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MP241 ‘Interoperability Checker Update’

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP241 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No	While the proposal may improve the accuracy, use of data sources to predict for any individual site will still lead to inaccuracies so the issue will not be resolved	The proposed enhancements to the Interoperability Checker Service will provide an improved independent source of information. Whilst it will not resolve all issues, it will offer a significant improvement on the current data provision.
Utilita Energy Ltd	Large Supplier	No	We disagree that the issue is one that needs resolved. The interoperability checker was developed to allow to check if their current Smart meter would lose functionality if they switched suppliers. Whilst this can still be an issue, we believe that a better solution would be to direct the customers back to the Energy Supplier to answer their queries, as the Supplier will have the required information to answer these, as well as any follow up questions, or to book jobs as required.	Citizens Advice operates independently from Suppliers. This helps ensure that consumers receive accurate and unbiased information about their Smart Meter, Supplier options and interoperability. Citizens Advice are already providing information to the consumers, but this modification aims to improve the data they are currently providing. Citizens Advice has noted that many users have already been in contact with a Supplier before using the Interoperability Checker Service.
British Gas	Large Supplier	Yes	See comments in our answer to Question 3 below.	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			The current situation isn't ideal, and it is particularly difficult when the customer gets a false positive or false negative. It is often a difficult follow-on conversation with the Energy Supplier, and the overall experience isn't great for the customer. The proposal to help improve the accuracy of the tool seems to be a very helpful suggestion.	

Question 2: Do you agree that the legal text will deliver MP241?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	-	-	-
Utilita Energy Ltd	Large Supplier	Yes	No further comments	-
British Gas	Large Supplier	Yes	-	-

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No	We don't believe this should be implemented and think more consideration should be given to whether this tool is still required when the majority (i.e. well over 50%) of people have Smart meters. More importantly is there a better way / a better party to engage with consumers on whether a smart meter can be fitted at their property; namely their energy supplier?	. The Interoperability Checker Service is primarily 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 allow consumers to make better informed decisions. Citizens Advice operates independently from Suppliers. This neutrality helps ensure that consumers receive accurate and unbiased information about their Smart Meter, Supplier options and interoperability
Utilita Energy Ltd	Large Supplier	No	-	-
British Gas	Large Supplier	Yes/No	There seem to be two requirements that have been bundled together into one Modification. The first is to improve the accuracy of the current interoperability checker (Business Requirements 1-3) and these actions seem really sensible as a package. These	The DCC has stated that the inclusion of 2G/3G and 4G coverage data will be available in the DCC System Data and will not add complexity to the solution.

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Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			would require some additional work from the DCC, but relatively little change at the Citizen's Advice end, in order to get a more accurate tool, and better customer experience. We agree with the proposed approach to resolve this. The second requirement however is the addition of the SM WAN checker. This seems quite a bit more complicated (especially with the upcoming move to 4G), and would presumably require a new functionality being built on the Citizen's Advice site. We are not so sure about this, and think it maybe should be assessed as a separate Modification, not bundled in with the Interoperability Checker changes.	SECAS notes that the new user journey mapping and impacts on Citizen Advice would be greater. This would also require input from Suppliers to agree appropriate messaging.

Question 4: Is the enhancement to check for Smart Meter feasibility in your area considered worthwhile and valuable for improving the Interoperability Checker Service?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	-	-	-
Utilita Energy Ltd	Large Supplier	No	The customers energy supplier would be better placed to answer this, as the most common next step would be booking an appointment, which the check would then have to direct the customer to their supplier to action.	Citizens Advice operates independently from Suppliers. This helps ensure that consumers receive accurate and unbiased information about their Smart Meter, Supplier options and interoperability. Citizens Advice are already providing information to the consumers, but this modification aims to improve the data they are currently providing. Citizens Advice has noted that many users have already been in contact with a Supplier before using the Interoperability Checker Service.
British Gas	Large Supplier	No	We already do our own checks on WAN coverage before installation, as a Supplier. It's not clear what the Citizen's Advice message to customers would be if the Smart Meter feasibility check came back as "Unfeasible".	As part of the new user journey mapping, it is proposed that Suppliers would be engaged on the messaging for this service.

