

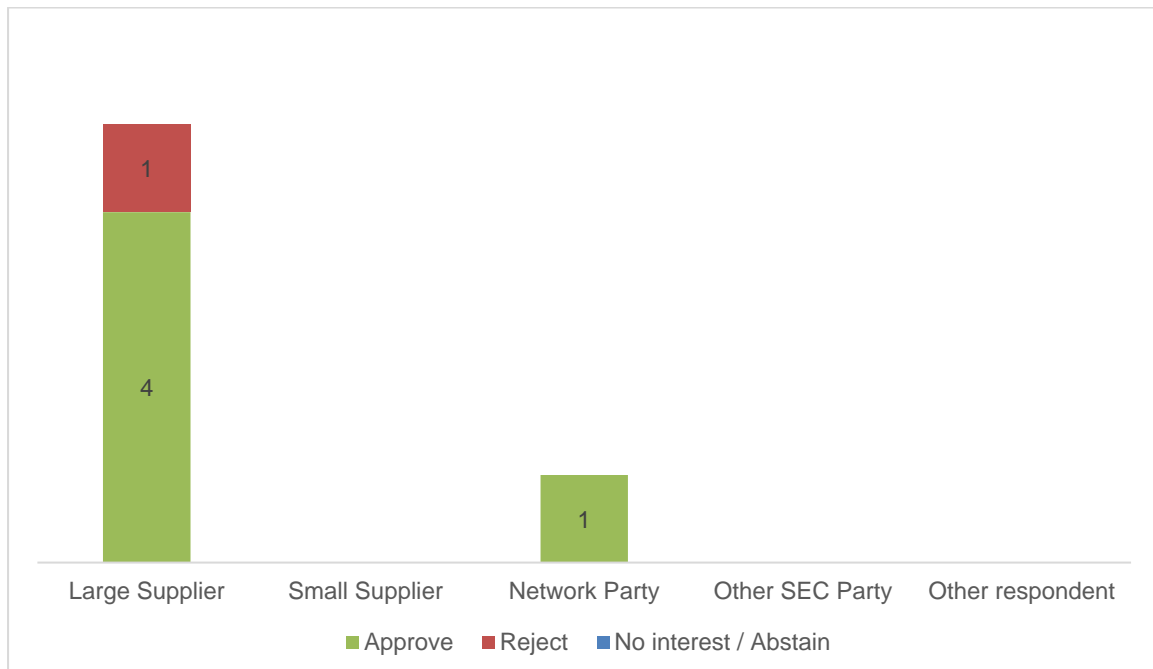
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MP222 ‘CPL submission efficiency improvements’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP222 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP222 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Approve	-	-
EDF	Large Supplier	Approve	We agree that this modification will better facilitate SEC Objectives (a), (c) and (d).	-
EON UK	Large Supplier	Approve	MP222 allows the flexibility for a Manufacturer to submit CPL entries without requiring the direct support of a Supplier. There is negligible cost to implement the change.	-
OVO Energy	Large Supplier	Approve	No comment.	-
British Gas	Large Supplier	Approve	Agree that it supports General SEC Objectives (a), (c) and (d).	-
Utilita Energy Ltd	Large Supplier	Reject	<p>Removing the requirement for a Supplier endorsement removes a layer of assurance on firmware suitability.</p> <p>Whilst the proposal streamlines the process, it does at the expense of assurance processes and Supplier control.</p> <p>As Suppliers are responsible for the maintenance of Device firmware, we should not seek to diminish our control of the associated process.</p>	The legal text, if approved, will allow the Manufacturer (provided they are a SEC Party (non-SEC Party Manufacturers must abide by the current obligations)) to submit hardware and firmware revisions to the CPL. However, Suppliers can still (although not obligated), complete testing

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			We would support the direct Manufacturer submission of entries (including those with Hashes) if the Supplier endorsement was still required. (i.e. Manufacturers create and submit the entry form, accompanied by proof of Supplier testing and approval).	for the upgrades before choosing to execute a mass deployment. Commercial Products Assurance (CPA) certification will remain in place and with it the obligation to make sure the firmware is valid for deployment. Further details can be found in the CPA Security Characteristics.

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
National Grid Electricity Distribution	Network Party	-
EDF	Large Supplier	N/A
EON UK	Large Supplier	No further comments.
OVO Energy	Large Supplier	-
British Gas	Large Supplier	-
Utilita Energy Ltd	Large Supplier	No further comments.