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MP209 ‘Lifetime CPA Certificates’ Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to **approve** MP209. It believed the modification better facilitated SEC Objectives (a)¹ and (f)².

Modification Report Consultation

SECAS received six responses to the Modification Report Consultation. They all believed that the modification should be approved. They considered the modification better facilitated SEC Objectives (a) and (f).

¹ Facilitate 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

Modification Report Consultation responses

Summary of responses

The respondents (five Large Suppliers and a Network Party) all believed that the modification should be approved.

They agreed that this modification provided an efficient process that supports the continuation of Devices on the Central Products List (CPL) and would reduce the likelihood of unnecessary removal of Devices.

One respondent (a Large Supplier) noted that the supporting guidance being drafted as an annex to the National Cyber Security Centre's (NCSC) document 'Process for Performing Foundation Grade Evaluations (PPFGE)' must be adequate and clear for manufacturers. The Proposer has confirmed that the annex to the PPFGE has been drafted and circulated to the Security Sub-Committee (SSC) and the SSC Commercial Product Assurance Issue Resolution Sub-group (SCIRS) on 8 July, enabling Manufacturers to provide input. The initial recertifications will act as pilots, enabling this document to be updated based on lessons learned from these.

The same respondent also noted that the SSC would need to give clear timescales should any Devices need to be withdrawn if a Device does not get a renewal. The removal of Devices would be up to the discretion of the SSC in line with SEC Appendix Z, section 6. The SSC would set out a clear timescale for the removal of Devices, if required.

Another respondent (a Large Supplier) also noted that the identification in the CPL should be confirmed in advance of the modification. The SSC has agreed that the 'CPA Certificate Identification Number' (currently column L) will be prefixed with an [E] or [R] to represent whether the Device has an expiry date or renewal date and considered that the same approach using a [T] prefix could be used for a Trial Device (if MP172 is approved).

Following the end of the Modification Report Consultation period an Other SEC Party also raised an issue regarding how Device Manufacturers would be able to commence the recertification within the timescales required if the guidance documentation had not been finalised. The SSC Chair confirmed that the guidance was being worked on with NCSC to ensure it is delivered to manufacturer satisfaction and timescales. They also noted that the SSC are taking a proactive stance to the management of Device Models that are due to expire and will make risk-based decisions on those Device models prior to Certificate expiry. The respondent accepted this response.

Change Board vote

Change Board vote

The Change Board voted to **approve** MP209 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	5	0	0	Approve
Small Suppliers	1	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

Views against the General SEC Objectives

Objective (a)

The Change Board believed that MP209 will better facilitate SEC Objective (a) by ensuring that working Devices are not unnecessarily removed from consumer premises and provide an efficient process for CPA recertification.

Objective (f)

The Change Board also believed that MP209 will better facilitate SEC Objective (f) as the SSC will be able take a risk-based approach to Device certification.

Change Board discussions

The Change Board had no further comments.