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MP241 'Interoperability Checker Update'

Modification Report

Version 1.2

11 March 2025

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views, and conclusions.

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This document also has four annexes:

- **Annex A** contains the business requirements for the Proposed Solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex C** contains the full responses received to the Refinement Consultation.
- **Annex D** contains the full Data Communications Company (DCC) Impact Assessment Response.

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1. Summary

This proposal has been raised by Robin Seaby from the DCC.

The Interoperability Checker Service is a tool hosted on the Citizens Advice website that enables consumers to check whether their Smart Meter should be operating in Smart Mode. It currently uses information provided by Suppliers to provide generalised results to the consumer.

The current results in the Interoperability Checker are generalised based on Device Models and Supplier Interoperability Data. The Data used to populate the Interoperability Checker is based on the Responsible Supplier's indication of which Smart Metering Equipment Technical Specification (SMETS) Device Models it is capable of operating. If the information is not kept up to date, it can lead to inconsistencies such as the website indicating the meter is not operating in Smart Mode, even though the Supplier is communicating with the meter, leading to consumer confusion. Citizen's Advice has received consistent feedback from consumers based on these generalised results and would like to explore changes to improve the consumers' user experience and provide additional information on Smart Meter availability.

The Proposed Solution aims to enhance the accuracy and functionality of the Interoperability Checker Service. The DCC will do this by using its own system Data for Devices operating in Smart Mode and Supplier operable Device Models. This will be complemented by integrating the Citizens Advice backend system with DCC Application Program Interface (API) endpoints and developing the Citizens Advice website accordingly. The Proposed Solution is aimed towards SMETS1 Devices only.

This modification will impact the DCC and Suppliers. The DCC costs for implementing this modification are £86,862. SECAS is targeting this modification for an ad hoc SEC Release. This is a Self-Governance modification.

2. Issue

What are the current arrangements?

SEC Section H 'DCC Services' Clause 16 'Interoperability Checker Service' requires the DCC to collaborate with Citizens Advice to provide the tool on behalf of Suppliers. The tool advises consumers on whether their Smart Meter is operating in Smart Mode. It also informs consumers about which Suppliers they could switch to whilst retaining or regaining Smart functionality on their Smart Metering System (SMS).

The Data used to populate the Interoperability Checker is based on the Responsible Supplier's indication of which SMETS1 Device Models it is capable of operating. The Interoperability Checker Service was designed to assist SMETS1 consumers to identify whether their meters would lose functionality if they moved Supplier, as well as helping them to see whether the Device was working with the smart functionality enabled.

What is the issue?

Currently, the Interoperability Checker's results may not reflect a consumer's actual experience with their Smart Meter. If the Citizen's Advice website does not hold the most up-to-date information, this will impact the results provided to consumers. A Supplier's ability to operate a Smart Meter is tied to

multiple factors that are not captured by the generalised Device Model information, such as poor Wide Area Network (WAN) signal. To gain further feedback on the issue, Citizens Advice ran a survey from 17 November 2022 until 10 March 2023, which received 88 responses. One of the questions in the survey asked, "Was the tool helpful to you?". 35 respondents answered "Yes" and 53 answered "No", therefore 60.2% of respondents felt the tool is unhelpful.

The Interoperability Checker Service has issues with providing accurate information to consumers about their Smart Meter's capabilities and the likelihood of whether they would be able to have a Smart Meter installed (based on data showing the number of installed Smart Meters in their local area). The current generalised results are based on Device Models rather than Data reflecting the specifics of the consumers SMS. This has contributed to misperception and inconsistency in results which can be frustrating for consumers.

Comments from consumers who completed the survey included:

- *"The pages (for both meters) say my meter is working but my account says that no meter readings since 24/10/22."*
- *"It said it cannot get readings, but my supplier does get them. I know my meter is SMETS1 and want to see if it's been upgraded".*
- *"It says my meter SHOULD be working in Smart mode not IS WORKING so I suspect the tool just checked that a Smart Meter was installed, not that it was actually signalling readings back to my supplier. Waste of time."*

When asked what could make the tool more useful, suggestions from consumers included:

- *"Absolute Confirmation that the meters are sending data."*
- *"Yes. How do I know it is functioning correctly. That would help."*
- *"An answer from the tool that discusses the possibilities why there is no reply from the meter."*

What is the impact this is having?

