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Angela Love
SEC Panel Chair
SECAS (*By email only*)

9 July 2025

Dear Angela,

RE: SEC Change Board decision on MP241 'Interoperability Checker Update'

In accordance with SEC D9.4(a), I am writing to appeal to the SEC Panel for the reversal of the SEC Change Board decision on MP241 'Interoperability Checker Update'¹, a Self-Governance Modification proposed by the Data Communications Company (DCC) with support from Citizens Advice.

Executive Summary

DCC is confident that MP241 would deliver improved outcomes for consumers, better facilitate the General SEC Objectives and offers a low cost, high value solution to the issue identified within this SEC Modification. These views are shared by Citizens Advice and DESNZ.

The Interoperability Checker Service is already popular with consumers who visit the Citizens Advice website seeking information. It is now the 3rd most visited of Citizens Advice's energy pages with circa 100K active users per annum.

The issue identified by MP241 is that information provided through this service today is not specific to the device of the consumer but based on generalised meter type information and additionally does not presently provide a service to consumers with SMETS2 meters. The enhancements offered by the MP241 solution address these issues.

The SEC Change Board voted on MP241 on 25 June 2025, the vote was evenly split (2-2), so without a majority vote it was rejected. We set out our reasoning in more detail in the sections below why we believe this decision to reject should be reversed and further consideration given to the outcome of this SEC Modification.

¹ [Interoperability Checker Update - Smart Energy Code](#)

Background

Today, Citizens Advice provides consumers with trusted information and advice on energy and smart metering, supported by the Interoperability Checker Service. However, consumers' expectations are not always met by the Checker and the results it gives would be made more relevant, accurate and personalised by MP241. Throughout the SEC Modification Process, Citizens Advice has emphasised the ongoing demand for the Checker, how it is used by consumers and the need to align the results that it gives with consumer expectations.

Under Section H16 'Interoperability Checker Service', there is a requirement for an Interoperability Checker Service to be established, which was by direction of the Secretary of State. The requirement is to provide the Interoperability Checker Service until further directed by the Secretary of State. DESNZ confirmed during the June 2025 SEC Change Board meeting that there is no plan to remove the requirement for the Interoperability Checker Service in the foreseeable future.

The Interoperability Checker is hosted on the Citizens Advice website. The Checker allows consumers to check information about their Smart meter, its interoperability, and whether their Supplier can operate it in smart mode. Consumers are directed to contact their Supplier for more information or assistance with their smart meter after using the Checker. It is a popular tool with consumers and has circa 100K active users per annum. It is Citizens Advice's 3rd most used energy web content. The Checker is clearly addressing a widespread consumer need.

In May 2023, DCC raised MP241 to enhance the current Interoperability Checker Service, with the objective of providing consumers with responses that:

1. Are specific to their smart meter, as opposed to generalised based the meter model;
2. Indicate whether the meter is operating in smart mode based on records that DCC holds of communications between the Supplier and the meter; and
3. Provide the above information in relation to SMETS2 meters as well as SMETS1 meters.

On 25 June 2025, the SEC Change Board voted on MP241 'Interoperability Checker Update'. The votes taken at the SEC Change Board across the SEC Party categories were:

- 2 approving the modification (Small Suppliers, Consumer Representative);
- 1 vote abstaining (Network Parties); and
- 2 votes rejecting the Modification (Large Suppliers voting to reject, Other SEC Parties having a split vote which represents a rejection).



As a result of the overall SEC Change Board split vote (2-2), the Modification was rejected.

We challenge the rationale given by several Parties who voted against MP241 on the basis that they would prefer consumers to always contact their Supplier for information on the status of their smart meter. DCC has an existing SEC Obligation to deliver the Interoperability Checker Service and to contract with Citizens Advice to host the Checker on its website. The Modification Proposal is to enhance the current Checker and therefore the options before the Change Board were to:

- a) Approve the enhancements (more accurate results, better consumer experience); or
- b) Reject the enhancements and maintain the status quo (less accurate results, inconsistent consumer experience).

The continued provision of the Interoperability Checker Service and its use by consumers was not the subject of the vote.

Reasons for the appeal

We are appealing this decision to the SEC Panel in accordance with SEC D9.4(a) as shown below.

D9.4 A Self-Governance Modification shall only be approved where the Change Board votes to approve the Modification Proposal, subject to the following:

- a) any Party that disagrees with the decision of the Change Board, may (within 10 Working Days following the publication of that decision) refer the matter to the Panel, and the Panel shall determine whether it wishes to reverse the decision of the Change Board;*

During the SEC Change Board meeting, and as noted in the below extracts from the MP241 Conclusions Report v2.0, Parties who voted to reject MP241 expressed several views against it better facilitating the General SEC Objectives. We have provided a view from DCC and Citizens Advice in response to each of them:

1. An abstaining Large Supplier did not believe that the modification better facilitated SEC Objective (c)² as consumers would still need to contact their Suppliers if there are issues with the Smart Meter.

