

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.



MP241 'Interoperability Checker Update'

Modification Report

Version 0.4

15 January 2024



About this document

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

Contents

1. Summary.....	3
2. Issue.....	3
3. Solution	4
4. Impacts	5
5. Costs	7
6. Implementation approach	7
7. Assessment of the proposal	8
8. Case for change.....	10
Appendix 1: Progression timetable	11
Appendix 2: Glossary	12

This document also has four annexes:

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

Contact

If you have any questions on this modification, please contact:

Mohammedanwar Sumro

020 3934 4506

mohammedanwar.sumro@gemserv.com

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 uses information provided by Suppliers to provide generalised results to the consumer.

The current generalised results in the Interoperability Checker are based on policy data on Device Models and Supplier Interoperability Data. This data can change and leads to inconsistency and can lead to consumer confusion. Citizens 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 their own system data to inform reports for Devices operating in smart mode, Supplier operable device models, smart meter take-up, and Wireless Area Network (WAN) coverage. 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.

This modification will impact the DCC and Suppliers. The DCC costs for implementing this modification are £100,000 and is targeted for the June 2025 SEC Release.

This will be a Self-Governance modification.

2. Issue

What are the current arrangements?

SEC Section H16 '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 Smart Metering Equipment Technical Specification (SMETS) 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 smart functionality was currently being used.

What is the issue?

Currently, the Interoperability Checker's results may not reflect a consumer's actual experience with their Smart Meter. This inconsistency has resulted in misunderstanding among some consumers. 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 question that was asked was "Was the tool helpful to you?" 35 respondents answered "Yes" and 53 answered "No".

The Interoperability Checker Service has issues with providing accurate information to consumers about their Smart Meter's capabilities and the likelihood of having one installed. The current generalised results are based on Device Model rather than personalised information. 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 personalised information for consumers waiting for a Smart Meter installation has led to queries being raised to the DCC. There is a need to improve the Interoperability Checker's user experience and provide additional information on the likelihood of having a Smart Meter installed.

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 personalised 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. Furthermore, the absence of a reliable source of personalised information for consumers awaiting Smart Meter installations is resulting in enquiries to the DCC, creating further inconvenience and delays. It is understood that this is likely generating call traffic to Suppliers as well.

3. Solution

The Proposed Solution involves the DCC making 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 new reports to identify:

- Premises that are currently operating in Smart Mode.
- Which SMETS1 Device Models can be operated in Smart Mode by each Supplier.
- For each Domestic Premises, whether that premises is covered by the DCC Smart Meter Wide Area Network (SMWAN).
- For that premises, the percentage of the total number of Domestic Premises in the surrounding area.

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

The legal text for the solution can be found in Annex C.

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 due to utilising and optimising existing data sources and infrastructure. They will need to build additional reporting and support Citizens Advice to deliver the information to their website.

Suppliers will be 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 Preliminary Assessment response in Annex B.

DCC System traffic

It has been advised that the proposed solution should not add any traffic or processing to the Smart Metering System or network.

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 C.

Technical specification versions

This modification does not impact Technical Specifications.

Devices

No Devices are impacted from the implementation of this modification.

Consumers

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 Smart Meters.

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 on greenhouse gas emissions if this modification were to be implemented.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is £100,000. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£100,000
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

More information can be found in the DCC Preliminary Assessment response in Annex B.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation cost to implement this as a stand-alone modification is one days 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 cost any 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 advising no costs will be incurred by implementing this modification, with one respondent advising the Proposed Solution would slightly reduce their costs if there are 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 call volumes.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **26 June 2025** (June 2025 SEC Release) if a decision to approve is received on or before 26 August 2024; or
- **6 November 2025** (November 2025 SEC Release) if a decision to approve is received after 26 August 2024 April 2024 but on or before 6 January 2025.

Managed by

This modification does not impact the DCC total system, therefore can target any SEC Release as it does not require the full SIT/UIT cycles. There is a ten month lead time detailed within the Preliminary Assessment, therefore the earliest Release this could target is the June 2025 SEC Release.

