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# MP223 'WAN Coverage Reporting'

## Refinement Consultation responses

### About this document

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This document contains the full collated responses received to the [MP223 'WAN Coverage Reporting' 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
British Gas	Large Supplier	Yes	Yes, we support the proposer's view that this solution should effectively (or as effectively as possible) help with the identified issue.  We agree with the Modification Report that any reporting set in place needs to also be future-proofed for 4G.	
EDF	Large Supplier	Yes	Improved reporting will provide a measure for DCC's performance against Bmax targets and provide understanding to industry of what measures DCC are taking to improve performance whilst allowing suppliers and others a better, more detailed understanding of WAN coverage across the country –saving money on field visits and (hopefully) ensuring customers have a prospect of coverage improvements in the future derived from the information such reporting will provide.	
EON	Large Supplier	Yes	In regard to requirement 3, it is not clear if the incidents suppliers have already reported by the current method will be included in the reporting.	DCC have noted that historical WAN-related incidents will not be included in reporting. This is because they have not been recorded in such a way that can be transferred to a new report. DCC noted that the new template will provide structure

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			We want to avoid suppliers having to re-raise any known issues in order to populate the report. We suggest that this is factored into the solution and the legal text.	which is required to allow all new WAN incidents to be collated into the new report.
<b>Octopus Energy</b>	Large Supplier	Yes, partially	<p>The proposed solution resolves the first part of the identified issue to provide reporting on current WAN coverage percentages. We feel that creating an SEC Requirement for this type of regular reporting may also hold CSPs more accountable for their coverage responsibilities.</p> <p>We acknowledge that the scope of this modification is to provide a reporting mechanism but we feel an important next stage will be how it might drive work to improve WAN coverage.</p> <p>Whilst we accept that there might be a higher cost associated with making the reporting a contractual requirement for CSPs to provide regular WAN coverage reporting, we feel the lack of contractual arrangement leaves a risk that the CSPs may refuse or eventually stop producing the reporting. We understand there may be extensions to the timeline/costs if contractual change is sought as part of MP223 and therefore accept the proposal for informal request of this information but feel it is important to highlight there is an associated risk.</p>	<p>The business requirements have been written in collaboration with DCC, noting the existing reporting they already receive from CSPs. For example, some requirements state the DCC should produce monthly reporting, because this is the frequency which they receive the information from CSPs.</p> <p>The Proposer is also keen for this modification to be as low-cost as possible. SECAS discussed the potential of changing DCC/CSP contracts however where advised that this would likely incur very high cost, going against the wishes of the Proposer.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	We just have one query around requirement 4 as we believe that there are already templates to raise WAN incidents as this is a process that is already in place. Can this requirement be expanded upon? How would this template differ? Would this also help prevent the CSP's also coming back to Suppliers requesting further information?	SECAS has asked for this information from DCC and will update this response accordingly.
Utilita	Large Supplier	Yes	We believe that having accurate reporting on the status of WAN connectivity is required to identify if Bmax targets have been met. It will help industry and the DCC identify where coverage improvements are required. Enhanced reporting will also enable future projects, such as the 4G transition, to be successful. In addition, accurate reporting would allow Suppliers to plan installation appointments with confidence and reduce the number of failed visits due to WAN coverage issues.	

## Question 2: Do you agree that the legal text will deliver MP223?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	<p>We recognise that unfortunately H13.15 (e) and (f) can only be on an informal basis. However, we think it is still worth including these.</p> <p>We found the wording on H13.15 (b) and (c) to be a bit unclear. I particularly think for (b) the sentence needs to be redrafted, as I can't quite understand what the sentence is trying to say is required.</p> <p>What is the difference between a "WAN-related incident" in (c) and a "WAN incident" in (d)?</p>	<p>For (b) this has been amended to read "Produce monthly reporting of addresses where there is no WAN coverage or the WAN coverage level has changed since the last quarterly report".</p> <p>The Legal Text has been amended to refer to all WAN-related incidents.</p>
EDF	Large Supplier	Yes	Legal text appears to provide for the changes noted in answer to Q1, however; "c) produce monthly when Suppliers raise..." appears to miss the word 'reporting'.	This text error has been amended in the Legal Text v0.2
EON	Large Supplier	Yes	However, please see answer to Q1.	
Octopus Energy	Large Supplier	Yes, partially	The legal text appropriately covers the requirements of the initial request and therefore delivers MP223.	
OVO	Large Supplier	Yes	-	
Utilita	Large Supplier	Yes	No comments	

