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# MP122B ‘Operational Metrics – Part 2’ Refinement Consultation responses

## About this document

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This document contains the full collated responses received to the MP122B Refinement Consultation.

## Question 1: Do you agree that the solutions put forward for reporting Alerts will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	Question does not make sense and align to the ask. Providing a Yes or No answer to the proposal to progress the 3 solutions is not helpful and does not allow us to provide our view. Much discussion and debate has been had on the use of Proxy for alerts. We do not support this solution, but we support CR1438 and CR1418. There was never a requirement to provide a proxy view for this metric. So the answer 'Yes' is conditional.	SECAS accepts that the default 'response' of yes/no does not fully align with the question asked but understands the response given from the rationale provided, as with other respondents.
<b>Western Power Distribution</b>	Network Party	Yes	<p>Progressing CR1418 alone only addresses the issue for one of the CSPs and none of the S1SPs, and therefore we will be unable to clearly understand the performance in these areas.</p> <p>We believe that progressing CR1418 and CR1438 will offer the best solution due to these changes enabling the appropriate and accurate reporting of the various service providers and the actual alerts, however the costs are significant.</p> <p>We appreciate the DCC looking for an alternative TOC option, however we have concerns over the appropriateness of the proxy. Whilst we understand the idea that an alert is half the time of a Service Request, the</p>	Considering the lack of appetite from the Working Group and other Refinement Consultation respondents for the DCC's proposed proxy for measuring Alerts, SECAS does not believe it to be of value to carry out further investigations into the proposed proxy. SECAS also notes the DCC's response to this question which suggests that using a proxy means the DCC cannot be held accountable for performance. Therefore, implementing the proxy will likely have impacts on the

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			DCC are unable to confirm that this is an accurate proxy to use. We wonder whether there could be some work carried out to understand if this proxy is suitable, for example DCC measure SRVs and half the time as proposed and a volunteer or two provide alert timings, i.e. the alert generation time to the time received to prove if the proxy is appropriate.	validity of Code Performance Measure 3 of SEC Section H 'DCC Services'.
<b>British Gas</b>	Large Supplier	No	Not sure it's still required, DNOs wanted originally for Power Outage Alerts.	
<b>Scottish and Southern Electricity Networks</b>	Network Party	Yes	We agree that both solutions CR1418 and CR1438 together will meet all business requirements and will most effectively resolve the issue. However, we do note the sizing of costs attributed to CR1438 alone as well as the costs of both solutions combined.	
<b>Utilita Energy</b>	Large Supplier	No	The TOC option appears to be a very inaccurate way of measuring Alert times. Issues with either the upstream or downstream process would not be identifiable and therefore issues could not be identified – removing one of the key benefits of improved reporting.	
<b>DCC</b>	DCC	Yes	DCC supports the changing of reporting measures so that DCC Users can access performance data that they feel is more relevant and shows performance in areas they have a greater interest in. DCC notes that there are different options for data provision and the use of TOC data will not	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>directly report on DCCs performance in many areas and will include the performance of areas outside of DCCs control.</p> <p>Progressing both CRs is considered to report on DCC performance most effectively in the areas of User interest. Other solutions would not report on all areas of User interest or be focused on DCC only performance. However, DCC is also considerate of the cost saving when utilising TOC data for reporting and believe this should be a User choice.</p> <p>Where TOC or proxy data is used, Users should be mindful of this when either setting targets or where DCC might be held to account for under performance since DCC is not under full control of achieving the target.</p>	