7. Assessment of the proposal

Sub-Committee input

SECAS has engaged with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need 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

Observations on the issue

The OPSG Chair highlighted that this modification is a big change which could potentially put DCC closer to the end consumer over Suppliers. There were highlighted that the accuracy and responsibility of data is with Suppliers. The OPSG Chair stressed the importance of clarifying the purpose and scope of the service and suggested obligating Suppliers to provide accurate data. The solution has been presented to the OPSG Chair. The OPSG Chair advised they will be interested with the development of this modification and would like to be kept informed on the progress made.

The SSC Chair pointed out that the initial security architecture has been approved. The SCC Chair noted that the information on the Citizens Advice website may be promising more than 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.

The TABASC Chair emphasised that Suppliers would need to approve the data due to a disconnect between what they see and what the DCC sees. The modification seeks approval from all Parties who attend Change Sub-Committee (CSC) and Change Board meetings.

The group 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 needs to 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 users 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.

A Working Group member 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 and is available. SECAS has investigated this with the DCC and Citizens Advice. 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 as is. Another Working Group member advised that the proposed enhancement does not completely resolve the issue and it undermines the Supplier's role. The Proposer responded advising 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.

A 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. The DCC responded advising the proposed enhanced 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.

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 only the premises in closest geographical proximity to the address provided while not covering so few premises that it would be possible to identify data relating to individual premises in the result. These criteria will be developed in the Full Impact Assessment.

DCC Data source

The 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 criterion DCC plan to use to identify whether a SMETS1 Smart Meter is operating in Smart Mode is:

- Supplier has sent at least one Service Request within the preceding 30 days (or another period to be confirmed) from a list of Service Reference Variants (SRVs) (to be confirmed) that targets the Device and that was successfully processed.

The criterion DCC plan to use to identify whether a Supplier can operate a SMETS1 Smart Meter is in Smart Mode is:

- The Supplier has sent at least one Service Request that targets a Device of that Device Model and that was successfully processed.

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.

8. Case for change

Business case

DCC's location-based data improved the accuracy on information consumers get about their Smart Meter providing an informed choice. This enhancement will improve consumer experience as the DCC will provide tailored information for each consumer. Having this enhancement also reduces the number of enquiries and support requests that the DCC would receive.

The proposed modification holds the potential to enhance the effectiveness of the Interoperability Checker Service and reduce consumer confusion.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that providing more personalised information to consumers about their Smart Meter capabilities will better facilitate SEC Objective (a)¹ and (c)².

Industry views

One respondent to the Refinement Consultation agreed that this modification would better facilitate General 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 allow consumers to make better informed decisions.

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

A Large Supplier expressed that this modification would have a negative effect on General 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 has a neutral impact on lowering bills.

Reduced environmental damage

This modification has a neutral impact on reducing environmental damage.

Improved quality of service

This modification has 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.

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

Timetable	
Event/Action	Date
Refinement Consultation	15 Nov 2023 – 6 Dec 2023
<i>Impact Assessment costs approved by Change Board</i>	24 Jan 2024
<i>Impact Assessment requested</i>	25 Jan 2024
<i>Impact Assessment returned</i>	20 Mar 2024
<i>Modification discussed with Working Group</i>	3 Apr 2024
<i>Modification Report approved by CSC</i>	19 Apr 2024
<i>Modification Report Consultation</i>	24 Apr 2024 – 15 May 2024
<i>Change Board Vote</i>	22 May 2024

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
DS&A	Data Science and Analytics
OPSG	Operations Group
PIT	Pre-Integration Testing
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
SMWAN	Smart Meter Wide Area Network
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
UIT	User Integrated Testing
WAN	Wireless Area Network

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

MP241 ‘Interoperability Checker Update’

