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MP122B 'Operational Metrics – Part 2'

Working Group Meeting summary – 8 June 2021

Attendees

Attendee	Organisation
David Kemp *(Chair)*	SECAS
Holly Burton *(Meeting Secretary)*	SECAS
Joe Hehir	SECAS
Joey Manners	SECAS
David Walsh	DCC
Easton Brown	DCC
Oliver Bridges	DCC
Charlotte Semp	DCC
Wahab Siddiqui	DCC
David Rollason	DCC
Richard Haigh	BEIS
Rochelle Harrison	British Gas
Michael Walls *(part)*	Ofgem
Emslie Law	OVO
Mahfuzar Rahman	Scottish Power
Matthew Alexander	SSEN
Rachel Norberg	Utilita
Gemma Slaney (Proposer)	Western Power Distribution
Kelly Kinsman	Western Power Distribution

Summary

MP122B 'Operational Metrics – Part 2' impacts the DCC and all its Service Providers. The latest DCC estimated implementation costs for the combined set of Change Requests are between £7,100,000 to £7,950,000. **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).

Due to the significantly high costs associated with these Change Requests, the DCC has investigated alternative Technical Operations Centre (TOC) solutions, each of which were discussed by the Working Group in the previous meeting.

The only requirement with an associated Change Request that does not have an alternative TOC solution is CR1430 'PMR Reduced Timescales' which seeks to reduce the DCC's service level agreement (SLA) to produce the Performance Measurement Report (PMR).

The DCC provided the Woking Group with an update against the TOC Alert reporting, PMR SLA and TOC firmware reporting.

SECAS provided a recap of actions captured at the previous meeting in April 2021:

- The DCC to produce a mock-up and demonstration of the output of its TOC option for CR1418 & CR1438 (Alerts)
- The DCC to provide a cost estimate for securing data from its Service Providers required for CR1423 & CR1440 (firmware)
- SECAS and the DCC to liaise with Ofgem to confirm if the TOC option for CR1423 and CR1440 would be satisfactory for the Operational Performance Regime (OPR) requirements (firmware).

TOC reporting on Alerts

MP122B is seeking to address the general reporting of all Alerts whilst MP096 'DNO Power Outage Alerts' is reviewing more specifically the reporting of power outage and power restoration Alerts only. This more detailed reporting under MP096 is separate to, and out of scope of the reporting under MP122B.

The Alerts reporting sought by MP122B is not a requirement for Ofgem's OPR.

Use of a proxy for Alerts

The DCC previously noted that the TOC currently does not receive any data from the Communication Services Providers (CSPs) indicating when an Alert reaches the Communications Hub (CH). This cannot currently identify when an Alert enters the Service User's gateway, only when the Data Services Provider (DSP) tried to send it. As a result, the TOC option proposes a proxy measure using Service Requests as opposed to a true measure for Alerts.

The Working Group was presented with a swimlane diagram which demonstrated the different functionality between Smart Metering Equipment Technical Specifications (SMETS) 1 and SMETS2+ Devices. These charts specifically called out the steps for when a Service Request is sent by the Users and its journey through the DSP and the CSP to the CH before coming back. The DCC advised that on average, the time for an Alert to travel across the DCC's network is effectively half the time in which a Service Request would take as each behave in the same way. The DCC offered this statistic for a CH, Gas Proxy Function (GPF) and an Electricity Smart Metering Equipment (ESME) to compare the differing times for each.

The DCC advised that the proxy for SMETS1 would not have the same effect as each SMETS1 Service Request results in multiple interactions between the SMETS1 Service Providers (S1SPs) and the Device (either the target Device, or the associated CH), and each interaction may cross multiple interfaces. This could result in dozens of messages in some cases.

POST-MEETING NOTE:

- CR1418 SMETS1 costs: n/a
- CR1438 SMETS1 costs: £600,000 - £1,000,000

SECAS (JM) noted an Alert is an event generated from the Device with no corresponding Service Request, yet the proxy intends to use Service Requests and responses. They therefore questioned how using Service Request times and cutting this by half can be a fair reflection of Alerts. The DCC noted the limitations of the proposed proxy but noted they proposed this method in response to being asked to find a more economically viable method for measuring Alerts. This was based on the understanding that Service Requests and Alerts tend to have very similar timescales, other than Power Outage Alerts which are a small subset of Alerts and are out of scope of MP122B. The DCC added that in terms of the delivery of an Alert, it can only be tracked if it gets to the DSP. The TOC cannot see lost alerts prior to reaching the DSP.

The Proposer noted there must be some way in which an Alert could be measured using the payload within the Alert to gain the generation time and comparing this against the point at which the Alert reaches the User. The DCC advised that the DSP solution under CR1418 would achieve this but only for the CSP South and Central Region, not the CSP North Region. Again, this solution alone was deemed inadequate as it would not address Alerts in the CSP North Region.

