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# MP122B ‘Operational Metrics – Part 2’ DCC Change Request questionnaire responses

## About this document

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This document contains the full collated responses received to the MP122B DCC Change Request questionnaire.

## Question 1: Noting the impacts on the SMETS1 Service Providers, should the SMETS1 Service Provider elements be progressed under the applicable CRs?

Question 1			
Respondent	Category	Response	Rationale
<b>Utilita Energy Limited</b>	Large Supplier	Yes	Utilita agrees the SMETS1 Service Provider elements should be taken to a full Impact Assessment.
<b>OVO Energy</b>	Large Supplier	Yes	Without an express exclusion being afforded by Ofgem on the meters serviced by the DCC then it is not possible to provide a view. This is to enable DCC Users to provide reports to Ofgem. If they state they do not want the data for Enrolled SMETS1 meters are part of that then that would be the answer to this question.
<b>Western Power Distribution</b>	Network Party	-	Rather than answering this question I have reviewed each change request individually and provided responses below.
<b>British Gas</b>	Large Supplier	Yes	<p>Ability to review and compare all DCC's Service Providers is key to performance managing the whole ecosystem. Enabling all Service Providers to go live at the earliest opportunity and migrate devices must take priority, once that is complete / stable (respectively) then other system and process changes can be implemented.</p> <p>Also, a disconnect between SMETS2 reporting and SMETS1 in terms of working days difference in publication dates may be a workaround for a short period of time. However, the end goal must be combined reporting within 10 WDs of period end to help the whole industry review in a timely and more efficient manner.</p>

## Question 2: Noting the provisional costs and implementation timescales, do you believe CR1418 should be taken forward further and progressed to DCC Impact Assessment?

Question 2			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	Yes	Without an Impact Assessment being carried out, it is not possible to understand the full impact of the work needed. The measurement of Alerts is critical to certain functions and is required by the PMR itself, so not having the ability to do it in full must be established if we are to say to Ofgem it cannot be done. All reasonable endeavours, including establishing cost and impact, must factor into that. We would expect a view from Ofgem on the costs and timescales being presented and would expect them to be satisfied if they are acceptable as they have already made it clear they want all of this by April.
Western Power Distribution	Network Party	-	Please note that we reviewed throughput of alerts in their entirety and therefore our comments are provided in response to question 3.
British Gas	Large Supplier	Yes	The success of alerts being delivered highlights the performance of the whole system, especially the HAN. HAN performance is largely unmonitored, especially for Gas meters which means prepayment performance is not dealt with as quickly as possible.

### Question 3: Noting the provisional costs and implementation timescales, do you believe CR1438 should be taken forward further and progressed to DCC Impact Assessment?

Question 3			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	Yes	As per the answer to Question 2, without an actual impact assessment, we are unable to provide a conclusive view to Ofgem. This includes agreement for the cost and time it will take to obtain the assessment.
Western Power Distribution	Network Party	-	<p>We have the following thoughts and questions:</p> <ul style="list-style-type: none"> <li>– CPM 3 – Percentage of Alerts delivered within the applicable TRT, DCC are currently meant to report on the performance of alerts being delivered within the TRT. What exactly are they reporting on if this is the cost involved in order to meet this requirement?</li> <li>– This functionality has already been done for AD1 / 3F35 and 8F36, how much was this? Can we utilise this functionality? This was slightly more complicated as DSP also had to read the payload data.</li> <li>– DCC and S1SP alerts are excluded and we are not sure why</li> <li>– Page 8 of PIA states DSP are meant to inspect payload, does this pose a security risk? Do we need to run this past SSC?</li> <li>– CSP N indicated significant impact but don't really understand why</li> <li>– With regards to CR 1438 it would be good to understand how much per SP</li> </ul>

Question 3			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>– Why is the requirement to send in 15 minutes intervals?</li> <li>– How much of the cost is due to reducing the timescales?</li> </ul>
<b>British Gas</b>	Large Supplier	Yes	We believe TABASC should be involved in the system changes for CR1438, as it's not clear why Arqiva would need to change their billing and financial systems, for example.

## Question 4: Noting the provisional costs and implementation timescales, do you believe CR1420 should be taken forward further and progressed to DCC Impact Assessment?