Annex A

Business requirements – version 0.2

About this document

This document contains the business requirements that support the solution(s) for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The Data Communications Company (DCC) will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements		
Ref.	Requirement	Responsible for delivery
1	Provide consumers with specific data to indicate whether their smart meter is capable of operating in Smart Mode	DCC
2	Provide consumers with specific data to indicate whether their smart meter is currently operating in Smart Mode	DCC
3	Provide consumers with specific data as to whether, if they switched Supplier, their meter would continue to operate in Smart Mode	DCC
4	Provide consumers with information as to whether their property could have a Smart Meter installed	DCC

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

This solution will be applied to Smart Metering Equipment Technical Specifications (SMETS)1 and SMETS2 Devices.

Amendments are required to the Citizens Advice (CA) Interoperability Checker, to improve the consumers' user experience and provide additional information on Smart Meter availability.

The current generalised results based on Device Models and Supplier Interoperability Data contribute to cause confusion and inconsistency. If a consumer's SMETS1 meter is a Device Model that the Responsible Supplier has indicated it would generally operate in smart mode, the checker will indicate that it is operating in smart mode and, conversely, if there is no match in the Supplier Interoperability Data, the checker will indicate that the meter is not operating in smart mode. In either case, the result could be incorrect as:

- the Supplier may not be communicating with that specific SMETS1 meter, despite its policy being to operate meters of that Device Model in smart mode.
- the Supplier Interoperability Data may be incomplete, as maintenance of the data is a manual task for Suppliers.

This modification recommends assessing improvements that would provide more personalised results based on actual transaction data, thereby also removing the need for Suppliers to maintain the Supplier Interoperability Data and utilising the DCC's location-based data to provide additional information to consumers waiting for Smart Meter installations.

2.2 Requirement 1: Provide consumers with specific data to indicate whether their smart meter is capable of operating in Smart Mode

This requirement is to ensure transparency and avoid any confusion. This information would help customers understand the capabilities of their smart meter. Providing clear and concise information would also help customers make informed decisions on whether to upgrade their meter if necessary.

2.3 Requirement 2: Provide consumers with specific data to indicate whether their smart meter is currently operating in Smart Mode

This information would ensure that customers are aware of the current functionality of their meter.

2.4 Requirement 3: Provide consumers with specific data as to whether, if they switched Supplier, their meter would continue to operate in Smart Mode

This information would give customers the confidence to switch providers without worrying about their smart meter capabilities changing.

2.5 Requirement 4: Provide consumers with information as to whether their property could have a Smart Meter installed

This information would enable customers to make more informed choices about availability of having a Smart Meter

3. Glossary

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

Glossary	
Acronym	Full term
DCC	Data Communications Company
CA	Citizens Advice
SMETS	Smart Metering Equipment Technical Specification

SEC Modification Proposal, SECMP241

Interoperability Checker Update

Preliminary Impact Assessment (PIA)

Version:	1.0
Date:	13th October, 2023
Author:	DCC
Classification:	DCC Public

Contents

1	Executive Summary	3
2	Document History	4
2.1	Revision History	4
2.2	Associated Documents	4
2.3	Document Information.....	4
3	Context and Requirements	5
3.1	Problem Statement	5
3.2	Business Context and Requirements.....	5
3.3	Business Requirements	5
4	Description of Solution	7
4.1	DCC Data Science and Analytics (DS&A) Solution	7
4.2	Critical Software Solution	8
4.3	Citizens Advice Solution	8
5	Impact on Systems, Processes and People	10
5.1	Infrastructure Impact	10
5.2	Security Impact	10
5.3	DCC Functions and Capabilities.....	10
6	Implementation Timescales and Approach.....	10
6.1	Testing and Acceptance.....	10
7	Costs and Charges.....	12
7.1	Design, Build, and Testing Cost Impact.....	12
	Appendix A: Glossary	13

1 Executive Summary

The Change Board are asked to approve the following:

- Total cost to complete the Full Impact Assessment (FIA) of £10,000; and
- The timescales to complete the Full Impact Assessment of 40 days.

