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# MP209 ‘Lifetime CPA certificates’

## Annex A

### Legal text – version 1.0

#### About this document

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This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

## Section F ‘Smart Metering System Requirements’

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These changes have been redlined against Section F version 11.0.

### Amend Section F2 as follows:

#### F2. Central Products List

##### Central Products List

F2.1 The Panel shall establish and maintain a list (the “**Central Products List**”) of:

- (a) the SMETS2+ Device Models for which the Panel has received all the Assurance Certificates required for the Physical Device Type relevant to that Device Model (known as the Certified Products List); and
- (b) in the case of SMETS1 Device Models, those Device Models for which the Panel has received all the information required in accordance with the CPL Requirements Document (which does not require any certification of SMETS1 Devices under the CPA or any other assurance scheme).

F2.2 The Panel shall ensure that the Central Products List identifies the Data required in accordance with the CPL Requirements Document, and that the Central Products List is updated to add and remove Device Models in accordance with the CPL Requirements Document (including as described in Section F2.7A).

F2.2A Where a Party disagrees with any decision of the Panel to add, remove, not remove, reinstate, or not reinstate a SMETS1 Device Model to or from the Central Products List, that Party may refer the matter to the Authority for its determination, which shall be final and binding for the purposes of this Code.

##### Background to Assurance Certificates

F2.2B For SMETS1 Device Models, there are no required Assurance Certificates for any of the Physical Device Types.

F2.3 The Technical Specification relevant to the Physical Device Type sets out which Physical Device Types require Assurance Certificates from one or more of the following persons (each being an “**Assurance Certification Body**”):

- (a) the ZigBee Alliance;
- (b) the DLMS User Association; and
- (c) NCSC.

F2.4 The following Assurance Certification Bodies issue the following certificates in respect of Device Models of the relevant Physical Device Types (each being, as further described in the applicable Technical Specification, an “**Assurance Certificate**”):

- (a) the ZigBee Alliance issues certificates which contain the ZigBee certified logo and interoperability icons;
- (b) the DLMS User Association issues certificates which include the conformance tested service mark (“**DLMS Certificates**”); and
- (c) NCSC issues commercial product assurance scheme certificates (“**CPA Certificates**”).

F2.5 An Assurance Certificate will not be valid unless it expressly identifies the Device Model(s) and the relevant Physical Device Type to which it applies. With the exception of a CPA Certificate, An Assurance Certificate will not be valid if it specifies an expiry date that falls more than 6 years after its issue.

### Expiry and renewal of CPA Certificates

F2.6 As CPA Certificates that have not been withdrawn or cancelled will require periodic renewal at their expiry or renewal date~~contain an expiry date~~, the following Parties shall ensure that action is taken to ensure that a replacement CPA Certificate can be considered for renewal is issued in respect of Device Models for the following Physical Device Types before the expiry or renewal date of such CPA Certificate (to the extent Device Models of the relevant Physical Device Type require CPA Certificates in accordance with the applicable Technical Specification):

- (a) the DCC for Communications Hubs; and
- (b) the Import Supplier and/or Gas Supplier (as applicable) for Device Models of all other Physical Device Types.

F2.7 The Panel shall notify the Parties on or around the dates occurring 12 and 6 months prior to the date on which the CPA Certificate for any Device Model is due to expire. The Panel shall also provide to the Parties any notice concerning CPA Certificates which the NCSC asks the Panel to provide to the Parties.

### Consequence of Expiry, Withdrawal or Cancellation of Assurance Certificates

F2.7A Where:

- (a) a CPA Certificate for a Device Model expires or is not renewed or is withdrawn or cancelled by the NCSC, then the Security Sub-Committee shall determine whether to remove that Device Model from the Central Products List in accordance with the CPL Requirements Document, which may provide for a CPA Certificate Remedial Plan to be imposed;
- (b) any other type of Assurance Certificate for a Device Model is withdrawn or cancelled by the Assurance Certification Body that issued the certificate, then the Panel shall remove that Device Model from the Central Products List.

