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MP209 'Lifetime CPA Certificates'

Modification Report

Version 1.0

22 June 2022

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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC).

The National Cyber Security Centre (NCSC) issues Commercial Product Assurance (CPA) Certificates to certain Devices. This enables them to be placed on the Central Products List (CPL) to be used on the Data Communications Company (DCC) network. Currently, the Certificates have an expiry date, and a new Certificate must be sought prior to the expiry should the Manufacturer wish to keep using the Devices. The expiry date of the first CPA certified Devices is 30 August 2022. To manage the re-certification process, the NCSC aims to bring in new Lifetime CPA Certificates without an expiry date. These would have a renewal date instead. The SEC currently does not have any concept of Lifetime CPA Certificates, and only references expiry dates.

The solution is to enable these new Lifetime CPA Certificates that will not expire but will need to be renewed, to be accommodated by the SEC.

This modification will impact Suppliers and Other SEC Parties (Device Manufacturers). There are no DCC System costs so implementation costs will be limited to the Smart Energy Code Administrator and Secretariat (SECAS) time and effort. This is a Self-Governance Modification and, if approved, will be implemented in an ad hoc SEC Release on 1 August 2022.

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, it cannot be added to the Smart Metering Inventory (SMI) and therefore cannot be communicated with. The CPL is a list of 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.

Only once a Device has met the requirements set out in SEC Appendix Z 'CPL Requirements Document' can it be added to the CPL.

CPA Certificates

There are three types of Assurance Certificates, each issued by a different Assurance Certification Body. These are:

- Zigbee Alliance Certificates;
- Device Language Message Specification (DLMS) Certificates; and
- CPA Certificates

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.

The CPA Certificate scheme was set up to help companies demonstrate that their products meet defined NCSC standards, known as CPA Security Characteristics (SCs). The Assurance Certification Body for the CPA scheme is the NCSC. The scheme gives companies a way of having their Devices tested to show that the product meets the requirements of these SCs. The NCSC uses Accredited Evaluation Facilities to conduct product testing and assessment, known as CPA Test Houses. The independent test laboratories assess the Device against the NCSC's standards. If the evaluation of a Smart Meter or recognised smart metering product is successful, it is then listed on the NCSC website and is issued with a certificate which is valid for six years.

The SEC currently only references the expiry of CPA Certificates and has no concept of Lifetime CPA Certificates that do not expire.

What is the issue?

The SSC has been in discussion with the NCSC and the Department for Business, Energy and Industrial Strategy (BEIS) on how to manage the CPA Re-certifications, with the first Communications Hub CPA Certificates expiring on 30 August 2022. A process has been discussed and agreed with CPA Test Houses, the NCSC, BEIS and the SSC. This has also been shared with the SSC Commercial Product Assurance Issue Resolution Sub-group (SCIRS), which includes manufacturers, Meter Asset Providers (MAPs) and Suppliers.

The NCSC wishes to implement Lifetime CPA Certificates for Devices, with a renewal date as opposed to an expiry date. However, the SEC currently only references the expiry of CPA Certificates and has no concept of Lifetime CPA Certificates that require renewal.

What is the impact this is having?

Without making these necessary changes there is a lack of certainty from Device manufacturers and Suppliers on what will happen to Devices when CPA Certificates expire. There are approximately four million Communications Hubs with CPA Certificates that are due to expire 30 August 2022. If these expire then they will be non-compliant and Suppliers will be in breach of the SEC.

Impact on consumers

If the changes required to manage the CPA recertification are not implemented, then millions of working Devices could need to be removed from the CPL and therefore from consumer premises subject to the provisions of SEC Appendix Z.

3. Solution

The Proposed Solution will implement revised terminology within the SEC to accommodate the introduction of NCSC's Lifetime CPA Certificates, referencing their renewal as opposed to expiry.

This will be accompanied by updates made to the CPL Guidance Notes to advise Device Manufacturers, Suppliers and the DCC how to highlight whether the Certificate expires or requires renewal. This annotation will likely be in the form an [E] or [R] suffix added to the CPA Certificate identification number within the CPL submission which will need to be marked by the Party completing the submission.

The existing entries on the CPL will also be updated to match the defined format.