The total ROM costs to deliver SECMP0241 are £100,000, which includes Design, Build and PIT, with a tolerance of $\pm 20\%$.

Problem Statement

Citizens Advice, as the statutory consumer champion, has a remit to provide independent information and advice to consumers. Citizens Advice offers information on smart meters, including a tool to check whether a SMETS1 Meter is operating in Smart Mode and DCC is mandated by the SEC to provide the data (the Interoperability Checker Service) that is displayed on the Citizens Advice website.

Currently, the Interoperability Checker's results may not reflect a consumer's actual experience with their Smart Meter. The indication of whether a consumer's SMETS1 Meter is operating in Smart Mode is generalised and can lead to confusion for the consumer, since it may be inconsistent with their experience.

The lack of a source of personalised information from an independent source for consumers waiting for a Smart Meter installation also leads to frustration. There is a need to improve this user experience by providing additional information on the likelihood of having a Smart Meter installed.

Benefit Summary

By enabling Citizens Advice to provide personalised results, derived from up-to-date data held by DCC, consumers will benefit from unambiguous and reliable information on whether their SMETS1 Meter is operating in Smart Mode.

By providing independent advice on the likelihood that a SMETS2 Meter can be installed, based on DCC data, Citizens Advice will enable consumers to make more informed choices about Smart Meters.

In both cases, Citizens Advice's own advisers will be better able to support consumers who contact them seeking help and advice with issues relating to energy and smart meters.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
13/10/2023	1.0	Issued

2.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	Annex A - MP241 Business Requirements v0.1	SECAS	
2	DP241 Modification Report v0.2	SECAS	28/06/2023
3	MP241 - Preliminary Assessment Request	SECAS	14/09/2023

References are shown in this format, [1].

2.3 Document Information

The Proposer for this Modification is Robin Seaby from DCC.

The initial Preliminary Impact Assessment was requested of DCC on 14th September 2023.

3 Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated.

The requirements have been provided by SECAS, the Proposer, and the Working Group.

3.1 Problem Statement

Currently, the Interoperability Checker's results may not reflect a consumer's actual experience with their Smart Meter. This inconsistency has resulted in misunderstanding among some consumers.

The Interoperability Checker Service has issues with providing accurate information to consumers about their Smart Meter's capabilities and the likelihood of having one installed. The current generalised results are based on Device Model rather than personalised information. This has contributed to misperception and inconsistency in results which can be frustrating for consumers.

The lack of a source of personalised information for consumers waiting for a Smart Meter installation also leads to queries being raised to the DCC. There is a need to improve the Interoperability Checker's user experience and provide additional information on the likelihood of having a Smart Meter installed.

3.2 Business Context and Requirements

The Interoperability Checker Service is a tool available on the Citizens Advice website that advises consumers on whether their Smart Meter is operating in Smart Mode. The tool 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 Smart Metering Equipment Technical Specification (SMETS) 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 smart functionality was currently being used.

The Smart Energy Code (SEC) Section H16 'Provision of Data by Suppliers to the DCC' requires the DCC to collaborate with Citizens Advice to provide the tool.

3.3 Business Requirements

Requirement 1: Provide consumers with specific data to indicate whether their smart meter is capable of operating in Smart Mode.

This requirement is to ensure transparency and avoid any confusion. This information would help customers understand the capabilities of their smart meter. Providing clear and concise information would also help customers make informed decisions on whether to upgrade their meter if necessary.

Requirement 2: Provide consumers with specific data to indicate whether their smart meter is currently operating in Smart Mode.

This information would ensure that customers are aware of the current functionality of their meter.

Requirement 3: Provide consumers with specific data as to whether, if they switched Supplier, their meter would continue to operate in Smart Mode.

This information would give customers the confidence to switch providers without worrying about their smart meter capabilities changing.

Requirement 4: Provide consumers with information as to whether their property could have a Smart Meter installed.

