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Smart Energy Code

DP300

'Additional Operational Metrics to Measure on Success'

Modification Report

Version 0.1

8 September 2025

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Smart Energy Code

About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Rochelle Harrison from British Gas.

Smart Energy Code (SEC) Modification MP242 'Change to Operational Metrics to Measure on Success' (implemented on 12 November 2024) introduced a new reporting framework for seven Business Processes. Prior to this Modification, the means by which operational processes were measured was dependent on Target Response Times (TRTs). However, due to limitations around the measurement of TRTs in certain circumstances, a new reporting framework was required. As a result, MP242 allows for the measurement of Business processes in the context of 'success' for a Service Request (SR), Service Reference Variant (SRV), or Alert.

The Proposer has raised this Modification to introduce four new Business Processes into the MP242 reporting model. The scope of this Modification will also encompass a review of the mechanism introduced by MP242 by which a SEC Party may request additional operational metrics be included in the MP242 reporting model.

2. Issue

What are the current arrangements?

Seven Business Processes are included within the scope of the MP242 solution and therefore reported on via the MP242 reporting mechanism. This mechanism involves the measurement of the 'success' of a SR, SRV, or Alert. Where the 'failure' is not due to the Data Communications Company (DCC) ecosystem, i.e., sending updates to a Device an energy Supplier is not responsible for (E4s etc.), then exceptions will be allowed. All exceptions will be reviewed and agreed between the Operations Group (OPSG) and the DCC before being included in any reporting.

This has resulted in a report on the Success/Failure of an agreed set of SRVs across seven Business Processes, in which performance for these SRVs is based on whether that SRV meets pre-defined criteria set following collaboration between the DCC and OPSG. This will enable the DCC and Parties to better understand SRV performance from a consumer's perspective. The seven Business Processes are as follows:

- Install & Commission;
- Change of Supplier (Gain);
- Pre-Payment 1;
- Pre-Payment 2;
- Update Device Firmware;
- Meter Reads; and
- Tariff Updates.

The relevant SRVs associated with these Business Processes are captured in Table 7 of the Performance Indicators Document (PID); a DCC-owned document. The MP242 solution removed the governance arrangements relating to these Business Processes from SEC Section H – 'DCC Services' and transferred them to the PID, uplifting it from V1.0 to V1.1. Prior to this transfer, these arrangements were found in Clause H13.1A (Section H – V20.0) and are now found within Table 1 of the PID. This Clause detailed the Business Processes and their associated SRVs which were subject to the previous reporting model based on TRTs and included more Business Processes than the seven to be captured under the new reporting model. As a result, Table 1 captures the Business Processes which *may* be reported on via the new success definition, Table 7 captures those that *are* captured. An exhaustive list can be found in the PID as per the [MP242 solution].

A result of the transfer of the governance arrangements for the MP242 Business Processes from SEC Section H to the PID is a shift in how Modifications to these arrangements are managed. Changes to the SEC follow the SEC Modifications Process, as outlined in SEC Section D – 'Modifications Process'; whereas PID changes are managed via a DCC Change Request process. This creates a challenge for SEC Parties who wish to introduce subsequent additions to the MP242 solution but do not wish to incur direct costs as a result of the nature of the DCC Change Request Process. The removal of the Business Processes from the SEC leaves no recourse for alterations to the SEC to modify the MP242 solution.

What is the issue?

The Proposer has suggested the addition of the following Business Processes into the MP242 reporting mechanism, whereby their performance will be measured on the basis of relative success/failure, as opposed to TRTs:

- Change of Tenancy;
- Estate Management;
- Security Management; and
- I&C Amendment.

These were not included within the scope of the MP242 solution; at the time, the Proposer chose to focus on Business Processes which in their view were more critical. The Business Processes in scope of this Modification are deemed to be important by the Proposer but were not relatively as critical as the seven within scope of MP242 when the solution to that Modification was being developed.

For the DCC to report on these Business Processes under the MP242 performance mechanism, they would need to be introduced to the PID. The process by which changes to the PID are managed is detailed in Clause H13.5B of Section H – 'DCC Services':

> *The Panel shall establish and periodically review, in consultation with the Parties and the Authority, a document (to be known as the DCC Performance Indicators Document) which lists the reasonable service metrics which are to constitute the Performance Indicators, and which are therefore to be measured and reported on by the DCC. The DCC Performance Indicators Document shall include the Performance Indicators described in Section H13.5C and shall require these to be included in the report required under Section H13.5A and may request other individual Performance Indicator(s) to be included in the report, including:*
>
> *…*

More detail can be found in the section 4.6 of the [DCC Impact Assessment] conducted as part of MP242:

> *It should be noted that only the seven business processes stated in Requirement 2:*
>
> > *• Install and Commission • Change of Supplier (Gain) • Pre-Payment • Top Up Device • Update Device Firmware • Meter Reads • Tariff Updates*
>
> *are in scope for this Modification. It will require a DCC Change Request and agreed costs and durations agreed between OPSG and DCC to add further processes, individual SRs, SRVs, or other functionality.*

An amendment to Tables 1 & 7 of the PID to introduce the above Business Processes and their associated SRVs is required to achieve the Proposer's aims for this Modification. As detailed above, this change would need to be effected via the DCC Change Request process, whereby the DCC would determine the associated costs in collaboration with OPSG and consult with Panel for a final determination on whether to progress the change. The means by which costs are resolved differ between this process and the SEC Modification process; they are passed to the Proposer directly and mutualised across SEC Parties as per arrangements in SEC Section J – 'Payment of Charges' and SEC Section K 'Charging Methodology'.