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

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	Except we don't understand why it needs to take until November 2024 to implement. We would prefer this to be earlier if possible.
EDF	Large Supplier	Yes	No issues with approach. Positive to see 4G reporting will be included.
EON	Large Supplier	Yes	An ad hoc release would be preferable to waiting for a scheduled release date.
Octopus Energy	Large Supplier	Yes	We agree with the proposed approach to resolve the issue outlined in the proposal. We would however note that the November 2024 SEC release is over a year away and we believe it should be possible to bring this forward without impact on cost considering that we understand that the CSPs produce some type of reporting already in this area.
OVO	Large Supplier	No	As discussed at the working group we believe that a shorter lead time should be explored and perhaps the June 2024 release would be a more suitable time to aim for considering what is needed for this modification.
Utilita	Large Supplier	Yes	No comments

## Question 4: Will there be any impact on your organisation to implement MP223?

Question 4			
Respondent	Category	Response	Rationale
<b>British Gas</b>	Large Supplier	No	There is no implementation impact as such, except Suppliers need to be encouraged to report all WAN-related incidents, once the mod goes live, to be included in the reporting.  There will be a positive impact if it helps with accuracy of identifying non-WAN properties before we visit.
<b>EDF</b>	Large Supplier	No	Business already reports WAN issues to DCC as BAU process.
<b>EON</b>	Large Supplier	No	Impact is on DCC only.
<b>Octopus Energy</b>	Large Supplier	No	We do not believe there will be any impact on our organisation to implement MP223. The reporting that MP223 seeks to implement is in addition to what is already in place. We can choose to use this when necessary, hence it does not require any committed effort to implement other than the time spent by a staff member reviewing the data.
<b>OVO</b>	Large Supplier	Yes	A positive impact in terms of greater visibility of WAN incidents and WAN coverage reporting.
<b>Utilita</b>	Large Supplier	Yes	Potential minor process changes to job booking and planning within Field Services could be made to optimise these activities based on the increased accuracy of WAN reporting.

## Question 5: Will your organisation incur any costs in implementing MP223?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	TBC	Expected to be low.
EDF	Large Supplier	No	Business already reports WAN issues to DCC as BAU process.
EON	Large Supplier	No costs	-
Octopus Energy	Large Supplier	No	As in Question 4, we do not believe this will incur any additional efforts or costs. The Proposal appears to have benefits to us as a supplier. Implementation of MP223 will provide us with clearer WAN reporting on incidents raised and we will be able to better understand WAN issues at sites and not waste resources revisiting sites with known issues.
OVO	Large Supplier	Less than £100k	We anticipate minimal cost outside of this modification.
Utilita	Large Supplier	Less than £10k	There may be minor costs to implement this as it would involve checking a new report before booking or planning a job.



## Question 6: How long from the point of approval would your organisation need to implement MP223?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	It would be useful to have the more accurate coverage information as soon as possible.
EDF	Large Supplier	N/A	Business already reports WAN issues to DCC as BAU process.
EON	Large Supplier	N/A	-
Octopus Energy	Large Supplier	0	As covered in Questions 4 & 5, we do not believe there would be any need for extra resources or time to implement the changes proposed to implement MP223.  This is a reporting set which provides deeper information in addition to the already available WAN data.
OVO	Large Supplier		As soon as reporting is provided
Utilita	Large Supplier	1 – 2 months	If process changes are required with the advent of the new reports, we would need to update process documents and train out the new changes.

## Question 7: Do you believe that MP223 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	-
EDF	Large Supplier	Yes	MP233 very clearly facilitates the first general SEC objective of facilitating the efficient provision, installation and operation of Smart Metering Systems by allowing better understanding of WAN coverage across the country and hopefully providing a metric & data to allow DCC to improve coverage to customers.
EON	Large Supplier	Yes	This will facilitate objective a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain By reducing waste and promoting efficiency and providing a better experience for customers.
Octopus Energy	Large Supplier	Yes	MP223 helps meet SEC objective a) by facilitating improvements to smart meter installation confidence. To lesser degrees, it also supports SEC objectives b) & e). We feel that MP223 broadly facilitates the general SEC objectives and also encourages CSPs to meet their coverage targets by making this information more transparent and widely accessible.
OVO	Large Supplier	Yes	A, B and G
Utilita	Large Supplier	Yes	We believe that this mod would better facilitate Objectives (a) and (e). Having an accurate understanding of WAN status at a given property will lead to job bookings being more efficient, with fewer cancellations or failures due to communications issues. This will also give future projects the ability to plan rollouts targeted to areas that have high coverage and highlight areas that may require further intervention to resolve.  It will also help identify if coverage targets have been met and if enhancements are required.

