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MP122B ‘Operational Metrics – Part 2’ Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to **approve** MP122B. It believed the modification better facilitated SEC Objectives (b)¹ and (g)².

Modification Report Consultation

SECAS received four responses to the Modification Report Consultation. Two respondents believed that the modification should be approved and two believed it should be rejected.

¹ Enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence.

² Facilitate the efficient and transparent administration and implementation of this Code.

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Modification Report Consultation responses

Summary of responses

The two respondents (both Large Suppliers) who believed that the modification should be approved felt that this modification better facilitated SEC Objectives (b) and (g), although one of these respondents noted that they did not understand why the costs should be as high as they were.

One of the two respondents who believed the modification should be rejected (a Large Supplier) noted that while they supported the changes MP122B intended to implement the costs to deliver the modification were too high. The other respondent (also a Large Supplier) also cited high costs as a reason for rejection, as the decreased timeline for delivering reporting had been removed from the scope of the modification.

One of the two respondents who believed the modification should be rejected suggested there is potential for other Data Communications Company (DCC) Service Providers to offer communication services as standard in future which cover the scope of the modification and noted that this would significantly erode the benefits case. The DCC advised the relevant Service Provider contract is in place until 2028 with a potential extension of five years, and therefore the service changes necessary to implement the intent of MP122B cannot be guaranteed during this time.

Change Board vote

Change Board vote

The Change Board voted to **approve** MP122B under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	3	0	1	Approve
Small Suppliers	2	0	0	Approve
Network Parties	2	0	1	Approve
Other SEC Parties	2	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

The Large Supplier abstention was due to the member being unable to reach a satisfactory decision. The Network Party abstention was due to the member feeling that they lacked the requisite expertise in this area to provide a decisive view.

Views against the General SEC Objectives

Objective (b)

The majority of the Change Board believed that MP122B will better facilitate SEC Objective (b) as without the enhancements delivered by the modification the DCC is unable to fully report on the performance of its Service Providers.

Objective (g)

The majority of the Change Board believed that MP122B will better facilitate SEC Objective (g) by providing relevant reporting which details what is happening with the DCC Systems and performance. It will also highlight any anomalies that might require addressing.

Change Board discussions

A Change Board member queried whether the DCC change for reporting on Incident Categories 3, 4 and 5 had a reference number so that its delivery can be tracked. The DCC representative advised they would provide further information to the member once they had discussed internally.

A Change Board member queried whether the newly formed Performance Measurement Review Group (PMRG) would be looking at ways to introduce these changes if MP122B was not approved, and whether that might provide a cheaper solution to the identified shortfalls in reporting. SECAS agreed to provide feedback on the remit of the PMRG, and after the meeting advised the member that the group will be conducting a wider review of the DCC's Performance Measurement Report (PMR) and assessing if there are elements which are no longer of use or could be improved. This assessment may result in further recommendations and ultimately in separate modifications if necessary, however these would have different scopes to MP122B.

The Proposer noted that while the costs to deliver the MP122B solution are high, without the change industry cannot hold the DCC accountable for their performance and their Service Providers' performance.