This information would enable customers to make more informed choices about availability of having a Smart Meter.

4 Description of Solution

Following analysis of the Requirements above, the DCC proposes the following Solution:

- Coverage data-marts with associated reporting
- Smart mode data-marts with associated reporting
- Supplier operable device model data-marts with associated reporting
- Smart meter take-up data-marts with associated reporting
- Additional DCC API endpoints for smart mode, smart meter take-up and WAN coverage
- Citizens Advice back-end system integration with new DCC API endpoints
- Citizens Advice website development

4.1 DCC Data Science and Analytics (DS&A) Solution

Utilising the coverage datasets provided by the CSPs and Smart Metering Inventory data provided by the DSP, the DS&A team will create and maintain bespoke, automated Extract, Transform and Load (ETL) processes to import the data from our Data Lake and from there create a new data model which can be used to satisfy Requirements 1, 2, 3 and 4.

The data from this data model will be used to create 3 separate reports in csv format that will be consumed by the Interoperability Checker Service ETL applications and loaded to the database.

Report 1 - Requirements 1 & 3

For Requirements 1 & 3, a new report will be created that will be produced each week. The new report will indicate, for each Domestic Energy Supplier, which SMETS1 Device Models it is operating in Smart Mode. To determine this information, DCC will apply the following criteria:

- The Supplier has sent at least one Service Request that targets a Device of that Device Model and that was successfully processed.

Report 2 - Requirement 2

For Requirement 2, a new report will be created that will be produced each day. The new report will indicate, for each Enrolled SMETS1 Smart Metering System, whether the Responsible Supplier is operating that Smart Metering System in Smart Mode. To determine this information, DCC will apply the following criteria:

- The Supplier has sent at least one Service Request within the preceding 30 days (or another period to be confirmed) from a list of SRVs (to be confirmed) that targets the Device and that was successfully processed.

Report 3 - Requirement 4

For Requirement 4, a new report will be created that will be produced each month. The new report will indicate, for each Domestic Premises in GB, whether that premises is covered by the DCC SMWAN and the percentage of the total number of Domestic Premises in the surrounding area (the minimum size of which is to be confirmed, subject to Data Privacy Impact Assessment) at which there is an Enrolled SMETS2 Smart Metering System.

4.2 Critical Software Solution

Utilising the new reports provided by DCC, Critical Software will develop additional Extract, Transform and Load (ETL) serverless applications to be deployed into the DCC Interoperability Checker Service cloud environments. The Interoperability Checker Service database will be modified to hold the data supplied in Reports 2 and 3 (Report 1 contains data of a type already held in the database and so can be processed without impacting the database table structure).

Supplier Interoperability Data (SDID) files containing Device Model interoperability data from Suppliers will no longer be processed and so Suppliers will no longer be required to submit these via the DCC external SharePoint site.

The Interoperability Checker Service API will be modified to include new endpoints for Citizens Advice to request information in relation to Requirements 2 and 4, consumers and additional serverless applications will be developed to fulfil valid requests received at the new API endpoints.

4.3 Citizens Advice Solution

Requirements 1 & 3

In response to a consumer query, the Citizens Advice smart meter checker website currently displays a list of Energy Suppliers who support SMETS1 Meters of the same Device Model as the consumer's Meter, provided by the DCC Interoperability Checker Service API.

DCC's solution to fulfil Requirements 1 & 3 changes how this data is populated in the DCC system, however there is no change to the interface with Citizens Advice.

Requirement 2

Currently, in response to a consumer query, the Citizens Advice smart meter checker website checks whether that consumer's SMETS1 Meter is of a Device Model that's listed as being supported by the Responsible Supplier, as provided by the DCC Interoperability Checker Service API.

To fulfil Requirement 2, the Citizens Advice smart meter checker website will call an additional endpoint to the DCC Interoperability Checker Service API to establish whether the consumer's Meter is operating in Smart Mode, as indicated by Report 2. The result will be presented to the consumer, which will replace the current output derived from the list of supported Device Models.

