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MP146 'SM WAN Coverage Date'

Modification Report

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Corporate member of
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About this document

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

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Clare Stapley from the Data Communications Company (DCC).

The DCC is required to provide information to Parties via the Self Service Interface (SSI) regarding the Smart Metering Wide Area Network (SM WAN) availability for Smart Metering Equipment Technical Specifications (SMETS) 1 and SMETS2 Devices. The requirement as set out in SEC Section H is to provide information on if and when the SM WAN will be available.

The SEC sets out a specific date of 1 January 2021 for coverage to be provided. However, although the required target has been met, the Communications Service Provider (CSP) for the South and Central (S&C) Regions has stated that it plans to continue to increase and enhance the coverage. The DCC has therefore suggested that the limiting date in Section H should be removed to allow the CSP S&C to populate the date field beyond 1 January 2021.

This Proposed Solution is therefore to remove the date to allow the SM WAN coverage checker to continue to populate the expected date of any coverage.

This modification will affect the DCC and Suppliers. There are no DCC costs associated with this change. If approved this modification will be implemented in the June 2021 SEC Release. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

The DCC is required to provide information to Parties via the Self Service Interface (SSI) regarding the SM WAN availability for SMETS1 and SMETS2 Devices. The requirement, as set out in SEC Section H8.16, is to provide information on if and when the SM WAN will be available:

- (f) any and all information in respect of the SMETS1 SM WAN as the DCC is required to make available under the Self-Service Interface Access Control Specification and the SSI Baseline Requirements Document, which shall be made available to all Users; and the following information in respect of the SMETS2+ SM WAN, which shall be available to all Users (and which shall be capable of interrogation by post code and postal outcode):
 - (i) whether a Communications Hub Function installed in a premises at any given location:
 - (A) is expected to be able to connect to the SM WAN;
 - (B) is expected to be able to connect to the SM WAN from a particular date before 1 January 2021, in which case the date shall be specified; or

- (C) cannot be confirmed as being able to connect to the SM WAN before 1 January 2021;

This information allows Suppliers to identify where a Smart Metering System (SMS) could be installed and would connect immediately to the WAN. Alternatively, the Supplier could perform a 'proactive install and leave' where the SMS could be installed but not connected (where no WAN was present) and then connected at a later date when WAN was available, thus avoiding more than one site visit.

Currently, the DCC logic for the CSP S&C is as follows:

- If a premise already has WAN coverage, then the parameter availability on the CH device is set at 'True' and the WAN availability date is empty.
- If the premise does not have any WAN coverage, but the CSP plans to cover with a future network build in the next few months then the WAN availability on the CH is set to 'False' and the availability date will be populated.
- If the premise does not have any WAN coverage and there is no plan in place to provide WAN coverage, then the WAN availability on the CH is set to 'False' and the availability date will be empty. This will remain empty until six weeks before the date of coverage is being provided, after which the availability date will be populated.

What is the issue?

SEC Section H8.16 sets a date of 1 January 2021 for coverage to be provided. This date was used as when the Smart Meter Implementation Programme began, roll out was due to be completed by the end of 2020. Although the SM WAN coverage by the DCC has reached target levels, the CSP in the Central and South Regions expects to continue to increase and enhance the SM WAN coverage. This means DCC Service Users will start to see WAN availability date beyond 1 January 2021, in particular for new build properties and in areas where there is currently no network coverage. This will go beyond the 1 January 2021 limitation date stated in the SEC.

What is the impact this is having?

If the date remains the DCC will not be able to provide expected SM WAN coverage dates in the future. This facility has helped Suppliers to provide better customer service by allowing them to perform a proactive install and leave to avoid a second site visit once the SM WAN is active. However, it is worth noting that the Supply Licence Conditions 49.8(c) for electricity and 43.8(c) for gas provide a derogation which facilitates proactive install and leave. This derogation ends on 1 January 2021 so no further proactive install and leaves are permitted. Despite that, the population of the date field means Suppliers will be able to provide their customers with more information on when a WAN is likely to be available and will enable proactive install and leave should they be permissible again in the future.

