

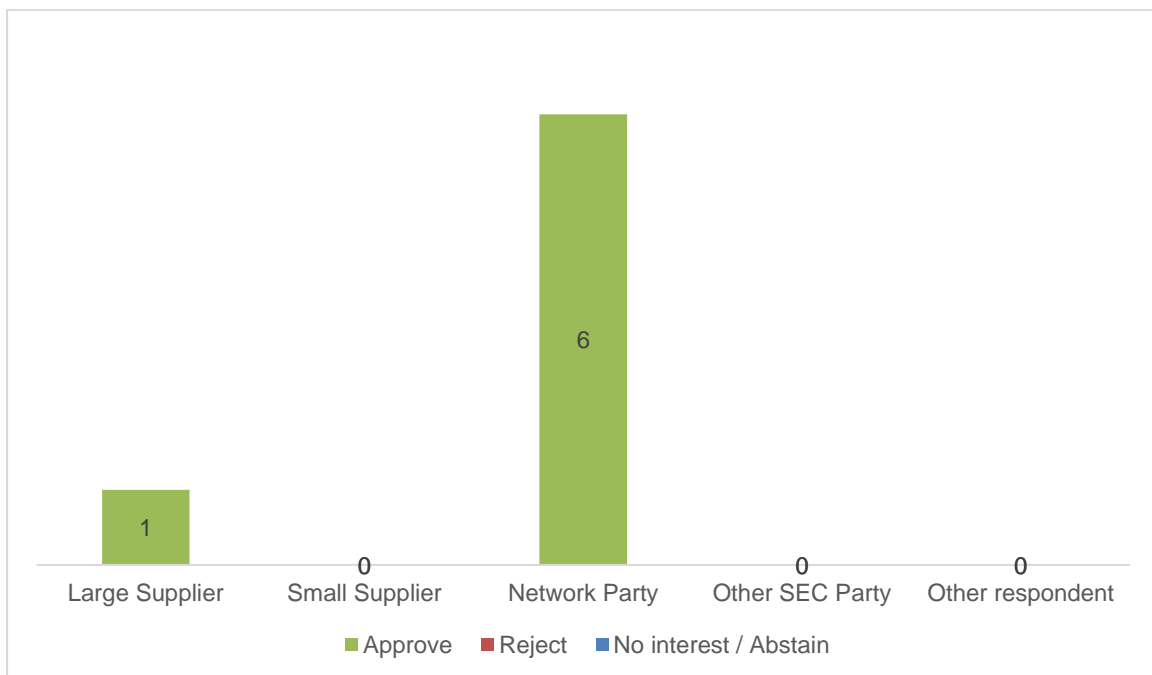
This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

# MP096 ‘DNO Power Outage Alerts’ Modification Report Consultation responses

## About this document

This document contains the full collated responses received to the MP096 Modification Report Consultation.