F2.7B Where a Party disagrees with any decision of the Security Sub-Committee made in accordance with the CPL Requirements Document:

- (a) to remove or not remove a Device Model from the Central Products List;

- (b) to not approve the Party's CPA Certificate Remedial Plan (where the Security Sub-Committee has determined that a CPA Certificate Remedial Plan is to be imposed on the Party),

that Party may refer the matter to the Authority for its determination, which shall be final and binding for the purposes of this Code.

### **Publication and Use by the DCC**

F2.8 Subject to the requirements of the CPL Requirements Document, the Panel shall (within one Working Day after being required to add or remove Device Models to or from the Central Products List in accordance with the CPL Requirements Document):

- (a) provide the updated Central Products List to the DCC (by way of an extract containing such subset of the information contained within the Central Products List as the DCC reasonably requires from time to time);
- (b) publish a copy of the updated Central Products List on the Website; and
- (c) notify the Parties that the Central Products List has been updated.

F2.9 Subject to the requirements of the CPL Requirements Document, the DCC shall, from time to time, use and rely upon the Central Products List most recently received by the DCC from the Panel at that time, provided that the DCC shall be allowed up to 24 hours from receipt to make any modifications to the Smart Metering Inventory that are necessary to reflect the updated Central Products List.

### **Deployed Products List**

F2.10 The DCC shall create, keep reasonably up-to-date and provide to the Panel (and the Panel shall publish on the Website) a list (the "**Deployed Products List**") of all the combinations of different Device Models that comprise a Smart Metering System (together with Associated Type 2 Devices) that exist from time to time (to the extent recorded by the Smart Metering Inventory).

### **SMETS1 Lists**

F2.10A The DCC shall create, keep up-to-date and provide to the Panel (and the Panel shall publish on the Website) lists of:

- (a) each combination of SMETS1 Device Models and communication services provider in relation to which the DCC has demonstrated through testing (which may include testing of a different combination that the DCC considers to be substantively equivalent) that it is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts (the "**SMETS1 Eligible Product Combinations**"), including the date on which each entry was first added to the list; and
- (b) each combination of SMETS1 Device Models and communication services provider) in relation to which the DCC is at that time:
  - (i) considering whether testing or development is required to demonstrate the capability; or

- (ii) developing and/or testing the capability,

to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts (the "**SMETS1 Pending Product Combinations**"), provided that the DCC shall not add a Device Model combination to the SMETS1 Pending Product Combinations where the relevant Testing Participant has indicated pursuant to clause 9 (SMETS1 Pending Product Combinations Tests) of the Enduring Testing Approach Document that such information should be treated as confidential.

F2.10B The obligation of the DCC under Section F2.10A(a) shall only apply once the DCC is first permitted under the Transition and Migration Approach Document to add a combination of Device Models to the SMETS1 Eligible Product Combinations.

### Technical Specification Incompatibility

F2.11 The Panel shall create, keep reasonably up-to-date and publish on the Website a matrix specifying:

- (a) which Versions of each Technical Specification are incompatible with which Versions of each other Technical Specification; and
- (b) where applicable, those areas in respect of which the Version of the Technical Specification is not incompatible with the Version of the other Technical Specification but may be subject to the application of particular constraints as identified

F2.12 For the purposes of Section F2.11:

- (a) 'incompatible' means in respect of a Version of any Technical Specification, that Devices or apparatus which comply with that Version are known to have been designed in a manner that does not enable them to inter-operate fully with Devices or apparatus that comply with the specified Version of each other Technical Specification;
- (b) each reference to a Version of a Technical Specification shall be read as being to that Version taken together with any relevant Version of the GB Companion Specification (as identified in the TS Applicability Tables), so that if there is more than one relevant Version of the GB Companion Specification for any Version of a Technical Specification, the matrix shall make separate provision for each of them; and
- (c) the matrix need not specify:
  - (i) which Versions of the ESMETS are incompatible with Versions of the GSMETS;
  - (ii) which Versions of the GSMETS are incompatible with which Versions of:
    - (A) the ESMETS;
    - (B) the HCALCSTS; or
    - (C) the SAPCTS.

