MP242 ‘Change to Operational Metrics to Measure on Success’

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP242 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**
Utilita	Large Supplier	Yes	We agree that the solution will resolve the issue identified, however, we believe that simply reporting on success or failure does not give a full picture of the performance of the network as a whole and believe that the existing time-based reporting should be retained alongside the success reporting as the two-work hand in hand to give a complete picture of performance. These paired reports can also help identify and pinpoint issues across the network, and as the time-based reports are already being produced, this should not increase costs.	SECAS will discuss the possibility of retaining the two sets of reporting metrics with the Proposer and the DCC.
British Gas	Large Supplier	Yes	-	N/A
Ovo Energy	Large Supplier	Yes	-	N/A
Octopus Energy	Large Supplier	Yes – partially	The proposed solution provides a more distinguishable breakdown between what DCC and Users define as a 'Success' or 'Failure' by Business Process which helps create a view of success that aligns with different perspectives. However, we believe that the solution proposed still does not seem to fully answer the question of TRTs vs RTTs as an appropriate means of reporting on the DCC Service which can be used in the Ofgem	SECAS will discuss the provided feedback with the Proposer and the DCC.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			Operational Performance Regime and that the DCC and their Service Providers are held accountable for on performance.	

Question 2: Do you agree that the legal text will deliver MP242?

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	Yes	No further comments	N/A
British Gas	Large Supplier	Yes	-	N/A
Ovo Energy	Large Supplier	Yes	-	N/A
Octopus Energy	Large Supplier	Yes, Agree	The Legal text appropriately covers the requirements sent out to deliver MP242. However, we note that the legal text still refers to RTT: "Business Process Performance Indicators set out the percentage of each of the Business Processes described in the table below which is delivered within the applicable Round Trip Time (RTT)." yet success in the attached table does not seem to include reference to time anymore, simply response code and there are also no 'applicable RTT' defined in the SEC.	SECAS will discuss the provided feedback with the Proposer and the DCC.

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

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	No	While the proposed approach makes sense, we question whether a three-month lead time would give the DCC enough time to undertake the development and testing work required to implement the reports in co-operation with Suppliers.	SECAS will discuss the potential amendment of the implementation approach with the Proposer and DCC.
British Gas	Large Supplier	Yes	-	N/A
Ovo Energy	Large Supplier	Yes	-	N/A
Octopus Energy	Large Supplier	Yes	The current success metric using round trip times is not appropriate for monitoring DCC success. The proposed solution regarding measuring success of 7 key business processes is a much better way of monitoring the overall success of the DCC.	N/A

Question 4: Will there be any impact on your organisation to implement MP242?

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	Yes	As part of this modification, the DCC have requested that Utilita cooperate in the production of these reports. We are happy to participate and provide key expertise	N/A
British Gas	Large Supplier	No	It will just be an additional report we receive. It will be for SEC Ops to manage.	N/A
Ovo Energy	Large Supplier	Yes	Positively. Success reporting will be far more valuable.	N/A
Octopus Energy	Large Supplier	No	As this is a reporting metric for DCC to be measured upon, it will not impact on our organisation to implement this.	N/A

Question 5: Will your organisation incur any costs in implementing MP242?

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	Less than £25k	Only costs associated with providing FTE as part of the report development process. It is currently unclear how much FTE commitment would be required.	N/A
British Gas	Large Supplier	No costs	It will just be an additional report we receive. It will be for SEC Ops to manage.	N/A
Ovo Energy	Large Supplier	No costs	None other than the cost of the modification.	N/A
Octopus Energy	Large Supplier	No	As this is a reporting metric for DCC to be measured upon, it will not cost us anything as an individual supplier to implement this beyond the shared costs to industry.	N/A

Question 6: How long from the point of approval would your organisation need to implement MP242?

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	N/A	There would be no impacts to our systems as part of this modification.	N/A
British Gas	Large Supplier	No time required	It will just be an additional report we receive. It will be for SEC Ops to manage.	N/A
Ovo Energy	Large Supplier	Immediately	-	N/A
Octopus Energy	Large Supplier	No Time	As this is a reporting metric for DCC to be measured upon, it will not require anything from us as a supplier once approved for implementation.	N/A

Question 7: Do you believe that MP242 would better facilitate the General SEC Objectives?

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	Yes	We believe that this modification will better facilitate General SEC Objectives (e) and (g). These reports will allow the identification of areas of operation that are not performing as expected, allowing investigation into the root causes to determine solutions, whilst also allowing innovation to flourish as business processes can now be put under a microscope to determine areas of inefficiency.	N/A
British Gas	Large Supplier	Yes	Definitely General SEC Objectives (b) and (g), and also General SEC Objective (a) over time.	N/A
Ovo Energy	Large Supplier	Yes	A	N/A
Octopus Energy	Large Supplier	Yes	SEC objectives A, B, C, E and G will be better facilitated by the implementation of this proposal by ensuring a good level of service and better ways to measure this. By being able to measure this more accurately it will ensure that the level of service is maintained which supports the provision of smart meter systems and ensures that customers can manage their energy usage.	N/A

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP242 is implemented?

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	Yes	If we can identify processes that are failing we can take steps to correct this, which would have a knock-on impact on consumer experience as the success rate of those processes increases. This will be especially felt in the prepay sector as any issues with vend successes can be identified early and resolved.	N/A
British Gas	Large Supplier	Yes	The reporting covers deliverables that are important to consumers and will have the highest consumer impact. The reporting will enable us to see points of favour, enabling the whole industry to investigate and improve, thus improving the consumer experience of smart.	N/A
Ovo Energy	Large Supplier	Yes	-	N/A
Octopus Energy	Large Supplier	Yes	Whilst not a direct impact of the change in reporting mechanism, we would expect that customers will be provided with a more reliable service as any drop-in service will be more closely measured under the new mechanism	N/A

Question 9: Noting the costs and benefits of this modification, do you believe MP242 should be approved?

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita	Large Supplier	Yes	We believe that the ability to accurately report on the success rate of the business processes outlined in the modification report is critical and as such, believe that this modification should be approved.	N/A
British Gas	Large Supplier	Yes	And as soon as possible, ideally before April 2024.	N/A
Ovo Energy	Large Supplier	Yes	-	N/A
Octopus Energy	Large Supplier	Yes	We believe that the modification should be approved, however we feel the costs are high considering the impacted areas are the DCC's Data Science and Analytics with no system changes required to implement this. £200k+ seems excessive given the PA states that 'the largest component of the change is the work associated with designing the full business logic associated with each business process.' which seems to be largely driven by time and effort from DCC resources. We also believe that elements of this reporting already exist. This seems to be a relatively minor change in reporting logic which costs £200k+ and does not bode well for any potential reporting changes in the future.	SECAS will discuss the provided feedback with the Proposer and the DCC.

Question 10: Please provide any further comments you may have.

Question 10			
Respondent	**Category**	**Comments**	**SECAS Response**
Utilita	Large Supplier	No further comments	N/A
British Gas	Large Supplier	-	N/A
Ovo Energy	Large Supplier	-	N/A
Octopus Energy	Large Supplier	-	N/A