MP122A 'Operational Metrics' & MP122B 'Operational Metrics – Part 2'

Working Group Meeting summary – 22 January 2021

Attendees

Attendee	Organisation
David Kemp *(Chair)*	SECAS
Joe Hehir	SECAS
Holly Burton *(Meeting Secretary)*	SECAS
Joey Manners	SECAS
David Walsh	DCC
Easton Brown	DCC
Oliver Bridges	DCC
David Rollason	DCC
Dipu Mantra	DCC
Simon Rogers	DCC
Wahab Siddiqui	DCC
Richard Haigh	BEIS
Rochelle Harrison	British Gas
Tony Shanahan	EDF Energy
John Noad	Npower
Michael Walls	Ofgem
Emslie Law	OVO
Mahfuzar Rahman	Scottish Power
Matthew Alexander	SSEN
Rachel Norberg	Utilita
Gemma Slaney (Proposer)	Western Power Distribution

MP122A 'Operational Metrics'

Summary

MP122A 'Operational Metrics' seeks to implement the Data Communications Company (DCC) internal and Technical Operations Centre (TOC) changes, as well as interim approaches for the most affected metrics in order to improve the transparency of the Performance Measurement Report (PMR). The

MP122A legal text is pending implementation in the February 2021 SEC Release. However, the subsequent reporting will then be presented from May 2021 looking back at data from April 2021. The DCC advised the following next steps for the development of the reporting:

- Report development complete: 16 April 2021

- First report start: 3 May 2021 (the report will contain data for April 2021)

- First report delivery: 24 May 2021 (May OPSG reporting meeting)

In previous Working Group meetings, members agreed that the design of the updated PMR would be assessed by the Working Group during the design phase of the modification's implementation to prevent any delay to the decision of the modification.

Review of DCC's draft PMR

The DCC provided an overview of its draft PMR which included prepayment data. This report has since been updated to include information previously discussed at the December 2020 Working Group meeting regarding incidents. The DCC advised that it has completed uploading the data for meter reads into its application which generates the report, and it will not take long to feed this into the report itself.

The DCC advised that each Service Request noted within the report will have its own graph and table to underpin it.

Working Group members noted the graph for Service Reference Variant (SRV) 1.6 'Update Payment Mode'. The DCC advised the same types of graphs and tables will be used for each SRV for consistency and efficiency.

Max Round Trip Time

The DCC has included the maximum round trip time (RTT) in the graph which tends to dwarf the other metrics within the graph. The DCC questioned whether the RTT was beneficial and whether it should be reported on a separate graph or table.

A member highlighted that from an Operations Group (OPSG) perspective, the maximum RTT is beneficial, but is flexible in terms of how it is presented. They suggested it could be removed from the graphs and instead a supporting statement be provided on these timings.

The DCC demonstrated three examples in which to present the graphs and sought feedback from members over which they preferred. The DCC noted there is an option to split the detail for success and failures of each SRV, and then the average success rate of incidents, instead of using line graphs. Another graph would look to concentrate on the RTT, with the bottom bar providing the average timings. The DCC believes this would enhance readability.

A Member agreed that the third presenting option (Annex C of this summary) was much clearer to read and is their preferred option for viewing performance and success rates. They also suggested to add the maximum volume of RTTs and remove it from the original graph to provide a more granular view.

Members preferred that straight lines be used for all line graphs within the report, rather than curved lines. The DCC agreed with this approach and will update this in further iterations of the report.

To reach a final decision, SECAS agreed to share the three DCC reporting examples with Working Group members so they could share internally within their organisations. The DCC advised that as there is no confidential data within the reports and confirmed they could be shared beyond the Working Group. SECAS has since shared these reports and sought feedback.

Incident data

A member also suggested that within the Incident Data report, it would be beneficial to note which Service Provider the data related to, including SMETS1, as this could vary. The DCC confirmed this would be possible and that there are several additional fields that could be used. The information of incidents will also be included within Appendix 2 of the final report present to the OPSG, which can then be cross-referenced against the full description in the PMR.

