



Department for
Energy Security
& Net Zero

Department for Energy
Security & Net Zero
3-8 Whitehall Place
London SW1A 2AW

The Authority (Ofgem), the SEC Panel, SEC Parties
and other interested parties

By email only

28 November 2025

Dear Colleague,

Smart Metering Implementation Programme: Response to consultation on a DCC Baseline Margin Project Performance Adjustment Scheme for the Future Service Management programme.

By this letter and its annexes government is today responding to our consultation of 21 August 2025¹ on a proposed Baseline Margin Project Performance Adjustment (BMPPA) Scheme under Appendix 1 of Condition 38 of the DCC Licence for the Data Communication Company's (DCC) implementation of the Future Service Management (FSM) programme. The BMPPA Scheme aims to incentivise the DCC's delivery of the programme by applying criteria that will determine the level of associated baseline margin it may retain based on its performance under the Scheme. Government's response to the consultation can be found in **Annex 1** to this letter.

We are also today formally making the BMPPA Scheme for the FSM programme, the final version of which is included in **Annex 2**. We are also issuing a notice under paragraphs 6.3 and 6.4 of the BMPPA Scheme which is included in **Annex 3** of this letter. This notice describes the process to be followed prior to making the determination of the Quality Factor against which the DCC will be assessed.

Yours faithfully,

James Cosgrove

Deputy Director and Head of Delivery

Smart Metering Implementation Programme

(An official of the Department authorised to act on behalf of the Secretary of State)

¹ <https://smartenergycodecompany.co.uk/documents/sec/20250821-fsm-bmppa-consultation/?highlight=FSM%20BMPPA>

Annex 1 Government response to consultation

Annex 2 BMPPA Scheme

Annex 3 Notice under paragraphs 6.3 and 6.4 of the BMPPA Scheme

Annex 1: Government response to consultation

Overview of consultation responses

1. The 21 August 2025 consultation closed on 2 October 2025, and we received a total of three written responses from the Smart Energy Code (SEC) Panel, the Data Communications Company (DCC) and Scottish Power.
2. All respondents agreed with our proposal to introduce a new Baseline Margin Project Performance Adjustment (BMPPA) Scheme for the DCC Future Service Management (FSM) programme. One respondent supported our proposals in respect of what, when and how the DCC should be incentivised under the BMPPA Scheme whilst two respondents made some suggestions for how the proposals could be amended.
3. There were some other comments made that were not relevant to the subject of the consultation and therefore they have not been reported on here.

Overview of government response

4. From the consultation responses, the government notes agreement for a majority of the proposals set out in the 21 August consultation alongside some suggestions made on certain aspects of the proposed Scheme, however we consider that the consultation text should remain unamended. Our reasoning is set out below.

Responses to the consultation questions

Q1	Do you agree with our proposals to introduce a BMPPA Scheme for the DCC's FSM programme?
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Overview of responses

5. All three respondents were in agreement that there needs to be a BMPPA Scheme to incentivise the DCC's delivery of the FSM programme.

Q2	Do you agree with our proposals for what, when and how the DCC should be incentivised under the BMPPA Scheme? If not, what alternative proposals do you suggest and why?
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Overview of responses

6. All three respondents supported our proposals for what, when and how the DCC should be incentivised under the BMPPA Scheme. Two respondents also made suggestions for how the proposals should be amended.

Detailed comments on Project Activity 1 (timely delivery of FSM service) and government response and decision

7. One respondent noted that they believed a sliding scale to determine how much baseline margin the DCC should retain under Project Activity 1 (PA1) would provide a better incentive. This would be consistent with previous incentive regimes such as the 4G Communications Hubs and Networks BMPPA Scheme. Such an approach would create an incentive on the DCC to minimise delays should its FSM service not be deployed on the go-live milestone date.

Government response: In light of a recent five-month delay impacting the go-live date for the FSM service, we do not consider it appropriate for the DCC to retain any associated baseline margin should the programme be impacted by any further delays. Should an event arise that is beyond the DCC's immediate control, the BMPPA Scheme provides a process for the Department to review the situation and consider reopening the Scheme. Any requests will be evaluated by the Secretary of State, who may determine whether modifications to the dates and/or criteria are appropriate considering the circumstances of the case.

