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MP122 'Operational Metrics'

Annex E

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP122 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	Yes, we agree that the DCC should facilitate the necessary changes to the their system to be able to report on the 5 business requirements.
Utilita	Large Supplier	Yes	We are broadly in support of MP122, we welcome the inclusion of prepayment top-ups to this reporting. We believe it is necessary to see further reporting on pre-payment processes managed through the DCC to highlight robustness of this service. Crucial features for inclusion are: - As mentioned in the working group sessions in June 2020, it would be useful to see how DCC downtime (planned and unplanned) relates to PPM top-ups and the activation of Emergency Credit, to understand the volume of self-disconnections during the times DCC is offline. - A clear understanding of the amount of retries, the average timing to action a service request such as Top-up Devices SR2.2, which is classed as an On Demand. This is to seek improvements to the customer top-up experience and where improvements are needed to ensure swift, reliable top-ups. - SR2.5 to 'Activate Emergency Credit', as part of the prepayment business process to help monitor the effect of DCC's system on self-disconnection. - Timing of DCC generating and sending to the Supplier the Alert codes 0x81AB 'Emergency Credit Activated' and 0x81AA 'Emergency Credit Exhausted' in order to see timely Alerts being sent by DCC/received by the Supplier before a customer self-disconnects.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	We agree that the Performance Measurement Report (PMR) needs to be revised, and that the performance measurements included in this report need to be more reflective of the DCC's actual performance, and the impact that performance has on end consumers. The PMR should move to a more outcome based approach, as ultimately success or failure is most fairly measured based on whether customers and end users can use the system effectively. While we are strongly supportive of the revision of the performance reporting framework, it is clear that further work is required is required to refine the detailed metrics and ensure that they are fit for purpose and meet the overarching business requirements. We note that ad hoc working group meetings have been convened to discuss MP122 further, and we will be participating in these working group meetings. We do not see the value in commenting further on the lower level detail of the solution while this process is ongoing.
Scottish Power	Large Supplier	Yes	We note a finding of the recent Ofgem review of the DCC's Operational Performance Regime: "DCC's customers are best placed to determine what levels of performance they need to see from DCC, according to their business and customer needs." Ofgem further committed to its continued use of the performance measures defined in the SEC as the basis for the OPR, and recognised the work of the SEC Operations Sub-Group in developing these measures. Like Ofgem, we are keen to see the views of the DCC's customers reflected in the metrics applied to its performance measurement.
DCC	Other Respondent	Yes, in principal but with caveats	DCC recognises that Service Users do not find the current reporting framework useful for their assessment of performance and welcome the opportunity to work with Service Users to amend reporting and provide additional value. DCC considers that amending Code Performance Measures and providing additional Performance Indicators agreed in

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			discussion and consultation with industry can result in the provision of data that Service Users may find more transparent and useful in assessing the performance of DCC systems and Service Providers. While DCC recognises the benefit of these amendments there are, in some instances, concerns on whether the requested information is available for reporting, increasing costs associated with contract changes and increasing reporting volume, whether measures identified are targeted at DCC performance, and the decrease in time available to provide reporting. DCC remains supportive of the continued work with industry and to amending Measures and Indicators to provide increasingly useful information, however DCC considers it essential to ensure that measures are targeted at appropriate services and data, and that the time available to implement and PMR allows for quality data to be produced. The increase in reporting and the decrease in time available to produce the PMR presents a challenge. DCC is reliant on the timely provision of data from Service Providers and moving from a 25 working day SLA to a 10 working day SLA will require contractual changes. Data produced is subject to internal review to ensure its accuracy, and the production of narrative explanation also requires analysis and time to provide accurate explanations. Data assurance will sometimes result in requirements for data to be recalculated and resubmitted where issues are identified and so it is important that the time available to produce the PMR allows for this. It should be noted that the addition of new Code Performance Measures and Performance Indicators increases the volume of reported measures, and therefore the impacts on the time required to produce the report. The decrease in time available to produce the report will put the accuracy and quality of the explanation of data at risk. DCC does not consider the 10 working day timeframe to be reasonable and considers the 25 working day timeframe to be more realistic for the production of such a complex report. Due to the volume of data to be provided and the requirement to fully assure that data and provide