As the Proposer wishes to have the four required Business Processes introduced into the MP242 reporting model via a SEC Modification rather than a PID change for reasons relating to Charges as outlined above, this Modification seeks to explore mechanisms whereby this can be achieved. The scope will cover both the four requested Business Processes, as well as a lasting mechanism whereby Business Processes can be introduced in a way which does not require change to the PID exclusively.

What is the impact this is having?

The Proposer has indicated that they would expect that access to performance metrics for the requested Business Processes under the MP242 reporting model would allow them to resolve consumer complaints in a more efficient manner. This would then have a secondary impact on their organisation from an operational capacity as resource is freed up from consumer complaint resolution to be deployed elsewhere, which may in turn have an indirect impact on consumer outcomes.

Impact on consumers

There is no direct consumer impact. However, there is an indirect impact as per the above section.

3. Assessment of the proposal

Areas for assessment

Determination of mechanism of change:

MP242 established a mechanism whereby future additions to the "success/failure" reporting model could be achieved; by changes to the PID, as outlined in Section 2 of this document. The Proposer would rather effect change via the SEC Modifications process, as a result of the different means by which Charges are allocated. This creates a challenge: a change must be made within the SEC, but no legal drafting remains in Section H which might be modified to achieve this, as it was removed as part of MP242. Industry must therefore achieve two core goals as part of the assessment of this Modification:

1. Identify a means by which a Modification can be made in the SEC that will result in a consequential change to the PID, allowing Charges associated with changes to the PID to be absorbed within the costs of a SEC Modification on a consequential basis. This may involve the introduction of legal drafting back into Section H – 'DCC Services' that makes top-level reference to the PID, thus allowing a change to the former that affects the latter.
2. In the identification of the means outlined in (1), do so in a manner which does not undermine the intention of the MP242 legal drafting, where additions to the original solution are actioned via PID changes alone. SECAS recommend creating two viable pathways:
    a. **PID changes alone**: These would incur higher direct individual Charges to the Proposer, but could be achieved in a faster timescale
    b. **SEC Modifications resulting in consequential PID change:** These would incur smaller direct individual Charges but would be achieved over a longer timescale.

Determination of required SRVs:

The Proposer has requested four Business Processes (outlined in Section 2 of this document). The Proposer and the DCC will need to determine what combination of SRVs will most fully achieve the Proposer's outcomes. This will be especially pertinent in the case of "derived" aspects of requested Business Processes; for example, the DCC have indicated that "Clock Drift", requested by the Proposer as part of the "Estate Management" Business Process is not formally defined. Rather, the DCC have indicated that it is likely to be derived from a custom set of SRVs, rather than a prescribed set, in the case of Install & Commission, for example.

Sub-Committee input

SECAS will engage the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS will not engage with the Chairs from the Privacy Sub-Committee (PSC), the Testing Assurance Group (TAG), and the Performance Assurance Board (PAB) as we do not expect this Modification to require their input, on the basis that they did not provide input for MP242. SECAS therefore believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	**Input sought**
OPSG	Assess any potential operation impacts as a result of the potential solution
SMKI PMA	Assess any potential operation impacts as a result of the potential solution
SSC	Assess any potential operation impacts as a result of the potential solution
TABASC	Assess any potential operation impacts as a result of the potential solution

SECAS will seek input from these Sub-Committees on the basis that engagement was sought with them previously for the development of MP242. Whilst only OPSG of the above four Sub-Committees confirmed an impact during MP242, for completeness, this view will be taken again for this Modification.

Appendix 1: Progression timetable

Timetable	
Event/Action	**Date**
Draft Proposal raised	8 September 2025
Presented to CSC for initial comment	*16 September 2025*
Requirements Workshop	*29 September 2025*
Legal Counsel to review draft legal text	*October 2025*
DCC Preliminary Assessment	*October 2025*
Presented to TABASC	*October/November 2025*
Presented to SMKI PMA	*October/November 2025*
Presented to SSC	*October/November 2025*
Presented to OPSG	*October/November 2025*
Working Group	*November/December 2025*

Italics denote planned events that could be subject to change

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**
DCC	Data Communications Company
OPSG	Operations Group
PAB	Performance Assurance Board
PID	Performance Indicators Document
PSC	Privacy Sub-Committee
RTT	Round Trip Time
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SR	Service Request
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Assurance Group
TRT	Target Response Time