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MP241 ‘Interoperability Checker Update’

Conclusions Report – version 2.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

Smart Energy Code Administrator and Secretariat (SECAS) received four responses to the Modification Report Consultation. Three respondents believed that the modification should be rejected, and one respondent believed the modification should be approved. Two respondents believed this modification did not better facilitate General Smart Energy Code (SEC) Objective (a)¹ and (c).² The approving respondent believed this modification did better facilitate General SEC Objective (a) and (c). The fourth respondent did not comment concerning the General SEC Objectives.

Change Board (25 September 2024)

The September 2024 Change Board decided to defer the modification due to two concerns which were raised during the discussion of this modification relating to the definition of non-communicating Smart Meters and a query relating to how Gas Proxy Function (GPF) information is derived.

Change Board (23 April 2025)

The April 2025 Change Board decided to defer the modification due to concerns regarding the governance of the inclusion of the GSME part of the solution, as well as the governance around the end of life of the Interoperability Checker should the modification be rejected.

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers premises within Great Britain

² 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

Modification Report Consultation responses

Summary of responses

One respondent (Large Supplier) responded to reject this modification under the basis that the Citizens Advice tool has outrun its purpose which was initially to check Smart Metering Equipment Technical Specification (SMETS1) interoperability. The respondent believed although there are potential improved data sources that the new additions are inappropriate. They stated that consumers should be contact their Energy Supplier with any questions surrounding Smart availability. They further stated that the customer journey of going via the Interoperability Checker Service is too complicated and highlighted that the tool does not align with what is happening with the consumers meter in practice. The respondent stated this modification does not support General SEC Objective (a)³ and commented saying consumers checking the tool and then contacting their Supplier with any discrepancies is the most efficient provision and that they would prefer the consumer to contact Suppliers directly with any queries. They believed that General SEC Objective (c)⁴ is not better facilitated due to the Citizens Advice tool not forming part of the Smart Metering System.

Another respondent (Large Supplier) rejected this modification and stated there is no need for ongoing investment in the SMETS1 Interoperability Checker Service. They stated with over 12 million SMETS1 meters now enrolled in the Data Communications Company (DCC), allowing for easier Supplier switching, they believed the need for the checker had diminished. Additionally, they noted that the Secretary of State has set a deadline of 31 December 2024, for the remaining enrolment activities. They suggested that the DCC should focus on completing SMETS1 enrolment and associated activities instead of investing further in the checker. They argued that retiring the tool after this deadline would better service consumers and avoid unnecessary costs.

Another respondent (Large Supplier) highlighted that consumers contacting the Supplier would enable any remedial work required to resolve any issues without the need for repeated contact.

Another respondent (Consumer Advocate) believed the modification should be approved. The Interoperability Checker Service was highlighted as an increasingly popular tool among Consumers. The tool has been consistently promoted by the DCC, Department for Energy Security and Net Zero (DESNZ) and others, and the improvements made by this modification would deliver clear benefits to consumers.

The Consumer Advocate believes the changes in this modification will empower consumers to understand issues they may be experiencing with their smart meter. It would also support independent advice providers to help consumers with such issues as well as equip them with the information they need to seek a resolution, which would be welcomed by industry.

They also noted that the Interoperability Checker Service is the third most accessed page on their website, showing the importance of the tool. They also highlighted that it aligns with Ofgem's ambitions through its Consumer confidence strategy for the sector⁵.

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⁴ 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

⁵ Ofgem, [Consumer confidence: a step up in standards](#), September 2024

Change Board (September 2024)

Change Board (September 2024)

This modification was presented at the September 2024 Change Board for final vote. A Change Board member (Large Supplier) stated that there is a difference between what the DCC and Suppliers define as 'non-communicating'. The member advised that they expect the definition of non-communicating will continue to be worked on for some time, as there are discrepancies between the DCC and Suppliers in what is defined as 'non-communicating'. The Proposer agreed with this, however, stated that the DCC are proposing a list of Service Requests to understand if a Smart Meter is operating in Smart Mode. They stated that as that work progresses it will improve the level of accuracy the Interoperability Checker Tool currently generates.

A Change Board member (Large Supplier) 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 via the GPF, the source and integrity of this information are critical to ensure accurate reporting and Data exchange.

The Change Board decided the modification was not able to be voted upon until this information was established.

Following the meeting in September 2024, SECAS investigated both queries with the DCC. The Proposer (the DCC) have chosen to progress with this modification with the DCC definition of 'non-communicating', as they believe that 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 noted it could take several months until the discussions are concluded. The DCC have 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 nor a new modification. The DCC have stated that it will be able to notify Suppliers of any changes of criteria from the tool.

In relation to the GPF query the DCC have advised, that it can see 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 can see 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 Gas Smart Metering Equipment (GSME) is actively present, establishing a direct link between the two systems.