3. Solution

Proposed Solution

The Proposed Solution is to remove the date '1 January 2021' from SEC Section H8.16. This will futureproof the SEC for Suppliers to continue to provide a service to areas where WAN coverage is yet to be installed. The solution will benefit Suppliers who want to extend their network coverage and continue to provide an improved service.

The proposed redlined changes can be found in Annex A.

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

Supplier Parties

Supplier Parties would be able to access up to date information to continue to extend their service and fulfil their contractual obligations. This will have a positive impact as futureproofing the SEC will allow Suppliers to continue to perform proactive 'install and leave' or information for consumers for areas where WAN is yet to be installed should it be permitted.

DCC System

There are no impacts on the DCC Systems.

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 A.

Consumers

There will be no negative impact on consumers. Consumers will benefit from this proposal as they will be supplied with Smart Meters and site visits will be reduced.

Other industry Codes

No other industry Codes are impacted by this proposal.

Greenhouse gas emissions

This proposal will have no effects on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs to implement this proposal.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There will be no cost to SEC Parties to implement this proposal.

6. Implementation approach

Agreed implementation approach

Panel has agreed an implementation date of:

- **24 June 2021** (June 2021 SEC Release) if a decision to approve is received on or before 10 June 2021; or
- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received after 10 June 2021 but on or before 21 October 2021.

The rationale for choosing this implementation date is that it is the earliest SEC Release it could be incorporated into for a straightforward change following a decision. Given the change would not be making any material impacts, there is no lead time associated with the Proposed Solution.

7. Assessment of the proposal

Observations on the issue

Interactions with the licences

A Change Sub-Committee (CSC) member suggested this could pose a problem for them due to the date being hardcoded into Supply Licences as the end date for proactive install and leave in areas where there is a future coverage date. The CSC member referred to The Department for Business, Energy and Industrial Strategy (BEIS) consultation on consequential changes following confirmation of the new post-2020 policy framework (September 2020 Consultation – cover letter and consultation document).¹

The BEIS consultation states:

Proactive install and leave and DCC WAN coverage

22. Electricity supply licence condition 49.8(c) and gas supply licence condition 43.8(c) temporarily exempt energy suppliers from the operational requirements set out at licence conditions 49.4 and 43.4, respectively, in cases where the DCC WAN is not available on the installation date but is expected to be available prior to 1 January 2021. This date reflects DCC's contractual obligations to provide WAN coverage to 99.25% of premises in the CSP Central and South Regions, and 99.5% of premises in the CSP North Region by the end of 2020.

23. We do not propose amending this date despite the extension to the 'all reasonable steps' framework as the DCC is on track to deliver its contractual obligations by the end of 2020. The most recent DCC Statement of Service Exemptions shows that as of 1 January 2020 WAN coverage was at 99.75% in the Central and South regions and 99.4% in the North region.

24. We note that certain SEC provisions also relate to DCC WAN coverage and apply from the end of 2020. We do not propose amending these provisions for the same reasons.

The consultation confirmed that BEIS is not planning to move this date as set out in the Supply Licence. These obligations do not allow proactive 'install and leave' beyond 1 January 2021.

By removing the date 1 January 2021 from SEC Section H it will allow Suppliers to know when the SM WAN will be present, if it is not at the time of checking. This will allow Suppliers to keep consumers informed of when they might be able to have a Smart Metering System installed.

¹ <https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-consequential-changes-following-confirmation-of-the-new-post-2020-policy-framework/>

Overall, this means that Suppliers **will not** be able to continue to perform proactive 'install and leave' but **will** be able to improve coverage for areas they have not covered before. This will also enable proactive install and leave should this be permissible again in the future.

Views of the DCC

The DCC initially suggested that the date should be changed to 2029, which is the end of the CSP contract, to allow for any improvements that the CSP S&C might make. However, this caused some confusion. A SECAS investigation determined that the reason for the change of date was to allow for SM WAN coverage enhancements and it was suggested that the date should be removed completely to allow further futureproofing.

The DCC further suggested that Parties may have hardcoded the date into their Systems. This modification was presented to all the SEC Sub-Committees and to various DCC Working Groups. No Parties highlighted that this issue would affect them, nor that there was any reason why a Party would hardcode this date into their systems.