F2.13 The Panel shall, as soon as reasonably practicable after it makes a change to such matrix, notify all the Parties that a change has been made.

#### **Firmware Information Repository**

F2.14 The Panel shall establish and maintain a list of firmware releases, updates, and corresponding Manufacturer contact details (the “**Firmware Information Repository**”).

F2.15 The Panel shall ensure that the Firmware Information Repository contains a minimum of three fields:

- (a) A number which uniquely identifies a record on the Central Products List, which is a mandatory field;
- (b) Manufacturer contact details, which is a mandatory field, to include email address, telephone number and business address; and
- (c) A free text field for release notes that Manufacturers can record against, which is a mandatory field for completion but the content is at the discretion of the Manufacturers.

F2.16 The Firmware Information Repository will be updated alongside the Central Products List, with the number which uniquely identifies a record on the Central Products List providing a cross reference.

F2.17 The Party or any other person submitting Device details for addition to the Central Products List shall also supply the details listed in F2.15 for the same Device.

## Appendix Z ‘CPL Requirements’

These changes have been redlined against Appendix Z version 4.0.

### Amend Section 2 as follows:

#### 2. Central Products List Contents

- 2.1 The Panel shall ensure that the Central Products List identifies each Device Model by Physical Device Type, and lists the following matters in respect of each Device Model:
- (a) Manufacturer and model;
  - (b) hardware version;
  - (c) firmware version;
  - (d) for SMETS2+ Device Models, the version of the SMETS or CHTS (as applicable) and (in each case) the GBCS version for which the Device Model has one or more Assurance Certificates;
  - (e) for SMETS1 Device Models, Version 1.2 of SMETS;
  - (f) for SMETS2+ Device Models, the identification numbers for each of the Device Model's Assurance Certificates (including the version of the relevant standard against which each Assurance Certificate was issued);
  - (g) where the Device Model is required to have an associated CPA Certificate, the expiry or renewal date of the Device Model's CPA Certificate and the associated version of the Security Characteristics (as defined in the relevant Technical Specification); and
  - (h) where there is an associated Manufacturer Image:
    - (i) the relevant identity of the person who created the Manufacturer Image;
    - (ii) a descriptor of the Manufacturer Image; and
    - (iii) the Hash of the Manufacturer Image (to be provided pursuant to Clause 4).

### Amend Section 6 as follows:

#### 6. Central Products List

- 6.1 Where an Assurance Certificate for a Device Model which was issued by the ZigBee Alliance or the DLMS User Association is withdrawn or cancelled by the ZigBee Alliance or the DLMS User Association (as applicable)-, then the Panel shall remove that Device Model from the Central Products List.
- 6.2 Where a CPA Certificate for a Device Model expires or is not renewed or is withdrawn or cancelled by NCSC, then the Security Sub-Committee shall determine whether the Device Model is to be removed from the Central Products List, and the Panel shall remove the Device Model (or not) as determined by the Security Sub-Committee. In reaching such a determination, the Security Sub-Committee:

