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MP176 ‘Customer Analytics Reporting’

Annex E

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP176 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We agree that the reporting will help provide details to Users about industry performance in the same area to enable investigations where required.	-
Electricity North West Limited	Network Party	Yes	<p>We agree with the solution to improve reporting of the DCC and other SEC Parties' performance for Devices connected to our electricity distribution network.</p> <p>The DCC are currently providing Electricity Distributor with Alert reporting metrics which are not currently codified in the SEC. We would welcome a new requirement for the DCC to provide the following reports to ENWL individually (and against the industry average using anonymised data for other Parties);</p> <ul style="list-style-type: none"> • Inventory reporting • Alert reporting <p>We recommend that any refinement of the Alert reporting under SEC Modification MP176 is reflective of the final conclusions and legal text regarding SEC Modification MP096 'DNO Power Outage Alerts'. For example, the Alert reporting should include and be set against the new performance targets (e.g. split by technology) for Power</p>	SECAS will ensure the implications of MP096 are considered in the MP176 reporting contents and liaise with the DCC to align the two approaches.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Outage Alerts and Power Restoration Alerts being developed under MP096.</p> <p>We see the benefit of this reporting not to enable the assessing of our own performance but rather to improve DCC performance in the provision of their services to us a User.</p>	
EDF	Large Supplier	Yes	It is important that the DCC can report against its key metrics at User Level	-
Utilita Energy Limited	Large Supplier	Yes	The reporting suite should assist Users in diagnosing factors which impede their performance.	-

Question 2: Do you agree that the legal text will deliver MP176?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	-	-
Electricity North West Limited	Network Party	Yes	As per our response to Q1 the benefit of this reporting is not to enable the assessment of our own performance. Neither the Inventory nor Alert reporting are performance metrics delivered by the Electricity Distributors.	-
EDF	Large Supplier	Yes	The legal text appears to be appropriate	-
Utilita Energy Limited	Large Supplier	Yes	No comments on legal text.	-

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	-	-
Electricity North West Limited	Network Party	Yes	-	-
EDF	Large Supplier	Yes	-	-
Utilita Energy Limited	Large Supplier	Yes	We would like to see this modification implemented in the most time and cost-efficient manner.	-

Question 4: Will there be any impact on your organisation to implement MP176?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We will be able to see our performance compared to our peers and potentially makes changes if required to enhance our experiences.	-
Electricity North West Limited	Network Party	Yes	See our response to Q1 - the provision of the reporting to Electricity Distributors does not enable the assessment of our own performance but rather will improve DCC performance in the provision of their services to us as a User. This in turn will enable us to more effectively manage and plan our internal business systems.	-
EDF	Large Supplier	No	Not directly, however change may be appropriate once the reports have been studied.	-
Utilita Energy Limited	Large Supplier	No	No immediate impacts. Post-Implementation, these reports could identify issues which may require resource to investigate and resolve. Systemic issues may also be identified, which are not the responsibility of the recipient to resolve.	-

Question 5: Will your organisation incur any costs in implementing MP176?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No costs	-	-
Electricity North West Limited	Network Party	No costs	-	-
EDF	Large Supplier	Less than £100k	The reports will need to be reviewed and appropriate actions taken but this is not required unless we choose to.	-
Utilita Energy Limited	Large Supplier	No	There will be no direct costs because of the implementation of the reports. It is possible this modification could lead to costs being incurred. The modification may identify issues that require resource to analyse. Without identification of what issues may be at this point, it is difficult to quantify the potential costs that could arise.	-

Question 6: Do you believe that MP176 would better facilitate the General SEC Objectives?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We believe that this modification will better facilitate SEC Objective (a) for the reasons stated in the Modification Report.	-
Electricity North West Limited	Network Party	Yes	This modification will better facilitate SEC Objective (a) by allowing Parties to identify potential shortcomings in the DCC and other SEC Parties' business processes.	-
EDF	Large Supplier	Yes	SEC Objective (a) by highlighting potential improvements in business processes.	-
Utilita Energy Limited	Large Supplier	Yes	SEC Objective (a) – identification of performance issues could lead to remedial action. This could improve the installation and operation of Smart Metering Systems.	-

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP176 is implemented?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	There is the potential that improvements can be made to enhance performance of the smart service that is provided to consumers.	-
Electricity North West Limited	Network Party	Yes	If we receive better reporting from the DCC on their Alert services it enables us to better plan for our services to customers during power outage and power restoration.	-
EDF	Large Supplier	Yes	Through improvements highlighted by the reports	-
Utilita Energy Limited	Large Supplier	Yes	If the reports identify issues which are subsequently addressed amongst the key business processes, consumer experience could be improved as a result.	-

Question 8: Noting the costs and benefits of this modification, do you believe MP176 should be approved?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	-	-
Electricity North West Limited	Network Party	Yes	See our response to Q1.	-
EDF	Large Supplier	Yes	-	-
Utilita Energy Limited	Large Supplier	Yes	-	-

Question 9: Is there any information you would like to see in the Customer Analytics Reporting guidance document that is not already included?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No	-	-
Electricity North West Limited	Network Party	Yes	See our response to Q1 and Q3. Any guidance needs to account for the final MP096 proposals which should be implemented before MP176.	SECAS will ensure the implications of MP096 are considered in the MP176 reporting contents and liaise with the DCC to align the two approaches.
EDF	Large Supplier	No	-	-
Utilita Energy Limited	Large Supplier	No	-	-

Question 10: Do you agree with the reporting change process outlined in the Customer Analytics Reporting guidance document?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	-	-
Electricity North West Limited	Network Party	-	-	-
EDF	Large Supplier	Yes	-	-
Utilita Energy Limited	Large Supplier	No	We approve of the steps required to initiate change requests and the consultation process. However, any change to the reporting which comes at cost must be approved by those Users who fund the system. This should be reflected in the change process.	SECAS will address this concern with the Proposer and discuss the potential approaches and their rationale with the Working Group. The outcomes of all discussions will be captured in the Modification Report.

Question 11: Do you agree with the decision to implement changes to the reporting suite being made through consultation with the affected DCC Customers?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	-	-
Electricity North West Limited	Network Party	Yes	See our response to Q1.	-
EDF	Large Supplier	Yes	-	-
Utilita Energy Limited	Large Supplier	No	As per response to Q10 – we approve of the consultation process, but ultimately final approval of any change which comes at cost should be decided upon by those who fund the system. This should be reflected in the change process.	SECAS will address this concern with the Proposer and discuss the potential approaches and their rationale with the Working Group. The outcomes of all discussions will be captured in the Modification Report.

Question 12: Please provide any further comments you may have.

Question 12			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	<p>We wonder, as a result of this modification, whether current DCC reporting needs to be reviewed and compared. For example, there are various reports available either via the SSI or published to SharePoint, including inventory reports, however the first Business Requirement is to provide an inventory report to users. We want to ensure that there is no duplication of effort. It might be that some existing reporting could be withdrawn.</p> <p>We still don't understand exactly what differences are between the current DNO POA/PRA reporting and the reporting proposed here. Is this modification expanding on the current reporting or proposing duplicated reporting?</p>	SECAS will discuss these concerns with the DCC to ensure Parties are not receiving duplicated reporting.
Electricity North West Limited	Network Party	The DCC costs for implementing both MP176 and MP096 should avoid any double counting regarding Alert reporting.	SECAS will ensure the implications of MP096 are considered in the MP176 reporting contents and liaise with the DCC to align the two approaches.
EDF	Large Supplier	No further comments.	-
Utilita Energy Limited	Large Supplier	No further comments.	-