

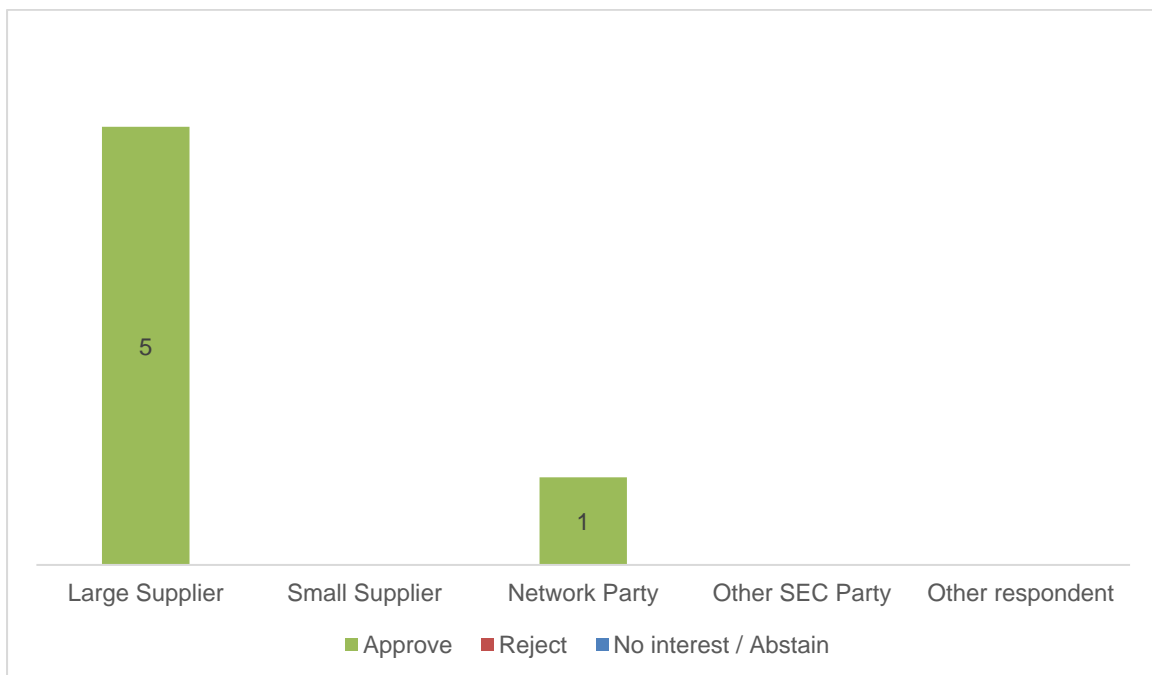
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MP209 ‘Lifetime CPA Certificates’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP209 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP209 should be approved?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Approve	This seems like a sensible approach to managing CPA certification and will reduce the likelihood of unnecessary device removal.	-
E.ON	Large Supplier	Approve	We approve of this modification, on the basis that the detail of the information that the Proposer advised is being drafted as an annex to NCSC's document 'Process for Performing Foundation Grade Evaluations (PPFGE)' is adequate and clear for manufacturers.	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.
Western Power Distribution	Network Party	Approve	We believe that this will better facilitate SEC objectives (a) and (f)	-
British Gas	Large Supplier	Approve	Agree it supports General SEC Objectives (a) and (f)	-
Utilita Energy	Large Supplier	Approve	SEC Objectives A & F – this mod removes the unnecessary administrative burden and non-compliances caused by the current CPA certificate expiration processes. Altering the expiration/renewal processes facilitates more efficient operation of Smart Metering	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			Systems whilst ensuring Devices are appropriately secure.	
EDF Energy	Large Supplier	Approve	EDF agrees that this Modification Proposal better facilitates SEC General Objective (a) and (f) by providing a defined process that supports the continuation of Devices on the CPL.	-

Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	SECAS Response
OVO Energy	Large Supplier	It would be good to have sight of the new format of the CPL ahead of implementation.	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).
E.ON	Large Supplier	We note that in the modification, it states that manufacturers are to submit evidence to support a renewal 12 months ahead of it's expiry, but a decision/certificate will only be provided a month before the stated expiry. As Suppliers/MOPs we'd need visibility from the SSC on the timescales to be expected in removing any assets that do not get a renewal/withdrawn.	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.
Western Power Distribution	Network Party	-	
British Gas	Large Supplier	This seems sensible.	
Utilita Energy	Large Supplier	N/A	
EDF Energy	Large Supplier	No	