## Question 2: Noting the impacts on the SMETS1 Service Providers, should enhanced reporting for SMETS1 Alerts be progressed?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	No	Although having a concise and complete view of our portfolio, which includes SMETS1 meters that have been enrolled into the DCC Service, the costs being proposed are unacceptably high and need to be challenged. We do need them but cannot justify the costs presented. Why the alert reporting was not covered under the IEPFR to establish the requirements is unclear. The fact there is now such a huge cost to include this, and it is unclear if this is for ALL Cohorts and SMETS1 Service Providers, we cannot agree to pursue this. All costs relating to this SEC Mod are increasing for items that should already be in place.	
<b>Western Power Distribution</b>	Network Party	-	We believe that it is only right to include S1SPs and SMETS1 alerts due to the volume of SMETS1 meters that will be enrolled, however we are unsure if the benefit will outweigh the costs.	
<b>British Gas</b>	Large Supplier	No	As question 1	
<b>Scottish and Southern</b>	Network Party	Yes	Depending on the output of question 1, if pursued it would be important to understand the full performance of alerts (SMETS1 and SMETS2). Without this, statistics would be	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Electricity Networks			incomplete and would mean reporting will continue to be non-reflective of true performance levels.	
Utilita Energy	Large Supplier	No	<p>SMETS1 Alert behaviour has been stable and performs as expected. Unless there is evidence of severe downgrade of service because of E&amp;A (which so far appears not to be the case) then reporting on S1 Alerts appears unnecessary, given the costs involved. Furthermore, each individual Supplier is likely to operate the majority of their S1 estate via a single S1SP, decreasing the incentive for cross-industry cooperation in driving improvements. S1 Assets are more operationally diverse and likely operate to a manner which meets the needs and business process of individual suppliers – attempting to drive performance to a uniform baseline would therefore be unwarranted.</p> <p>Reporting on S2 Alerts is required as S2 performance still requires improvements and accurate data is necessary to target said improvements. The principles of S2, namely interoperability and interchangeability, as well as their operation via a single shared platform, means that system wide reporting has value which is absent for S1.</p>	
DCC	DCC	Yes	DCC considers the reporting of SMETS1 Service Providers to be an important part of DCCs reporting and therefore consider that this CR should be progressed.	

### Question 3: Should the speed or the success rate of Alerts be measured?

Question 3			
Respondent	Category	Response and rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Unable to answer as this measurement is not covered in the Modification Report to be able to understand the ask. Is the speed meant to be the amount of time from the alert being generated to being provided to the Supplier system? Or to the DCC? What is meant by 'speed of alerts'? Reporting on Alerts (page 8 of the Report) makes no mention on Speed or what this means. Can this question be expanded upon?	<p>The preference around speed and success rate of Alerts were discussed at a Working Group meeting on 8 June 2021 but not in detail. This is summarised on page 20 of the MP122B Modification Report (v0.5).</p> <p>The term “speed” is intended to mean the amount of time from the Alert being generated to the point it gets to the Supplier system or, if the DCC can do so, from the point the Alert reaches the Communications Hub to the Supplier system (the latter showing DCC-only performance).</p>
<b>Western Power Distribution</b>	Network Party	We are interested in both to some extent. We believe that there is an argument that the success rate is more important than the speed, however there should be a limit and expectation on speed so that Users know and understand exactly what the expected service is.	
<b>British Gas</b>	Large Supplier	No, there are no alerts we rely on in our business processes that need to be delivered within TRT	

Question 3			
Respondent	Category	Response and rationale	SECAS Response
<b>Scottish and Southern Electricity Networks</b>	Network Party	<p>As most alerts are successfully delivered to the service user, as a Network Operator, we need to react to the alerts we receive. The speed is very important.</p> <p>However, we would expect the success to be easily measured due to the acknowledgment/handshakes that exists between the systems within the smart metering/DCC ecosystem.</p>	
<b>Utilita Energy</b>	Large Supplier	<p>Anything outside of the expected minimum service level response time is a failure, therefore reporting on the success rate seems adequate. The TRT for alerts is 60s (H3.14(g), noting exclusions in (h)) – there are no business scenarios which would require us to take action within this time frame. Therefore, success (which requires alerts to be delivered within a certain time) seems to be the most important measurement.</p>	
<b>DCC</b>	DCC	DCC considers this to be a User choice, but also consider that both measures could be reported if required.	