The lack of a source of information for consumers to check whether their Smart Meter is operating in Smart Mode has led to queries being raised to the DCC Service Desk. Since the DCC is not a consumer-facing organisation, this presents challenges in ensuring that consumers receive timely and accurate Data without overwhelming DCC resources.

This emphasises the need for improved Data flow and communication channels between the DCC and consuming-facing entities such as Citizens Advice.

The Proposer believes that there is a need to improve the Interoperability Checker's user experience. The Proposer also notes there is a need to provide additional information on the likelihood of having a Smart Meter installed for consumers that are awaiting installation.

Impact on consumers

Consumers are impacted negatively due to the Interoperability Checker's results not reflecting a consumer's actual experience with their Smart Meter. The use of Device Models instead of SMS-

specific transaction Data and reliance on outdated Supplier Interoperability Data can cause confusion and inconsistencies for consumers.

This lack of accurate information can lead to frustration and potentially prevents consumers from making informed decisions about their energy usage and their ability to benefit from time of use tariffs or acquiring an Electric Vehicle.

3. Solution

The Proposed Solution aims for the DCC to make use of System Data to enhance the accuracy of the Interoperability Checker Service, ensuring more reliable results for consumers. The DCC will develop an automated system to collect, transform and load Data which will serve all business requirements associated with this modification.

The DCC will develop reports to feed into the Citizen's Advice endpoint API:

- Premises that are currently operating in Smart Mode.
- Which SMETS1 Device Models can be operated in Smart Mode by each Supplier.

DCC Data source

The Proposed Solution will utilise the DCC transactional Data to provide more accurate results for the consumer than relying on policy Data from Suppliers. This will provide a more tailored result to the consumer.

The criteria DCC plan to utilise when identifying whether a SMETS1 Smart Meter is operating in Smart Mode is derived from the following Service Reference Variants (SRV):

- SRV 4.6.1 'RetrieveImportDailyReadLog'
- SRV 4.8.1 'ReadActiveImportProfileData'
- SRV 4.8.2 'ReadReactiveImportProfileData'
- All variants of SRV 4.1 & SRV 4.4

The DCC will verify that a Supplier has sent at least one SRV listed above within 60 days.

The criteria DCC plan to use to identify whether a Supplier can operate a SMETS1 Smart Meter is in Smart Mode is derived from the following SRVs which targets a Device of that Device Model and that was successfully processed

- SRV 4.6.1 'RetrieveImportDailyReadLog'
- SRV 4.8.1 'ReadActiveImportProfileData'
- SRV 4.8.2 'ReadReactiveImportProfileData'
- All variants of SRV 4.1 & SRV 4.4

The Proposed Solution was originally envisaged to include both Electricity Smart Metering Equipment (ESME) and Gas Smart Metering Equipment (GSME). However, following discussions with the Working Group and the Operations Group (OPSG), the scope was amended to only include ESME information. Further work on how to determine GSME Smart Mode functionality will need to be carried out before the DCC can include it in the API.

Additionally, the Proposed Solution included a requirement for the Citizen's Advice website to provide Data on whether a consumer could have a Smart Meter installed on their premises. This would be based on geographical Data that the DCC would provide to determine a consumer's likelihood of having a Smart Meter installation. Following feedback from the Working Group, this was de-scoped.

Both of these points are developed further in Section 7 'Assessment of the Proposal' of this modification report.

The business requirements for the solution can be found in Annex A.

The changes to the SEC required to deliver the Proposed Solution can be found in Annex B.

Detail on the criteria to be used to fulfil the reporting requirements can be found in the DCC Impact Assessment in Annex D.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties	✓	DCC

The DCC will be impacted as it would be utilising and optimising its existing Data sources and infrastructure. It will need to build additional reporting and support Citizens Advice to deliver the information to its website.

Suppliers will be positively impacted by this modification as they will no longer be required to provide the DCC with policy Data, streamlining the process and reducing their administrative burden.

DCC Systems

DCC System changes

This modification does not impact the DCC Total System.

The DCC Data Science and Analytics (DS&A) team will create new reports that will be produced to inform the Interoperability Checker Service through the Citizens Advice website.

The Interoperability Checker Service API will be modified to include new endpoints for Citizens Advice to request information in relation to the new requirements. Consumers and additional serverless applications will be developed to fulfil valid requests received at the new API endpoints.