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			narrative explanation DCC does not consider that it is possible to report within the 10 working day timeframe. 25 days is required to ensure quality of data and to meet SEC Objective G and ensure accurate and transparent data is provided DCC understands the aim of reporting produced under Code Performance Measures, Performance Measures and suggested Performance Indicators is to provide data to industry on the performance of DCC service provision. Therefore, DCC considers that all reporting measures and Indicators should be calculated to show DCC performance only and DCC be allowed to exclude data where Service User issues negatively impact that data. The measures and data reported should be specific to DCC performance, DCC should not in these measures be asked to report on industry wide performance, as has been suggested in discussion at the working group. The definition of Measures should be updated to make this clear and ensure that Performance Indicators developed in the future are targeted appropriately. DCC is working with industry and SECAS to develop Code Performance Measures to ensure that the final metrics agreed are fit for purpose. The development of additional Performance Indicators overtime should therefore not be required, unless those Indicators are to report on any emerging issues. Though it is unclear whether Indicators could be developed in the manner described in the draft legal text and implemented in a timely manner to allow those Indicators to be reported while those issues persist. Allowing DCC to continue engagement with Service Users to develop Ad Hoc reporting will allow for swifter reporting as desired by industry. There is currently a requirement for DCC to consult on any amendments to the Performance Measures Methodology (PMM). The draft legal text requires DCC to seek approval from the SEC Panel (13.6b) and obtain SEC Panel approval (13.6c) for any changes. Since DCC holds data and contracts under which data is provided, DCC does not

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			consider that the Panel should have approval powers in the production of the PMM. However, DCC will continue to welcome and consider thoroughly Panel and industry comments on any consultation.

Question 2: Will there be any impact on your organisation to implement MP122?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	No	Not based on what is being proposed once this is implemented. This should not impact us directly.
Utilita	Large Supplier	Yes, this is likely to have a positive impact on the organisation	Improved reporting from DCC will create more transparency between DCC and Industry
EDF	Large Supplier	No	We do not believe that there will be any direct impacts as a result of the implementation of MP122.
Scottish Power	Large Supplier	No	We expect the implementation of these proposals, and their subsequent manifestation in the OPR, to provide positive benefits to Users by focusing DCC's attention on the areas that matter most to its customers.
DCC	Other Respondent	Yes	The solution put forward increases the volume of reporting (in both statistical information and narrative explanation) DCC will be required to produce, and the decreased time allowed to provide the report puts further strain on its production. Furthermore, the decrease in time from 25 working days to 10 working days to produce each report will require changes to Service Provider contracts and will result in additional cost. Contractual changes will be required to amend the data provided by Service Providers which will result in additional costs and delays. The decrease in time available and the increase in measures will require additional people resources to be allocated to the production of data, including manual work to review and quality assure data and produce narrative explanation.

Question 2			
Respondent	**Category**	**Response**	**Rationale**
			The changes suggested will require amendments to the Performance Measures Methodology (PMM) document, including the required industry consultation process. Updates to the PMM will require analysis as to the most appropriate way of calculating performance measures based on the information available to DCC and will require the development of data warehousing and code to allow automation. When Performance Indicators are amended in the future further contract changes may be required and an updated PMM will need to go through the consultation process. Where changes to increase the number of Indicators without removing others are made, this may require additional people resources to complete report production. There will be a cost associated to produce the required data warehousing and code, and an increase in permanent FTE to work produce the report and narrative.

Question 3: Will your organisation incur any costs in implementing MP122?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	No	Not directly although we would look to automate any outputs and use it for numerous works that, at this time, are unquantifiable.
Utilita	Large Supplier	No, there is no extra cost for Utilita in implementing MP122 apart from the unclear final costs associated with this Mod and its implementation, i.e. costs that are incurred by DCC and eventually passed on to suppliers.	
EDF	Large Supplier	No	We do not believe that there will be any direct cost impacts as a result of the implementation of MP122.
Scottish Power	Large Supplier	No	-

Question 3			
Respondent	**Category**	**Response**	**Rationale**
DCC	Other Respondent	Yes	DCC estimated these costs in the preliminary assessment as £340,000 for Design, Build and Test and a further £51,190 for a Full Impact Assessment. However, discussion in working groups has progressed the final solution and requirement for reporting. Any contractual changes required will result in additional costs and will take time to negotiate. The production of new reporting processes and code will require resources to develop and time to complete the PMM consultation process. The increase in reporting volume and decrease in time allowed to produce the report may require additional people resources required on an ongoing basis. DCC has been directed not to complete an impact assessment on this modification at this stage. However, based on the evolution of the modification and discussions at the working group, DCC may expect costs of at least £500K to produce the data warehousing and code to meet the new requirements, in addition to the cost of contractual changes and increasing people resources required.

