

Consultation

Improving Smart DCC Engagement with Customers and Stakeholders

Consultation opens: 3 December 2018
Consultation closes: 31 January 2019

Date: 3 December 2018

Classification: DCC Public

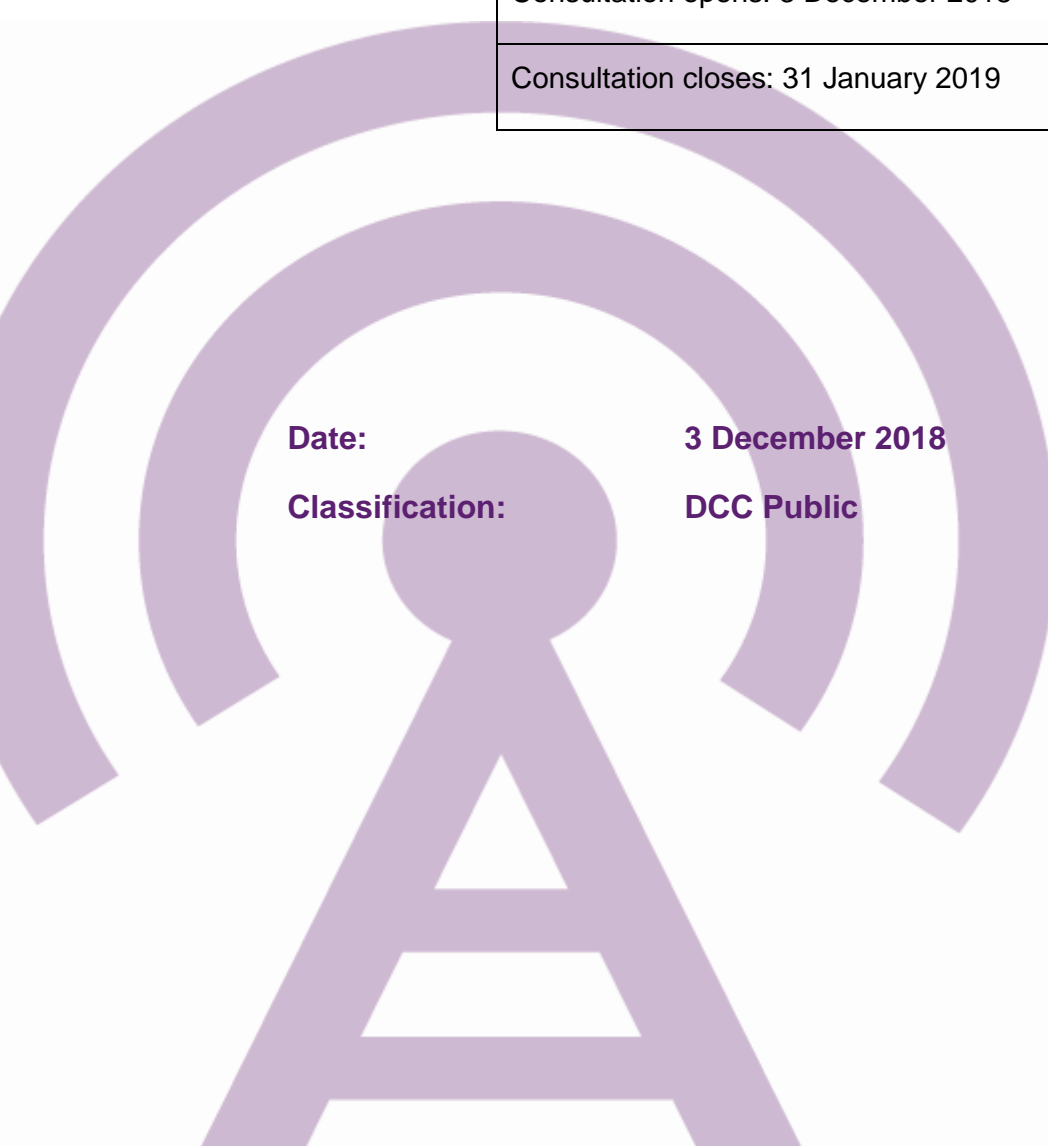


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1 Introduction

Background

Over the last five years, much of Smart DCC's activity has, in effect, been mandated by Government and Ofgem. Our staff have worked hard to bring to life the policy objectives that necessitated our creation.

Irrespective of the Government's lead on our objectives, we have engaged our customers in a variety of ways, ranging from formal governance forums and bilateral meetings, to industry presentations and technical working groups. This emphasis on looking outward is now very much part of the way DCC operates with dedicated operational Service Managers addressing day-to-day issues for customers, and a stakeholder management team supporting our involvement in the various governance forums.