8. One respondent considered that the strongest emphasis must be placed on timeliness. Adherence to the agreed implementation date is critical, given the previous delay to go-live and the need to provide Parties with certainty. Incentives should therefore ensure that any slippage in the timetable results in clear and proportionate consequences.

Government response: The Department agrees that timely delivery is important, however, noting delays already experienced with the delivery of FSM we are not willing to apply a higher weighting against an already delayed go-live date. Considering this, we believe it appropriate to apportion slightly more baseline margin towards the quality assessment, whilst still ensuring there is a focus on delivering FSM on time.

Detailed comments on Project Activity 2 (quality of FSM service provision) and government response and decision

9. One respondent agreed with the incentivisation of Project Activity 2 but raised a concern on the subjective nature of a single question that will be asked of the respondents.

Government response: The process for determining the Project Activity 2 Quality Factor and the supporting scoring framework (set out in Section 3 of the notice under paragraphs 6.3 and 6.4 of the BMPPA Scheme) are consistent with, and align with, those implemented in previous BMPPA Schemes. The proposed scoring framework allows for scores to be assigned based on evidence provided by both the DCC and the SEC Panel (taking into account views of DCC customers) on both material and non-material areas of concern identified post go-live. The Department will consider all evidence presented to it in order to support its assessment of materiality. Material and non-material areas of concern are defined respectively in paragraphs 3.9 and 3.10 of the notice and based on the approach taken for defining Categories of Incidents as set out in the Incident Management Policy under the Smart Energy Code.

10. One respondent raised concern that the proposed 90 day service quality assessment period is insufficient to identify or provide a reliable measure of stability and to capture the full range of meaningful quality issues. To address this, the respondent recommended a phased review of an initial assessment window of 90 days, followed by a further assessment period of up to another 90 days if considered needed by the SEC Panel.

Government response: We do not believe it necessary to include an additional 90 day period as we are confident, due to the anticipated volumes of activities to be carried out via ServiceNow following go-live (including 4G Communications Hub ordering and Communications Hub returns, incident reporting and Anomaly Detection Threshold report submission), that all core system functions will be utilised at scale within the initial 90-day

review period. This should provide sufficient time to identify any issues that may arise from carrying out these activities.

Q3	Do you agree with the proposed criteria in paragraph 11 in terms of the period over which the DCC FSM service provision should be assessed? If not, what alternative proposals do you suggest and why?
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Overview of responses

11. Two respondents agreed with our proposed criteria in paragraph 11. One respondent did not consider 90 days enough to assess the stability of the FSM service following the introduction of SEC Modification 252 and referred to their previous suggestion in response to Question 2, suggesting a second review cycle determined by a review and recommendation by the SEC Panel.

Detailed comments and government response and decision

12. One respondent noted that following the introduction of SEC Modification Proposal 252, any SEC Party will be able to return Communications Hubs to the DCC via the DCC Service Management System (DSMS). The respondent took the view that the utilisation of this capability will increase over time and may not be operating at scale until after the 90 day assessment period starting from the go-live date.

Government response: SEC Modification Proposal 252 allows for any SEC Party to initiate a Communication Hub return via the DSMS and this capability will be available on the FSM platform from the date of go-live. We are confident that this functionality will be utilised from go-live of the FSM service and during the 90 day assessment period, thus allowing it to be assessed under Project Activity 2. The end-to-end capability to process a Communications Hub return stretches beyond the scope of FSM and it would be inappropriate for this entire end-to-end process to be considered when appraising the quality of the FSM service.

Q4	Do you agree with the proposed principles for reopening the BMPPA Scheme in paragraph 16?
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Overview of responses

13. All three respondents agreed with our proposed principles for reopening the BMPPA Scheme in paragraph 16.

Q5	Do you have any comments on the drafting of the BMPPA Scheme included in Annex 2?
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Overview of responses

14. No respondents made any comments on the drafting of the BMPPA Scheme.

Q6	Do you have any other comments on the draft notice under paragraphs 6.3 and 6.4 of the Scheme in Annex 3
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Overview of responses

15. One respondent had no other comments. One respondent confirmed they are confident that they could support the proposed process set out in the notice. One respondent disagreed with the PA2 Quality Criteria and referred to the comments they provided for Questions 2 and 3.

Detailed comments and government response and decision

16. One respondent noted they are confident in their ability to fulfil this role within the proposed timetable. One respondent noted that in lieu of their response to Questions 2 and 3, they disagree with the Project Activity 2 Quality Criteria.