Whilst it is true to say that only the supplier is in a position to resolve issues with a smart meter, and the Citizens Advice website already makes it clear to consumers that this is the case, the Checker provides an independent source of information for consumers. The Checker has been in operation for more than 3 years and is used by consumers seeking to know whether their meter is operating in smart mode. MP241 would improve the accuracy of the Checker's responses, meaning that many more consumers would have the clarity they seek and, where their meter is operating in smart mode, would require no further help.

2. 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.

Consumers' management of electricity and gas use is achieved through a variety of means, including with data acquired via the HAN and also data acquired from smart meters via the WAN. The latter is particularly relevant to third party energy services for which a smart meter is a prerequisite. A common use case for the Interoperability Checker Service is consumers visiting the Citizens Advice website seeking to understand whether their smart meter is operating in smart mode in order to confirm that they do meet that prerequisite.

3. 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)³ and (c).

² To 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

³ To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

As noted above, we consider that the implementation of MP241 would lead to fewer enquiries to Suppliers due to the enhanced accuracy and relevance of the responses given by the Interoperability Checker Service.

Consumers value the fact that the Checker is provided by Citizens Advice, the independent consumer champion, something that is also recognised by Ofgem in its goal to build consumer confidence. Suppliers do have access to data that DCC does not, yet consumers still currently often turn to the Checker in its existing form, after they have spoken to a Supplier. The Checker is not always able to answer those questions and already directs consumers to their Supplier where further help is required, but the implementation of MP241 will greatly improve the relevance of responses it gives.

We note that the Small Suppliers in their vote to approve MP241, whilst not necessarily welcoming the continuation of the Interoperability Checker Service, voted pragmatically to improve the accuracy of the Checker results given that the Checker is to continue for the foreseeable future.

Whilst we appreciate that there are Supplier concerns regarding the continuation of the Interoperability Checker, as the Checker is required under the SEC and is not planned for removal, it makes little sense to allow its continuation with less accurate data when MP241 could improve the accuracy of data for consumers, and a vote to reject the Modification is a vote for the status quo.

Alignment of the Modification with General SEC Objectives

DCC and Citizens Advice consider that implementing the Modification better facilitates SEC Objectives (a) and (c):

- (a) *facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain*
- (b) *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*



The current service provides only a generalised response to the consumer, indicating that their Supplier should or could be operating their SMETS1 meter in smart mode, based on whether the Supplier has indicated that it can operate SMETS1 meters of the same model. This generalised data set was considered to be sufficient to resolve the consumer problems that could be foreseen at the time of development.

Consumers using the Checker may already have contacted their Supplier and/or may simply be looking for fast and accurate information about their smart meter from an independent source to enable them to make informed decisions. Currently these needs cannot always be met due to the limitations of the data that the Checker relies upon and the focus on SMETS1. Consumers expect that the Checker will cover all enrolled smart meters and will provide a personalised response that indicates whether their smart meter is actually operating in smart mode and are therefore forced to make further enquiries.

If the Modification is implemented, consumers who use the Checker would be given a clear indication of whether their specific smart meter is being operated in smart mode by their Supplier, based on actual records of data communications, and regardless of whether it is a SMETS1 or SMETS2 meter. This will better address the evolving needs of consumers, giving them a more accurate indication of whether their meter is working in smart mode, which is a pre-requisite for engaging with many third-party energy services, better facilitating SEC Objective (b)⁴.

As is the case today, where more information or assistance is required, consumers will be directed to contact their Supplier, however the provision of an accurate, personalised response makes it less likely that further assistance will be required. This increases overall efficiency in the operation of Smart Metering Systems, better facilitating SEC Objective (a).

The cost to implement this Modification is relatively low (£86,862) and there are no additional release costs – it is standalone and represents value for money for the consumer benefits it would deliver.

⁴ To enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence



Next steps

We are asking the SEC Panel to determine whether it wishes to reverse the decision of the Change Board, as the Interoperability Checker Service is a tool required under the SEC for the foreseeable future, it is popular with consumers, it is of low cost to implement, there are no ready alternatives, and this Modification will enable higher accuracy and greater satisfaction with the results given to consumers.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Seaby', with a long horizontal flourish extending to the right.

Robin Seaby

End-to-End Architect, DCC

A handwritten signature in black ink, appearing to read 'Emily Stone', written in a cursive style.

Emily Stone

Product Manager, Citizens Advice