Performance summary table

Working Group members noted the updated performance summary table which showed Service Requests are rarely delivered within the SLA. The Working Group acknowledged that this is likely due to the table including data for both Gas and Electricity meters, with "sleepy" Gas meters likely to bring overall performance down. As a result, members recommended that the table be split by GSME, ESME and a combined view of the two meter types. The DCC confirmed it could easily do this.

Members also requested having the error codes included within a footnote rather than the main body to save space in the report. The DCC's view was that a standalone exception list would be built for SRVs which could be included. However, it confirmed placing the error code within a footnote would be achievable.

SEC Party Success and Volume

The Working Group noted the graph relating to SEC Party Success and Volume across all SEC Parties.

It asked the DCC to split each graph by CSP Region and by SMETS1 Service Providers. The DCC confirmed live data supports the graphs and that there are significant troughs for some Suppliers. A member suggested that the Y axis 'percent' start from 50% to record a more granular view. However, the Working Group opted not to take forward the suggestion as it thought this would lose useful data as a result. Instead, the DCC suggested and the Working Group agreed that supporting tables could be added beneath each 'Party Success and Volume' graph to provide a more granular view.

The DCC noted that the Install and Commission data will take longer than other business processes to load into the report. This is because tailored calculations will be required for the Install and Commission SRVs to ensure they were attempted on the day of the installation.

Report size and format

Considering the feedback received from the Working Group, the DCC noted there will be approximately 20 pages per SRV. This means there will be roughly 160 pages for the Install and Commission SRVs alone, alongside six other business processes. The DCC noted there are around 40 SRVs which it is to report on. This totals to around an 800-page document, in which the OPSG will

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be asked to review on a monthly basis. SECAS advised it will review these documents beforehand to make sure any key elements and highlights are identified before the OPSG review.

Members acknowledged the high page count, but noted they should easily be able to identify any notable drops in performance from the graphs and tables, e.g. through the Red/Amber/Green (RAG) status colour-coding.

Members asked the DCC to ensure that when these PDF documents are circulated, the PDF title (found in information) is correct and titled accurately.

Members suggested that each business process is given its own document rather than a single document containing all the business processes. This would allow organisations to pinpoint who needs to see which report internally. Members highlighted the document title that appears in the toolbar when opening as a PDF must be correct. Members agreed that recipients shall receive all the reports irrespective of which ones they are interested in. This would prevent the DCC from having to tailor which reports it sends to each Party and increase efficiency.

Report sign-off

The group agreed that a milestone is needed to sign-off the report by the Working Group and to hand it over to the OPSG on an enduring basis. The Chair recommended that this be done ex-committee via email. Members agreed, subject to the magnitude of comments fed back to the DCC.

Next steps

The following actions were recorded from the meeting:

- The DCC to circulate each of the three PMR examples to SECAS for SEC Parties to review and provide comments
    - o **This action has since been completed.** The decision was to use formatting from 'MP122 - Annex C - Suggested Requirements v1'
- The DCC to update its draft PMR in accordance with the Working Group's feedback.
- Once all comments have been accounted for in the final draft PMR, the DCC will seek sign-off from the Working Group via SECAS.

MP122B 'Operational Metrics – Part 2'

MP122B summary

The impacts of MP122B 'Operational Metrics – Part 2' will be limited to the DCC and its Service Providers. The latest DCC estimated implementation costs for the combined set of Change Requests are between £8,292,000 to £9,595,000. These costs cover system changes only; contractual changes and Application Support costs will be identified in the Impact Assessment.

These costs have only been provided in a Preliminary Assessment and have been split out over several Change Requests (CRs).

Summary of MP122B questionnaire responses

SECAS received four response to the questionnaire. None of the respondents advised that any of the Change Requests should not be progressed but had several questions on the DCC's Preliminary Assessment. The DCC provided a document containing feedback and rationale in response to the questionnaire responses. This was circulated prior to the Working Group meeting and used to discuss each Change Request during the meeting.