Government response: As outlined in our responses to Questions 2 and 3, we do not consider that the proposed additional 90-day review period is necessary.

Next Steps

17. As noted at the beginning of Annex 1, we are now making the BMPPA Scheme for the FSM Project included in Annex 2 of this document which will take legal effect from today 28 November 2025 and issuing today a notice pursuant to that Scheme in Annex 3 of this document.

Annex 2: BMPPA Scheme

BASELINE MARGIN PROJECT PERFORMANCE ADJUSTMENT SCHEME

Future Service Management Project

Introduction

This document is issued for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (together, the **DCC Licence**).

This document constitutes –

- (A) a direction issued by the Secretary of State under paragraph 35.5 of Condition 35 of the DCC Licence (The Chapter 9 Particular Definitions) identifying a 'Project' (the **Project**); and
- (B) the terms of a Baseline Margin Project Performance Adjustment Scheme (a **Scheme**) made by the Secretary of State in accordance with paragraph A2 of Appendix 1 to Condition 38 of the DCC Licence (Baseline Margin Project Performance Adjustment Scheme),

and has effect for the purposes of the Price Control Conditions of the DCC Licence, and in particular Part D of Condition 38 (Calculation of the value of the BMPPA term).

Contents

Section 1 identifies the Project to which the Scheme Relates.

In accordance with the provisions of paragraphs A4 and A8 of Appendix 1 to Condition 38 of the DCC Licence (Baseline Margin Project Performance Adjustment Scheme) –

- Section 2 describes a number of activities carried out by the DCC for the purposes of the Project (the **Project Activities**).
- Section 3 specifies the weighting factor in relation to each Project Activity (the **Project Activity Weighting Factor**).
- Section 4 describes the performance target in relation to each Project Activity (the **Project Activity Milestone**).
- Section 5 specifies the performance factor in relation to each Project Activity Milestone (the **Project Activity Performance Factor**).

- Section 6 sets out provisions for the purpose of interpreting and giving effect to the Scheme (the **Scheme Principles**).

Words and phrases used in Sections 1 to 6 shall be interpreted in accordance with, and have any meanings given to them in, Section 7.

1 The Project

1.1 The **Project** means the activities carried out (or to be carried out) by the DCC:

- (a) in accordance with the implementation plan (the **Plan**):
 - (i) produced by the DCC for the delivery of the Future Service Management Programme in compliance with a direction issued by the Secretary of State on 18 December 2024 under Condition 13B of the DCC Licence (Network Evolution Arrangements); and
 - (ii) approved by the Secretary of State on 18 July 2025;
- (b) in order to support the effective delivery of the Future Service Management Programme.

2 The Project Activities

2.1 Each of the following categories of activities being carried out by the DCC for the purposes of the Project shall be a Project Activity under the Scheme.

Project Activity 1

2.2 **Project Activity 1** constitutes all activities carried out by the DCC, under and in accordance with the Plan, for the purposes of replacing the Legacy DSMS with the Future Service Management Platform.

Project Activity 2

2.3 **Project Activity 2** constitutes all activities carried out by the DCC, during the period which commences on the PA1 Milestone Date and ends on the PA2 Milestone Date, for the purposes of assessing the quality of the services provided by the DCC in its implementation of the Project.

3 The Project Activity Weighting Factors

3.1 The Project Activity Weighting Factor in respect of each of the Project Activities shall be that which is set out in the table immediately below.

<u>Project Activity</u>	<u>Project Activity Weighting Factor</u>
1	$\frac{3}{10}$
2	$\frac{7}{10}$

4 The Project Activity Milestones

- 4.1 Each of the following performance targets relating to the DCC's undertaking of a Project Activity shall be a Project Activity Milestone under the Scheme in respect of the specified Project Activity to which it relates.

Project Activity Milestone 1

- 4.2 The Project Activity Milestone which applies in relation to Project Activity 1 is the go-live date of the Future Service Management Platform (the **PA1 Milestone Date**).

Project Activity Milestone 2

- 4.3 The Project Activity Milestone which applies in relation to Project Activity 2 is that the DCC has, no later than 90 days after the PA1 Milestone Date (the **PA2 Milestone Date**), successfully carried out the activities comprised in that Project Activity when those activities are assessed by reference to the PA2 Quality Criteria.

