

Utilita Response

Consultation: Proposed changes to DCC's Implementation Milestones

1. What are your views on the proposed recovery mechanism and the alternative approach set out above? Please provide rationale for your response.

Utilita disagrees with the alternative approach regarding recovery mechanisms set out within the implementation milestones consultation.

We strongly believe that this service needs to be robust and viable on an enduring basis and view the provisions provided as trying to condense the timeline and ensure ILO targets are met regardless of quality concerns.

The alternative approach of increasing incentives, 'which would create a 'backstop' for contingency of October 2016', would also represent the same level of risk and provide no assurances to the effectiveness of DCC at Initial Live Operations (ILO).

2. Do you agree with the proposal for the recovery of IM4, IM5, IM6 and IM7, where the Time Factor was greater than 0, to be proportionate to the tapering of the proposed IM10? Please provide rationale for your response.

Utilita disagrees with the proposal for the recovery of IM4 to IM7.

Our main concerns are around the compression of testing that will result in the rigor being reduced, this will lead to greater risk for a smaller supplier such as ourselves.

While we can understand the rationale of incentivising the initial operations services to ensure they are released in line with the 'go-live' we can only support this to the extent it does not adversely affect the quality of the service at 'go-live' operations. Furthermore, we are sceptical major issues requiring significant work would be actioned if out of scope.

3. Do you agree with the proposal for incentivising readiness for the start of Systems Integration Testing? Please provide rationale for your response.

Utilita broadly agrees with the proposal for incentivising readiness for the start of Systems Integration Testing

We support this as long as the testing process is robust and all parties have met the entry criteria demonstrated via the quality gate review process, this will provide confidence within the DCC service.

4. Do you agree with the proposal for incentivising the readiness for the start of Interface Testing? Please provide rationale for your response.

Utilita disagrees with the proposal for incentivising the readiness for the start of Interface Testing.

Our main concerns are around the compression of testing time that will result in the rigor being reduced. This will lead to greater risk for a small supplier.

SIT and IT (Interface Testing) will overlap meaning for a small supplier with constrained resources this will require more resource reallocated from business as usual operations as we do not have

dedicated testing teams. Clearly favouring larger suppliers and providing a commercial advantage to them.

5. Do you agree with the proposal for incentivising the readiness for live Enrolment and Communication Services? Please provide rationale for your response.

Utilita disagrees with this proposal for incentivising the readiness for live enrolment and communication services

Our rationale for disagreeing is that the splitting of regions will result in some regions being further ahead than others, as this could potentially result in a less robust service increasing the level of risk.

The backstop of 1st October appears to be attempting to enable the DCC additional time to complete actions without the same effect on the proposed incentive; this does not provide much confidence in the ability of the implementation milestones being provided on time.

While we agree that some importance should be placed on the 'go-live' milestone we do believe that this needs to be considered in line with creating an enduring service that improves upon suppliers own existing provisions.

6. Do you agree with the proposal for incentivising implementation beyond live Enrolment and Communication Services? Please provide rationale for your response.

Utilita disagrees with the proposal to apply constraints to the provisions in initial live enrolment and communication services.

We disagree with the proposal due to the risk of ILO without completing the initial DCC stabilisation up until 6 months later. While we would appreciate the DCC working with users to stabilise systems and processes in a timely manner, this should be happening along with robust testing to ensure it performs on an enduring basis before proposed IM10 (DCC live).

Further details of the operation performance regime would be appreciated, as the proposed IM11 currently proposed at 5% is relatively low to drive the performance of the DCC in this period, creating additional concern at the robustness of this stage.

7. What are your views on the proposal for the proposed IM11 to be sub-divided by two region categories and the alternative approach set out above? Please provide rationale for your response.

Utilita disagrees with the proposal to subdivide into two region categories to remove constraints as soon as possible within each region.

We would support the alternative approach of IM11 being set at a national level, further details would be required relating to exactly what this would contain.

The removal of constraints are broadly supported as long as they stabilise operations for users, reducing risk

8. Do you agree with the proposal to remove the current IM14? Please provide rationale for your response.

Utilita disagrees with the proposal to remove IM14.

Our rationale for the disagreement is based on Utilita considering this critically important for removing risk, we would contend IM14 is required to ensure a robust and effective service at ILO.

9. Do you agree with the proposal to introduce recognition of external dependencies, and their proposed treatment, in Schedule 3 of the Licence? Please provide rationale for your response.

Utilita agrees with the proposal to introduce recognition of external dependencies and the inclusion with schedule 3 of the licence (Implementation performance regime)

The reason we would not support their inclusion within each of the IM criteria is due to the governance arrangement around this requiring significant updates in line with each new external dependency.

10. Do you agree with the overall proposal to amend the Implementation Milestones? Please provide rationale for your response.

Utilita does not agree with the overall proposal to amend the implementation milestones, our rationale for this view is included below.

We strongly believe that this service needs to be robust and viable on an enduring basis, for this reason, the introduction of less stringent testing and the removal of stages such as User Integration testing to meet implementation milestones is contradictory to this aim in our opinion.

Our main concerns are around the compression of testing that will result in the rigor being reduced this will lead to greater risk for a small supplier such as ourselves.

SIT and IT (Interface Testing) will overlap meaning for a small supplier with constrained resources this will require more resource reallocated from business as usual operations as we do not have dedicated testing teams. Clearly favouring larger suppliers and providing a commercial advantage to them.

Dividing of each individual region may result in one of the 3 regions being unable to continue as other regions move further ahead, as both regions are required for initial live operations (ILO)

IM11's removal is also of a concern as this is removing the Users Interface Testing opportunity to ensure the compatibility with systems and ensure a robust and viable solution on an enduring basis.

The proposal to remove furthermore seeks to replace IM11 with a stage called DCC stabilisation for 5/6 months after ILO.

While we can understand the rationale of incentivising the initial operations services to ensure they are released in line with the 'go-live' we can only support this to the extent it does not adversely affect the quality of the service at go live operations. Furthermore, we are sceptical major issues requiring longer than months would be actioned if out of scope.

IM13 in order to gain confidence within the DCC vigorous testing will be required, as without this we cannot be certain of the stability and it's interactions within our own systems. We support a move to ensuring stabilised operations for users but the removal of constraints should not include testing, while favouring completion of milestone to ensure receipt of financial incentives.

Lastly the removal of IM14: Completion of User Integration Testing/ end to end testing, Utilita considers this critically important for removing risk, as a Small supplier we would contend IM14 is required to ensure a robust and effective service at ILO.