When presented to the Change Sub-Committee (CSC), a member noted that the solution did not explicitly state how Parties would enact the re-certification process. The Proposer advised that this detail is being drafted as an annex to NCSC's document 'Process for Performing Foundation Grade Evaluations (PPFGE)'.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers		Meter Installers
✓	Device Manufacturers		Flexibility Providers

Suppliers and Device Manufacturers will be impacted by the new Lifetime CPA Certificates as entries to the CPL will need the Certificate identification number to be annotated to highlight whether the Certificate expires or requires renewal.

The DCC will be impacted by the Communications Hubs requiring new CPA Certificates in the same way.

DCC System

There will be no DCC System impacts from this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section F 'Smart Metering System Requirements'
- Appendix Z 'CPL Requirements Document'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Devices

Devices impacted			
✓	Electricity Smart Metering Equipment	✓	Gas Smart Metering Equipment
✓	Communications Hubs	✓	Gas Proxy Functions
	In-Home Displays		Prepayment Meter Interface Devices
✓	Standalone Auxiliary Proportional Controllers	✓	Home Area Network Connected Auxiliary Load Control Switches
	Consumer Access Devices		Alternative Home Area Network Devices

Device behaviour will not be impacted by this modification. However, the NCSC will now provide a Lifetime CPA Certificate with a renewal date, as opposed to a CPA Certificate with an expiry date. Any Device that would require CPA Certification will be affected in this manner.

Consumers

There will be no impact to consumers from this modification.

Other industry Codes

No other industry Codes are impacted by this proposal.

Greenhouse gas emissions

If the changes required to manage the CPA recertification are not implemented, then millions of working Devices could need to be removed from consumer premises unnecessarily.

5. Costs

DCC costs

There are no DCC costs to implement this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is two days of effort, amounting to approximately £1,200. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry

- Updating the existing CPL entries to identify the dates are for expiry, not renewal
- Updating the CPL guidance documents

SEC Party costs

There will be no costs incurred by SEC Parties for this modification. The added step required by submitters to annotate the CPA Certificate identification number is minimal.

6. Implementation approach

Approved implementation approach

The CSC has agreed an implementation date of:

- **1 August 2022** (ad-hoc SEC Release) if a decision to approve is received on or before 27 July 2022; or
- **Three Working Days following approval** if a decision to approve is received after 27 July 2022.

This is a document only change and needs to be implemented in time to allow the NCSC to issue Lifetime CPA Certificates with a renewal date. The first CPA Certificates expire 30 August 2022. There will be approximately four million Communications Hubs affected by the expiry of these Certificates. The NCSC intends to issue the first Lifetime CPA Certificates from 1 August 2022 (one month before expiry) and therefore the SEC also needs to be updated from the same date.

This modification is being progressed as a Self-Governance Modification. Due to the need to implement this solution as soon as possible, this modification will be implemented, if approved, before the end of the Self-Governance referral period. Should a referral be received and the decision to approve subsequently overturned, the changes would be backed out of the SEC.

7. Assessment of the proposal

Solution development

How will Lifetime CPA Certificates be renewed?

In the 12 months prior to a Certificate expiring or needing renewal, the Device manufacturer is required to start the CPA Re-certification process by contracting with a CPA Test House and providing a Change History of the Device and a Security Analysis. The CPA Test House will assess the compliance of the Device against the original CPA SC it was tested against as well as against the latest SC version. It will then be able to produce a Gap Analysis Report for the NCSC which identifies security risks.

One month before CPA certificate expiry, the NCSC will issue a Lifetime CPA certificate i.e. with no expiry date. The Lifetime CPA certificate will come with a letter from the NCSC to the manufacturer

and the SSC advising a renewal date (at least every six years) and any recommendations to improve the security of the Device. This will also be the case for new Devices undergoing first time CPA evaluations going forward, which will also receive a Lifetime CPA certificate.

The outcome of the CPA Test House assessment and the subsequent Risk Analysis review by the NCSC will have three possible outcomes:

1. The Device is found to be fully compliant with the latest version of the SC.
2. The Device is not fully compliant with the latest version of the SC but the risk associated with gaps or areas of non-compliance are within risk tolerance and do not justify removal of the certificate.
3. The Device is found not to be compliant with the relevant SC and is found to have a risk exposure that is not within risk tolerance. In this case, the CPA Certificate is withdrawn.