## Question 4: Which Alerts do you believe are time critical?

Question 4			
Respondent	Category	Response and rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Without understanding the above question, we are unable to answer this.	SECAS has provided a response to the respondents request for further detail on question 3 of the consultation.
<b>Western Power Distribution</b>	Network Party	We need confirmation that all POA and PRA alerts (including those for polyphase meters, not just AD1, 8F35 and 8F36, are included within the scope of SECMP096.  We believe that extreme voltage alerts should be considered time critical.	SECAS has asked the DCC to confirm the scope of Alerts included within MP096. Once it confirms SECAS will inform the Proposer.
<b>British Gas</b>	Large Supplier	Only alerts that engineers need to receive whilst in a customers' premise are time critical, all others are worked around or ignored by our processes.	
<b>Scottish and Southern Electricity Networks</b>	Network Party	Any alerts that are to do with the supply at a property we feel would be deemed critical. These can be outage and restoration alerts, voltage, tamper, top-up and meter state changes as these can all have an impact on the customer and their supply.	
<b>Utilita Energy</b>	Large Supplier	Anything customer generated would be of most interest to us, as these alerts may be used to assist with active call centre conversations with customers.  <u>DCC Alerts</u>	

Question 4			
Respondent	Category	Response and rationale	SECAS Response
		<p>N56 – SMETS1 Service Provider Provision of prepayment top-up UTRN</p> <p><u>Device Alerts</u></p> <p>0x810E for Credit applied locally or CS01A/CS01b for failures.</p> <p>0x8051 Duplicate UTRN entered</p> <p>0x8057 Supply Interrupted (and phase equivalents)</p> <p>0x805B UTRN exceeds Maximum Credit Threshold</p> <p>0x8061 – 4 UTRN processing issues</p> <p>0x8068 Supply Disabled then Armed – Activate Emergency Credit triggered</p> <p>All Alerts associated with the Install &amp; Commission process are also time critical</p> <p>Any Safety related alerts should also be considered critical</p>	
DCC	DCC	DCC considers this to be a User choice.	

## Question 5: Do you agree that the proposed solution put forward for reporting Category 3, 4 and 5 Incidents will effectively resolve the identified issue?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Yes	This solution makes pragmatic sense.	
Western Power Distribution	Network Party	Yes	We support the suggestion of for the TOC solution for reporting on Category 3, 4 and 5 Incidents.	
British Gas	Large Supplier	Yes – TOC report	All Service Providers and DCC should be using Remedy for managing incidents, which should be regularly monitored and reconciled anyway	
Scottish and Southern Electricity Networks	Network Party	Yes	We agree that the proposed solution will resolve the current identified issues.	
Utilita Energy	Large Supplier	Yes	Validation by Service Providers seems unnecessary for what should be fact-based reporting. We note that this may require the DCC to caveat the data and we are open to the possibility of agreed exclusions on this basis – exclusions could potentially be agreed by OPSG. The data held within the TOC appears to be at sufficient granularity to meet the reporting requirements.	
DCC	DCC	Yes	DCC considers that Remedy System data can report these measures with sufficient accuracy.	

## Question 6: Do you agree with the proposed 18 working day SLA for the DCC to produce the PMR?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	No	Our position has not changed and neither has the SEC in relation to this. The cost is unacceptable so we're being forced to accept a less acceptable option. How going from 18 day to 17 days, for instance, will cost £15M is totally nonsensical. Being this is an existing SEC requirement, stating it will cost many millions to meet it is a strange place to be. The viability of this option seems to lie outside the requirement to be compliant. That is not how viability works.	
<b>Western Power Distribution</b>	Network Party	No	We are not convinced that the costs that have been identified under CR1430 justify the benefit. The delivery time is only being reduced by seven days but the costs are significant. We would like to better understand if this reduced timescale will be of benefit to the SEC Ops group and mean that the reports are reviewed at an earlier meeting, closer to the reporting period.	SECAS has investigated if an 18 working day SLA would make a material difference to the OPSG. Taking September 2021 as an example, if the report was produced 18 working days following the month end, then the PMR would be received on 24 September and not in time for the OPSG reporting meeting paper day on 20 September for the meeting on 27 September. However, if SECAS re-scheduled agendas or meetings then we could accommodate this for the Main

