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

## Annex B

## Legal Text – version 1.2

### 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 A ‘Definitions and Interpretation’

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These changes have been redlined against Section A version 28.0.

**Add the following definitions to Section A1.1 in alphabetical order as follows:**

**Trial Device Approval** has the meaning given to that expression in Section F2.18 (Device Trials).

**Trial Device Certificate** has the meaning given to that expression in Section F2.25 (Device Trials).

**Trial Device Model** has the meaning given to that expression in Section F2.18 (Device Trials).

**Trial Device Remedial Plan** has the meaning given ~~into~~ that expression in Clause 6.3(b) of Appendix Z (CPL Requirements Document).

## Section F 'Smart Metering System Requirements'

These changes have been redlined against Section F version 11.0.

### Amend Section F2 as follows:

#### Device Trials

F2.18 The Security Sub-Committee shall consider applications from Manufacturers for SMETS2+ Device Models to be added to the Central Products List, on a limited trial basis, without a CPA Certificate needing to be issued by the NCSC. If approved by the Security Sub-Committee, the relevant SMETS2+ Device Model will be known as a "Trial Device Model" for the duration set out in the approval (the "Trial Device Approval"). The Security Sub-Committee shall have sole discretion in deciding whether to grant a Trial Device Approval.

F2.19 In its application for Trial Device Approval, the applicant Manufacturer must evidence that the SMETS2+ Device Model for which it is seeking approval has all Assurance Certificates other than a CPA Certificate issued by the NCSC.

F2.20 The Security Sub-Committee shall require a business rationale to support the application, a security risk assessment, and assurance that Energy Consumers of Trial Device Models shall be required to opt into trial participation and informed of the implications of doing so, and may (at its sole discretion) set additional requirements that must be evidenced in an application.

F2.21 Where a Trial Device Approval is granted, the Security Sub-Committee shall set out in a written notice to the Manufacturer and the Panel:

- (a) A detailed description of the Trial Device Model;
- (b) a summary of why the Trial Device Approval is being granted and the assessment undertaken by the Security Sub-Committee in considering the application;
- (c) the start date and expiry date of the Trial Device Approval;
- (d) the maximum number of Devices of the Trial Device Model that may be deployed; and
- (e) any other conditions applied to the Trial Device Approval.

F2.22 The Security Sub-Committee shall determine the appropriate level of detail to be provided in the Trial Device Approval notice and shall not be required to disclose any information it considers sensitive.

F2.23 If one or more of the conditions applicable to the Trial Device Model are breached, then the Trial Device Approval may be withdrawn or cancelled by the Security Sub-Committee.

F2.24 Where an application is not approved, the Security Sub-Committee shall set out in a written

notice to the Manufacturer and the Panel a summary of why approval has not been granted and the assessment undertaken in considering the application. The Security Sub-Committee shall determine the appropriate level of detail to be provided in the summary and shall not be required to disclose any information it considers sensitive.

F2.25 A Trial Device Model will be deemed to have a valid CPA Certificate for the duration of the Trial Device Approval. The Security Sub-Committee shall issue a trial certificate (the "**Trial Device Certificate**") for the duration of the trial in lieu of the CPA Certificate that would ordinarily be issued by the NCSC. The Trial Device Certificate will include an identifier code which is unique to the Trial Device Model and the Trial Device Approval as well as an expiry date which matches the expiry date of the Trial Device Approval. The Trial Device Certificate will be provided to the Manufacturer and the Panel.

F2.26 In respect of a Trial Device Model, this Code will be construed such that any requirement for a SMETS2+ Device Model to have a CPA Certificate shall be deemed satisfied by a valid Trial Device Certificate. Where necessary, the requirements of this Code applicable to a CPA Certificate will be construed so as to not inhibit the use of a Trial Device Model in accordance with a Trial Device Approval and Sections F2.18 to F2.32.

F2.27 With effect from the start date set out in the Trial Device Approval, the Panel shall add the Trial Device Model to the Central Products List. The Central Products List must show that the relevant SMETS2+ Device Model is a Trial Device Model, identify the specific Trial Device Approval that applies to the Trial Device Model, and include the expiry date for such approval.

F2.28 On a monthly basis, the DCC shall provide the Security Sub-Committee with a copy of the Smart Metering Inventory so that the Security Sub-Committee can extract details of Trial Device Models.

F2.29 The Manufacturer of a Trial Device Model may apply to the Security Sub-Committee to request an amendment to its Trial Device Approval. The Security Sub-Committee may amend a Trial Device Approval at any time and at its sole discretion, irrespective of whether an amendment application has been made by the Manufacturer. If the Security Sub-Committee amends a Trial Device Approval, it shall notify the Manufacturer and the Panel. The notice will include a summary of why the Trial Device Approval has been amended. The Security Sub-Committee shall determine the appropriate level of detail to be provided and shall not be required to disclose any information it considers sensitive. Where necessary, the Panel shall update the Central Products List to reflect such amendment.

F2.30 The Security Sub-Committee may withdraw or cancel a Trial Device Approval at any time and at its sole discretion. Upon such withdrawal or cancellation, the Security Sub-Committee shall notify the Manufacturer and the Panel. The notice will include a summary of why the Trial Device Approval has been withdrawn or cancelled. The Security Sub-Committee shall determine the appropriate level of detail to be provided and shall not be required to disclose any information it considers sensitive.

F2.31 If a Trial Device Approval expires, or is withdrawn or cancelled, the Trial Device Certificate will expire, be withdrawn or be cancelled (as applicable) by the Security Sub-Committee and the

provisions of Clause 6 (Removal of Device Models from the List) of Appendix Z shall apply in determining whether or not to remove the Trial Device Model from the Central Products List and whether a Trial Device Remedial Plan is to be imposed. If it is determined that the Trial Device Model shall be removed from the Central Products List, the Manufacturer may either apply for a new Trial Device Approval or apply for a CPA Certificate.

F2.32 Where a Trial Device Model is removed from the Central Products List, all Devices of the relevant SMETS2+ Device Model must be promptly Decommissioned by the Responsible Supplier, unless:

- (a) the relevant SMETS2+ Device Model has since gained a CPA Certificate (or a new Trial Device Certificate) and has been updated accordingly on the Central Products List; or
- (b) the relevant Device can be (and is) updated via firmware to become a SMETS2+ Device Model which is listed on the Central Products List.

## Appendix Z ‘CPL Requirements Document’

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These changes have been redlined against Appendix Z version 5.0

### Amend Section 6 as follows:

#### Removal of Device Models from the 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 or a Trial Device Certificate for a Trial Device Model expires or is withdrawn or cancelled by the Security Sub-Committee, 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 NCSC concerning the risks associated with the cancellation, 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 or a Trial Device Remedial Plan (as relevant) 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 or a Trial Device Remedial Plan (as relevant) 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 or Trial Device 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" or, in the case of a Trial Device Certificate, its "Trial Device Remedial Plan");
  - (c) comply in all material respects with the CPA Certificate Remedial Plan or Trial Device Remedial Plan (as relevant); 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 or Trial Device Remedial Plan (as relevant).
- 6.4 Where the Security Sub-Committee initially determines under Clause 6.2 that a CPA Certificate Remedial Plan or Trial Device Remedial Plan (as relevant) 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.