Question 4: Do you believe that MP122 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	Yes, we agree that this will better facilitate SEC Objectives (b) and (g) as identified in the Modification Report.
Utilita	Large Supplier	Yes	This will better facilitate SEC Objective (b) and (g) providing clarity in reporting from DCC.
EDF	Large Supplier	Yes	We agree with the Proposer that MP122 will facilitate SEC Objective (b) as it will provide a clear statement of the level of service that the DCC's Users are receiving and whether these are compliant with the DCC's obligations in its licence. We also agree MP122 will facilitate SEC Objective (g) by providing relevant and accurate reporting that is reflective of DCC performance and the impact that performance has on energy consumers.
Scottish Power	Large Supplier	Yes	We think the implementation of these proposals would better facilitate achievement of objective (a): i.e. the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.
DCC	Other Respondent	Yes, where measures are targeted appropriately and where time available allows the	DCC considers that the aim of the modifications has been to enhance SEC Objective G - to facilitate the efficient and transparent administration and implementation of this Code. However, this will only be met where the required reporting is specific to DCC performance and does not include Service User issues, and where DCC is not asked to report on industry wide performance.

Question 4			
Respondent	**Category**	**Response**	**Rationale**
		production of quality data	Furthermore, the decreased timeframe available to produce the PMR puts data quality and narrative accuracy at risk, and therefore increases the risk that inaccurate information is presented.

Question 5: Noting the costs and benefits of this modification, do you believe MP122 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	The reporting identified is needed as per the Ofgem works and the OPRs highlighted. This will give us a far greater view of the issues being faced.
Utilita	Large Supplier	Yes	We believe this a worthwhile modification and needs to be prioritised for Implementation date of February 2021. Together with the New OPR we believe both these reporting measures work well together.
EDF	Large Supplier	Yes	We agree that MP122 should be approved, subject to a satisfactory outcome being achieved through the working group discussions.
Scottish Power	Large Supplier	Yes	We note the costs for implementing this Modification, as reported by the DCC, are rather high; however, on balance, the benefits we expect to accrue to Users from this implementation should outweigh these costs.
DCC	Other Respondent	Unclear	DCC wants to provide industry with data that they will find increasingly transparent and useful in assessing the performance of DCC systems and Service Providers. As directed by the Change Board an Impact Assessment is yet to be produced while the finer detail of Performance Measures and Indicators are discussed and agreed, it is therefore difficult to make a judgement as to whether the cost involved is outweighed by the benefit to Service Users. However, if measures reported are specific to DCC performance, where time available allows for quality data to be reported, and where these measures provide data that is more useful for Service Users the modification should provide a benefit to them.

Question 6: How long from the point of approval would your organisation need to implement MP122?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Not known	As no direct changes are applicable to us in our organisation, there should be no lead time needed for any implementation.
Utilita	Large Supplier	Not applicable	DCC implements MP122
EDF	Large Supplier	N/A	We do not require any lead time to be able to implement MP122.
Scottish Power	Large Supplier	No lead time required	DCC impacts only
DCC	Other Respondent	>9 months for all Measures and Indicators	DCC recognises that the February 2021 implementation date is important for the Authority and Service Users. Discussions in the Working Group continue to widen the scope of measures and the direction of data sources. It will be important that the scope of changes and measures does not expand to such an extent that delivery in desired timescales is not plausible. It may be necessary to separate measures out into those required for implementation by February 2021 and those that can be implemented at a later date. The continued discussions at the working group on Code Performance Measures and Performance Indicators, how they should be calculated, what data to utilise and the timeline for reporting, provides uncertainty on final requirements. It is therefore difficult to establish how long this modification is likely to take to implement. Where contractual changes are required to produce data under new or amended Performance Measures, DCC can expect there to be a lead time of at least six months for those contract changes to be agreed and implemented, plus additional time required to amend systems to host and supply information. Any contract changes for the provision of

