

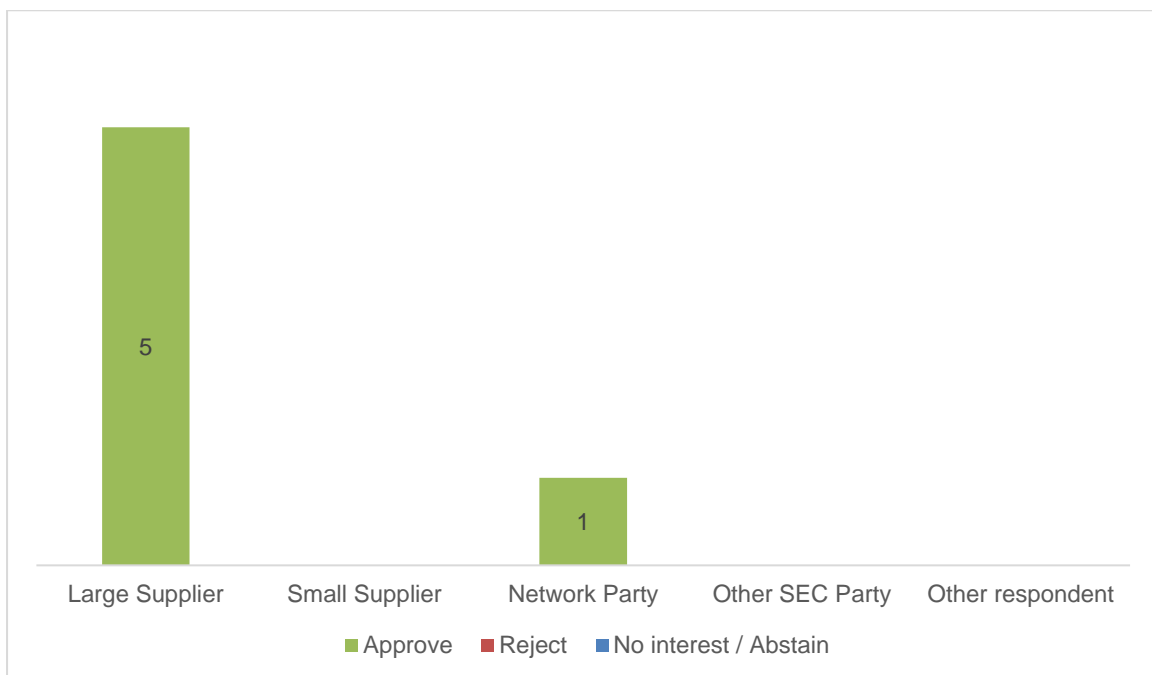
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MP223 ‘WAN Coverage Reporting’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP223 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP223 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Approve	General SEC Objective (a) in particular, together with wider operational benefits for industry parties.	
EDF	Large Supplier	Approve	We believe that MP223, if approved, would better SEC Objectives (a), (b) and (g).	
National Grid Electricity Distribution	Network Party	Approve	-	
Octopus Energy Ltd	Large Supplier	Approve	<p>We welcome the greater depth to reporting on WAN coverage including greater clarity on sites where WAN levels have changed. This will be of greater importance as we move through 2G & 3G sunseting. We also welcome the second report mentioned which would show where incidents have been raised to prevent further unnecessary visits to sites.</p> <p>We note that by keeping the CSPN data/reporting to a postcode level will continue to provide an inaccurate level of coverage and will likely cause confusion as some postcodes will be covered according to the WAN data but will have multiple incidents for the individual properties in the postcode which are not covered.</p>	SECAS notes that as reporting will remain at postcode level in CSP North there may be some issues with addresses that are reported as covered but do not have SMWAN. Throughout the modification process the Proposer has sought to keep costs as low as possible. Changing reporting in CSP North would have increased the costs substantially, hence why the Proposer has chosen to keep reporting at the existing level.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			The cost to implement this also seems reasonable for the minimal changes proposed.	
OVO Energy	Large Supplier	Approve	<p>However, although we understand the requirement around the new template and why it has been included, it wasn't one of the original requirements of the modification. We still question why it is needed, especially due to the extra 20k it has added to the cost of the modification at this late stage.</p> <p>We don't necessarily feel that the process has been gone about correctly. We are paying to improve things i.e. the template, at User's expense when there are templates already in place. If the modification wasn't so valuable to us, we would want to address the extra costs that have been added so late in the day, but ultimately, we would like to move this modification on, so we support the modification as it is.</p>	Currently, when incidents are raised with the DCC they are stored but cannot be collated into a report. When building the requirements for this modification SECAS was made aware that without a new template, future incidents would not be able to be recorded and reported on. As such, this has been included as part of the proposed solution.
Utilita Energy Ltd	Large Supplier	Approve	We believe this modification would better facilitate General SEC Objective (a) by providing accurate and up to date information on WAN coverage.	

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

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	We are keen to see this implemented as soon as practicable, and appreciate that it now has an ad-hoc implementation date, rather than waiting until November 2024.	
EDF	Large Supplier	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.	
National Grid Electricity Distribution	Network Party	-	
Octopus Energy Ltd	Large Supplier	Whilst we appreciate the greater depth of the WAN coverage being afforded by the implementation of this SEC MOD. We note there is also an issue with properties being suggested they are covered and then no signal being found. This however is largely in CSP N region and the WAN coverage is only at a postcode level meaning there are often properties not covered in the postcode but if one property is covered then CSP N can claim coverage. This means that the WAN coverage is	

Question 2			
Respondent	Category	Comments	SECAS Response
		not an accurate representation for the CSP-N even with the introduction of MP223.	
OVO Energy	Large Supplier	We are happy to show our support for this modification, however, we really feel that we should be presented with a robust view of costs at this stage. Increasing the cost of the modification so late in the process is not acceptable in our view and does not set a very good precedent for future modifications. We do appreciate the extra time given to respond.	SECAS acknowledges that the costs of the modification should not change at this stage of the modification process. SECAS is working with DCC to ensure this late change in cost does not occur in any future modifications.
Utilita Energy Ltd	Large Supplier	<p>Accurate and up to date WAN coverage data is essential in planning remaining rollout activities – the data currently being provided via the WAN Coverage Checker is not always accurate, leading to Suppliers arriving at a customer property to install a Smart meter and finding there is actually no WAN coverage available, causing the install to fail. Further, in cases where WAN coverage is present, it is not always stable, leading to more issues with the Install & Commission process than initially anticipated.</p> <p>Additionally, there is no obligation on the DCC to provide data on coverage beyond the checker, nor on any steps being taken to improve coverage or resolve WAN connectivity issues.</p> <p>It is vital to note that this data will play a key role in the 4G transition work, enabling Suppliers to mitigate the risk that comms hub swap outs</p>	

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>fail due to WAN issues and ensuring that we do not leave customers with a degraded service after the swap.</p> <p>Additionally, as a PrePay supplier, having an accurate understanding of our customers WAN status allows us to confidently offer our products and services to customers. Further, having WAN coverage is critical for PrePay to enable remote top ups, an essential feature that customers have come to expect of a Smart PrePay supplier.</p>	