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex D.

DCC System traffic

It has been confirmed by the DCC Impact Assessment that the Proposed Solution should not add any traffic or processing to the Smart Metering System or network infrastructure.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex B.

Technical specification versions

This modification does not impact the Technical Specifications.

Devices

No Devices are impacted from the implementation of this modification.

Consumers

The Proposer believes that this modification will lead to a more accurate Interoperability Checker Service, enhancing the user experience by providing consumers with the information they need to make informed decisions about their energy usage.

Other industry Codes

No impacts have been identified on other Codes if this modification were to be implemented.

Greenhouse gas emissions

No impacts have been identified affecting greenhouse gas emissions if this modification were to be implemented.

5. Costs

DCC costs

The DCC cost to implement this modification is £86,862. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£86,862
Systems Integration Testing (SIT)	£0
User Integration Testing (UIT)	£0
Implement to Live	£0
Application Support	£0

More information can be found in the DCC Impact Assessment response in Annex D.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

This modification is not expected to incur costs to any SEC Party. Suppliers may experience improved efficiency by reducing the volume of customer queries and less time advising of policy changes to the DCC.

Two respondents to the Refinement Consultation commented that they will not incur any costs by implementing this modification. One of the respondents advised the Proposed Solution would slightly reduce their costs if there were a reduced number of errors from the Interoperability Checker Service. Another respondent to the Refinement Consultation was unsure if any costs would be incurred and explained it would be highly dependent on increased or decreased call volumes.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **Ad-hoc SEC Release** (six months after a decision to approve has been received from the Change Board)

This modification does not impact the DCC Total System, therefore can target a SEC Release at any time as it does not require the full SIT/UIT testing cycles associated with a conventional SEC Release. The DCC would look to produce two new reports that would feed into the Citizen's Advice website through an API. The Citizen's Advice website will require updating to ensure consumers are aware of what data was used to determine their Smart Meter functionality. Citizen's Advice will utilise focus groups during the development of the website content to ensure clarity and ease of understanding of the information presented.

Monitoring of this development will be reported to the Change Sub-Committee (CSC) on a monthly basis to ensure on-time delivery.

7. Assessment of the proposal

Sub-Committee input

SECAS has engaged with the Chairs from the OPSG, the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA), the Testing Advisory Group (TAG) and the Privacy Sub-Committee (PSC) to confirm what input is required from these forums. SECAS asked the following Sub-Committees to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	OPSG to advise on operational requirements needed to improve the Interoperability Checker's user experience
SMKI PMA	No input required
SSC	Seek input on whether any necessary adjustments or assessments should be taken into consideration before progressing
TABASC	To review if there are any potential risks or challenges that could arise during implementation
TAG	No input required
PSC	No input required

Observations on the issue

The OPSG Chair highlighted that this modification is a big change which could potentially put the DCC closer to the end consumer over Suppliers. The OPSG Chair highlighted that the accuracy and responsibility of Data is with Suppliers and stressed the importance of clarifying the purpose and scope of the service. The OPSG Chair therefore suggested obligating Suppliers to provide accurate Data. The OPSG Chair commented that this modification should be progressed once the definition of non-communicating Smart Meter is aligned between the DCC, Department for Energy Security & Net Zero (DESNZ) and Suppliers.

After discussing the Proposed Solution with the DCC, the OPSG Chair is satisfied that the Proposed Solution and definition provided to the Interoperability Checker Service is appropriate for the use of determining whether a consumer's meter is operating in Smart mode. The Chair proposed that the DCC share a report, using the same Data, to Users bilaterally and as part of the non-communicating suite of reports shared at OPSG meetings for industry review. The DCC has also committed to further

work on aligning the non-communicating Data as part of the work being done with the OPSG and will update the tool in future if required, to improve accuracy. SECAS has suggested that there is a caveat on the Citizens Advice website to state that this tool cannot tell an Energy Consumer whether they are being billed to reads obtained from the Smart meter.

The OPSG Chair endorses the progression of this modification on the basis of the above.

The SSC Chair pointed out that the initial security architecture of the tool has been approved. However, they mentioned they would like to be updated on the changes made to the current tool and what remains the same. The SCC Chair noted that the information on the Citizens Advice website may be promising more than what the service provides. The DCC have advised as part of the new User journey mapping, it is proposed that Suppliers would be engaged on the messaging for this service on the Citizens Advice website.