Working Group scrutiny of MP122B

SECAS noted some respondents had questioned who would be held responsible for any delays to MP122B if they felt the Change Requests were not ready to progress due to ongoing cost scrutiny required. Ofgem noted it had already provided a response to this risk in one of the earlier MP122A Working Group meetings. However, it reaffirmed its previous advice that Ofgem cannot, nor would it, hold any Parties or organisations responsible for delaying any Modification Proposal, including MP122B. Ofgem can only act on an organisation's compliance if it is in breach of its licence conditions. In summary, Ofgem believed the risk of delaying this modification had been eliminated in 2020 and were surprised to see this query raised again.

Members noted Ofgem's statement and agreed they could proceed to scrutinise the MP122B solution and costs without any risk.

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

The reason this question was proposed was due to the Smart Metering Equipment Specifications (SMETS1) 1 implementation costs alone being estimated to be between £2,920,000 to £3,650,000. All respondents felt all the SMETS1 elements should be taken forward. SECAS summarised respondents believed the ability to review and compare all the DCC's Service Providers is key to performance managing the whole smart metering ecosystem.

One respondent advised a disconnect between SMETS1 and SMETS2 reporting in terms of publication dates may be a workaround for a short period of time. This was noted in relation to the new SLA introduced by MP122A for the DCC to produce the PMR 10 working days from the end of the reporting period instead of 25 working days. However, the end goal must be combined reporting within 10 working days of period end to help the whole industry review in a timely and more efficient manner.

The DCC highlighted that the inclusion of SMETS1 reporting means an additional seven DCC Service Providers are impacted, each of which will have costs associated with completing a Preliminary and Full Impact Assessment and any subsequent development. However, the DCC does not see any other reasons to not include the SMETS1 elements of each Change Request. It also noted that Ofgem has an Operational Performance Regime (OPR) requirement for the DCC to report SMETS1 performance.

No further comments were raised in relation to this question.

Decision
All SMETS1 elements shall be progressed by the DCC for all the applicable Change Requests.

Questions 2 & 3: Should 'Throughput of Alerts' be taken forward and progressed to DCC Impact Assessment?

SECAS noted DCC has raised two Change Requests for measuring the throughput of Alerts. As both change Requests are interdependent, views given against these were summarised together.

Both are intended to provide greater granularity of Code Performance Measure (CPM) 3 of SEC Section H13.1.

- CR1418: Progressing the Data Services Provider (DSP) changes

- CR1438: Progressing the Communication Services Provider (CSP) and SMETS1 Service Provider changes

Respondents agreed that the improved performance reporting against Alerts is needed, especially as there is a CPM tied to it. SECAS summarised other views including comments that the measurement of Alerts is critical, and that the success of Alerts being delivered highlights Home Area Network (HAN) performance, which is largely unmonitored.

The DCC noted a respondent questioned, for several Change Requests, why the proposed rate of supply of information from the DSP as being every 15 minutes. The DCC advised this is the current rate of supply already provided by the DSP. The respondent advised that if compiling the information at the month-end would be easier for the Service Providers, this would be acceptable. The DCC believed it would cost more to change the methodology than to leave it as-is.

What does the existing PMR report on Alerts?

The Proposer highlighted that CPM 3 requires the DCC to report on the Target Response Time of Alerts. They questioned what the DCC is currently reporting, considering the DCC has raised a Change Request against this. The DCC explained that CPM 3 requires the DCC to measure the combination of all Alerts, not each Alert individually. The DCC added that the Performance Measurement Methodology (PMM) clearly excludes HAN-time from the measure.

Members questioned whether CSP performance is measured. The DCC confirmed this cannot be done at the moment. However, this CR1438 would deliver this.

The SECAS OPSG representative noted that based on PMRs received in the past, the commentary is often reflected as CSP issues when there has been a dip in performance. The CSP North has previously noted noise issues as being a reason for a dip in performance, which would suggest it is being measured. The OPSG has been under the impression that this is a representation of the CSP performance and not DSP performance coming from that Region. They added that from the commentary, it would suggest that this interpretation has been re-enforced.