We are a regulated business and subject to annual scrutiny of our expenditure by Ofgem. Historically, this process has been rather opaque to customers, but we understand fully the desire for better insight into what drives our costs. We have attempted to be open in sharing information on our cost base, both actual and forecast, through our quarterly Finance forums. We have shown customers what our charges are expected to look like up to four years ahead. Furthermore, we have been willing to share more detailed analysis of our cost base, either through the quarterly presentation or on a bilateral basis.

However, we are aware that there will always be demand both for additional information and for opportunities to engage and input on topics of importance to customers. Moreover, we believe that better engagement will help us in shaping the services we offer.

We are now reaching a stage in our development where a number of our mandatory programmes of work are coming to a conclusion.

This means that there will be greater scope for discretionary activity to ensure that customers receive a high quality service and to deliver improvements requested by our customers. In addition, we will start to commit effort to our licence obligations to seek out opportunities for innovation and the reuse of the Smart DCC infrastructure. In both cases, customers will rightly expect a greater involvement in the decisions being made by Smart DCC, in particular given that the express purpose is to deliver benefits to our customers.

Purpose

The purpose of this consultation is to seek the opinions of customers and stakeholders on how engagement with us might be improved and how it might develop over the longer term. Greater flexibility will exist with respect to the choices or priorities for expenditure, which in turn will open up more engagement options.

We present a wide range of proposed initiatives and are keen to obtain customer feedback on these. Questions are presented at the beginning of each section of this document and then listed in the final section.

Equally, we would be interested in alternative proposals, or additional aspects to engagement which could be considered, but which are not covered in this document.

How you can respond to this consultation

We very much welcome written responses to the consultation, addressing each question. However, we understand that our stakeholders have different resource constraints and may not be able to provide fully detailed responses. You are welcome to write a brief or partial response, if desired. If you have more detailed views you are welcome to request a face-to-face meeting or phone call with us.

Please note: we are planning to attend the Ofgem-BEIS Independent Supplier Forum and the SECAS Engagement Day on 7th and 11th December respectively. We are intending to make presentations in relation to this consultation, so if you can attend these, we are happy for comments received to be considered alongside the written responses to this consultation.

2 Principles of Engagement

Through our status as a monopoly, we are duty bound to take account of all the different stakeholder groups which have an interest in our services.

Any framework of engagement we implement needs to fulfil the following:

1. is effective for all participants recognising the different needs and preferences they will have and so informs a representative, 'all-market' view
2. recognises our licence obligations to facilitate competition and not unduly favour any one stakeholder or group of stakeholders over others

In addition, we believe that our engagement activity should seek to take advantage of best practise, such as using technology to facilitate access to information and engagement and to enable transparency over what was said and by whom.

Q1. We welcome customers views on the principles described in section 2.

Are there any other considerations which we should take account of when designing engagement activity?

2.1 Proposed principles

In seeking to improve the quality of our engagement with customers and stakeholders, we have considered the principles which we believe should be followed **We welcome feedback on the following:**

Comprehensive – to date, the overwhelming part of our activity has been mandated by Government or Regulator. This places limits on the extent to which customers can influence our work programme.

However, we commit to being open about the resources required to deliver these programmes, as this could have an impact on how customers view or prioritise discretionary activity. In addition, where there are options as to how mandatory work is delivered, we will seek customer opinions to inform decision-making.

In respect of all discretionary activity, we should actively consider where engagement would be appropriate, with the default being that engagement will be required. We will provide guidance to our managers in planning effective engagement which is proportionate to the decisions in hand.

Inclusive – our customer and stakeholder bases are diverse in respect of the relative size of organisations, their maturity and levels of expertise. Whilst some customers have the capacity to dedicate significant time and resource to Smart DCC / industry meetings and forums, the majority don't.

Where practicable, we will aim to ensure that there is a low barrier to participation in engagement for example, by providing additional support and tailored events to smaller customers, who may be

resource constrained. We will not give the views of trade associations or other lobby groups undue weight.

Re-use – we do not believe that the principle of ‘inclusion’ is achieved simply through the creation of new advisory forums. There are already a significant number of industry forums, plus a variety of our own. Attendance and servicing of these forums is resource-intensive, for our customers and ourselves. Therefore, our preferred approach will be to work with industry to adapt and re-purpose existing forums before creating new governance structures.

Two-way – we believe that customers and stakeholders should be able to initiate engagement on topics of interest to them. Our approach to engagement should enable customers to initiate discussion, both with ourselves and other customers, but also to ask questions of us and provide suggestions.