Requirement 4

Citizens Advice will develop a new user journey for consumers who visit its website seeking information about new Smart Meter installations, directing them to a new section of the website where they will be prompted to enter their postcode and premises identifier.

Using a new API endpoint provided by DCC, Citizens Advice will request SMWAN coverage and Smart Meter take-up information relevant to that address and present back to the consumer.

5 Impact on Systems, Processes and People

As defined the change included in this document is confined to data already within the DCC, with no expected changes impacting SMETS1 or SMETS2 Service Providers.

5.1 Infrastructure Impact

No impact to existing infrastructure.

It should be noted that the solution as proposed should not add noticeable traffic or processing to the Smart Metering System or network.

5.2 Security Impact

The provision of Smart Meter take-up data for the area surrounding a consumer's premises will be subject to a Data Privacy Impact Assessment by DCC, in order to ensure that the definition of that geographical area encompasses a sufficient number of domestic premises that there could be no risk of any breach of privacy for those individuals, while still providing a meaningful response to the consumer.

5.3 DCC Functions and Capabilities

The full range of activities required to implement the new reports including design, development, testing, and implementation would be performed by DCC DS&A utilising in-house contractors and permanent staff.

DCC Enterprise IT will support deployment of the updates to the DCC Interoperability Checker SIT and Prod environments.

DCC Enterprise Testing will execute tests in the DCC Interoperability Checker SIT environment to validate the deployment.

DCC Service Centre procedures and knowledge articles will be updated to reflect the extended scope of the service provided to Citizens Advice.

6 Implementation Timescales and Approach

A key factor in planning and delivering this Modification's implementation and release is that the changes are neither part of the Smart Metering System, nor do they impact any Technical Specifications, such that they can be implemented separate from the now-standard SEC Release dates.

This work should be completed within ten (10) months of approval. This delivery timeline can be considered as two separate parts:

Part 1: Delivery of Requirements 1, 2 and 3 within six (6) months; and

Part 2: Delivery of Requirement 4 within a further four (4) months.

Parts 1 and 2 may be released separately or combined into a single release into Production. Timescales will be further elaborated as part of the Full Impact Assessment.

6.1 Testing and Acceptance

The development and testing will not follow the PIT, SIT, and UIT pattern associated with a conventional SEC Release, and will not require the testing services of the System Integrator, DSP or CSPs.

DCC DS&A and Critical Software will develop and test the required changes in their respective test environments prior to deployment into the DCC Interoperability Checker SIT environment, where DCC will carry out further testing to validate the DCC solution end-to-end.

Citizens Advice will carry out User Acceptance Testing against the DCC Interoperability Checker SIT environment prior to deployment to the Production environment.

Consumer focus groups will be used during the development of website content to ensure clarity and ease of understanding of the information presented.

Further detail on the testing approach will be developed as part of the Full Impact Assessment.

7 Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal. The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the business requirements.

7.1 Design, Build, and Testing Cost Impact

The table below details the cost of delivering the changes and Services required to implement this Modification. The scope of supply under this PIA includes design, development (build), testing within the Critical Software PIT environment and validation by Citizens Advice against the DCC Interoperability Checker SIT environment.

£	Design, Build and Test
Implement Interoperability Checker Update	£100,000 with a tolerance of +/- 20%

Based on the existing requirements, the fixed price cost for a Full impact Assessment is £10,000 and would be expected to be completed in 40 days.