Question 6			
Respondent	**Category**	**Response**	**Rationale**
			data will need to mirror the agreed PMM (or part of it). The PMM also requires development and industry consultation and so a >9-month implementation period may not be unreasonable. DCC is required to undertake consultation with industry on any changes to the PMM, and there is always uncertainty on responses received ant therefore the time required to finalise the methodology to be used in the production of the PMR. SEC Panel approval of the PMM, and the availability of data for producing data production methodology may also offer the potential for delay to implementation.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	We agree with the approach defined in the Modification Report.
Utilita	Large Supplier	Yes, we agree with the proposed implementation approach	We believe it is critical to work towards implementation for Feb 2021, in order these changes align with the new OPR from the 1st April 2021
EDF	Large Supplier	Yes	We agree with the proposed implementation approach, noting that this change needs to be in place on a timely basis to support Ofgem's revision of the DCC's Operational Performance Regime.
Scottish Power	Large Supplier	Yes	-
DCC	Other Respondent	Broadly supportive but with concerns on scope and volume of change	Previous assessments on the time required to implement the required changes to the PMM and PMR were based on the working groups aim for there to be no contractual changes required for the provision of data. It has now become clear that contractual changes will be required for the provision of additional data and for data to be supplied if the 10 working day time frame is enforced. Contractual negotiations can be expected to take 6 months before data provision is established and so the current timeline for approving the modification and implementation of the changes is not feasible. The timeline to begin the reporting of Performance Indicators will be tied to the final agreement of those Indicators. Only once these indicators have been approved can DCC begin the work required to update the PMM, enter contractual negations with service providers and produce the necessary data warehousing and code to produce the data.

Question 8: Do you agree that the legal text will deliver MP122?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	We do.
Utilita	Large Supplier	Yes	-
EDF	Large Supplier	No	We have the following minor comments on the draft legal text: • For Code Performance Measure 5 (page 3) ‘which the DCC is responsible for resolving that are resolved’ should read ‘which the DCC is responsible for resolving and that are resolved’. • For Code Performance Measure 6A (page 4) ‘each of the Business Process’ should read ‘each of the Business Processes’ • For Code Performance Measure 6B (page 4) ‘each of the Business Process’ should read ‘each of the Business Processes’ • For Code Performance Measure 6B (page 4) ‘delivered in response the schedule’ should read ‘delivered in response to the schedule’ • H13.1A and H13.1B – we understand that the contents of the table in these sections are subject to the discussions by the Working Group; we cannot determine if this legal text is correct until those discussions have successfully concluded.
Scottish Power	Large Supplier	Yes	No issues identified at this time
DCC	Other Respondent	Yes, in principal but with caveats	DCC considers that changes to Code Performance Measures and Performance Indicators will only provide additional clarity for service users on DCC service provision where Service User issues can be excluded from reported data.

Question 8			
Respondent	**Category**	**Response**	**Rationale**
			DCC does not agree with the reduced timeframe to produce the PMR as outlined in other answers to this consultation. DCC does not agree that SEC Panel need to approve the PMM before its implementation as outlined in other answers to this consultation.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP122 is implemented?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	No	We do not believe there will be any direct impacts or benefits to consumers if this Mod is implemented although it will assist in overall improvements to the Service due to the nature of the reports being generated. As such, those benefits are had to quantify at this stage.
Utilita	Large Supplier	Yes	We believe there is an indirect benefit for consumers as more awareness and clarity will be provided around DCC issues, such as downtime of DCC's systems. In improving the reporting, we believe this will highlight the usability of prepayment for enrolled SMETS1 meters and SMETS2 meters.
EDF	Large Supplier	Yes	Introducing new reports will not directly benefit consumers. However, the revised performance reporting should provide a better view of the DCC's actual performance in relation to key business processes which directly impact on the consumer experience of smart metering. Improved reporting should lead to easier and earlier identification of issues that are impacting the service consumers receive, and trigger resolution actions to improve that performance and the consumer experience.
Scottish Power	Large Supplier	Yes	We expect consumers to benefit from the upstream efficiencies that will manifest from these changes.
DCC	Other Respondent	Yes, but with clarifications / changes	DCC considers that the change to reporting can benefit Service Users in providing additional clarity on DCC performance, but only where Measures are fully understood and reporting can be completed robustly, either through data currently held by DCC or data provision by Service Providers. It is important to ensure that Measures directly report DCC