Overlap with Network Operator Alerts project

The Proposer added that the desired reporting is currently being facilitated by the DCC for the following Alerts:

- AD1 'Power Outage Event'

- 8F35 'Supply Outage Restored'

- 8F36 'Supply Outage Restored - Outage >= 3 minutes'

They questioned the delivery costs for these Alerts and whether the same functionality could be utilised under the MP122B Alerts requirement. The DCC advised that the cost for the three Alerts was £269,224 and that the same functionality will be utilised by in CR1418 for the remaining Alerts under MP122B. The DCC noted this functionality is scheduled for delivery at the start of March 2021.

This includes measurements at the following points:

- When the Alert was generated by the Device

- When the Alert reached the Communications Hub

- When the Alert entered the CSP/SMETS1 Service Provider systems

- When the Alert left the CSP/SMETS1 systems to the DSP

CR1438 gives the DCC additional granularity within CSP and SMETS1 systems. CR1438 also identifies any Alerts that go missing from CSP systems or if there are any delays in the systems.

Which Alerts are in scope?

Members questioned why the DCC had excluded DCC Alerts and certain SMETS1 Alerts from the Change Request. The DCC advised that DCC Alerts are excluded because they do not go down to the Device. It clarified that only SMETS1 power outage Alerts would be excluded because they do not exist for SMETS1.

Security impacts

The Proposer questioned the DCC's statement that the DSP will be required to inspect the payload of Alerts and if this required Security Sub-Committee (SSC) consideration. The DCC confirmed that the DSP already looks at the message code/alert code within the payload for existing Alerts. However, the Change Request under MP122B requires the DSP to extract the timestamp from the Alert payload, which the DSP does not currently do. The Working Group did not believe this needed SSC approval.

What are the CSP impacts for reporting Alerts?

Members questioned the high CSP North impacts noted in the DCC's Preliminary Assessment. The DCC advised it is currently working with the CSP North to reduce costs and it is expecting to receive a significantly revised Preliminary Assessment submission from the given CSP to address these issues.

Members questioned whether any of the costs under CR1438 were related to the reduction in the DCC's SLA to produce the PMR. The DCC confirmed that the reporting timescales are not seen as a concern with CR1438.

Members asked the DCC to provide a standalone cost for each Service Provider impacted by CR1438, to which the DCC agreed.

Decision
Both CR1418 and CR1438 shall be progressed by the DCC.

Question 4: Should CR1420 'Incident reporting to support revised PMR' be taken forward and progressed to DCC Impact Assessment?

CR1420 'Incident reporting to support revised PMR' seeks to provide a capability for the DCC to report on CPM 5 and new CPM 5A within SEC Section H13.1.

Service Provider involvement

Members questioned why the DCC's Service Providers are involved in the data provision for these CPMs and believed the data should be available within the DCC. The DCC advised currently in the PMR, it collates Incidents and specifies whether service levels have been met. This approach was initially set-up by the Department for Business, Energy and Industrial Strategy (BEIS), with an obligation placed on the Service Providers to provide this information to the DCC. If there are any discrepancies with the data, this gets sent straight back to the Service Providers to clarify. Therefore, the easiest possible way to implement this change without effecting existing processes was to ask the Service Providers to break down the Incident data by Incident Categories 3, 4 and 5.

Considering the feedback from the questionnaire, the DCC advised that after further investigation, it may be able to source the data internally rather than from its Service Providers. The DCC has asked its commercial teams to explore this. However, there is a slight concern that the DCC may still need to validate the data with its Service Providers. The DCC noted that a contractual change would be needed to facilitate this and would come at a cost, but this would likely be significantly cheaper than the cost of CR1420.

PMR production SLA impact

Members questioned what impact the reduction in the SLA to produce the PMR was having on the CR1420 cost. The DCC is unable to confirm explicit costs for reducing timescales but noted the CSP North would facilitate CR1420 at no cost if CR1430 'PMR reduced timescales' is implemented. However, this is not the case with the the other Service Providers, some of which believe reducing the PMR SLA to 10 working days is not possible. The DCC advised it will look to confirm this before circulating as part of an Impact Assessment.