The TABASC Chair emphasised that Suppliers would need to approve the Data presented due to a disconnect between what they see and what the DCC sees.

The OPSG, TABASC and SSC Chairs agreed that it is the Supplier's responsibility to provide the necessary information to meet the consumer's needs. The DCC have advised that it will use DCC transactional Data which is already in their system to improve the accuracy the Interoperability Checker Service.

Solution Development

Would updating Supplier Interoperability Data improve the consumer's experience?

The Interoperability Checker tool could be improved to make it easier to use and be more reliable. This can be done by using information about how different Devices work together, as well as checking to see if a Smart Meter is working properly by looking at its transactions. The Proposer believes that this will allow consumers to get tailored results based on their specific information. The Proposer also notes this will save time and frustration and help users make informed decisions.

The Working Group raised concerns over an issue of duplication and commercial interests as there is a similar Smart Meter health checker being built by a SEC Party which is available. The DCC noted that these changes are building on an existing requirement and service from within the SEC. Citizens Advice also noted that the SEC Party's specific tool did not meet their requirements with its current design.

The Working Group also believed that the Proposed Solution does not completely resolve the issue as there is a likelihood that the Data used will not effectively show the Device is operating in Smart Mode on the Supplier System. The Working Group also believed it undermined the Supplier's role. The Proposer advised that this modification aims to provide additional tools and information for consumers. Citizens Advice also highlighted the importance of providing independent advice and guidance to help consumers.

An Other SEC Party responded to the Refinement Consultation and expressed that the solution improves the accuracy, however even after the enhancement the issue will not be resolved, as the DCC does not have the ability to troubleshoot why a Device may or may not be operating in Smart Mode in a Supplier's System. The DCC explained the enhancement to the Interoperability Checker Service will provide an improved independent source of information. Whilst it will not resolve all issues, it believes that it will offer a significant improvement on the current Data provision.

Should consumers be able to check the viability of having a Smart Meter at their premises?

It was not the original intent of the Interoperability Checker Service to serve consumers that do not have a Smart Meter. However, Citizens Advice noted that there is currently nowhere for a consumer to check whether it is possible to have a Smart Meter fitted at their premises.

The intent is for a consumer to be able to identify whether they can have a Smart Meter installed, and the solution supports this by providing a percentage of Smart Meter take up in a surrounding area. The results from the tool need to encompass domestic premises which are in the closest geographical proximity to the address provided by the consumer all whilst while not covering so few premises that it would be possible to identify Data relating to individual premises in the result. This criterion had been developed in the Full Impact Assessment.

A Working Group member queried the potential impacts from 2G/3G sunsetting and the transition to 4G, raising concerns about the accuracy of the information consumers would receive as a result of this. The DCC noted that there is an overlap between areas covered by 2G/3G and 4G. Once 4G went live, this data would be included in the reporting that is sent to the Citizen's Advice website. The DCC was unable to confirm whether 2G/3G coverage Data would be removed from the tool once the sunsetting occurred.

Following a discussion at the Working Group, the Proposer agreed to reduce the scope of the modification and remove business requirement 4¹. This will ensure enhancements to the Interoperability Checker Service but not the introduction of the ability for consumers check whether it is viable to have a Smart Meter operate as intended at their premises. It was agreed if this requirement was to be taken forward that it should do so under a separate modification.

A Working Group member noted that the wording on the Citizens Advice website should provide clear information that the results may not be a true reflection of the viability of having a Smart Meter installed at the premises. Citizens Advice responded by saying that the checker will check with consumers whether communication has been clear. This feedback will be obtained by a feedback form the consumer will be able to fill out after using the tool. The checker will also explain where it sources the information from.

Change in Use Case for the Interoperability Checker Service

A Working Group highlighted that the Interoperability Checker Service's intended use is to help consumers check if their SMETS1 meter will still retain Smart Mode capabilities if a consumer were to switch Supplier. This modification seeks to inform consumers if their meter is operating in Smart Mode which is not what the tool was originally built to provide. Citizens Advice have stated although the use case is different to the initial design, their research identifies that consumers are already using the tool to confirm whether their Smart Meter is working and noted media coverage often provides links to the tool to use in this way.

