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## MP222 ‘CPL submission efficiency improvements’

### February 2023 Working Group – meeting summary

#### Attendees

Attendee	Organisation
Ali Beard (AB)	SECAS
Rachel Black (RB)	SECAS
Ben Giblin (BG)	SECAS
Kev Duddy (KD)	SECAS
Elizabeth Woods (EW)	SECAS
Christopher Thompson (CT)	DCC
David Walsh (DW)	DCC
Patricia Massey (PM)	BEAMA
Eleanor Taylor (ET)	BEIS
Julie Brown (JB)	British Gas
Emma Johnson (EJ)	Centrica
Steve Blackler (SBlac)	E Gas & Electricity
Alex Hurcombe (AH)	EDF
Daniel Davies (DD)	ESG Global
Martin Bell (MB)	EUA
Kevin McIntyre (KM)	geo
Kelly Kinsman (KK)	National Grid Electricity Distribution
Stuart Blair (SB)	Northern Power Grid
Ralph Baxter (RBa)	Octopus
Jamie Flaherty (JF)	Ofgem
Audrey Smith-Keary (ASK)	OVO Energy
Mahfuzar Rahman (MR)	Scottish Power
Jeff Studholme (JS)	Smart Meter Assets
Joanne Rush (JR)	SSE
Shuba Khatun (SK)	SSE
Kevin Clark (KC)	Utilita
Karen Jacks (KJ)	Vantage Meters
Luke Brady (LB)	Vantage Meters

## Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue, the business requirements and Proposed Solution, as well as the next steps.

## Issue

- A Device Manufacturer can add a new Device to the Central Products List (CPL) without any Supplier intervention.
- As soon as the same Device requires a change to hardware or firmware, it must have Supplier endorsement before it can be updated on the CPL.
- Without Supplier endorsement, the Device Manufacturer cannot progress with the CPL submission.
- Currently the SEC assumes the Supplier reviews the Commercial Products Association (CPA) documentation associated with the CPL submission. In practice, Suppliers simply forward an email from the Manufacturers with no notification or further checking – the products have been rigorously assessed under CPA by the Manufacturers' certification processes monitored by National Cyber Security Centre (NCSC).
- The most detailed level of testing for a Device is the CPA, which is overseen by the SSC and NCSC – this modification will not impact current CPA requirements.
- Hash Image is created by the Manufacturer, yet the request to list on CPL requires Supplier approval and the hash is part of the CPL entry.

## Impact

- Urgent fixes to installed Devices can be delayed and potentially blocked.
- Can result in difficulties for new Manufacturers to enter the market if they are not affiliated with a Supplier.

## Business requirements

Business Requirements	
Ref.	Requirement
1	Firmware and / or hardware revisions for Devices currently listed on the Central Products List (CPL) are to be submitted in a more efficient manner.
2	A Manufacturer can submit a Hash Image for firmware and / or hardware revisions for Devices currently listed on the CPL following CPA approval without the additional support of a Supplier Party.
3	CPL submission efficiencies will not compromise security and this does not force the supplier to deploy the firmware.

## Proposed Solution

- To enable Manufacturers to submit firmware / hardware revisions for existing CPL registered Devices.

- Manufacturers are able to submit Hash Images themselves (following completion of CPA process as currently and with the current signing process).
- SEC Appendix Z 'CPL Requirements Document':
  - Remove reference to Supplier Parties:
    - 'Supplier Party' to 'Party or Manufacturer' – (not all Manufacturers are SEC Parties)

## Working Group Discussion

SECAS (BB) provided the Working Group with an overview of the issue, the Business Requirements, Proposed Solution and the next steps.

When questioned, SECAS (BB) confirmed that this modification will not result in any DCC System impacts as MP222 is a governance change. The Proposer (MB) added that the Proposed Solution will not negatively impact Parties, as the process will become more direct and efficient.

A Large Supplier representative (JB) stated that they acknowledge the issue and approve of the Proposed Solution. A Device Manufacturer representative (AC) stated that they experience liaising with many Suppliers as part of business as usual (BAU) CPL submissions, and are also supportive of the Proposed Solution.

## Next Steps

The following actions were recorded from the meeting:

- SECAS to discuss MP222 and the Working Group outcomes with the Security Sub-Committee (SSC).
- SECAS to issue the Refinement Consultation.
- SECAS to present the Refinement Consultation responses with the Working Group.