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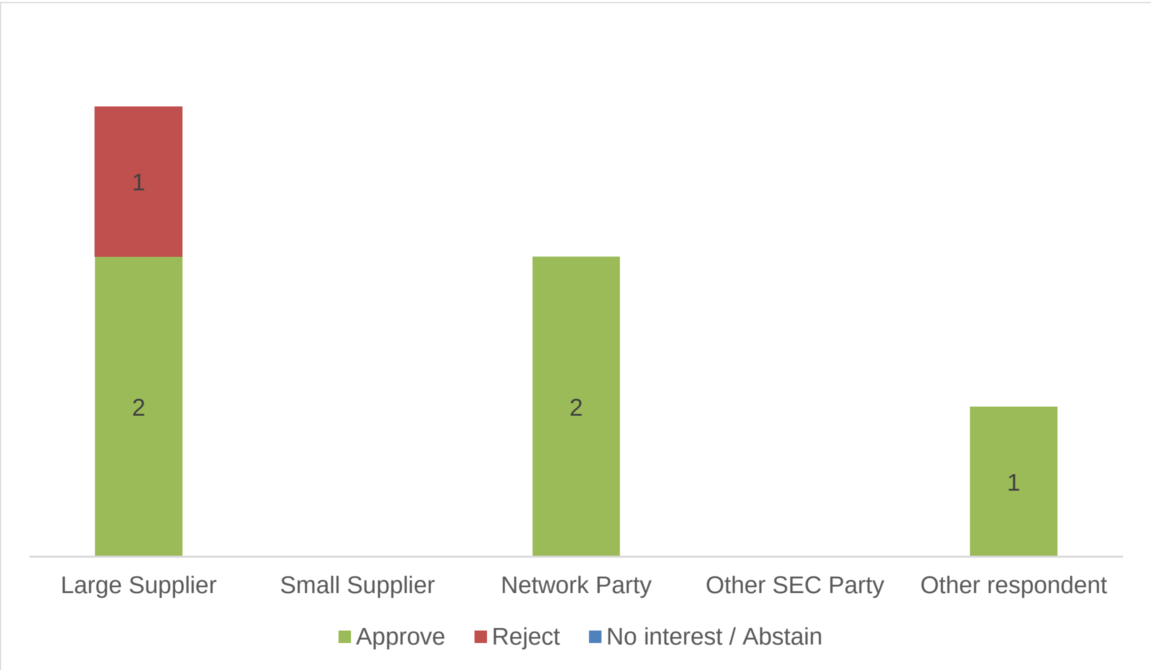
MP242 'Change to Operational Metrics to Measure on Success'

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP242 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP242 should be approved or rejected?

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
British Gas	Large Supplier	Approve	Definitely, General SEC Objectives (b) and (g). Plus, General SEC Objective (a) over time.	-
National Grid Electricity Distribution (NGED)	Network Operator	Approve	-	-
EDF Energy	Large Supplier	Approve	-	-
Scottish and southern Electricity Networks	Network Operator	Approve	We believe as detailed in the proposal this will better facilitate SEC Objective (b) and Objective (g) providing a clear indication of success and failure.	-
Octopus Energy Ltd	Large Supplier	Reject	We feel that there is not sufficient justification for the ongoing costs of this MP including the need for 1 FTE to produce this reporting. Our understanding of the reporting suite is that it should be something which is generated automatically and may need checking which does not account for 1 FTE of effort. These changes do not justify a cost of £156,000 annually on top of the one-time cost of this Modification Proposal. These costs ultimately get passed on to customers and as suppliers, we have to	The DCC have provided a breakdown of the responsibilities to be undertaken by the additional resource within this document. The response outlines monthly and additional tasks to be actioned in relation to the Proposed reporting suite.

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			protect customers from unnecessary costs and we do not feel that supporting this costly proposal is in the best interests of SEC parties and Consumers. SEC objective B states it will hold DCC to their license conditions, where we believe the costs associated would contradict the DCC's Enduring General objectives, such as; Part B: 5.9 "The First Enduring General Objective of the Licensee is to carry on the Mandatory Business in the manner that is most likely to ensure the development, operation, and maintenance of an efficient, economical, co-ordinated, and secure system for the provision of Mandatory Business Services under the Smart Energy Code and where relevant the Retail Energy Code. 5.10 The Second Enduring General Objective of the Licensee is to carry on the Mandatory Business in the manner that is most likely to facilitate: (a) effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy under the Principal Energy Legislation; (b) such innovation in the design and operation of Energy Networks as will best contribute to the delivery of a secure and sustainable Supply of Energy under the Principal Energy Legislation; and	

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			(c) the reduction (by virtue of benefits arising from the provision of Value Added Services) of the charges payable for Mandatory Business Services." In our opinion, the business case for this modification does not outweigh the annual and one-time cost required to deliver and could be delivered for far cheaper than the DCC is suggesting.	
DCC	DCC	Approve	DCC have been asked to provide a rationale for the Application Support costs, including the need for one Full Time Equivalent (FTE). Licensing for the visualisation tooling will be needed to be enhanced to support the volume of users needed to create waterfall views. Additional compute will be required to support data processing and storage for the generation on the reports monthly. Any work conducted at the device level will require extremely large volumes of computing which is totally different from previous reporting that has been shared at a far more aggregated level such as SECMOD122 .This will include performance at device and roll up to arrive at the reports. In terms of FTE activities on a monthly basis: • Data quality checks will be needed to ensure accuracy and consistency across all the reports during development.	-