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
BAU, BaU	Business As Usual
CPL	Central Products List
CSP	Communication Service Provider
CSV	Comma Separated Variable
DCC	Data Communications Company
DNO	Distribution Network Operator
DSP	Data Service Provider
DUIS	DCC User Interface Specification
ESME	Electricity Smart Metering Equipment
FIA	Full Impact Assessment
FTE	Full Time Employees
GBCS	Great Britain Companion Specification
GSME	Gas Smart Metering Equipment
I&C	Installation and Configuration
IHD	In Home Display
KPI	Key Performance Indicators
MVP	Minimum Viable Product
OMR	Operational Metrics Review
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
PMR	Performance Measurement Report
PPMID	Payment Meter Interface Device
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SLA	Service Level Agreement
SMETS	Smart Metering Equipment Technical Specification
SMS	Smart Metering System
SRV	Service Request Variant
SVP	Speed, Volume, Payload
S1SP	SMETS1 Service Provider
TOC	Technical Operations Centre
UIT	User Integration Testing

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

MP241 ‘Interoperability Checker Update’

Annex C

Legal text – version 0.1

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section H 'DCC Services'

These changes have been redlined against Section H version 21.0.

Amend Section H.16 as follows:

H16. INTEROPERABILITY CHECKER SERVICE

The Responsibility of Supplier Parties

H16.1 Each Supplier Party shall ensure that Energy Consumers at premises supplied with electricity and/or gas shall:

- (a) have access to the information described in Section H16.2;
- (b) be able to access that information in the manner described in Section H16.4; and
- (c) have such access in such manner during the period determined in accordance with Section H16.5.

H16.2 The information described in this Section (the **"Interoperability Data"**) is, in respect of each premises, information as to:

- (a) whether the supply of electricity or the supply of gas (as determined by the request made by the Energy Consumer) to the premises is made through an Enrolled Smart Metering System; and
- (b) where either the supply of electricity or the supply of gas is made through an enrolled Smart Metering System:
 - (i) whether the supply of other fuel is also made through an Enrolled Smart Metering System;
 - (ii) the name of the Electricity Supplier or the name of the Gas Supplier (or both as the case may be);
 - (iii) whether any such Enrolled Smart Metering System is a SMETS1 Smart Metering System or a SMETS2+ Smart Metering System; ~~and~~
 - (iv) where any such Enrolled Smart Metering System is a SMETS1 Smart Metering System, the name of each electricity and/or gas supplier (as the case may be) which ~~has notified~~ the DCC can identify that ~~it is its policy~~, if it commences to supply premises at which a Smart Metering System of that type is installed, to operate that Smart Metering System in Smart Mode;
 - (v) whether any such Enrolled Smart Metering System is currently operating in Smart Mode;
 - (vi) whether the premises is covered by the DCC SMWAN; and

~~(iv)~~(vii)the percentage of the total number of domestic premises in the surrounding area at which there is an Enrolled SMETS2 Smart Metering System.

H16.3 For the purposes of Section H16.2(b)(iv), the name of the electricity or gas supplier shall include, where applicable, any brand name that the electricity or gas supplier has notified to the DCC as a brand name that it uses in any communications with or to Energy Consumers.

H16.4 The Interoperability Data in respect of any premises shall be able to be accessed by each Energy Consumer at those premises on the request of that Energy Consumer, by means of remote communications, and free of charge.

H16.5 The Interoperability Data shall be capable of being accessed by an Energy Consumer:

- (a) from any such date as may be specified in a direction issued by the Secretary of State to all Supplier Parties and the DCC; and
- (b) until any such date as may be specified in a further direction issued by the Secretary of State to all Supplier Parties and the DCC,

and for these purposes the Secretary of State may exercise the power to give a direction under Sections H16.5(a) and (b) more than once.

Provision of Data by Suppliers to the DCC

H16.6 ~~Not used.~~For the purpose of establishing a record of the Interoperability Data referred to in Section H.16.2(b)(iv), each Supplier Party may provide the DCC, in such manner and in such form as may be specified by the DCC, with a statement which:-

- (a) ~~Not used~~is in respect of each type of Smart Metering System which at that time constitutes an Enrolled SMETS1 Smart Metering System at any premises;
- (b) ~~Not used~~indicates whether the policy of that Supplier Party, if it commenced (at the date of the statement) to supply premises at which that type of Smart Metering System was installed, would be, subject to any exceptions identified by the Licensee in the statement, to operate it in Smart Mode; and
- (c) ~~Not used~~is accurate and up to date.