Question 4			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	Yes	The costs being presented need to be closely scrutinised and justified to establish why the Service Providers have to completely change they way they operate and are contracted to just provide data to us quicker. That then should be validated with Ofgem as viable costings to progress this.
Western Power Distribution	Network Party	-	<p>We have the following thoughts and questions:</p> <ul style="list-style-type: none"> <li>– CPM 5 – clearly states measuring the % of Cat 3/4/5 resolved in accordance with IMP within Target Resolution Time. Also states the date and time the INC is raised, resolved and closed used within the Service Measures calculation, so how is it this much just to report slightly different and how are SP costs being incurred when this should all be within DCC's systems?</li> <li>– How much of the cost is in relation to reduction in timescale?</li> <li>– Pg13 of PIA states that a 2-5 day turnaround might not be met and therefore commentary would follow the next month. Seems counterproductive and confusing, and means potentially paying for quicker report and still not actually getting that service.</li> <li>– Pg 14 of PIA states this should really be dependent on CR1430 and this would reduce costs – by how much?</li> </ul>

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	We are unclear why the data is not produced by DCC's Remedy system.

## Question 5: Noting the provisional costs and implementation timescales, do you believe CR1430 should be taken forward further and progressed to DCC Impact Assessment?

Question 5			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	Yes	As stated previously, this needs Ofgem sanction and acceptance as it is stated that the DCC is not able to meet the requirement set out for this reporting. This is not a failing of the Suppliers to do so and needs their agreement. With a valid and concise Impact Assessment then that will not be possible to progress. The huge cost associated with this must be validated too. Only Ofgem can state if something cannot be done.
Western Power Distribution	Network Party	-	<p>We have the following thoughts and questions:</p> <ul style="list-style-type: none"> <li>- Pg 15 of PIA states business requirement (D) and we are not sure where this has come from?</li> <li>- Costs don't include the Application Support (enduring) costs and there is not guide to these.</li> <li>- Pg 15 of PIA states SPs noted change of format and content of ESI-101/102 files which will entail extra work – believe this is as a result from CR1420 but we don't understand why/where this is coming from.</li> <li>- Pg 16 of PIA states CSP C&amp;S say a complete overhaul is required. DCC are challenging FIA and ROM costs however it is not clear if the costs provided have the CSP C&amp;S costs included or excluded from the quoted values? CSP N haven't</li> </ul>



Question 5			
Respondent	Category	Response	Rationale
			<p>even completed a PIA response so we presume the the values quoted exclude CSP N.</p> <ul style="list-style-type: none"> <li>– Pg 16 – 18 of PIA is listing a LOT of exceptions so potentially a large cost but still not meeting requirements</li> <li>– Pg 18 of PIA states this CR should really be dependent on CR1420 and this would reduce costs – by how much?</li> </ul>
<b>British Gas</b>	Large Supplier	Yes	-

## Question 6: Noting the provisional costs and implementation timescales, do you believe CR1423 should be taken forward further and progressed to DCC Impact Assessment?

Question 6			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	Yes	<p>This is required to be able to fulfil our PMR requirements. But, and it must be made very clear, that stating that this is explicitly linked to other SEC Mods that are yet to be delivered and are unlikely to be in place to meet the Ofgem timescales then alternative solutions must be provided. That or agreement is reached with Ofgem of the delay in doing so and the reasons it cannot be met but, in order to provide them that information they are going to need the details in the Impact Assessment to make that judgement.</p> <p>Please note that the DCC have confirmed that SECMP0007 will ONLY be implemented by them at the end of 2022. The SEC changes have happened but it is now on the DCC to deliver and they have no plans to do so in the next 2 years. Can the bits stated they can do rely on the roll out of the Firmware or can it be done without it?</p>
Western Power Distribution	Network Party	-	<p>We have the following thoughts and questions:</p> <ul style="list-style-type: none"> <li>– The PIA states that if MP24 is approved these costs would reduce, by how much?</li> <li>– Pg 21 of the PIA has a DSP solution and we are unsure why when it is a CSP process and CSP devices and presumed that CSP would be able to report on this themselves.</li> <li>– Pg 22 of the PIA states CSP C&amp;S costs are for providing monthly reports and so costs are inaccurate as this is not regularly enough.</li> </ul>

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	-

## Question 7: Noting the provisional costs and implementation timescales, do you believe CR1440 should be taken forward further and progressed to DCC Impact Assessment?