Process-driven – the key to success in engagement will be ensuring that listening to and integrating customer views becomes part of the way we plan and deliver work. We commit to modifying our project initiation, delivery and change management processes to ensure that customers have the opportunities to engage at those points where their feedback can be influential. We will also revise our standard project documentation to ensure that it lends itself to sharing with customers.

Responsive – as part of embedding engagement within our operating processes, we commit to giving feedback to customers following any engagement process. This feedback will be provided within a specified timeframe. Where we decide to take actions, which are not supported by customer opinions, we will provide a full rationale for these decisions.

Learning – it is unlikely that engagement will always run smoothly and that experience will show that aspects of our approach will need to evolve over time. We will engage customers directly in the continuous improvement of our engagement process and do so regularly through a more formal review.

2.2 Roles and Responsibilities

Smart DCC values customer opinion and input and we hope that this is embodied by the principles we have laid out. However, we also believe that it is worth being clear about how decisions will be influenced.

Basis for engagement:

We recognise that through our monopoly status, customers have no option in funding of us. Hence, where customers and stakeholders are impacted by our decisions and, in particular, where there are implications for expenditure, customers have the right to be consulted and for their opinions to be taken seriously. This means engaging ahead of any significant decisions, so that customers can have real influence on them. In addition, there may need to be a number of cycles of engagement before a final decision is made.

Customer and Smart DCC roles:

One of the fundamental roles of our management is to make decisions; weighing the information and evidence that is available to them. They are held accountable for these decisions through a

variety of formal mechanisms, including the annual Price Control, but also in respect of the reputation that the company has for being open, transparent and customer-focused.

Customer views and experience are a vital part of the evidence upon which decisions are made. However, ultimately, our management has the responsibility to make the final decision, except where other formal mechanisms exist, such as industry code governance.

Our management are answerable ultimately to customers and the Regulator for those decisions. We will always look to explain how customer opinions have shaped our decisions and where we have not picked up on suggestions, we will explain why.

2.3 Practical issues

It is possible to have a very comprehensive approach to engagement which then gets derailed by basic practicalities, such as having an up-to-date list of customer representatives and an understanding of their interests, e.g. financial, regulatory, operational etc.

To facilitate greater involvement of our customers and stakeholders in decision-making, we will need to gather and maintain appropriate data to allow us to direct our efforts, rather than rely on 'all-customer' communications. We believe that a targeted approach will be more efficient and will be welcomed by customers.

This subject is also relevant to our customer relationship management strategy for creating a web-based customer portal, as part of a CRM platform, to support two-way communications between customers and Smart DCC, which is described in full in section 5.1.

Given the need to share information, which may have commercially sensitive or confidential aspects or simply be a work-in-progress, this will enable us to put in place secure access requirements, such as logons/passwords.

We would welcome ideas as to:

- **the best way to ensure that information is directed to the relevant representatives within our customers and stakeholders?**
- **how access to information could be managed with minimum overhead for Smart DCC or our customers?**
- **how, via the CRM platform, we can publish individual customers views and conclusions to deliver transparency, traceability and logic of DCC business decisions?**

To be effective, engagement activity will need to be tailored to the specific topic under discussion. A meaningful discussion around committing expenditure to a major project would require provision of information on the detailed requirements, a full cost-benefit analysis etc and might only be suitable for people with some background in the subject. A discussion re the strategy and direction of Smart DCC is likely to require a very different audience and suitable techniques.

In reviewing the ideas in this consultation, we would welcome any thoughts on the different kinds of engagement which customers and stakeholders believe would be appropriate.

3 Proposed Engagement Initiatives

Q2. In section 3, we outline our proposals to extend engagement with customers and stakeholders.

We would value any feedback from customers on the proposals as described. We also welcome ideas as to how these could be improved or suggestions of alternative / additional actions we could take.

Improved engagement is likely to be marked by a series of distinct but related initiatives rather than through a simple fix. In the following sub-sections, we present some ideas as to how engagement can be improved going forward. This engagement should ensure stakeholders are more closely involved in decisions and better able to influence the direction.

3.1 Business Planning

In each of the last two years, we have undertaken a formal internal business planning process to define our strategy, objectives, plans, resourcing and budgets for each function within the company.

The introduction of this process in 2017 reflected the transition from a delivery organisation which was heavily focused on the SMETS2 programme into an operational business capable of supporting a nationwide infrastructure and multiple programmes of work. This necessitated the development of a significant Operations function, supported by complementary corporate functions, whilst also retaining a significant capability for the delivery of new programmes in areas such as dual-band and Switching.