Despite the relatively low costs of the proxy compared with the associated Change Requests, there was consensus amongst members from Suppliers and Network Parties that the DCC's proposed proxy for Alerts would not be a viable option. Members noted that if the DCC cannot prove the proxy is adequate then it should not be used. However, they noted they could not make a decision without an industry consultation taking place first.

The DCC can already measure AD1 'Power Outage Event' Alerts. The Proposer suggested that the DCC should compare actual data for these against the DCC's proposed proxy for measuring Alerts to assess the proxy's likely effectiveness. This was deemed a flexible compromise given the concerns raised with the proxy.

A member (RH) questioned whether the "Manchester Lab" could be used to set up and test some Alerts, especially AD1s, to help assist in testing the proxy. From a timing perspective, the Proposer was comfortable with what the DCC was proposing which is the time generated on the CH to the time they attempt to deliver. However, they considered whether this approach is suitable for other Alerts is a different question. The main concern is that the prices associated with this modification do not present a justifiable business case and the overarching issue is still not being addressed.

Time vs success of Alerts

The Chair and the Proposer questioned whether Parties were more interested in the timing of Alerts or the success rate of Alerts. Suppliers were unable to give a definitive response but agreed it is usually the success rate they are more concerned with. However, they acknowledged this is not the case for power outage Alerts and power restoration Alerts which Network Parties are reliant upon receiving as fast as possible.

A Supplier (MR) noted there is a big disparity between Network Party and Supplier impacts of Alerts. They noted Alert Code 8F72 'Firmware Verification Status' as an example and as being of interest to Suppliers. They noted this Alert is not always successful and Suppliers have had to build workarounds as a result.

Summary

Working Group members agreed it would be beneficial to see an analysis from the DCC as to whether the proposed proxy would be sufficient.

The DCC (CS) suggested to list the types of Alerts looking to be measured before calling out the proxy to demonstrate against this Alert, or whether this is already being measured as part of MP096 'DNO Power Outage Alerts'. The DCC suggested to host a matrix for the DCC TOC solution which can be included as part of the consultation, so Industry can see the DCC's success against management and time. The Working Group did not see the need for this and so it was not discussed further.

The Chair summarised the following options will need to be consulted upon:

- Progressing CR1418 (which is a DSP change only and would allow reporting CSP South and Central only)
- Progressing CR1418 & CR1438 (to allow reporting on all S1SP and SMETS2 CSPs
- Progressing the TOC proxy option
- Excluding all SMETS1 Alerts from the reporting
- Whether Parties are more interested in the timing or the success rate of Alerts
- What Parties deem as time-critical Alerts

ACTION: The DCC to prepare a document covering the proposed TOC proxy for Alerts, how this would work and provide a breakdown of the costs, so it can be appended onto the Modification Report ahead of consultation.

UPDATE: The DCC has advised this information can be found section 3.2 (pages 6-9) and section 4.6 (page 13) of the DCC's Preliminary Assessment provided in the meeting pack and on the MP122B webpage.

ACTION: Working Group members to clarify if the information on the TOC proxy for Alerts in the Preliminary Assessment is sufficient before the previous action is closed.

Reducing the PMR SLA

CR1430 seeks to reduce the PMR SLA. This is not a requirement for Ofgem's OPR.

Current PMR timescales and process

The DCC has captured the existing processes for validating and publishing the PMR and demonstrated this using swim lanes. The beginning of the month sees both the DCC and its Service Providers raising and responding to queries and generating commentary.

The second column which covered activities from 10-15 working days consisted of the DCC processing data from the Service Providers, responding to queries where necessary and also issuing more questions and identifying the source of problems.

The third column covering 15-20 working days will is the point at which all materials and final reports are submitted to the DCC who then take five working days to carry out various activities before finalising and signing off the PMR before issuing to the Operations Group (OPSG) for review.

Reducing the PMR SLA; Service Provider responses

The original MP122A/B business requirement was for the DCC to reduce the time it takes to create the PMR to within 10 working days from the end of the measurement reporting period. This has been implemented into SEC Section H 'DCC Services' although the DCC has since been granted a derogation. The DCC noted that only 80% of the original submissions from the Service Providers are delivered on the tenth working day with the other 20% being received after this timeframe.

Some Service Providers have stated they are unable to change their timescales to meet the 10-working day SLA, names of which can be found in the Preliminary Assessment (PA) previously circulated. Therefore, the DCC deemed the producing the PMR on the tenth working day could not be achieved.

The majority of the Service Providers advised that providing selected reports at different timescales would not have any impact on their PA submissions with no reduction in costs or timelines.

CR1430 – PMR SLA reduction options

The DCC noted the five possible options at this stage:

1. Compress the whole PMR reporting process to publish after 18 working days at the cost of £1.14m-£1.16m.

   Note that the CSP South and Central is a blocker to reducing this time further down to 14 working days. However, they would reduce their SLA to 18 working days at no cost, but anything less than this would cost £15m.