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
				<p>OPSG meeting (5 October, paper day 28 September).</p> <p>However, for October 2021, it would be close if not impossible to support for either the reporting or main meetings as the PMR would be ready on 26 October, the day after the reporting meeting and the paper day of the Main meeting.</p> <p>In summary, SECAS does not believe that an 18-working day PMR SLA would provide a benefit with the current meeting cycle.</p> <p>SECAS will present the DCC's solution to the OPSG for feedback and summarise views from the Refinement Consultation.</p>
<b>British Gas</b>	Large Supplier	Yes	Although disappointing it keeps the reporting within the next calendar month rather than 2 months after reporting period end.	
<b>Scottish and Southern Electricity Networks</b>	Network Party	No	Noting the costs and implementation timescales against the derogation period. We believe that the reduction from 25 working days to 18 working days does not provide enough benefit in relation to the implementation costs.	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy	Large Supplier	Yes	<p>Given the scale of cost involved with shorter reporting periods, we agree that the 18 Working Day SLA is the better option.</p> <p>We would like to know why the CSP C&amp;S contract is not reflective of SEC requirements and why this is the case.</p>	<p>The business requirement for this area is for the DCC to deliver the PMR at a 10-working day SLA. This was recommended under the OMR and carried through to MP122A 'Operational Metrics'. During MP122A, the DCC advised that a 10-working day SLA could not be facilitated. However, the Proposer and the Working Group did not want to drop the requirement. MP122A eventually shortened the PMR SLA within SEC Section H 'DCC Services' from 25 to 10 working days with the DCC and the Working Group knowing that the DCC would need a derogation until a solution could be found. The derogation was granted and MP122B has since been investigating the shortest possible PMR SLA the DCC can achieve with a justified implementation cost.</p>
DCC	DCC	No	<p>Prior to the implementation of SECMP122A, the time allowed for the production of reporting was 25 working days, and it should be clear that the 10 working day timeframe is an amended requirement DCC has not worked to in the past.</p>	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			<p>DCC notes the size and complexity of the data provision and is unsure on the benefits of providing data within 18 working days rather than 25 working days as was the case. While it may be possible to produce data within 18 working days, additional time allowance will allow DCC to fully assure the data so that when provided to industry it is accurate and without error, while also allowing DCC to provide commentary as may be required.</p> <p>CSPN can provide data to allow reporting within 18 days but the cost of that data provision has not been considered in this consultation.</p> <p>Additional time allowance is increasingly important where data reports on areas outside of DCCs control and may require investigation and interrogation to fully explain performance.</p>	

## Question 7: Noting the costs, do you believe CR1423 or the alternative DCC TOC option should be taken forward further and progressed to DCC Impact Assessment?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	How will it cost between one and a half million pounds, to one and three quarters of a million pounds, to report on the status of the CHs where other Mods are delivering the data needed to do this? This again proves that making any changes required to the DSP are so expensive to industry that it is impossible to justify any changes needing to be made. As such, it seems sensible to progress to IA to draw out why this is so expensive and allow Working Group members to fully understand, with Ofgem too, as to the reason this is so expensive. There is no cost of TOC performing an IA listed but we'd still like to understand why reporting on such a critical part of the overall DCC Solution is so high.	
<b>Western Power Distribution</b>	Network Party	-	We believe that it is more appropriate for Suppliers to give their opinion on this question to advise whether the cheaper TOC option is appropriate. We are concerned by the costs involved of the original option.	
<b>British Gas</b>	Large Supplier	-	CR1423 should be taken forward, as the TOC solution does not give the important performance information and DCC will be assessed on the costs via PCR, so will need to keep economic and efficient	

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Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	N/A	-	
Utilita Energy	Large Supplier	DCC TOC Option	Provided the reporting fully meets the original business requirements, the cheaper option is preferable.	
DCC	DCC	See rationale	<p>Progressing the CR is considered to report on DCCs performance most effectively in the areas of User interest. However, DCC is also considerate of the cost saving when utilising TOC data for reporting and believe this should be a User choice.</p> <p>Where TOC or proxy data is used, Users should be mindful of this when either setting targets or where DCC might be held to account for under performance since DCC is not under full control of achieving the target.</p> <p>Where TOC data is to be utilised those measures should not be Code Performance Measures, since this would indicate the performance is specific to DCC but should be included in Performance Indicators. This would provide Users with the same information but under a different, clearer, definition.</p>	