The DCC suggested that delaying commentary until the following month's report could potentially still be an issue, as whenever there are instances where timescales are not met, ongoing conversations are had with the Service Providers throughout. If information is received towards the end of the month, there may not be enough time for the Service Providers to respond. The 10-day production reporting may be missed and would still be an issue as commentary would need to be included within the PMR.

The Working Group agreed it could not confirm a decision on progressing this Change Request to Impact Assessment until the alternative approach had undergone a Preliminary Assessment.

Actions
• The DCC will investigate if it can source the CPM5 and CPM5A data internally from Remedy, instead of using its Service Providers. • If it can source the data internally, the DCC will advise implementation costs and timescales. • The DCC is to confirm what proportion of the CR1420 costs are associated with the reduction in the PMR SLA (CR1430).

Question 5: Should CR1430 'PMR reduced timescales' be taken forward and progressed to DCC Impact Assessment?

Members noted that this Change Request impacts all 13 of the DCC's Service Providers, some of which do not believe the 10 working day SLA is possible. They also raised concern at the high costs and that they don't include the Application Support costs or contractual costs, so assumed these would only increase. However, OPSG members agreed it is important to drive this forward as much as possible given the importance raised by the OPSG to see the reports sooner than they do now.

The DCC advised an alternative solution could be to mandate the use of its ticketing system by the Service Providers. This would ensure a single source of truth for its Service Providers, and the DCC is investigating this. The DCC noted that the CSP North already solely use the DCC ticketing system hence its costs are significantly lower. There is likely to be an associated contractual change with mandating the ticketing system, but the net costs are likely to be much lower.

The Proposer highlighted that the assessment showed the CSP South and Central stated its reporting systems required a complete overhaul to meet the requirement. They questioned whether their costs had been factored into the cost quoted under the Change Request given the DCC is challenging these. The DCC advised it challenged the Preliminary Assessment from the CSP South and Central as soon as it was received. The DCC included an estimated cost in the Change Request based on discussions with the CSP, but it is still awaiting the delivery of an updated cost.

The DCC advised that the CSP North provided costs for CR1420 and CR1430 as a combination. Given that the solution for CR1420 might be changed, it may be that the quoted costs in CR1430 will need to be re-evaluated. This will also be reflected in the Impact Assessment if the DCC proceeds.

Noting the limitations from the Service Providers, a member questioned the current SLAs the CSPs must meet to report internally to the DCC. They believed most companies have a regular reporting regime with statistics required to be reported before the month end. The DCC advised it does not have a reporting validation process. However, one of its contracts specifies the CSPs have 10 working days to produce the reporting with an additional five Working Days to respond to any queries from the DCC.

Ofgem questioned that if the DCC knew several of its Service Providers could not achieve the 10 working day SLA, whether it knew what each of their fastest turnaround would be. The DCC has approached the CSPs requesting their best offer for reporting; however, there was not a huge difference in reporting timescales. The DCC advised all of its Service Providers could potentially meet a 20-working day SLA, but this will need further investigation.

The DCC agreed to take an action to understand and look at the different durations to help the Working Group understand what is viable in relation to reducing timescales for CR1430. The Working Group will then reconsider this question and agree how to proceed.

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Action
• The DCC will investigate the possibility and cost of mandating its ticketing system for its Service Providers and whether this will facilitate the 10 working day SLA. • The DCC will investigate the fastest SLA each of its Service Providers could produce the required information and therefore confirm the fastest SLA that all could meet together. The DCC will provide a breakdown of this information for different reporting timescale options, and state what information would still be outstanding at each potential deadline.

Questions 6 & 7: Should CR1423 and CR1440 'be taken forward and progressed to DCC Impact Assessment?

CR1423 and CR1440 both seek to facilitate more detailed reporting for Communications Hub and SMETS1 Device firmware respectively. Views given against these were summarised together.

A member noted that CR1423 is dependent upon SECMP0007 'Firmware updates to IHDs and PPMIDs' which will be implemented in two phases. They questioned when CR1423 would be available as the latter phase would not be available until June 2022.

