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MP241 ‘Interoperability Checker Update’

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP241 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP241 should be approved or rejected?

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Reject	We think that the original rationale for the Citizen's Advice tool has outrun its purpose (for checking SMETS1 interoperability), and we don't think the new use cases for the tool are appropriate, even with a potentially improved data source. We think customers should be contacting their Energy Supplier with any questions surrounding Smart availability. The customer journey of going via the Citizen's Advice 'checker' is too complicated, especially when the 'checker' does not align with what is happening with the customer's meter in practice. Even with the revised (improved?) data flows, we don't think this gap is closed.
E.ON	Large Supplier	Reject	We disagree that the issue described is one that needs to be resolved on an ongoing basis. Fundamentally, we do not support the continued investment in development of the SMETS1 Interoperability Checker. The Interoperability Checker solution was originally developed early in the SMETS1 Enrolment and Adoption programme. Based on DCC's own industry reporting, over 12 million SMETS1 meters have been enrolled into the DCC, allowing them to be operated by a gaining supplier after a Change of Supplier event. SMETS1 enrolment activities have already concluded on the IOC, MOC MDS, and FOC-NP cohorts. Additionally, the Secretary of State has designated a revised version of the TMAD which specifies a December 31st 2024 deadline for concluding remaining enrolment activities in both the MOC-Secure and FOC-BG cohorts. As a broad range of energy suppliers have committed to operating enrolled SMETS1 meters, the impact of switching between suppliers is significantly lower than it was in 2018/2019 when the Interoperability Checker was originally proposed. Statistics on the current usage of the Interoperability

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			Checker by energy consumers do not appear to have been shared to support further investment in the solution. Instead of investing a further £87,000, we believe the DCC would be better focussing its attentions on concluding SMETS1 Enrolment and Adoption activities. Ahead of the December 2024 TMAD deadline, this would include driving the pace of remaining enrolment activities with suppliers and progressing activities associated with the shutdown SMETS1 migration solutions early in 2025. Adopting this approach would better serve consumers, by ensuring eligible SMETS1 assets are enrolled and can be operated via the DCC, and that the DCC does not incur and impose unnecessary costs on funding DCC Users. On this basis we believe that the SMETS1 Interoperability Checker should be gracefully retired shortly after the December 31st 2024 deadline specified in the designated TMAD version.
Citizen's Advice Bureau	Other Respondents	Approve	We strongly support the approval of MP241 and its implementation as soon as possible, noting that it was raised 16 months ago. We believe that MP241 will better facilitate SEC Objectives (a) and (c), as outlined in the modification report. The interoperability checker is a tool created with the support of the Government and Smart Metering Implementation Programme - with specific legislation enacted by the secretary of state in order that consumers have access to this information through Citizens Advice. The tool has been consistently promoted by the DCC, DESNZ and others and we believe the improvements made by this modification would deliver clear benefits to consumers and would be in direct response to consumer feedback and increasing demand. MP241 will ensure that the smart meter checker can correctly identify whether a meter is operating in smart mode or not, empowering consumers to understand issues they may be experiencing with their smart meter. This would also support independent advice providers to help consumers with such

Question 1			
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			issues and equip consumers with the information they need before seeking a resolution to the issues, something we think would be welcomed by industry. It would also simplify the customer journey for consumers who wish to switch their energy supplier but need to check interoperability in advance. It is a significant improvement for consumers to be able to self-serve online and simply in just a few minutes than check this information by phone or email with one, or more likely, multiple suppliers. At such an insignificant cost of £86,862 and either zero cost or cost savings experienced by SEC parties, we believe this modification is overwhelmingly in the interests of energy consumers and SEC parties alike. We would reiterate to the panel that this modification would deliver an important improvement to the third most visited advice page on Citizens Advice's website for the last 12 months. The SEC Change Board should consider how enabling the DCC and Citizens Advice to improve the results it provides would be an important step in delivering better outcomes for consumers in the supplier market and how, we believe, it aligns with Ofgem's ambitions through its Consumer confidence strategy for the sector¹.
Utilita	Large Supplier	Reject	We do not believe this modification affects any of the General SEC Objectives and should therefore be rejected.

¹ Ofgem, [Consumer confidence: a step up in standards](#), September 2024

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
British Gas	Large Supplier	This has been a strange modification, proposed by DCC, but specifically benefitting the Citizen's Advice tool. We don't understand why it wasn't proposed by Citizen's Advice. We also don't understand why Citizen's Advice didn't respond to the Refinement Consultation.
E.ON	Large Supplier	-
Citizen's Advice Bureau	Other Respondents	Since its launch the Smart Meter Checker has seen steadily increasing traffic flows from consumers. The tool has also been highlighted by Which?, government departments and numerous media outlets as a means to check whether a smart meter is operating in smart mode, increasing awareness of and traffic to the tool. We last reported traffic rates to the SEC in 2023 when we were receiving over 40,000 uses per quarter. Traffic has since increased by a further 12.5%. The tool is the third most visited energy advice page on Citizens Advice's website for the last 12 months. Though the tool was originally designed to help consumers during the enrolment and adoption of SMETS1 meters onto the DCC by telling them whether their meter was operating on the DCC, its use case quickly moved beyond this. Consumers sought to check whether their meter was operating on the DCC, and third-party service providers began to direct potential customers to the tool as a first step in checking whether a consumer will be able to use their DCC-connected services. Our research, as outlined in the modification report, has clearly identified that consumers need an easy and reliable way to find out if their smart meter is operating in smart mode or not. Supplier call centres sometimes struggle to provide this insight, and the smart meter tool provides a quick, secure and convenient means to do so, without adding load to supplier phone lines or other customer support channels. This provides a clear benefit to both consumers who are better equipped to deal with issues and to suppliers

Question 2		
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		The continued and increasing use of the tool demonstrates the extensive consumer demand for reliable information about whether their meter is operating as it should, and the benefit of such information both to consumers and innovative new products and services which improve the energy market and the usefulness of smart meters. As such it has been frustrating that the tool's outputs have so far been based on meter type, rather than tailored to the specific meter of the consumer. The changes outlined in the MP241 modification report will improve the accuracy of results and better meet the expectations and needs of consumers. Implementation of MP241 will: • Improve the service provided by the smart checker tool, making it more accurate and tailored. • Increase both the transparency of issues with smart meters and increase Consumers' ability to understand when they have an issue with their smart meter. • Reduce consumer contacts to suppliers and support services when results from the Smart Meter Checker are confusing or inaccurate. • Deliver for the needs of the users, as the popularity and demand for the tool continues to increase.
Utilita	Large Supplier	Our stance is still firmly that the questions being answered by implementing this modification would be better served by the consumer contacting their Supplier directly. This also enables any remedial work required to resolve any issues to be handled at the same time rather than requiring the consumer to then make a separate contact after discovering an issue using the checker. Further, during the Refinement Consultation we were given usage figures of 40k hits per quarter, and the survey providing the impetus for this modification had 88 respondents, of which, 53 stated the checker was not helpful – less than 1% of users. Given this, we must consider whether making these changes would negatively impact the experience the majority of users receive just to satisfy an incredibly small minority.