## Question 8: Noting the costs, do you believe CR1440 or the alternative DCC TOC option should be taken forward further and progressed to DCC Impact Assessment?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Yes	This is an OPR item. As such, a full IA is needed to justify the huge costs being presented.	
Western Power Distribution	Network Party	-	We believe that it is more appropriate for Suppliers to give their opinion on this question to advise whether the cheaper TOC option is appropriate. We are concerned by the costs involved of the original option but also note that the TOC option does not actually measure the updates to the devices beyond the CH.	
British Gas	Large Supplier	-	CR1440, as the TOC solution does not give the important performance information, same rationale as question 7	
Scottish and Southern Electricity Networks	Network Party	N/A	-	
Utilita Energy	Large Supplier	No Response	It seems as if Ofgem's input should have been provided before this consultation was issued. We tend towards supporting meeting business requirements, regulatory requirements, and any obvious necessary pragmatic operational requirements at the lowest cost to industry.	Ofgem provided its feedback to SECAS prior to this consultation. It noted the little support for the TOC solution and that it does not meet the OPR requirement for reporting SMETS1 firmware. Ofgem advised that it is keen to understand what

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
				<p>solution is supported by the Working Group under MP122B as ideally it would like to use the same reporting solution for both MP122B and the OPR.</p> <p>As a result, SECAS is seeking industry views on the SMETS1 firmware reporting solutions and will inform Ofgem once views have been collated.</p>
DCC	DCC	See rationale	<p>Progressing the CR is considered to report on DCCs performance most effectively in the areas of User interest. However, DCC is also considerate of the cost saving when utilising TOC data for reporting and believe this should be a User choice.</p> <p>Where TOC or proxy data is used, Users should be mindful of this when either setting targets or where DCC might be held to account for under performance since DCC is not under full control of achieving the target.</p> <p>Where TOC data is to be utilised, those measures should not be Code Performance Measures, since this would indicate the performance is specific to DCC but should be included in Performance Indicators. This would provide Users with the same information but under a different, clearer, definition.</p>	

## Question 9: Which implementation approach do you prefer?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Single implementation approach	Unfortunately, there is very little information provided as to the costs that may be incurred if either approach is adopted. This Mod has already been split out to deliver elements sooner. Doing so again could add further delays and costs, or may be sensible and most cost effective. Is there any details on how this may affect the costs in any way? A single approach is always favourable but may be better to do it in parts.	SECAS accepts it is difficult to provide a preference over the implementation approaches without fully understanding the cost implications.  Once the Proposer and the Working Group agree which solution options to take forward to an Impact Assessment, the Proposed Solution will be clearer. As a result, the number of solution combinations should decrease with SECAS being able to make a clearer recommended implementation approach considering the impacts on the implementation costs.
<b>Western Power Distribution</b>	Network Party	Single implementation approach	We would prefer a single implementation date as this will make the transition from one set of reporting to the new reports easier.	
<b>British Gas</b>	Large Supplier	Phased implementation approach	We need the performance data as soon as possible	

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Single implementation approach	As the PMR is reviewed as a whole, implementing the change requests in a phased approach introduces a risk that the report becomes confusing.	
Utilita Energy	Large Supplier	Single implementation approach	Given that all will be required to support the OPR – bringing them online in a phased approach appears to achieve little other than complicate the process.	
DCC	DCC	Phased implementation approach	<p>DCC considers that providing data as it becomes available will be most beneficial for Users. For efficiency DCC would like to report new or amended performance measures in the PMR as an annex and complete a single PMM consultation detailing the methodology for all new reporting.</p> <p>Implementing in 2023 may require a further derogation from OPR.</p>	