Definition of non-communicating

Members of the Working Group and Change Board have highlighted that there is some misalignment between the definition non-communicating between DESNZ, DCC and the OPGS.

- Non-operated, and non-communicating meters

¹Business requirement 4 - Provide consumers with information as to whether their property could have a Smart Meter installed. This has subsequently been removed following this feedback.

- The meter is non-communicating, and no Service Requests or billing alerts have been observed in the past 35 days

If this modification is approved and implemented, the Interoperability Checker Service will use the DCC definition of non-communicating. The DCC have stated once the alignment of the definition for non-communicating Smart Meter has been agreed across all relevant Parties, that the DCC will be able to use the criteria for the new definition. The DCC have also stated that Suppliers will be notified of this alteration to the tool.

Gas Smart Meter Data

A Change Board member queried where the Gas Proxy Function (GPF) information is derived from. They highlighted its importance as the Proposed Solution relies on accurate Gas Smart Meter Data. Since Gas Smart Meters communicate indirectly via the GPF, the source and integrity of this information are critical to ensure accurate reporting and Data exchange.

The GPF is a feature in SMS used to represent a Gas Smart Meter in communication with the DCC when the Gas Smart Meter itself does not have direct communication capabilities. Essentially, it acts as a proxy for the gas meter, allowing gas consumption Data to be transmitted via a connected Electricity Smart Meter, which can communicate with the DCC.

Text information on Citizens Advice website

A CSC member advised the current wording on the Citizens Advice website should be revised due to causing confusion on what service the tool is currently providing. Citizens Advice has noted that content will be reviewed so that the information presented is clear and concise. The addition of a consumer checking the viability of having a Smart Meter fitted is a new user journey that would need to be mapped out during the implementation. This will require new public facing text developed to accompany the tool. The DCC has since stated that input will be sought from Suppliers to agree the appropriate text.

The views of Change Board

The modification was presented to the Change Board for a final vote in September 2024. The discussion detailed below resulted in the Change Board deferring the vote. This was due to further information required regarding the definition of non-communicating, as well as the use of GPF to obtain Data regarding GSMES.

A Change Board member highlighted that there is a difference between what the DCC and Suppliers define as non-communicating. The member stated that the alignment of the definition will be worked on for some time, as there are discrepancies in what is defined as non-communicating. An action was raised for SECAS to establish if this modification can be aligned with the discussions of what the definition of a non-communicating Smart Meter is.

SECAS investigated this action with the DCC. The DCC has chosen to progress with this modification with the DCC definition of non-communicating as there will be a potential immediate improvement to consumers who are using the Interoperability Checker Service. The DCC commented on the challenge of having many Parties agreeing to a new definition of non-communicating and said it could take some time until the discussions are concluded. The DCC has advised that when a new definition

of non-communicating exists, the DCC would be able to align the new definition with ease by making a change to the Interoperability Checker Service. This would involve changing the internal criteria which of what the DCC currently deems as non-communicating without the need for any participation of a software provider to make any of the changes.

A Change Board member highlighted that there are some cases where the communications between a Gas Smart Meter and the Communications Hub has broken down, which results in no Data contained within the GPF. The DCC have no access to Data in this case and are unsure on what information is supposed to be transmitted. A Change Board member requested SECAS to investigate where GPF information derives from in relation to this modification.

Following discussions with the DCC, the DCC has advised that it can identify a Service Request or an Alert originating from the GPF which has successfully been processed by the relevant Supplier therefore the Gas Smart Meter would be deemed as operating in Smart Mode. Although the DCC has access to Data flowing from the GPF to the Communications Hub, it is uncertain on the specifics of the Data being transferred, which means the DCC cannot confirm whether any Data is being transmitted. The DCC also highlighted that a GPF is only commissioned when a GSME is actively present, establishing a direct link between the two systems.

The DCC considers this issue with the GPF to be a niche problem that occurs infrequently. The DCC believe such instances are rare and do not represent a widespread concern across the overall potential improvement of the Interoperability Checker tool.

The views of OPSG

This modification was discussed with OPSG members in November 2024. The OPSG Chair stated that discussions around creating an industry wide definition of non-communicating Devices will be explored outside of this modification. Citizens Advice representatives were also present during the meeting and provided information to members that there are approximately 40,000 visits to the tool per quarter. Citizens Advice highlighted that consumer behaviour with the tool has dictated that the tool is currently being used to provide information on whether an Energy Consumers meter is operating in Smart Mode.