The DCC suggested that some reports might be affected but no reports were identified as being affected.

In conclusion, the DCC requested removing the date from the SEC and for the DCC to be allowed to respond to its customers with a date after 1 January 2021 to allow for CSP SM WAN coverage enhancements.

Views of the TABASC

The Technical Architecture and Business Architecture Sub-Committee (TABASC) expressed interest in this Draft Proposal. The TABASC noted this proposal would not be expected to result in any changes to the DCC Systems, however questioned if it could potentially require changes to User Systems. It suggested SECAS discuss with BEIS to manage and align this change with the work BEIS was undertaking regarding DCC network coverage.

The BEIS representative on the TABASC advised that proactive and leave install is a policy which allows energy Suppliers to meet their operational licence conditions by installing and leaving Smart Metering equipment where the WAN is predicted to be provided by 1 January 2021. The consultation position, as noted above, is to effectively end the concept of proactive leave and install when the DCC achieved its target coverage. The BEIS representative advised the Draft Proposal was raised to allow for changes to the WAN Coverage Checker to reflect changes in coverage over time, in particular due to new build premises and the provision of the WAN to these sites.

Views of the Change Sub Committee

The Change Sub Committee agreed that this Draft Proposal should be converted to a Modification Proposal and go straight through to the Report Phase.

Support for Change

There was support for this change from a Large Supplier, although it was recognised the DCC has met its coverage target. This change will allow the CSP Central and South to let Suppliers, and

therefore consumers, know when it will be providing a service to areas which do not currently have WAN coverage.

There was also a request to have new build postcodes added to the coverage checker more quickly than at present, as the main issue for Suppliers is the significant delay between new postcodes being created and then appearing on the DCC coverage checker. SECAS acknowledged this requested and advised this would need to be a separate modification.

There was a request from the Large Supplier for the DCC to provide information on how the CSP conducts its planning and enhancements and how the CSP S&C could publish information on which areas were being upgraded. This was because if a Supplier has previously checked an address and been told there is no SM WAN expected they would not know to check again. The DCC will publish any CSP Coverage enhancements as appropriate.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification better facilitates General SEC Objective (a)². The reason given was that it would enable future dated WAN connections which would allow Suppliers to provide more consumers with Smart Meters. Suppliers will be able to provide more information to consumers about when WAN coverage would be available to a particular premise.

Views against the consumer areas

Improved safety and reliability

The change is neutral against this area.

Lower bills than would otherwise be the case

The change is neutral against this area.

Reduced environmental damage

The change is neutral against this area.

Improved quality of service

This implementation will have a positive impact to Suppliers as it allows them to provide more accurate information to consumers and to aid in their roll out obligations.

Benefits for society as a whole

This implementation will benefit the society as it will allow for areas to be connected to the smart metering infrastructure where it was not previously able to be due to no WAN connection. This will

² Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers premises within Great Britain.

give the opportunity for the CSP C&S to continue to extend its service enhancements beyond the date of 1 January 2021 and more consumers to have Smart Metering Systems installed.

Appendix 1: Progression timetable

The Modification Proposal was presented to the CSC on 5 January 2021 where CSC recommended it should be presented to Panel for conversion to a Modification Proposal and to be taken straight to the Report Phase as a Self-Governance Modification.

Timetable	
Event/Action	Date
Draft Proposal raised	16 Oct 2020
Presented to CSC for initial comment	27 Oct 2020
Presented to CSC for update	24 Nov 2020
Present to CSC for final comment and recommendations	5 Jan 2021
Panel converts Draft Proposal to Modification Proposal	15 Jan 2021
Modification Report Consultation	18 Jan 2021 – 5 Feb 2021
Change Board vote	24 Feb 2021

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
BEIS	Department of Business, Energy and Industrial Strategy
CSC	Change Sub Committee
CSP	Communication Service Provider
DCC	Data Communications Company
S&C	South and Central Regions
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMS	Smart Metering System
SM WAN	Smart Metering Wide Area Network
SSI	Self Service Interface
TABASC	Technical Architecture and Technical Business Architecture Sub Committee