5 The Project Activity Performance Factors

- 5.1 Each of the numbers identified (or for which a means of calculation is identified) below in respect of any Project Activity shall be treated as being the Project Activity Performance Factor (**PAPF**) in respect of that Project Activity for the purposes of this Scheme.

Project Activity Performance Factor for Project Activity 1

- 5.2 In relation to Project Activity 1, the PAPF shall be calculated so that, where the PA1 Milestone Date is a date which falls:

- (a) either on or before 21 March 2026, the PAPF shall be zero;
- (b) after 21 March 2026, the PAPF shall be 1.

Project Activity Performance Factor for Project Activity 2

5.3 In relation to Project Activity 2, the PAPF shall be a number that:

- (a) is no less than zero and no greater than 1;
- (b) is equal to one minus the PA2 Quality Factor expressed as a fraction; and
- (c) represents the extent to which the activities comprised in the Project Activity have – in the determination of the Secretary of State, when those activities are assessed by reference to the PA2 Quality Criteria – been successfully carried out by the DCC by the PA2 Milestone Date.

6 BMPPA Scheme Principles

Maintenance of Information and Evidence

6.1 For the purposes of the Scheme, the DCC shall on the PA2 Milestone Date, provide to the Secretary of State details of the specific activities carried out by it, together with supporting evidence, in respect of Project Activity 2.

Project Activity 1

6.2 For the purposes of calculating the Project Activity Performance Factor in respect of Project Activity 1, the PA1 Milestone Date shall be the date, determined by the Secretary of State, as the go-live date of the Future Service Management Platform.

Project Activity 2

6.3 In respect of Project Activity 2, the Secretary of State shall:

- (a) for the purposes of the Project Activity Milestone, set out in a notice issued to the DCC and the Panel a set of criteria (the **PA2 Quality Criteria**) by reference to which he will be able to assess and determine the extent to which the DCC has successfully carried out the activities comprised in that Project Activity by the PA2 Milestone Date; and
- (b) for the purposes of calculating the Project Activity Performance Factor, determine (on a day of his choosing after the PA2 Milestone Date) a percentage (the **PA2 Quality Factor**) representing the extent to which, in his assessment conducted by reference to the PA2 Quality Criteria, the DCC has successfully carried out the activities comprised in that Project Activity by the PA2 Milestone Date.

Provisions in Relation to Determinations by the Secretary of State

- 6.4 The Secretary of State shall, before making any determination of the PA2 Quality Factor in accordance with paragraph 6.3(b), set out in a notice issued to the DCC and the Panel a description of the process to be followed prior to making that determination, and shall subsequently follow that process.
- 6.5 The Secretary of State may, in making any determination referred to in paragraph 6.4, include in his determination such principles of interpretation in relation to any of the determined terms as he may consider appropriate to be applied for the purposes of the Scheme.
- 6.6 Where the Secretary of State makes any determination referred to in paragraphs 6.2 and 6.4, or issues a notice in accordance with 6.3(a), that determination or notice shall be treated as an integral part of the Scheme Principles and shall have effect as such for the purposes of this Scheme.

7 Definitions and Interpretation

- 7.1 Except to the extent to which an alternative definition is set out in paragraph 7.3:
- (a) words and phrases defined in either the DCC Licence or in the Smart Energy Code shall have the same meaning in this document;
 - (b) if the same word or phrase is defined in both the DCC Licence and the Smart Energy Code and the definitions are not consistent, the definition in the Smart Energy Code shall take precedence for the purposes of this document.
- 7.2 The rules of interpretation set out at Condition 2 of the DCC Licence shall apply as if they formed part of this document.
- 7.3 For the purposes of this document, unless the context otherwise requires –

DCC	means the holder of the DCC Licence.
DCC Licence	means the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986, taken together.
Future Service Management Programme	means the programme of that name more fully described in the Plan.
PA1 Milestone Date	has the meaning given to that expression in paragraph 4.2.

PA2 Quality Criteria	has the meaning given to that expression in paragraph 6.3(a).
PA2 Quality Factor	has the meaning given to that expression in paragraph 6.3(b).
PA2 Milestone Date	has the meaning given to that expression in paragraph 4.3.
Plan	has the meaning given to that expression in paragraph 1.1.
Project	has the meaning given to that expression in paragraph 1.1
Project Activity 1	has the meaning given to that expression in paragraph 2.2.
Project Activity 2	has the meaning given to that expression in paragraph 2.3.
Scheme	means the Baseline Margin Project Performance Adjustment Scheme that is set out in this document taken together with any determination or notice of the type that is referred to in paragraph 6.6.