An OPSG member stated that a Supplier should be providing information on whether a meter is operating in Smart Mode, due to the fact there still could be a number of reasons as to why a Device is not communicating with the Supplier outside of the Service Requests that the DCC are deeming a meter to be operating in Smart Mode. Citizens Advice mentioned that they it has been made aware of consumers experiencing difficulties with getting in touch with a Supplier with their Smart Mode query.

It provided examples such as long hold times as well as being connected to multiple agents to be provided the information. Citizens Advice provided information that 80% of queries are for electric Smart Mode queries and 20% for gas Smart Mode queries. The OPSG acknowledges that gas related Smart Mode queries will be providing inaccurate information if the Proposed Solution was implemented and acknowledged that there should be a focus on the electric Smart Mode queries providing enhanced results for the consumer. An OPSG member highlighted that a GPF message may be historic and may not accurately reflect if the meter is operating in Smart Mode.

The DCC is currently discussing internally and with Citizens Advice whether gas related Smart Mode queries should be excluded from the Proposed Solution, until the DCC can provide clearer information than what is already available from the tool. Should this be achievable, it will be investigated at a later date. Citizens Advice highlighted that the Secretary of State signed off legislation for the

Interoperability Checker Service and that it will keep rights to provide Gas Smart Meter information whilst the DCC investigates how to provide an enhanced service to obtain the information.

The OPSG members agreed that the wording on the Citizens Advice website must be clear to highlight that the results provided to consumers, do not represent that the current meter reading on a consumer's Device is used for billing services. Citizens Advice confirmed that there will be some participation from SEC Parties as to what message is available.

8. Case for change

Business case

The solution aims to enhance the accuracy and functionality of the Interoperability Checker Service by leveraging DCC System Data. The Proposer believes that this will provide consumers with more reliable source of information about their Smart Meters operational status, reduce customer service queries, and streamline the process for Suppliers.

The Proposer believes that the Proposed Solution holds the potential to enhance the effectiveness of the Interoperability Checker Service and reduce consumer confusion.

However, it has been highlighted by industry throughout the modification that the tool would not resolve the issue, as the DCC and Supplier definition of non-communicating is not aligned.

Non-communicating Devices is also a concern, which is being addressed as part of wider industry engagement. However, the reasons for non-communicating Devices are wide and varied, which will likely take a significant amount of time to resolve. What this means for consumers is that it would – in some cases – lead to conflicting information, i.e. the tool would advise a consumer that their Smart Meter is working when the Supplier cannot access the information, or vice versa. This would go against the aim of the Proposed Solution to support consumers in obtaining accurate information and is likely to increase consumer dissatisfaction with both the Supplier and Citizen's Advice.

Views regarding the General SEC Objectives

Proposer's views

The Proposer believes that providing more SMS-specific information to consumers about their Smart Meter capabilities will better facilitate SEC Objective (a)² and (c)³. This is because the enhancement ensures that Smart Meters are correctly identified as operating in Smart Mode or not.

This reduces the likelihood of operational issues or confusion during meter installations or when switching Supplier. The Proposer believes that this modification also enables consumers to receive more precise and reliable information about their Smart Meter.

² facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises with Great Britain

³ facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems

Industry views

One respondent to the Refinement Consultation agreed that this modification would better facilitate SEC Objective (c). Another disagreed, noting that SEC Objective (c) relates to energy consumers management of their use of electricity and gas through the provision of them of appropriate information by means of Smart Metering Systems. They stated that the Interoperability Checker Service does not form part of the Smart Metering System.

The DCC responded advising that the Interoperability Checker Service is a tool to help consumers with SMETS1 Devices better understand their choice of Supplier and impacts of switching. By providing reliable information, the proposed changes will allow consumers to make better informed decisions. In March 2024, there were around 15m SMETS1 Devices that should be migrated to the DCC network, with 11.7 connected as of March 2025. With the rollout of 4G, it is likely that there will be an increase in the ability to communicate with Devices, thus improving interoperability.

A Large Supplier expressed that this modification would have a negative effect on SEC Objective (a), as the additional steps using the service before being redirected to the Supplier could be avoided if consumers were directed to the Supplier initially. Citizens Advice has noted that most users appear to have engaged with their Supplier and use the Interoperability Checker Service as a way of gaining independent information to assist them in their enquiries.