## Question 10: Will there be any impact on your organisation to implement MP122B?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	We will be charged a huge amount to get reporting that should already be in place as per the SEC. As such, we will be paying for things that we shouldn't be. This has impacts, especially due to the costs themselves, that will, inevitably, end up for our end point customers to foot the bill for.	
<b>Western Power Distribution</b>	Network Party	No	In order to implement MP122B there will be no impact to our organisation.	
<b>British Gas</b>	Large Supplier	Yes	Higher workload for performance managers and process owners	
<b>Scottish and Southern Electricity Networks</b>	Network Party	No	-	
<b>Utilita Energy</b>	Large Supplier	No immediate impacts – potential impacts depending	The only impacts would be in monitoring DCC Performance and taking appropriate action. Therefore, the only impacts may be indirectly driven by the results of the new reporting implemented by MP122B.	

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
		on reporting		
<b>DCC</b>	DCC	Yes	<p>There will be impact on DCC regardless of which reporting method is selected. Change Requests and impact assessments will need to be progressed, system changes as required under CRs, changes to reporting will need to be progressed, consultation on amended PMM will need to be completed and new reporting put in place for business-as-usual activities.</p> <p>New measures also have interactions with OPR reporting and will require change to ensure compliance with that regime.</p>	

## Question 11: Will your organisation incur any costs in implementing MP122B?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	£500k-£1m	Based on Market Share and the Costing model – please refer to Section 5 of the Modification Report. It would be helpful to understand exactly how much each SEC Party and / or DCC User will be charged for this.	
<b>Western Power Distribution</b>	Network Party	No costs	There will be no additional costs to implement this further to the central costs.	
<b>British Gas</b>	Large Supplier	Less than £100k	-	
<b>Scottish and Southern Electricity Networks</b>	Network Party	No costs	-	
<b>Utilita Energy</b>	Large Supplier	No	-	
<b>DCC</b>	DCC	Greater than £1m	Dependent on the method of implementation chosen, please see PIA.	



## Question 12: How long from the point of approval would your organisation need to implement MP122B?

Question 12				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	No long	As this is on DCC to provide the reports to us, we will not need to make many, if any, changes our side.	
Western Power Distribution	Network Party	N/A	-	
British Gas	Large Supplier	-	-	
Scottish and Southern Electricity Networks	Network Party	N/A	-	
Utilita Energy	Large Supplier	N/A	-	
DCC	DCC	See detail in DCCs PIAs	See detail contained in PIAs, to be refined with further PA. DCC will also need to complete PMM consultation to agree final reporting methodology, including SEC Panel approval, which could take a number of months to develop and finalise.	

## Question 13: Do you believe that MP122B would better facilitate the General SEC Objectives?

Question 13				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	It will allow DCC to be more compliant with the SEC than they are today as called out in the Modification Report.	
<b>Western Power Distribution</b>	Network Party	Yes	We believe the intent of this modification would better facilitate SEC Objectives (b) and (g) for the reasons detailed in the Modification Report.	
<b>British Gas</b>	Large Supplier	Yes	We agree with the proposer's assessment	
<b>Scottish and Southern Electricity Networks</b>	Network Party	Yes	SSEN agree that this modification will better facilitate SEC Objectives (b) & (g) as described in the modification report.	
<b>Utilita Energy</b>	Large Supplier	Yes	[as posed]	
<b>DCC</b>	DCC	Yes, where measures are targeted appropriately and where time available allows the	<p>DCC considers that the aim of the modifications has been to enhance SEC Objective G - to facilitate the efficient and transparent administration and implementation of this Code.</p> <p>However, this will only be achieved where the required reporting is specific to DCCs performance and does not include Service User performance, and where DCC is not asked to report on industry wide performance. Where</p>	

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Question 13				
Respondent	Category	Response	Rationale	SECAS Response
		production of quality data	<p>measures report on end-to-end performance the performance of individual aspects of the ecosystem may become less transparent.</p> <p>Furthermore, the decreased timeframe available to produce the PMR puts data quality and narrative accuracy at risk, and therefore increases the risk that inaccurate information is presented.</p>	

