided. The Device Manufacturer would then use this CPA certificate reference in the CPL submission sent to the Smart Energy Code Administrator and Secretariat (SECAS). If approved then Devices could be added to the CPL, with detail on existing fields to highlight it as a trial Device, but without affecting the format of the CPL to ensure no impact on DCC systems.

## **2.6 Requirement 5: At the end of the trial period Devices shall either be removed or receive firmware update to CPA certified firmware.**

DCC Users operating these trial Devices must have processes in place to enable trial Devices to be removed, or to have the firmware updated to a CPA certified version. These processes should account for situations where the consumer chooses to change Supplier during the trial. The SEC states the requirements for Devices whereby CPA Certification has expired to be upgraded and as part of this modification the SEC must be updated to state that these trial Devices will follow the same processes.

## **2.7 Requirement 6: All relevant SEC Party’s Smart Metering Key Infrastructure (SMKI) certificates shall be placed on the trial Devices, and those organisations notified.**

All trial Devices must have the same configuration as non-trial Devices of the same Device Type. Therefore, any relevant Network Party and Supplier SMKI Certificates must be added to the Device, as well as all Post-Commissioning obligations would also need to be met. Notification of these trial Devices will be via reference to the newly updated CPL and not by Device Manufacturer to Network Party as and when trial Devices get installed at consumer premises.

## **2.8 Requirement 7: The DCC shall provide an extract of the SMI to enable the SSC to monitor the number of Trial Devices on the DCC network.**

The SSC has requested that the DCC provide them with a report to enable them to track the trial Devices on the network. The DCC currently provides a full extract of the SMI to the SSC to allow them to monitor the Device volumes across the estate. It is envisaged that this report will meet this requirement. The SSC will use this in combination with the CPL extract to identify and monitor the Trial Devices. It is not expected that there will be any further development of new functionality or changes outside of this reporting as this would not be required as part of this modification.

### 3. Solution options

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This section outlines the solution option being considered for this Modification Proposal. It provides detailed information on the proposed solution for the business requirements contained in Section 1 of this document.

#### 3.1 General

It is proposed that the solution to deliver these business requirements will be by request to the SSC. The SSC would be responsible for notifying the Department of Business, Energy and Industrial Strategy (BEIS) of ongoing trials. The DCC and other Parties would be informed of a new Device trial via the usual notification of updates to the CPL which would indicate a trial device has been added.

It was noted during the Working Group discussions that this process could impact the DCC's Operational Performance Regime (OPR) or internal processes and these would need to be considered. 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.

It is envisaged that the Device Manufacturer would send a CPL submission to the SSC for approval, instead of SECAS, and that prior notification of Devices via an updated CPL sent on to the DCC should be sufficient for awareness. The Trial Device Models are likely to be identifiable by prefixing a "[T]" on the CPA Certificate Identifier on the CPL. It is noted that this data is not currently, or planned to be, held in the SMI.

## 4. 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 of Business, Energy and Industrial Strategy
CPA	Commercial Product Assurance
CPL	Central Products List
DCC	Data Communications Company
DNO	Distribution Network Operator
ESME	Electricity Smart Metering Equipment
GBCS	Great Britain Companion Specification
GFI	GBCS for Industry
GSME	Gas Smart Metering Equipment
OPR	Operational Performance Regime
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMI	Smart Metering Inventory
SMKI	Smart Metering Key Infrastructure
SSC	Security Sub-Committee
UIT	User Integration Testing