Annex 3: Notice under paragraphs 6.3 and 6.4 of the BMPPA Scheme for the Future Service Management Project

1. Introduction

- 1.1. This document constitutes a notice under paragraphs 6.3 and 6.4 of the Baseline Margin Project Performance Adjustment (BMPPA) Scheme for the Future Service Management (FSM) Project. It sets out the Project Activity 2 (PA2) Quality Criteria and the process to be followed prior to the making of a determination by the Secretary of State of the PA2 Quality Factor.

2. Project Activity 2 Quality Criteria

- 2.1. This section sets out the PA2 Quality Criteria in accordance with paragraph 6.3 of the BMPPA Scheme for the FSM Project.
 - **PA2 Quality Criteria:** The DCC FSM service provision has been without issue in the first 90 days of operation.

3. Process for determining the Project Activity 2 Quality Factor

- 3.1. This section sets out the assessment process to be followed by the Secretary of State prior to making a determination of the PA2 Quality Factor in accordance with paragraph 6.4 of the BMPPA Scheme for the FSM Project.

Process outline

- 3.2. The DCC will need to prepare a submission to the Department for Energy Security & Net Zero ('the Department') assessing its performance against the PA2 Quality Criteria. The SEC Panel will also prepare a submission setting out their assessment of the same, ensuring that DCC customers can feed in views towards the submission's preparation. This will ensure both the DCC and DCC customers are represented in the assessment process, thus providing a balance of stakeholder views.
- 3.3. Once the submissions are received from the DCC and the SEC Panel, the Department, acting on behalf of the Secretary of State, would form a 'minded to position' as to what score should be awarded to the DCC for Project Activity 2. This would consider the submissions from the SEC Panel and the DCC and any other information the Department considers relevant. The Department would then consult on its minded to position. The submissions from the DCC and the SEC Panel would be published alongside that consultation.
- 3.4. Following consultation and considering the responses received, the Department would make a final determination of the score. This would be based on a single aspect and assessment question which holds 100% of the weight for Project Activity 2.
- 3.5. Once the final decision on the values of the scores has been taken, the Department will notify Ofgem and other interested parties of the outcome and set out the value of the PA2 Quality Factor that should be used for the purposes of the BMPPA Scheme.

Assessment process and scoring

- 3.6. We have included a single aspect and assessment question to evaluate the DCC FSM service provision.

- 3.7. The aspect and assessment question against which the DCC's performance should be assessed is set out in Table 1.

Table 1 – Aspect, assessment question and aspect weighting in relation to Project Activity 2

Aspect	Assessment question	Aspect weighting
DCC FSM service provision	Has the DCC Future Service Management (FSM) service been provided without issue since go-live of the FSM solution?	100%

- 3.8. The score for Project Activity 2 should be based on the Scoring Framework in Table 2 below. The SEC Panel and the DCC should provide a score of up to one decimal place and the score awarded by the Department can be up to two decimal places. In the context of Table 2, material and non-material areas of concern have been defined based on the approach taken for defining Categories of Incidents as set out in the Incident Management Policy under the Smart Energy Code.
- 3.9. Material areas of concern refer to any material issues that may have arisen with the provision of the FSM service including those that:
- prevented a large group of DCC customers from using the FSM service;
 - had a critical adverse impact on their activities;
 - had a non-critical adverse impact on their activities but the FSM service was still working at a reduced capacity; and/or
 - caused financial loss and/or disruption to them.
- 3.10. Non-material areas of concern refer to any non-material issues that may have arisen with the provision of the FSM service including those that:
- had either a minimal impact, a minor adverse impact or a moderate adverse impact on the activities of DCC customers; or
 - had an adverse impact on their activities but which was reduced to a moderate adverse impact due to the availability of a workaround.