2. Reduce the reporting to produce the PMR reports earlier in the cycle.

   This would improve the timelines for a few of the Service Providers with a 4% reduction in the ROM costs. This would involve a further element of DCC administration and management for those reports that are not complete at each stage which is not included in the estimated timescales.

3. Break the PMR into sections based on the Service Provider returns and issued on the tenth working days, fourteenth working day, with the complete PMR provided on the eighteenth working day.

   Similar costs to option 1. This would involve a further element of DCC administration and management for those reports that are not complete at each stage.

4. As previously identified to the Working Group, the DCC TOC could produce the MP122A TOC reports 10 working days from the end of the measurement reporting period. However, this would mean the TOC reports and the PMR being provided to the OPSG at different times.

5. The as-is option would leave the PMR being produced 25 Working Days from the end of the measurement reporting period.

The OPSG will primarily be reviewing the PMR as part of its reporting meetings with the focus being on 15 Service Requests. There will be two separate agenda items. The PMR will still be submitted to the Panel for review but there will be a supplementary report for OPSG which will provide a DCC Indicator summary and discussions.

This was discussed at the last Working Group meeting where the DCC noted the costs do not include application support costs or any costs to amend Service Provider contracts.

The Proposer highlighted there are around 20 working days in a month, so there is generally 15 working days from the start of the month to the OPSG reporting meeting. Therefore, even if the reporting period is changed, some Service Provider PA submissions have stated they will still be unable to accommodate the new SLA.

The Proposer queried whether the reporting needs to happen per calendar month. Understanding there was reasoning behind this, they believed there should be flexibility around the reporting period to give an accurate reflection and review. The DCC noted there is a reporting schedule which could be moved to support the change of the reporting period without imposing technical difficulties. If this date was to change then data relating to historical trends month on month would be lost; this should not affect the data being reporting upon mid-month moving forward.

The Proposer felt that in order to seek wider views around suitable reporting times, this should be presented to the OPSG as this group will be responsible for reviewing the reports. However, the OPSG wouldn't make any decisions against the cost of the modification and would refer such questions back to the Working Group. SECAS (JM) noted the OPSG's preference could be sought although, there is already a strong desire to get the reporting date as close to the appropriate month as possible. Moving the reporting period would not have any impact on the duration between the reporting period ending and when the reports for this could be produced. There was limited support for pursuing this option further.

In summary, the Working Group suggested the best option is to pursue reducing all reporting timescales down to 14 working days. The DCC (CS) advised they would open discussions with the CSP South and Central to meet the 14 workday SLA as well. This will be highlighted in the consultation to seek further views. The date of the OPSG reporting meeting could also be reviewed in light of this timescale.

Reporting firmware updates

Reporting and OPR dependency

SECMP0007 'Firmware updates to IHDs and PPMIDs' will provide what was included in CR1421 with further TOC development required to produce the reports. CR1423 would producing reporting of CSP initiated firmware updates to CHs. CR1440 would provide reporting against firmware updates to SMETS1 Devices.

Rough order of magnitude (ROM) costs for the TOC option are estimated around £100k plus additional costs to secure the data. The DCC advised it has not been able to confirm what these costs are and so the action remains open.

Based on previous discussions with Ofgem, SECAS (JH) confirmed CR1423 is not for a requirement under the Operational Performance Regime (OPR) but there are Code Performance Measures

against it within Section H. However, CR1440, which covers firmware updates to SMETS1 Devices, is a requirement for the OPR.

The Working Group could not form a decision on CR1423 as the costs for the DCC to gather the data were still not clear. It will review this following the consultation.

Change in SMETS1 firmware requirement

In response to the action it was given, SECAS held a discussion with the DCC and Ofgem to review the firmware requirements. As a result, a change in the SMETS1 firmware requirement was suggested to gain a better measure of the DCC's performance. SECAS explained the SMETS1 firmware process whereby SR11.1 'Distribute Firmware' delivers the Image to the S1SP. The Supplier then has to send an SR11.3 'Activate Firmware' which sends the Image down from the SMETS1 SP to the CH. In some cases, dependent on the S1SP, another SR11.3 will need to be sent to transfer the Image from the CH to the target Device. As a result, SECAS felt measuring SR11.3 instead of SR11.1 for SMETS1 firmware updates would a better measure of the DCC's performance. The DCC also confirmed it held the data for SR11.3 in relation to SMETS1 firmware updates.

The Proposer and the Working Group subsequently agreed to switch the SMETS1 firmware business requirement to measure SR11.3 instead of SR11.1. It was also agreed that the TOC option should be taken forward instead of progressing with CR1440. SECAS will inform Ofgem of the changed requirement.

Next steps

- A Refinement Consultation will be issued with additional questions as agreed in the meeting
- The outcomes and responses will be represented to the OPSG and the Working Group