## Summary of responses



## Question 1: Do you believe that MP096 should be approved?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Approve	We believe that this modification should be approved as it will better facilitate SEC Objective (b) by allowing DCC to be compliant, and SEC Objective (g) as Parties will understand exactly what level of service they will receive in relation to Power Outage and Power Restoration Alerts.	-
Electricity North West Limited	Network Party	Approve	<p>A solution is required as this issue has existed since go live and with the increasing number of smart meters being installed onto the network this issue is becoming more compounded. We are impacted as an Electricity Network Operator, as the current service we receive, is not the service set out in the original design for receiving alerts within 60 seconds and towards which we had planned our systems.</p> <p>We have worked extensively with the DCC, SECAS and other DNOs over multiple meetings to refine the main legal text, the accompanying new POA PRA Delivery Management Document and the DCC Performance Measurement Methodology.</p> <p>We will now need to re plan our systems to understand what benefits can be realised based on our receiving alerts (from the current Long- Range Radio technology) within 4 mins 31 seconds (95<sup>th</sup> percentile performance) for</p>	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Power Outage Alerts (POA) and within 5 minutes 34 seconds for Power Restoration Alerts (PRA) over the next 12 month period.</p> <p>We will participate in an annual review of the alert performance targets and the exclusions list with the DCC and other DNOs as set out in the new delivery management document.</p>	
<b>Scottish and Southern Electricity Networks</b>	Network Party	Approve	<p>Through recent collaboration with the DCC, we feel that the modification is now in a position whereby it can be approved. We believe that the legal text and supporting documentation, which includes new targets and a suitable ongoing review process, should be approved. We would like to recognise the collaborative work between SECAS, DCC and DNO's to ensure the final documentation is fit for purpose and the new performance metrics proposed have a robust methodology behind them.</p> <p>We would also like to recognise that although we feel that this modification is now in a position where it can be approved. Due to the rejected improvement costs previously identified through the modification process to improve the target response times, this modification will not reduce or resolve the current DCC non-compliance relating to power outage and restoration alerts being received by users within sixty seconds. This modification seeks only to align the SEC with current DCC</p>	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			performance. The benefits to consumers previously anticipated through outage and restoration alerts being received within sixty seconds, now cannot be realised.	
<b>Scottish Power Energy Networks</b>	Network Party	Approve	<p>We agree that changing the SEC to reflect the current performance of the CSPs infrastructure will address the DCC's current non-compliance with the SEC. The solution doesn't address the underlying issue of the poor performance of the POA and PRA delivery relative to the current SEC obligation; however we recognise that the costs of changing the infrastructure to comply with the current SEC requirements would be disproportionate to the benefits that could be delivered to consumers. As the proposal does not relate to increasing the capability of the DCC system to comply with the current SEC requirements, we would like to reiterate that the proposed solution delivers no benefits to SPEN nor our customers and hence we will not be able to deliver all the power outage related smart meter benefits previously expected.</p> <p>We will participate in an annual review of the alert performance targets and the exclusions list with the DCC and other DNOs as set out in the new delivery management document.</p>	-
<b>E.ON</b>	Large Supplier	Approve	No cost impact on suppliers of this implementation, and it supports the DNO use cases for Smart Metering.	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
<b>UK POWER NETWORKS</b>	Network Party	Approve	<p>We believe that MP096 should be approved because the proposed modification will better facilitate the:</p> <ul style="list-style-type: none"> <li>• General SEC Objective “b” as the proposed change to the SEC will bring DCC into compliance to meet its obligations stemming from the licence conditions, and</li> <li>• General SEC Objective “g” as the proposed change to the SEC will enable DCC to will deliver a consistent and agreed service level to the DNOs in alignment with modified obligations under the SEC.</li> </ul>	
<b>Northern Powergrid</b>	Network Party	Approve	<p>We agree that changing the SEC to reflect the current performance of the CSP’s infrastructure will address the DCC’s current non-compliance with the SEC. The solution doesn’t address the underlying issue of the poor performance of the POA and PRA delivery relative to the current SEC obligation, however we recognise that the costs of changing the infrastructure to comply with the current SEC requirements would be disproportionate to the benefits that could be delivered to consumers. As the proposal does not relate to increasing the capability of the DCC system to comply with the current SEC requirements, we would like to reiterate that the proposed solution delivers no benefits to Northern Powergrid nor our customers (other than provisions to manage future performance deterioration) and hence we will not be able</p>	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>to deliver all the power outage related smart meter benefits previously expected.</p> <p>We would like to recognise work carried out by DCC and SECAS to increase the transparency of the POA and PRA issue and we agree that the introduction of the new Target Response Times proposed should help preserve the existing DCC POA and PRA delivery performance and/or identify where the performance is deteriorating over time.</p>	

## Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	<p>We have been left frustrated by the challenges faced in the progression of this modification since it was raised in 2019, following a few years of work prior to that. WPD have regularly engaged and tried to assist the DCC and SECAS wherever possible throughout the process, despite often being given documentation to review in challenging timescales, and comments not being addressed in a timely manner.</p> <p>We will continue to engage going forward, and assist with the reviews of the Power Outage and Restoration Alerts Delivery Management Document.</p> <p>We also have the following comments on the documentation:</p> <p><i>Legal Text</i></p> <p>H13.5B states that the Panel shall establish a document (known as the DCC Performance Indicators Document) and this may include ‘performance against the times set out in the DCC’s Power Outage and Restoration Alerts Delivery Management Document’ however, this document has not been included within the Modification Report pack, nor is there any evidence that it has been updated. The Performance Measurement Methodology document has been updated to include a section relating to Performance Indicators, however, we believe that this really sits within the ‘DCC Performance Indicators Document’ as the</p>	<p>Thank you for drawing our attention to the DCC Performance Indicators Document. The DCC shall identify the necessary changes and issue an amended document as part of this modification’s implementation.</p>

Managed by

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>actual Performance Measure isn't being amended, and therefore updating the Performance Measurement Methodology isn't appropriate as Performance Measures and Performance Indicators are different.</p> <p><i>Power Outage and Restoration Alerts Delivery Management Document</i></p> <p>Section 1 and 1.1.2 – There are hyperlinks to the Power Outage and Power Restoration Alert Technical Enhancement Paper that need better links. The link provided goes to the Modification page of the SECAS website where the document is given a different name and is not easily identifiable. We would expect the technical paper to be published alongside the Power Outage and Restoration Alerts Delivery Management Document.</p> <p>Section 3, Table 6 – there is a reference to 'Power Interruption Data reports' and we believe it would be beneficial to reference the DCC 'code' which we believe is PWO101NU, for clarity in the future.</p> <p>Section 4.2 – It states 'Performance Metric Measurement (PMM) which is incorrect as PMM stands for Performance Measurement Methodology. This section also states 'Please see the PMM for the new inserted text referencing the new Performance Indicators.' Please see our comments under '<i>Legal Text</i>' as we don't believe this is appropriate.</p>	