Table 2 – Scoring Framework for Project Activity 2

Score	Description	Margin retained
3	There are no material areas of concern and very few non-material areas of concern with the DCC's provision of the FSM service.	100%
2	There are no material areas of concern and some non-material areas of concern with the DCC's provision of the FSM service.	66.67%
1	There are no material areas of concern and many non-material areas of concern with the DCC's provision of the FSM service.	33.33%
0	There are one or more material areas of concern with the DCC's provision of the FSM service.	0%

Timetable for Project Activity 2

- 3.11. Assuming the PA2 Milestone Date (i.e. the date that follows a period of 90 days after go-live of the FSM solution) is in month 'M':
- 3.12. **Submission preparation (M to M + 3 months):** The DCC and the SEC Panel would prepare a submission for the Department's review, using this notice for reference. Each submission should set out an assessment of the DCC's performance against the PA2 Quality Criteria. In preparing their submission, the SEC Panel should seek views from DCC customers as part of their assessment of the DCC's performance. The DCC and the SEC Panel should work together transparently when preparing their submissions to maintain open communication and ensure the submissions are comparable.
- 3.13. **Reporting (end of M + 3 months):** The DCC and the SEC Panel should send their submissions via email to the Department along with any supporting evidence by no later than the end of the third month following month M.
- 3.14. **Assessment (M + 4 months to M + 6 months approximately):** We will conduct an internal assessment of both submissions against the aspect and assessment question for Project Activity 2. If necessary, we will return to the SEC Panel and the DCC with any questions at this stage to inform our position.
- 3.15. **Consultation (M + 7 months to M + 9 months approximately):** We will consult on our minded to position on the amount of margin the DCC should be permitted to retain in relation to Project Activity 2 and set out what this means in terms of the value of the PA2 Quality Factor. We expect stakeholders' responses to our consultation would serve as a 'right of reply' to our assessment and could include further evidence or examples of the DCC's performance that we should consider.
- 3.16. **Decision (M + 10 months to M + 11 months approximately):** We will analyse responses and any additional evidence provided. We will publish our final decision, outlining the DCC's final score and the PA2 Quality Factor and the associated margin retained. Finally, we will notify Ofgem of our decision so that it can implement it.

Submission requirements

- 3.17. The DCC and the SEC Panel should each prepare a submission providing an assessment of the DCC's performance in the period relevant to Project Activity 2 – as per the timetable provided previously.
- 3.18. Both submissions must provide a rounded and impartial view of the DCC's performance.
- 3.19. We would expect the DCC to provide the Panel with any information reasonably requested by them for the purposes of making their assessment. Furthermore, we would expect the DCC to abstain in any Panel vote on any decision relating to their assessment of the DCC's performance.
- 3.20. The DCC and the SEC Panel should engage with each other when drafting their submissions to ensure the two submissions are comparable.
- 3.21. In preparing its submission, the SEC Panel in particular must seek views from DCC customers as part of its assessment. We will not prescribe how the SEC Panel should seek these views.
- 3.22. The SEC Panel submission must explain how the SEC Panel sought DCC customer views in their assessment of Project Activity 2, in each case prior to the submission and how they were incorporated.

- 3.23. The submission from each of the SEC Panel and the DCC should be in the form of a main submission setting out the principal narrative and scoring (i.e. a score of up to one decimal place between 0 and 3) and a separate part containing the supporting evidence for the score provided as is further described in paragraph 3.25 below.
- 3.24. The Department expects to publish the SEC Panel and the DCC submissions as supporting documentation to its consultation on the minded to consultation. Any information that is considered confidential should therefore be highlighted to the Department. If a submission includes information that the DCC or the SEC Panel considers to be confidential, an alternative redacted version of the submission should also be provided in parallel for the Department to publish.

Format of the submission

- 3.25. The format of the submission should be essentially the same as the format of the submission to Ofgem under the OPR in that it should comprise:
- a main submission – part 1 – including the main narrative of the submission describing the DCCs performance and a score of up to one decimal place between 0 and 3; and
 - supporting evidence – part 2.
- 3.26. A submission checklist is provided in Table 3 below:

Table 3 – Submission checklist

Submission checklist	Expected length of submission
Part 1 – main submission: a) a narrative providing assessment of the DCC's performance against the PA2 Quality Criteria; b) the suggested score.	We anticipate the submission being no more than five pages (excluding covering pages and contents pages).
Part 2 – Additional supporting evidence	We are not proposing to set an expectation for how long this should be, however, we are not seeking an extremely detailed, in-depth analysis.

- 3.27. There should be no embedded documents within the submission document. Additional evidence should be referenced to within the main submission and where relevant provided separately as supporting evidence. The main submission should include an annex giving a list of the additional evidence that has been provided.