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

# Legal text – version 0.1

## 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:

**Device Trials**

F2.18 The Security Sub-Committee will 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 device will be known as a "**Trial Device**" for the duration set out in the approval (the "**Trial Device Approval**"). The Security Sub-Committee will 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. It must also evidence that it has previously obtained a CPA Certificate issued by the NCSC for a SMETS2+ Device Model device other than the device for which it is seeking a Trial Device Approval.

F2.20 The Security Sub-Committee 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 will set out in a written notice to the Manufacturer, the DCC and the Panel:

(a) a detailed description of the Trial Device;

(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 Trial Devices that may be deployed; and

(e) any other conditions applied to the Trial Device Approval.

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

F2.23 The Manufacturer will comply with any conditions in the Trial Device Approval or such approval will be revoked by the Security Sub-Committee.

F2.24 Where an application is not approved, the Security Sub-Committee will set out in a written notice to the Manufacturer, the DCC and the Panel a summary of why approval has not been granted and the assessment undertaken in considering the application. The Security Sub-Committee will determine the appropriate level of detail to be provided in the summary and will not be required to disclose any information it considers sensitive.

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

F2.26 In respect of a Trial Device, the 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 CPA Certificate. Where necessary, the Code requirements applicable to a CPA Certificate will be construed so as to not inhibit the use of a Trial Device in accordance with a Trial Device Approval and this section F2.18 to F2.31.

F2.27 On the start date set out in the Trial Device Approval, the Panel will add the Trial Device to the Central Products List. The Central Products list will show that the device is a Trial Device, identify the specific Trial Device Approval that applies to the device and include the expiry date for such approval.

F2.28 The DCC will provide the Security Sub-Committee with a monthly report setting out details of:

(a) the number of Trial Devices on the Central Products List;

(b) the number of Trial Devices added to the Central Products List since the previous report;

(c) the number Trial Devices removed from the Central Products List since the previous report;

(d) the number of Trial Devices deployed, in aggregate and broken down by Trial Device Approval;

(e) the number of Trial Devices deployed since the previous report, in aggregate and broken down by Trial Device Approval;

(f) the number of Trial Devices decommissioned since the previous report, in aggregate and broken down by Trial Device Approval;

(g) any Trial Device Approvals which will expire in the [three months] following the date of the report;

(h) any other information regarding Trial Devices reasonably requested by the Security Sub-Committee and available to the DCC.

F2.29 The Manufacturer of a Trial Device 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 will notify the Manufacturer, the DCC and the Panel. The notice will include a summary of why the Trial Device Approval has been amended. The Security Sub-Committee will determine the appropriate level of detail to be provided and will not be required to disclose any information it considers sensitive. Where necessary, the Panel will update the Central Products List to reflect such amendment.

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

F2.31 If a Trial Device Approval is revoked or expires, the Trial CPA Certificate will be cancelled by the Security Sub-Committee and the Panel will remove the Trial Device from the Central Products List. Following the end of a trial, the Manufacturer may either apply for new Trial Device Approval or apply for a CPA Certificate.