## Question 14: Do you believe there will be any impacts on or benefits to consumers if MP122B is implemented?

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	All changes that come with costs this high will impact consumers.	
<b>Western Power Distribution</b>	Network Party	No	We don't believe there will be any direct benefit to consumers however we appreciate that a better understanding of the systems and being able to appropriately monitor performance will ensure that consumers get the service that is expected from smart metering.	
<b>British Gas</b>	Large Supplier	Yes	Quicker response from the DCC and Service Providers for performance issues that are currently opaque to the industry, except where raised by individual DCC Users	
<b>Scottish and Southern Electricity Networks</b>	Network Party	No	-	
<b>Utilita Energy</b>	Large Supplier	No immediate impacts – potential impacts	Drives DCC improvements as issues can be identified and makes reporting against the PMR possible.	

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
		depending on reporting		
<b>DCC</b>	DCC	Yes, but with clarifications / changes	DCC considers that the change to reporting can benefit Service Users in providing additional clarity on DCCs performance, but only where Measures are fully understood and reporting can be completed robustly. The amendments to performance measures may be beneficial to consumers where changes and improvements can be implemented by DCC and Service Users to improve performance.	

## Question 15: Noting the potential costs and benefits of this modification, do you believe MP122B should continue to be progressed?

Question 15				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	Unfortunately, huge costs aside, the ability to have this reporting is needed and aligned to the Ofgem OPR regimes that should already be in place. These measures are all to that end.	
<b>Western Power Distribution</b>	Network Party	Yes	We believe that some more progress can be made to better understand if the TOC solutions are appropriate and also as per our response to Question 1 we believe that there could be some more work around investigation the alert proxy that has been proposed.	
<b>British Gas</b>	Large Supplier	Yes	-	
<b>Scottish and Southern Electricity Networks</b>	Network Party	Yes	As noted in this consultation response, there are key improvements and benefits to be gained from implementing change requests proposed through MP122B.	
<b>Utilita Energy</b>	Large Supplier	Yes – dependent upon which options	TOC options appear far more cost effective and quicker to implement	

Question 15				
Respondent	Category	Response	Rationale	SECAS Response
		are chosen		
DCC	DCC	NA	DCC considers this to be a User choice.	

## Question 16: Please provide any further comments you may have.

Question 16			
Respondent	Category	Comments	SECAS Response
OVO Energy	Large Supplier	Hopefully some more clarity can be obtained once the IA phase is completed, and some of the costs either be reduced considerably or justified to all of our satisfaction.	
Western Power Distribution	Network Party	-	
British Gas	Large Supplier	-	
Scottish and Southern Electricity Networks	Network Party	N/A	
Utilita Energy	Large Supplier	<p>End-to-End performance is the most important measurement. If reporting is provided to improve performance, this should be made explicit. If the end-to-end process is outside of the control of one party, then payments should not be contingent upon such a measurement. If reporting is provided for the sake of justifying payments, this should be made clear and provided entirely separately to any other reporting.</p> <p>Clear separation of the two categories will assist both the DCC and its service providers, as well as Suppliers seeking to drive performance improvements.</p>	



Question 16			
Respondent	Category	Comments	SECAS Response
DCC	DCC	<p>DCC supports the ongoing work to review reported performance measures.</p> <p>Progressing the CR is considered to report on DCCs performance most effectively in the areas of User interest. However, DCC is also considerate of the cost saving when utilising TOC data for reporting and believe this should be a User choice.</p> <p>Where TOC or proxy data is used, Users should be mindful of this when either setting targets or where DCC might be held to account for under performance since DCC is not under full control of achieving the target.</p> <p>DCC considers that where CRs are not progressed and TOC data is to be utilised that those measures should not be Code Performance Measures, since this would indicate the performance is specific to DCC but should be included in Performance Indicators. This would provide Users with the same information but under a different, clearer, definition.</p>	<p>SECAS notes the DCC's comments on the use of TOC data and a proxy for measuring Alerts. Specifically, these comments relate to reporting on Alerts, Communication Hub firmware and SMETS1 Device firmware. If the DCC cannot be held accountable for it's performance in these areas using TOC data or a proxy, the validity of Code Performance Measures 3, 6B and 6C will need to be assessed.</p>