- (a) shall consider the security implications of such circumstances, and weigh them against the consequences for Energy Consumers of Devices of the relevant Device Model being Suspended as a result of removing the Device Model from the Central Products List;
  - (b) shall take into account any relevant information provided to it by ~~NSCS-NCSC~~ concerning the risks associated with the ~~expiry~~, cancellation, ~~or~~ withdrawal or expiry without renewal of the CPA Certificate;
  - (c) may determine, whether or not the Device Model is to be removed from the Central Product List, that a CPA Certificate Remedial Plan is to be imposed (for SMETS2+ Communications Hubs) on the DCC or (for all other Device Models) on the Import Suppliers (for Devices of that Device Model forming part of a Smart Metering System for which they are the Import Supplier) and/or the Gas Suppliers (for Devices of that Device Model forming part of a Smart Metering System for which they are the Gas Supplier); and
  - (d) shall reach a determination as soon as reasonably practicable taking into account the seriousness of the potential security consequences.
- 6.3 Where the Security Sub-Committee determines under Clause 6.2 that a CPA Certificate Remedial Plan is to be imposed on one or more Parties, then the Security Sub-Committee shall notify those Parties and each of those Parties shall:
- (a) (within such period as the Security Sub-Committee may require) propose a plan to the Security Sub-Committee setting out how the Party intends to remedy the security issue or issues that have resulted in or arise from the cancellation, withdrawal or expiry without renewal of the CPA Certificate, and within what time period;
  - (b) (within such period as the Security Sub-Committee may require) take into account any and all comments on the proposed plan raised by the Security Sub-Committee, and obtain the Security Sub-Committee's approval of the plan (the approved plan for each such Party, as modified from time to time with the approval of the Security Sub-Committee, being that Party's "**CPA Certificate Remedial Plan**");
  - (c) comply in all material respects with the CPA Certificate Remedial Plan; and
  - (d) (where requested by the Security Sub-Committee) report to the Security Sub-Committee on progress in respect of the CPA Certificate Remedial Plan.
- 6.4 Where the Security Sub-Committee initially determines under Clause 6.2 that a CPA Certificate Remedial Plan is to be imposed as an alternative to removing a Device Model from the Central Products List, then the Security Sub-Committee may at any time determine that the Device Model in question is to be removed from the Central Products List, in which case the Panel shall remove the Device Model from the Central Products List.
- 6.5 For the purposes of Section M8.1(h) (Events of Default), the obligations of a Party under Clause 6.3 are material obligations. Accordingly failure by a Party to gain approval for, or failure by a Party to comply in all material respects with, a CPA Certificate Remedial Plan shall be an Event of Default if not remedied within 20 Working Days after notice from the Security Sub-Committee requiring remedy.



- 6.6 The DCC and each Supplier Party shall provide such relevant information as the Security Sub-Committee may reasonably request to assist it in reaching a determination under Clause 6.2 or 6.4.
- 6.7 The DCC and each Supplier Party shall notify the Panel of any withdrawal, expiry or cancellation of an Assurance Certificate of which the DCC or Supplier Party becomes aware. Where removal occurs as a result of the withdrawal, expiry or cancellation of an Assurance Certificate, the Panel shall only remove a Device Model from the Central Products List after the Panel has confirmed with the relevant Assurance Certification Body that the Assurance Certificate for that Device Model has expired or has been withdrawn or cancelled (and no new Assurance Certificate has been provided to the Panel under Clause 3).
- 6.8 The Panel may also remove a SMETS1 Device Model from the Central Products List where either:
- (a) the Security Sub Committee advises that the Device Model should be removed from the Central Products List; or
  - (b) it is determined by the Authority or by the Panel under Section F3 (Panel Dispute Resolution Role) that Devices of the relevant Device Model are not compliant with SMETS1 (either on their own or in combination with Devices of other Device Models listed on the Central Products List).
- 6.9 The Panel may reinstate to the Central Products List a SMETS1 Device Model that it has removed pursuant to Clause 6.8; provided that the Panel may only reinstate a Device Model that has been removed pursuant to Clause 6.2A(b) where it determines that the issue that gave rise to the removal of the Device Model has been rectified.
- 6.10 For the purposes of this Code, a Communications Hub Function or a Gas Proxy Function shall be considered to be on (or not on) the Central Products List if the Communications Hub of which it forms part is on (or not on) the Central Products List.
- 6.11 The Panel may provide for the removal of a Device Model from the Central Products List by marking that Device Model as 'removed'. All references in this Code to the removal of a Device Model from the Central Products List (and similar expressions) shall be interpreted accordingly.