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			• Prior to publication, validate the source data and data sets as well as validating available CSP and S1SP data against the data sets. • Run investigations and analysis of any report anomalies throughout the month. • After publication, there will be questions from SEC Parties, Operations Group, SECAS, and DCC around what the Operational Metrics reporting is stating and helping parties to understand the data and the interpretation of the data. Data presentations and potentially training will be required. Throughout the year the FTE will: • Investigate the availability of data at the device and SRV level – e.g., for device x did messages x,y,z successfully occur in the "correct" order. This will build up and enhance the customer journey metrics in the reports. • Work with DCC Service Providers to understand and analyse the cause and impact of observed E20/21s to provide insight and drive performance improvements. • investigate the currency and effectiveness of SECMP0122 reporting by comparison, and identify any possible redundancy of 122 reporting potentially recommending decommissioning to Operations Group.	

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			• maintain and develop multiple models that will need to be across all the processes as new data feeds from the DSP and new variables are introduced. • maintain and introduce new data to allow us to continue producing the journeys reflecting the development and implementation of new programmes such as 4G Comms Hubs & Networks or Modifications. • investigate the possibility of adding items in Appendix of FIA that were deemed out of scope, and see if there are options to add those to the solution. • function as the Point of Contact for any customer reports of errors, inconsistencies, or general queries including new or removed SEC Parties. • act as the Point of Contact for any customer requests for additional functionality, providing quotes for any required changes. DCC has worked closely with SEC Parties via the Operations Group (OPSG) and the Performance Measures Review Group (PMRG) in developing a solution for DCC to measure the success of a Service Request, Service Reference Variant (SRV), or Alert. Reporting on the success/failure of an agreed set of SRVs across seven business processes has been taken forward as the proposed solution and DCC has supported the proposed next steps regarding the production of reports for the	

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			current arrangements and the revised arrangements. DCC will support parties in determining which metrics should be reported on by keeping this activity under review. It is vital that only those metrics that parties deem most important be reported on to ensure DCC remain economic and efficient, thus avoiding the need to report on metrics that are deemed no longer required. We believe MP242 facilitates SEC Objectives (b) and (g), as it will work towards ensuring DCC is meeting its licence obligations and will improve reporting so that it is more aligned to SEC Parties priorities.	

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

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
British Gas	Large Supplier	We are disappointed that the originally proposed June 2024 delivery date has now slipped to November 2024. We would welcome iterative delivery of the reports – ie could some still be delivered for June 2024, even if the full final version is not available. (Specifically, if we could see the numbers in June, even if the "flying brick" graphs are not ready until November.) British Gas are happy to help with the development of the graphs and reporting pack, and (potentially more importantly) the prioritisation of the business processes.	SECAS will provide this feedback to the DCC with the intention of the DCC communicating the possibility of producing reports sooner during the detailed design phase if the modification is approved.
National Grid Electricity Distribution (NGED)	Network Operator	-	-
EDF Energy	Large Supplier	-	-
Scottish & Southern Electricity Networks	Network Operator	We note in the modification report that this SEC modification only impacts large suppliers, small supplier and the DCC. We believe this modification impacts all SEC parties that utilise the DCC system to communicate with smart meters. As we believe this impacts DNO's we would also like to understand if from the twenty-seven SRV's used for measuring success, from the list, we only use three of these as part of our core business processes. We would like to understand if this is a	SECAS will provide this feedback to the DCC to be considered during the detailed design phase.

Question 2			
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		big enough sample size of SRV's to measure overall success as we also have install and commission SRV's that are common across DNO's.	
Octopus Energy Ltd	Large Supplier	Whilst we approve of the general reporting proposed in this Modification Proposal, we do not believe the ongoing costs to be reasonable for the level of reporting being provided. There is a common occurrence with SEC Modifications related to DCC reporting whereby each modification seems to introduce a new FTE cost without any explanation of the extent of the work required to justify this cost. As a business, the creation or altering of existing reporting does not result in the requirement for new FTE resources. It is also not clear how much of the £156,000 is associated with the extra FTE and how much is associated with Application software and infrastructure. Our view is that the Application software and infrastructure should not cost that much and that another 1 FTE seems excessive when we would expect the reporting to be automated (even if there was a requirement for analysis of this reporting, this would not justify 1 FTE). The application software and infrastructure will likely change in line with the FSM, so further understanding of a breakdown of costs in Annex C would be welcomed, although it would not change our position on this.	The DCC have provided a breakdown of the responsibilities to be undertaken by the additional resource within this document. The response outlines monthly and additional tasks to be actioned in relation to the Proposed reporting suite.
DCC	DCC	DCC will continue to work with SEC Parties to ensure the solution developed is fit-for-purpose and delivers benefits that can be felt by the end consumer. Providing reporting on the more consumer impacting SRVs will result in a clearer understanding of successful message journeys which in turn will support parties in driving improvements. This	-

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		should also allow for any issues to be identified sooner, which will drive faster resolution times. Ultimately, MP242 has the potential to change how DCC's success is measured but this can only be achieved with the continued input and collaboration from all parties.	