Question 9			
Respondent	**Category**	**Response**	**Rationale**
			service provision and not be adversely impacted by the performance of Service Users since this will not provide clarity to Service Users. The amendments to performance measures may be beneficial to consumers where changes and improvements can be implemented to improve performance.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	**Category**	**Comments**
OVO Energy	Large Supplier	We are aware of the series of outstanding Action points and the potential delays that may be incurred due to the Contractual elements DCC needs to factor in being able to meet some of the requirements defined for this Mod. At this time, those outstanding items should not impact the question posed in this consultation and hinder it's progression accordingly.
Utilita	Large Supplier	No further comments
EDF	Large Supplier	-
Scottish Power	Large Supplier	N/A
DCC	Other Respondent	DCC understands the desire to reduce the time available to produce the PMR from 25 working days to 10 working days, including that this would provide more timely data for Service Users when reviewing Performance Measures. However, it should be noted that this will result in contractual changes with Service Providers and increased industry cost. The current 25 working day timeframe allows the data to be thoroughly reviewed for accuracy before publication, and so ensures data provided to industry is robust for the assessment of DCC performance. A reduction in this timeline risks data quality and is at odds to the requirements of this modification. Furthermore, the narrative around the data reported takes time to compile and requires the collection of data from several sources. A reduction in this timeline risks narrative quality and is at odds to the requirements of this modification. DCC does not want to produce data without a narrative explanation (as suggested by the working group) which puts reported data in to context for the reader; producing a report without narrative will not allow the reader to understand the complexities of the data provided and is at odds to the requirements of this modification. Where contracts can be changed to allow the quicker provision of data from Service Providers DCC still consider the 10 working day timeline to produce the PMR as insufficient to produce a robust report; DCC considers that the 25 working day time

Question 10		
Respondent	**Category**	**Comments**
		period should remain. The length and expense required to change contracts to deliver a shortening of the 25 working day to 10 working day should be factored in to the SEC release date. All performance measures should be developed to accurately record the delivery of DCC services/performance, and not be impacted by Service User issues. DCC should not be asked to report performance measures where Service User issues have negatively impacted the overall performance and should be allowed to exclude such data from its reporting. Including Service User data, where that User performance results in overall poorer performance, does not meet the requirements of the modification in that it does not report on DCC performance levels, including this data reports on combined DCC and Service User performance. If DCC is asked to publish anonymised Service User data that request should only be made and fulfilled where it is not possible to identify individual service users; DCC should be provided the option not to publish this type of data where it feels individual service users could be identified. Observations / comments on changes to Code Performance measures: • CPM 1-3 will require contract change for the provision of data to meet reduced timescale from Service Providers. Desire to change the methodology to include all messages (rather than test messages only) will result in contract changes and could result in Service Providers needing to amend their systems, which may not be possible • CPM 4 will require contract change to provide exception data to meet reduced timescales from Service Providers • CPM 5 - 5a will require contract change for the provision of data to meet reduced timescales from Service Providers • CPM 6 – 6b will require contract change for the provision of data to meet reduced timescales from Service Providers, • CPM 6c - DCC does not know the content of 5.1 and therefore cannot measure the performance of create schedule since the frequency is unknown

Question 10		
Respondent	**Category**	**Comments**
		• CMP 6d – cannot be reported on until successful implementation of SEC MOD 7 and should therefore not be included in this modification. The production of the PMR to report on Performance Measures is tied to the development, consultation and agreement of the PMM. The PMM sets out the methodology by which DCC calculates data for inclusion in the PMR. The methodology can only use data available to DCC either from DCC systems or provided by Service Providers. The suggested SEC legal text appears to require SEC Panel approval of the PMM and DCC considers that this could hinder the production of amended PMM and therefore PMR. DCC is currently required to consult with industry on any amendments to the PMM and seek feedback before finalising any methodology. DCC does not consider it appropriate for SEC Panel to have final approval of the PMM, and that such requirements may result in negative impacts for the provision of data where it results in additional complexity and delay to PMM implementation. The draft legal text allows the SEC Panel to establish and review new Performance Indicators. DCC understands the desire for additional information and will work with industry to report on DCC performance as they may find beneficial. DCC considers that any Performance Indicators developed should be targeted at DCC performance and exclude and negative impact caused by Service Users. It should also be noted that the inclusion of this new set of Performance Indicators represents increasing work required to produce the PMR, while the modification also seeks to reduce the time available for its production. Performance Indicators may also result in the need for contractual changes and development of the PMM. DCC is engaging with the Working Group to agree Performance Measures and so there should not be a requirement for additional Performance Indicators over time unless those Indicators are targeted at arising issues. Though it is unclear whether Indicators could be developed in the manner described in the draft legal text and implemented in a timely manner to allow those Indicators to be reported while those issues persist. Allowing DCC to continue engagement with Service Users to develop Ad Hoc reporting will allow for swifter reporting as desired by industry.

Question 10		
Respondent	**Category**	**Comments**
		DCC would like the definition of any Performance Measures and Indicators to make clear that they should relate specifically to DCC performance.