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## Question 8: Do you believe there will be any impacts on or benefits to consumers if MP223 is implemented?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	It would allow fewer failed Smart install visits.
EDF	Large Supplier	Yes	Potential benefit of avoiding unnecessary installation/engineer visits to customers and possibly leading to improved coverage in certain areas allowing smart meter installations and the benefits of smart systems to be brought to more customers.
EON	Large Supplier	Yes	Less aborted installation appointments which will benefit suppliers and customers.
Octopus Energy	Large Supplier	Yes	<p>We believe that the implementation of MP223 will improve the experience for energy consumers as they will have less time wasted on repeat jobs. This also improves the overall programme and reduces costs in wasted jobs- such costs would eventually make their way onto customers' bills so any reduction here has material benefit for energy consumers.</p> <p>Bringing a focus to WAN consistency and stability stands to benefit consumers as shared information may lead to better understanding and shared learning again reducing costs which would otherwise impact consumers.</p>
OVO	Large Supplier	Yes	We should be able to determine more easily whether there is WAN coverage at an address, reducing aborts and customer dissatisfaction.
Utilita	Large Supplier	Yes	<p>Consumers will benefit from the increased accuracy of reporting as this will improve the success rate of jobs and avoid breaking promises to customers due to unknown WAN status.</p> <p>Some customers may also receive coverage where they would not have without this reporting.</p>

## Question 9: Noting the costs and benefits of this modification, do you believe MP223 should be approved?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	The costs seem reasonable for the benefits this would (or should) achieve.
EDF	Large Supplier	Yes	The cost is very reasonable for the reporting provided and potential benefits it may provide.
EON	Large Supplier	Yes	More accurate reporting will lead to less aborted appointments
Octopus Energy	Large Supplier	Yes	The costs estimated to be £40,000 appear to be a reasonable price for the improvements to be made in programme support and improved energy consumer experience.
OVO	Large Supplier	Yes	-
Utilita	Large Supplier	Yes	<p>With the 4G transition on the horizon it is critical that all Supplier share an accurate understanding of the current WAN status of the networks across the UK, as this will enable a smooth rollout of this new technology.</p> <p>Additionally, this understanding on WAN status will provide ongoing benefits to new installations and replacements, as well as allowing proactive actions to be taken in chases where there has been a change in WAN status that we cannot do at the moment.</p>

## Question 10: Should the optional £5,000 cost for independent validation of CSP postcode validation data be included as part of this modification?

Question 10		
Respondent	Category	Comments
British Gas	Large Supplier	Yes, but could this be done as soon as possible, ahead of the November 2024 current targeted date. It is particularly important for accurate scoping and planning for RTS replacements, so the sooner the better.
EDF	Large Supplier	Yes – this is a reasonable cost for the additional validation.
EON	Large Supplier	
Octopus Energy	Large Supplier	We agree with the principle of independent validation of CSP postcode data and believe it would be valuable to the reporting proposed by MP223. However, we would be interested to know what form this independent validation would take and who would conduct this. We believe that CSPs should be validating their own data regularly aside from this modification but see this modification as an opportunity to clarify this and confirm the validity.
OVO	Large Supplier	Yes
Utilita	Large Supplier	We believe this will provide an additional level of confidence to the accuracy of the reporting, and for the cost, we do not see a reason this validation work should not be undertaken.

## Question 11: Please provide any further comments you may have.

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	
EDF	Large Supplier	-	-	
EON	Large Supplier	-	-	
Octopus Energy	Large Supplier	-	-	
OVO	Large Supplier		We would like to emphasise that we would like the reporting based on data this is available as a priority, and then changes to contracts to be considered as this could delay the issuing of the reports due to being costly and taking a long time.	<p>Due to the feedback received from Parties, this modification will be implemented as an ad-hoc SEC Release as soon as a decision is made by Change Board.</p> <p>The DCC has informed SECAS that the Impact Assessment will take 30 days. In the Impact Assessment an accurate timescale will be provided as to the testing time needed to implement this modification before go-live.</p>
Utilita	Large Supplier		It is important to note that Business Requirement 3 can only be accurately reported if Suppliers are raising WAN-related incidents with DCC as and when they occur.	<p>Response</p> <p>SECAS and the Proposer acknowledge that Suppliers will need to report on incidents so ensure the new report on WAN incidents is as accurate as possible.</p>

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Should this mod be implemented, it is critical that Suppliers are reminded to raise these incidents and that this behaviour becomes BAU activity if it is not already.</p> <p>This could be added to existing DCC communications channels such as Service Review or Incident Reviews as an example.</p>	<p>SECAS has not explored the possibility of adding this reminder to DCC communications channels but will do so when the Impact Assessment is requested.</p>