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

July 2022 Working Group – meeting summary

Attendees

Attendee	Organisation
Mike Fenn	SECAS
David Kemp	SECAS
Bradley Baker	SECAS
Joe Hehir	SECAS
Kev Duddy	SECAS
James Hosen	SECAS
Joey Manners	SECAS
Robin Seaby	DCC
David Walsh	DCC
Matthew Davies	AltHANCo
Patricia Massey	BEAMA
David Steel	British Gas
Julie Brown	British Gas
Alex Hurcombe	EDF Energy
Daniel Davies	ESG Global
Martin Bell	EUA
Danish Mahmood	Landis+Gyr
Ralph Baxter	Octopus Energy
Stephen McLaughlin	Scottish Power
Andy Beggs	Shell
Gordon Hextall	SSC
Audrey Smith-Keary	SSE - OVO
Shuba Khatun	SSEN
Matthew Alexander	SSEN
Robert Johnstone	Utilita
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue, the proposed solution to deliver [MP172 'Reduced CPA & CPL requirements for innovation and Device field trials'](#), and a summary of the DCC Preliminary Assessment.

Issue

- The DCC uses the Central Products List (CPL) to manage the Devices it can communicate with.
- Commercial Product Assurance (CPA) certificates are a requirement for Devices to be added to the CPL.
- CPA requirements are based on mass rollout of Devices, meaning products have to be fully developed to be rolled out to the field.
- There is no leeway to support limited number trials on the live DCC network.

Proposed Solution

Device Approval

- The Device Manufacturer will apply to the Security Sub-Committee (SSC) for a Trial Certificate in place of a full CPA Certificate. All other requirements and Assurance Certificates for the Device must be in place.
- The SSC will decide whether to approve/reject or may request further assurance from a CPA Test Lab who would carry out an independent risk assessment before making a decision.

DCC Technical Solution

- The SSC will notify the Panel of the approval, who would update the CPL with the new entry accordingly.
- The DCC would then pass the information to the Data Service Provider (DSP) who would update a back-end table with the information. This will then be referenced by Service Reference Variants (SRVs) 12.2 & 8.4 to apply a 'Trial flag' in the Smart Meter Inventory (SMI).

Preliminary Assessment summary

- The DCC have provided a cost range of £85,000 - £115,000 for Design, Build and Pre-Integration Testing (PIT).
- Implementation will take three months up to the end of PIT.
- The total cost for a Full Impact Assessment (IA) is £12,194 and would be expected to be completed in 30 Working Days.

Working Group Discussion

SECAS (KD) presented an overview of the issue, the Proposed Solution and a summary of the DCC's Preliminary Assessment.

A Working Group member (MA) questioned whether the impact to the DSP would impact the DCC User Interface Specification (DUIS). The DCC (DW) confirmed that it would not and that the impact is limited to the DSP processing.

A Working Group member (AB) questioned whether the requirement for the Device Manufacturer to have another CPA Certified Device Model was necessary. They noted that this modification seeks to improve innovation and limiting those who can apply to current Manufacturers could prohibit this. They continued to ask whether it would be better to not include that within the legal text, even if the SSC currently saw it as a requirement, as that thinking could change in the future. The SSC Chair (GH) confirmed that the SSC has discussed this modification at length and it is an absolute requirement.

A Working Group member (AB) questioned why the DSP needed to be aware of the Device, noting that the bulk of the costs for this solution appear to be from adding a Trial flag to the Devices. The SSC Chair (GH) also questioned why the solution involving the DSP was required, noting that the SSC currently receives reports from the DCC that are used to identify Devices on the SMI that have a Device Model due for expiry. The DCC (DW) was not aware of this reporting and would need to investigate further. They highlighted that the requirement is for DCC to provide these reports, and the CPL identifier is not currently held within the DSP System which is why the DSP changes are required. SECAS (JH) commented that the report it receives currently is a full extract of the SMI that SECAS then filter down for the SSC's purpose.

SECAS (KD) highlighted that the Preliminary Assessment requested feedback from the Working Group as to whether to implement the solution with a feature switch. The DCC clarified this would be a minor cost but allow them to back out any changes should the change be removed in the future. A Working Group member (AS) questioned whether those minimal costs would be split out so they could give a view. DCC (DW) confirmed they would not be able to be separated. A Working Group member (MB) requested clarification that switching the function on or off would require regression testing. The DCC (DW) confirmed it would.

A Working Group member (AB) did not think a feature switch was required as an implemented solution would be expected to be enduring, highlighting that the SSC could stop approving Devices and this would effectively stop the functionality being used.

A Working Group member (AB) requested clarification on what would happen to Devices at the end of the trial. The SSC Chair (GH) confirmed the exact outcome would be determined by the SSC as is the case for other CPL entries. However, the Devices could either be 'suspended' by the DCC if the CPL entry was marked as removed, or could be allowed to remain pending the CPA Certification subject to the perceived security risk. SECAS (KD) confirmed that this requirement was added to the latest version of the legal text and will be sent out for review by all SEC Parties as part of the Refinement Consultation.

SECAS (KD) summarised the discussions and asked whether an Impact Assessment should be requested if this solution was to remain, noting that DCC and SECAS would investigate the existing SSC reports in the meantime. The Working Group did not think this solution was appropriate as it stands and Impact Assessment should not be requested.

Next Steps

The following actions were recorded from the meeting:

- SECAS and the DCC to investigate whether the existing reports provided to the SSC would meet the requirement.
- SECAS to issue the Refinement Consultation.