Question 5: Will there be any impact on your organisation to implement MP241?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No	-	-
Utilita Energy Ltd	Large Supplier	Yes	Potential for increased call volumes and queries from customers to resolve issues the enhanced version of the Interoperability Checker cannot handle.	-
British Gas	Large Supplier	No	-	-

Question 6: Will your organisation incur any costs in implementing MP241?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No costs	-	-
Utilita Energy Ltd	Large Supplier	Unknown	Highly dependent on increased call volumes.	-
British Gas	Large Supplier	No	The proposed solution would slightly reduce our costs, especially if it reduced the number of errors in the current Interoperability Checker tool.	-

Question 7: How long from the point of approval would your organisation need to implement MP241?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	N/A		-
Utilita Energy Ltd	Large Supplier	None	There are no changes required to our systems.	-
British Gas	Large Supplier	-	-	-

Question 8: Do you believe that MP241 would better facilitate the General SEC Objectives

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No	The only to deliver SEC Objective C is to have a Smart Meter installed. To arrange this, a consumer needs to engage with their energy supplier, not the Interoperability Checker.	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 allow consumers to make better informed decisions.
Utilita Energy Ltd	Large Supplier	No	We believe this would have a negative effect on General SEC Objective (a), as the additional steps using the checker before being directed to the supplier could be avoided by simply directing the customers to their 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.
British Gas	Large Supplier	Yes	General SEC Objective (c).	-

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP241 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No	Quite the contrary – this cost is ultimately being borne by consumers and there is no compelling argument that will increase smart meter installations	The modification aims to provide consumers with more accurate information, benefitting consumers with an independent source of information when engaging with the Supplier.
Utilita Energy Ltd	Large Supplier	Yes	Customers may experience frustration that they are being redirected to their supplier part-way the process instead of being offered a single pathway to the relevant solution that could be achieved by directing them to their supplier at the first point of contact.	Refer to Question 4 SECAS response
British Gas	Large Supplier	Yes	We understand, and welcome, the popularity of the Interoperability Checker tool, and support the changes proposed here to help improve its accuracy. Particularly as customers become more aware of the benefits of Smart (for example being eligible for Demand Flexibility Service schemes). We are not sure that this is the right time to introduce a SM WAN checker tool, as we would still expect the Supplier to provide this information to the customer.	-

Question 10: Noting the costs and benefits of this modification, do you believe MP241 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	No	At this cost there needs to be more consideration to demonstrating the benefits without assuming the tool has to continue in operation	-
Utilita Energy Ltd	Large Supplier	No	We do not believe that any enhancements to the checker would be more beneficial than simply directing the customer to their supplier for a holistic solution to their queries.	
British Gas	Large Supplier	Yes/No	We would like to see the improvements to the current Interoperability Checker move forwards, and ideally earlier than February 2025 if possible. We are not so sure about the introduction of the SM WAN element. Particularly, as we believe this would be more complicated (especially re 4G), could risk slowing down the overall delivery time, and would also – presumably – require more investment on the Citizen's Advice platform. This may be the right thing to do, but we think it should be assessed separately to the changes to the Interoperability Checker.	Due to the length of time required to build the solution, detailed in the Preliminary Assessment, it is unlikely that this modification will be live earlier than February 2025. The DCC has stated that the inclusion of 2G/3G and 4G coverage data will be available in the DCC System Data and will not add complexity to the solution. SECAS notes that the new user journey mapping and impacts on Citizen Advice would be greater. This would also require

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
				input from Suppliers to agree appropriate messaging.

Any other comments

Question 11			
Respondent	Category	Comments	SECAS Response
Smart Meter Assets 1 Limited	Other SEC Party	-	-
Utilita Energy Ltd	Large Supplier	We have previously asked for usage figures for the checking in Working Groups as the modification reports only present a limited number of responses to a survey. Unfortunately, without these numbers it is difficult to properly assess the impact these changes could have.	Citizens Advice are collating information about Interoperability Checker Service usage. The initial view is in the region of 40,000 visits per month.
British Gas	Large Supplier	-	-