The DCC advised that the first phase of SECMP0007 will be implemented in the November 2021 SEC Release and will introduce DSP firmware tracking. This will track ESME and GSME firmware Images from when they have left the DSP gateway, to the CSPs and then to the Communications Hubs. The DCC advised it can use this functionality to provide enhanced reporting for ESME and GSME firmware updates. The DCC clarified that there are no Communications Hub changes associated with SECMP0007 November 2021.

Members acknowledged the clarification given by the DCC but agreed this needed to be documented in its assessment. This also needed to include clarity on how much the implementation costs would reduce if SECMP0024 'Communication Hub Firmware Management' is implemented which is noted as a dependency in the assessment.

Subject to clarification regarding reporting on Communications Hub firmware in relation to SECMP0007, Working Group members agreed to proceed with CR1423.

Members also agreed that the SMETS1 firmware reporting under CR1440 should also progress.

Decision & Action
• CR1423 and CR1440 shall be progressed by the DCC. • The DCC are to clarify and document the dependencies between SECMP0007 and SECMP0024 and the enhanced reporting on Communications Hub firmware.

Question 8: Should CR1429 'Additional CSP Reporting to validate 90 Day No SMWAN Incidents' be taken forward and progressed to DCC Impact Assessment?

SECAS summarised the responses with the common theme being concerns over the Impact Assessment and implementation costs. Respondents believed the DCC has confirmed it can already measure Install and Leave. One respondent believed the costs cannot be justified or accepted. The DCC confirmed that the costs had been challenged.

SECAS questioned if this Change Request had been raised due to some Suppliers not following the correct process in an Install and Leave scenario. The DCC confirmed this is the case and that if all Suppliers used SRV 8.14.2 'Communications Hub Status Update-CHF Install Success No SM WAN' in this scenario, CR1429 would not be needed.

The Working agreed that emphasis should be placed on making sure all Suppliers follow the correct process in an Install and Leave scenario. This would prevent significant costs incurred on Parties to pay for enhanced reporting to mitigate this issue.

The Working Group was content with the basic reporting already available and agreed this Change Request could be withdrawn.

Decision
CR1429 will not be progressed.

Question 9: Other comments

SECAS summarised the general comments from the questionnaire:

- Questions over the significant costs when several of the CPMs are already being reported on and the industry is just seeking additional detail.

- All impacts and associated risks must be identified and mitigated to truly deliver the benefits of this modification.

- The DCC should continue to engage and work with its Service Providers to reduce costs and deliver benefits to DCC Users.

Performance Measurement Methodology

BEIS asked when the DCC would update the PMM. The DCC advised that the new data resulting from MP122A will be included as part of an annex to the PMR which will not be ready until April 2021. The DCC would prefer to ensure the reporting meets the Working Group and OPSG requirements and is fully implemented before consulting on and seeking SEC Panel sign-off for the updated PMM.

The business case

The Proposer acknowledged the DCC has tried to answer some of the questions and concerns around costs. However, their initial thoughts are that the costs are still extremely high simply to achieve more accurate reporting, and that if these remained it would be hard to justify a business case. Information in the Preliminary Assessment does not answer some of the basic questions yet, whilst Working Group members are being asked to sign-off on a considerable sum without all

information being confirmed. It was agreed that more work needs to be done to flesh out costs within the business case to decide what should and should not be progressed.

Another member highlighted that the information sought is required to understand the DCC's performance. This increased reporting is needed to highlight the performance in certain areas and show what is and is not being achieved. The Working Group was also concerned that the DCC was not already requesting and receiving this performance information from its Service Providers.

Next steps

- CR1429 'Additional CSP Reporting to validate 90 Day No SMWAN Incidents' will not be progressed further

- The DCC will progress the actions for CR1420 'Incident reporting to support revised PMR'

- The DCC will progress the actions for CR1430 'PMR reduced timescales'

- The DCC will progress the action for CR1423 'Comms Hub Firmware Image Data'

A Working Group meeting will be convened once the requested information has been provided.

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