Question 2			
Respondent	Category	Comments	SECAS Response
		Once this modification is approved, Electricity Network Operators will have to re-evaluate their potential use of outage and restoration alerts to see what, if any, benefits they will now be able to provide to consumers.	
<b>Electricity North West Limited</b>	Network Party	<p>We have the following further comments linked to other SEC modifications:</p> <ol style="list-style-type: none"> <li>1) The modification report accompanying this consultation makes reference on page 7 and 15 to the constraints on the SMETS2 network for the CSP North as it utilises long-range radio technology which has a narrow band with. Consequently, performance is impacted by the volume of commissioned ESME and that during an outage event, the common radio channel used by Communications Hubs can become saturated. It also states that the DCC Network Evolution Programme (NEP) would only offer significant improvements to the South and Central CSP regions serviced by cellular technology. We have raised our concerns that implementation of the proposed SEC modification MP162 'SEC changes required to deliver MHHS' will result in further degradation of CSP North network performance. The response we received from SECAS that whilst our concerns were outside the scope of MP162 they "...agree that this needs to be resolved.". We would welcome the DCC and SECAS committing to working with DNOs operating in the North to resolve this issue long term and for a Network Evolution Programme to expand its scope and include the North. We will be raising similar comments in our response to the live MP162 consultation.</li> <li>2) In our response to the recent SEC Modification MP186 'Section D review (2020) enhancements' refinement consultation we stated that Ofgem has specifically asked the</li> </ol>	It is deemed that an end-to-end review of DCC Systems is outside of the MP162 scope and this activity falls under DCC business as usual processes.

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>DCC to improve their stakeholder/user engagement as part of the annual Ofgem price control reviews. Examples, where the DCC could have improved upon their SEC party feedback is regarding issues raised by DNOs during the MP096 refinement and the impact of the proposed solutions on DNO systems. This would have improved transparency and efficiency of the modification refinement process. We are seeking for this process to be more clearly defined and codified. We were disappointed that the SECAS response stated, if “... <i>the CSC feels the DCC has not adequately addressed industry concerns, it can send the report back for further work in the Refinement Process.</i>” We believe unnecessary time and resource was wasted during the refinement of P096. We do not believe it should be the role of the CSC (or its members and in this case the Electricity Network Party category who were delegated powers to approve the legal text) to remind the DCC to address industry concerns and provide notice and adequate timescale for refinement. We will be raising similar concerns in our response to the live MP186 modification consultation.</p>	
<b>Scottish and Southern Electricity Networks</b>	Network Party	No comment.	-
<b>Scottish Power Energy Networks</b>	Network Party	We are frustrated that it has took this length of time to come to a conclusion that has no benefits to our customers and does not provide performance improvements to the POA and PRA solution. SPEN have continually engaged with the DCC over the years to improve the	-

Question 2			
Respondent	Category	Comments	SECAS Response
		performance and we will continue to do so in the hope we can see improvements in this area.	
<b>E.ON</b>	Large Supplier	No comment.	-
<b>UK POWER NETWORKS</b>	Network Party	<p>We support the proposed modification that will enable the DCC to meet its objectives under the modified SEC obligations, however this will not improve the underlying performance of the DCC system upon which Network Parties have based their original benefits forecasts to be delivered to customers that were declared to Ofgem in their RIIO-ED1 submissions.</p> <p>Once this modification is implemented, Network Parties will be required to re-evaluate the original forecast of benefits to customers based on the lower performance levels required of the DCC in respect of power outage and power restore alert timings.</p> <p>We have worked closely with the DCC in conjunction with other Network Parties to assist the DCC with publishing their “Power Outage &amp; Restoration Alert Delivery Management Document” drawing-to-a-close the long-standing issue of the DCC non-compliance with POA/PRA delivery performance based on the current SEC standard.</p> <p>We recognise the collaboration of the DCC working with Network Parties to resolve some of the issues/concerns that had been raised, although not all elements are fully resolved. The implementation by the DCC of an Annual Performance Review of their system and to establish revised annual performance metrics is welcomed. This</p>	-

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>together with quarterly reviews should enable DCC to remain focussed on the delivery of POA/PRA performance.</p> <p>In addition, the modification document reviewed the performance of CSPs based on their technology type and stated that when 4G Communications Hubs are built, they will need to meet the 60-second performance requirement of the current SEC standard.</p>	
<b>Northern Powergrid</b>	Network Party	<p>We are somewhat disappointed that, despite the concerted efforts of DNOs to help the DCC develop a high quality Power Outage &amp; Restoration Alert Delivery Management Document, the version of the document included in the consultation pack still includes a number of errors. We have attached a marked up version of this document for your review.</p> <p>We were also confused by the reference to Round Trip Time (RTT) in section 11.1 of the updated DCC Performance Measurement Methodology. RTT is defined as being the time taken from the transmission of the outgoing communication to the receipt of the response communication, and this doesn't seem to be relevant for alerts.</p>	<p>Thank you for providing further comments on the DCC Power Outage &amp; Restoration Alert Delivery Management Document. DCC shall make the necessary changes ahead of the Change Board meeting on 27 July 2022.</p>