For outcomes 1 and 2, the SSC will confirm a renewal date to the SEC Panel.

What happens when it is determined that a CPA Certificate should not be renewed?

In the situation where the Device is found not to be compliant with the relevant SC or is found to have a risk exposure that is not within risk tolerance, the NCSC has confirmed that the Lifetime CPA Certificate will be withdrawn. This enables the existing provisions of SEC Appendix Z, section 6 to apply where the SSC decides whether and for how long to retain a Device on the CPL.

How will the different CPA Certificate types be displayed on the CPL?

Certificates will be annotated on the CPL. This is likely to be by using a suffix of [E] if the Certificate has an expiry date and with a suffix of [R] for Certificates with a renewal date. This will be in the 'Certificate identification number' field. This information must be provided by the DCC (if the Device is a Communications Hub) or Suppliers and Device Manufacturers (for all other Devices) on their CPL submission.

8. Case for change

Business case

As this is a document only change the implementation costs will be limited to SECAS time and effort. SEC Party impacts are limited to those who make CPL submissions, and they will need to annotate the CPA Certificate identification number to identify whether the Certificate expires or has a renewal date. This extra step should not add significant extra time to the submission process.

The benefits of making this change will be to provide a way for Devices to be efficiently CPA Certified and prevent removal of Devices from the CPL when the expiry date passes. This will prevent the removal of Devices from consumer premises that could be avoided.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this Modification Proposal better facilitates SEC General Objective (a)¹ and (f)² by providing a defined process that supports the continuation of Devices on the CPL. It enables a review of the security gap analysis of Devices against the SCs to make risk-based decisions on the continuation of the CPA Certificate.

Views against the consumer areas

Improved safety and reliability

If implemented, this modification will have a neutral impact against this consumer area.

Lower bills than would otherwise be the case

If implemented, this modification will have a neutral impact against this consumer area.

Reduced environmental damage

If implemented, this modification will have a positive impact against this consumer area as it will help prevent the removal of working Devices.

Improved quality of service

If implemented, this modification will have a neutral impact against this consumer area.

Benefits for society as a whole

If implemented, this modification will have a neutral impact against this consumer area.

Final conclusions

The SSC has determined that these changes are required to support existing Devices that are CPA Certified and will also be applied to all new Devices that require CPA Certification.

The specific format of identifying the Lifetime CPA Certificates within the CPL will be updated as part of the CPL Guidance Notes. The expected format is to use a suffix on the CPA Certificate identification number, but to provide flexibility as new requirements could be identified going forward, it is not explicitly defined within this Modification Report.

One CSC member stated that the solution should be more explicit in detailing what was required to renew or issue a new Lifetime CPA Certificate. The Proposer advised that this detail is being drafted

¹Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

² to ensure the protection of Data and the security of Data and Systems in the operation of this Code

as an annex to NCSC's document 'Process for Performing Foundation Grade Evaluations (PPFGE)'. It has been included under the Proposed Solution section.

The CSC member also noted that if the Manufacturer triggers recertification too late there will be insufficient time to recertify before the expiry of their existing CPA Certificate.

Appendix 1: Progression timetable

Following the Modification Report Consultation, the modification will be presented to the Change Board for vote under Self-Governance on 27 July 2022.

Timetable	
Event/Action	Date
Draft Proposal raised	10 Jun 2022
Modification Report approved by CSC	21 Jun 2022
Modification Report Consultation	22 Jun – 12 Jul 2022
Change Board Vote	27 Jul 2022

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 and Industrial Strategy
CPA	Commercial Product Assurance
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
DLMS	Device Language Message Specification
MAP	Meter Asset Provider
NCSC	The National Cyber Security Centre
PPFGE	Performing Foundation Grade Evaluations
SC	Security Characteristics
SCIRS	SSC Commercial Product Assurance Issue Resolution Sub-group
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMI	Smart Metering Inventory
SSC	Security Sub-Committee

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MP209 ‘Lifetime CPA certificates’

Annex A

Legal text – version 1.0

About this document

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

Section F ‘Smart Metering System Requirements’

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.