Views against the consumer areas

Improved safety and reliability

This modification has a neutral impact on safety and reliability.

Lower bills than would otherwise be the case

This modification could have a positive impact on lowering bills than would be otherwise be the case as consumers may have enhanced accuracy in the results generated in the tool. This leads to an increased chance for the consumer to have a Smart Meter installed which may lead to lowering their energy bills if consumers monitor their consumption.

Reduced environmental damage

This modification has a neutral impact on reducing environmental damage.

Improved quality of service

This modification may have a positive impact on improving the quality of service as it aims to improve the accuracy of the Interoperability Checker Service.

Benefits for society as a whole

This modification has a neutral impact in this area.

Final conclusions

The CSC have expressed that wording on the Citizens Advice website should be clear to the consumer to provide an accurate description of how the results are generated from a search on the tool. The Working Group believe that the Proposed Solution does not completely resolve the issue as the tool would not have the nuanced view of why a Smart Meter may or may not be operating on the Supplier's Systems. Therefore, Suppliers should be the first point of contact for any meter queries from a consumer.

Additionally, with the rollout of 4G, it is likely that communication with Devices will be improved. Consumers with Devices that were previously inoperable in Smart Mode could see their Devices operate as such. The Enrolment and Adoption (E&A) of SMETS1 Devices is also likely to negate the need for consumers to check which Suppliers would operate their Device should they switch, as all SMETS1 Devices will be enrolled on the DCC network. Thus, the case benefit for the tool would likely be outgrown.

The TABASC believe that Suppliers would need to approve the Data presented due to a disconnect between that a Supplier sees compared to what the DCC sees. The SSC are satisfied with the level of security of Data for the Proposed Solution. The OPSG Chair believes that this modification has been raised too early as there is a disconnect between the definition of non-communicating meters and that this modification should be progressed once the definition has aligned between the DCC, DESNZ and Suppliers. The Change Board hold the same view.

The Change Board also noted that at times, there could be an empty response when Data is received from the GPF. Citizens Advice believe that this modification should be implemented to potentially improve consumer experience with a tool which is live and used regularly.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	5 May 2023
Presented to CSC for initial comment	16 May 2023
CSC converts Draft Proposal to Modification Proposal	16 May 2023
Business Requirements developed with Proposer	16 May 2023 – 4 July 2023
Modification discussed with Working Group	5 Jul 2023
Modification discussed with OPSG	6 Jul 2023
Preliminary Assessment requested	14 Sep 2023
Preliminary Assessment returned	16 Oct 2023
Modification discussed with Working Group	1 Nov 2023
Refinement Consultation	15 Nov 2023 – 6 Dec 2023
Impact Assessment costs approved by Change Board	21 Feb 2024
Impact Assessment requested	23 Feb 2024
Impact Assessment returned	6 Jun 2024

Timetable	
Event/Action	Date
Modification discussed with Working Group	3 Jul 2024
Modification discussed with Working Group	7 Aug 2024
Modification Report approved by CSC	20 Aug 2024
Modification Report Consultation	21 Aug 2024 – 12 Sep 2024
Change Board Vote (deferred)	25 Sep 2024
Modification discussed with the DCC	3 Oct 2024 – 16 Oct 2024
Modification discussed with OPSG	14 Nov 2024
Modification discussed with Working Group	15 Jan 2025
<i>Modification approved by CSC</i>	<i>18 Mar 2025</i>
<i>Modification Report Consultation</i>	<i>19 Mar – 12 Apr 2025</i>
<i>Change Board Vote</i>	<i>23 Apr 2025</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
API	Application Program Interface
CSC	Change Sub-Committee
DCC	Data Communications Company
DESNZ	Department for Energy Security and Net Zero
DS&A	Data Science and Analytics
E&A	Enrolment and Adoption
ESME	Electricity Smart Metering Equipment
GPF	GPF
GSME	Gas Smart Metering Equipment
OPSG	Operations Group
PIT	Pre-Integration Testing
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	System Integrated Testing
SMETS	Smart Metering Equipment Technical Specification
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMS	Smart Metering System

Glossary	
Acronym	Full term
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group
UIT	User Integrated Testing
WAN	Wide Area Network