H16.7 Where a Supplier Party provides a statement to the DCC in accordance with Section H16.6, it may also notify the DCC of any brand name (including where it works in partnership with a White Label Tariff Provider any brand name of the White Label Tariff Provider) it uses when engaging in activities that are directed at, or incidental to identifying and communicating with, Energy Consumers in relation to the supply of electricity or gas.

Obligations of the DCC

H16.8 On behalf of all Supplier Parties, and for the purpose of ensuring that each Supplier Party can discharge its responsibility under Section H16.1, the DCC shall provide a service to be known as the “**Interoperability Checker Service**”, being a service:

Managed by

- (a) by means of which the Interoperability Data in respect of each premises to which gas and/or electricity is supplied shall be made available to Energy Consumers at those premises so that it may be accessed by each Energy Consumer on request and free of charge by means of remote communications; and
- (b) that is provided during the period determined in accordance with Section H16.5.

H16.9 For the purpose of providing the Interoperability Checker Service in accordance with Section H16.8, the DCC shall enter into an agreement in accordance with Sections H16.10 to H16.12 with either:

- (a) Citizens Advice and Citizens Advice Scotland; or
- (b) such other person as may, in substitution for those named in paragraph (a), be specified in a direction issued by the Secretary of State to the DCC.

H16.10 The agreement referred to in Section H16.9 shall be an agreement under which the person identified in that Section shall, by means of:

- (a) one or more dedicated pages on a website; or
- (b) a dedicated smartphone or tablet application,

maintained by it or on its behalf, agree to provide a facility through which Energy Consumers may request and obtain the Interoperability Data via remote communications.

H16.11 The agreement referred to in Section H16.9 shall, as a minimum, contain terms which require that the facility provided under that agreement is designed to ensure that:

- (a) any person requesting Interoperability Data shall be able to obtain the such data only on providing information that reasonably establishes that he or she is an Energy Consumer at the premises to which the Interoperability Data relates;
- (b) appropriate safeguards are in place to ensure that Interoperability Data may be accessed only by individual Energy Consumers, and may not be accessed by means of software capable of making automated requests in respect of multiple premises;
- (c) no Interoperability Data, or any information provided by Energy Consumers for the purposes of requesting the Interoperability Data, may be accessed, retained or processed by the person providing the facility:
 - (i) in such a manner as may be used to provide, or used in conjunction with the provision of, any other service by that person to an Energy Consumer; or
 - (ii) for any purpose other than ensuring the effective provision of the facility.

H16.12 A copy of the agreement entered into by the DCC in accordance with Section H16.9 shall, as soon as practicable after it has been entered into, be submitted by the DCC to the Secretary of State.

H16.13 The DCC shall have no liability to any Party where it provides (or does not provide) the Interoperability Checker Service in circumstances where it should not (or should)

have done so, to the extent that the same arises due to inaccuracies in the Interoperability Data that are not caused by the DCC.

Provision of Data by the DCC to Suppliers

H16.14 The DCC shall provide Supplier Parties, in such manner and in such form as may be determined from time to time by the DCC, with a statement that sets out each particular type of SMETS1 Smart Metering System which at that time is or can become an Enrolled SMETS1 Smart Metering System.

Definitions

H16.15 For the purposes of this Section H16:

Smart Mode	means, in respect of a Smart Metering System of a particular type, that a Supplier Party does or will, on a regular basis, send communications to and receive communications from that Smart Metering System by means of the DCC's Communications Services.
------------	---

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

MP241 ‘Interoperability Checker Update’

Annex D

Refinement Consultation responses

About this document

This document contains the full 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
Smart Meter Assets 1 Limited	Other SEC Party	-
Utilita Energy Ltd	Large Supplier	Yes
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 would require some additional work from the DCC, but	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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			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.	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 tool.
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 June 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 quarter.
British Gas	Large Supplier	-	-