Change Board (April 2025)

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A member of the Change Board (Large Supplier) queried the lack of comments to the second Modification Report Consultation for MP241. They queried if there had been any positive support from Citizens Advice, as the bulk of the benefits of the Proposed Solution would be for the Citizens Advice

website. SECAS confirmed there had been positive support from Citizens Advice during the first iteration of the Modification Report Consultation. A member (Other SEC Party) queried if this Modification had been updated, considering the discussions had at the Operations Group (OPSG). SECAS confirmed that the OPSG's view is the Electricity Smart Metering Equipment (ESME) information that the DCC provide is acceptable in the first instance, pending further work on the Gas Smart Metering Equipment (GSME) part of the solution. This is currently undergoing further work and SECAS will be engaging with the DCC when the GSME information is acceptable for the OPSG. Once this is acceptable the DCC will then upload the information that pertains to GSME information and provide this to the Citizens Advice website without the need for a further Modification. The DCC advised the DCC attended the OPSG and addressed the concerns which had been raised regarding the applicability of the Gas Data. The DCC are continuing to work alongside the OPSG. The purpose of this Change Board would be to approve the Modification for the ESME part of the Proposed Solution. The enhanced ESME output would be fed into the Interoperability Checker on the Citizens Advice website, pending further GSME work.

A member (Other SEC Party) queried what measures are in place to be able to take the Interoperability Checker down if this is necessary. The DCC advised the Checker is already there, therefore there are no changes being made to the tool that the consumer interacts with. The Checker currently provides a result showing if the Smart Meter is working in Smart Mode or not. A member of the Change Board (Small Supplier) queried the intended lifespan for the Interoperability Checker on the Citizens Advice website, if the Modification comes back for a final vote. Citizens Advice advised that the end of life of the tool would come about only with permission from the Secretary of State, in line with SEC Section H16.5(b).

Operations Group Follow-on Discussion

Following the April 2025 Change Board, SECAS liaised with the Operations Group (OPSG) to discuss the governance of the Gas Smart Metering Equipment (GSME) information required as part of the Proposed Solution for the modification.

The OPSG Chair agreed the modification should proceed with the legal text as is, with the understanding that the DCC will engage with the OPSG until the GSME non-communication issue reaches a point whereby the OPSG is comfortable with the Service Request Variants (SRVs) required to provide accurate information for the Interoperability Checker Service.

Change Board vote (June 2025)

Change Board vote

The Change Board voted to **reject** MP241 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	1	4	1	Reject
Small Suppliers	2	0	0	Approve
Network Parties	0	0	2	Abstain
Other SEC Parties	1	1	0	Reject

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Consumer Representative	1	0	0	Approve
Overall outcome:				REJECT

Views against the General SEC Objectives

Objective (a)⁶

The approving members of the Change Board believed that MP241 will better facilitate SEC Objective (a) as the enhancement ensures that Smart Meters are correctly identified as operating in Smart Mode.

An abstaining Large Supplier did not believe the modification would benefit SEC Objective (a), but did not provide a rationale for it.

Objective (c)⁷

The approving members of the Change Board believed that MP241 will better facilitate SEC Objective (c) as the enhancement would allow consumers to access Smart-specific benefits (such as Electric Vehicle tariffs, Time of Use tariffs, etc), by providing consumers with accurate knowledge on the operating mode of their meter.

An abstaining Large Supplier did not believe that the modification better facilitated SEC Objective (c) as consumers would still need to contact their Suppliers if there are issues with the Smart Meter.

A rejecting Large Supplier believed that the modification would not better facilitate SEC Objective (c) as consumers managing use of electricity and gas is more closely tied to the Home Area Network (HAN) as opposed to the Wide Area Network (WAN), which the modification did not address.

Large Suppliers that rejected the modification did so on the basis that the enhancement would not provide entirely accurate information, and consumers would still be required to contact their Supplier if there were issues with the meter, which would not lower the number of enquiries to Suppliers, or the DCC. Furthermore, Large Suppliers that rejected the modification believed that consumers should contact their Suppliers in instances where the Smart Meter is experiencing issues as Suppliers would have the most accurate and up-to-date information on the status of their Smart Meter. This applied to both SEC Objectives (a) and (c).

Change Board discussions

A member (Large Supplier) questioned whether the Checker had been evaluated against the upcoming Smart Meter Data Repository developed by Ofgem. They advised that actual Consumption Data would provide a more accurate indication of Smart Mode operation than inferred communication packets. The DCC responded that the Repository was still in development and not intended for direct consumer access, whereas the checker served a different, more accessible purpose.

A member (Small Supplier) queried if the Modification is not approved, what would the intention be with the existing Interoperability Checker. They questioned if the existing Interoperability Checker has

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a retirement plan or if it will remain in existence for the foreseeable future. SECAS advised that there is a clause in SEC Section H16 'Interoperability Checker' that states the Interoperability Checker can only be removed or retired under a Secretary of State decision. It will therefore continue to exist in its current form until the Secretary of State decides with regards to removing the Interoperability Checker obligation from the SEC.

A member (Large Supplier) raised concerns about the governance of the Checker. They noted that the tool was originally tied to the Secretary of State under transitional governance for Smart Meter Equipment Technical Specifications 1 (SMETS1) and questioned whether this was still appropriate given the tool's evolving role. The Department for Energy Security and Net Zero (DESNZ) acknowledged that while the Checker had evolved, the clause tying it to the Secretary of State remained valid until SMETS1 enrolment formally concluded.