Question 7			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	Yes	Please see the response to Question 1 as it is the same.
Western Power Distribution	Network Party	-	<p>We have the following thoughts and questions:</p> <ul style="list-style-type: none"> <li>- Pg 23 of the PIA states will use S1SP alerts – are these new alerts? Can system cope with traffic?</li> <li>- Pg 24 of the PIA states Secure will transfer files at a frequency to be agreed – could this incur further costs as frequency unknown.</li> </ul>
British Gas	Large Supplier	Yes	-

## Question 8: Noting the provisional costs and implementation timescales, do you believe CR1429 should be taken forward further and progressed to DCC Impact Assessment?

Question 8			
Respondent	Category	Response	Rationale
Utilita Energy Limited	Large Supplier	Yes	-
OVO Energy	Large Supplier	No	Nearly £100K to impact assess and then half a million to implement something that the DCC has confirmed it can already, partially, do. Those costs cannot be justified or accepted and, as such, should be reported back to Ofgem as being cost prohibitive.
Western Power Distribution	Network Party	-	<p>We have the following thoughts and questions:</p> <ul style="list-style-type: none"> <li>With regards to pg 26 of the PIA Section 10.2 we would seek views from Suppliers to understand if 'resolved' rather than 'closed' is appropriate.</li> <li>CSP C&amp;S said weekly reporting is more cost effective than daily – is it daily or weekly that has been costed? Why do CSP N need to change Ordering and Logistics and Billing and Financials when it is reporting that is changing?</li> </ul>
British Gas	Large Supplier	Yes	-

## Question 9: Please provide any further comments you may have

Question 9		
Respondent	Category	Comments
<b>Utilita Energy Limited</b>	Large Supplier	<p>With considerable changes required to deliver new reporting metrics, all aspects and Change Requests should be taken to full Impact Assessment. It is important, with the projected expense of this total modification, that all impacts, and associated risks are identified and mitigated to truly deliver the benefits of this modification.</p> <p>The overall implementation cost of this modification is high, and the DCC, wherever possible should continue to engage and work with its Service Providers in order to reduce costs and deliver benefits to DCC customers.</p>
<b>OVO Energy</b>	Large Supplier	<p>All of the items listed in this questionnaire come with huge costs associated to them and timescales far outwith any that Ofgem has stated are acceptable to them. They were very clear on the fact, in previous workshops, that the amount of time to develop and deliver all of this was there and they'd need clear justifications for any intention to not meet them, including prohibitive costings. A Risk was raised against the Mod as to 'ownership' of the delays and who would be responsible if those were not caused by Suppliers and belonged to the DCC. This is proving to be the case and agreement seems to be needed on what is acceptable to them to deliver against the requirements.</p>
<b>Western Power Distribution</b>	Network Party	<p>Pg 27 of PIA Section 11.2 states considerable increase the number of FTEs required to support, maintain and deliver the reporting on a monthly basis.</p> <p>Pg 27 of PIA Section 11.4 states potentially building a new database although this will be absorbed into TOC running costs. We seek further detail around why this is the case and costs involved. Where would these costs be signed off?</p> <p>We note it is still unknown how long or the costs to change contracts.</p>

Question 9		
Respondent	Category	Comments
		<p>We are concerned that the PIA is quoting some substantial costs whilst still lacking in detail in some areas and therefore at the moment don't feel that we are in a position to approve a request for a full impact assessment.</p> <p>We are struggling to understand how the costs involved are so significant when several of the CPMs are already being reported on and we are just seeking further clarification or some additional detail around them.</p> <p>A total of over £1,000,000 for a full impact assessment when there is still a lack of understanding of exactly what changes are required and why is difficult to accept, and estimated implementation costs of £11,212,000 - £13,245,000 when there are still values missing or subject to change as requirements are still being agreed between DCC and SPs is of concern.</p> <p>We wonder if DCC have perhaps misunderstood the end goal and are over complicating the requirements.</p>
<b>British Gas</b>	Large Supplier	<p>It is worth working group representatives remembering that Ofgem have confirmed that the cost of implementing the performance management changes will be reviewed by themselves in the relevant PCR. Therefore, the working group just need to ensure that the business requirement is sound (not gold plated) and ask TABASC for help with the system solutions (again not gold plated), rather than the CBA.</p>