It is our view that, if customers and stakeholders are to be engaged in our decision-making in a meaningful way, then they should have significant involvement in the annual business planning process.

Historically, our business planning process has been integrated with the budgeting process. However, to create the right opportunities for genuine customer involvement, we are proposing to amend both the format and timing of this process.

We propose to reform our business planning process into three phases in 2019. This process is described below:



3.1.1 Step 1 - Strategy and objectives

We will consider our strategy for the following 5 years. This strategy will examine the challenges and opportunities facing the wider energy market and our role within it.

In some cases, the strategy will be directed by the requirements of Government or Regulator, such as through the role which we have been asked to fulfil in the delivery of Faster Switching.

However, we anticipate that where there is scope for discretionary activity, any such activity will need to be prioritised and customers will have a view on the relative values they place on different initiatives.

We propose a process of engagement with all customers which provides substantial opportunities to input into the development of our strategy over the medium term, the key objectives we should focus on and appropriate measures to evaluate our performance.

It is anticipated that development of this strategy will require several touchpoints with customers and is likely to lend itself to an interactive approach, such as through workshops.

The Smart DCC Development Plan, which is a formal licence requirement, may also be informed by the information gathered through this period of engagement.

3.1.2 Step 2 - Business planning

Over the summer period, we will consider the outputs from the 'Strategy and Objectives' step, further developing the ideas that have emerged to formulate a draft business plan reflecting the discussions during this step.

Our business planning process will encourage the development of costed delivery options which can be shared with customers to obtain their views, either as part of this step or in the subsequent Budgeting phase.

3.1.3 Step 3 - Budgeting

In the Autumn period, we propose to undertake a further period of engagement with customers and stakeholders, drawing on the discussions over strategy and objectives and the subsequent work we have undertaken to translate these into proposed programmes of work and supporting activity.

The outcome of this work will be to develop a detailed two-year view of the necessary financial and other resources required to deliver the strategy and objectives, influenced by customer views, and ideally consistent with previous forecasts presented in the quarterly charging statements.

Customers and stakeholders can play an active role in this process through advising on their preferences and the relative value they place on different courses of action. This will help us to evaluate the merits of alternative options whether this is in relation to the delivery of mandatory requirements or discretionary activity.

At the conclusion of this process, we will be able to publish a full Business Plan for a final round of consultation with customers and stakeholders.

It should also be noted that this will not be the end of consultation in respect of the activities described in the business plan. In many cases, the activities will be at an early stage of their development, and as greater definition is applied to the requirements and the associated costs, there will be a need to engage further with customers as part of our in-year engagement process.

3.2 Current development plan

Over the past two months, we have been undertaking annual business planning – the last under the current format, given the above proposals. Realistically, it will be difficult to introduce meaningful customer involvement into this process given how far advanced it is.

In relation to the proposed changes to business planning, customers and stakeholders can comment on our approach through any response to this consultation. We also propose to present our proposals in relation to business planning at the coming Quarterly Finance Forum on 10th December.

In addition, we will be progressing work on the annual development plan, which is a licence obligation, but which also will set some of the context for the proposed business planning process in 2019. We would encourage customers and stakeholders to participate in this and will be holding a series of meetings and events in the New Year to inform it.

More detail of these events will be published shortly.

3.3 In-year engagement

We believe that through opening-up the business planning process, customers and stakeholders will have a real influence on shaping the strategy and direction of Smart DCC. However, we also recognise that the business plan, by its very nature, will only include a certain level of detail and that many of the initiatives identified in the plan will then be developed further over the remainder of the year.

In light of this, we anticipate that ongoing engagement will be required in respect of the detailed initiatives, at relevant decision points.

We will develop a framework, in consultation with customers, which will help us decide the most appropriate engagement model to adopt, driven by criteria such as the driver to the initiative (i.e. mandated/discretionary), the level of expenditure proposed, the impact on customer systems / processes etc.

We would welcome any initial thoughts on the criteria which we might use in selecting the appropriate engagement model.

3.4 Summary

Our proposed annual Business Planning process will act as fixed point in the engagement calendar, enabling customers and stakeholders to influence many of the “big decisions” which will shape the direction of Smart DCC over the coming years.

The final published Business Plan will then provide a framework for further engagement throughout the remainder of the year. Subsequent engagement will be much more focused on the specific projects or initiatives which have been laid out, thus meaning that customers will have been

involved in the key decisions from endorsing the germ of an idea, through to the detail of its implementation and the associated expenditure.

We anticipate that this will lead to an ongoing process of engagement, with customers actively involved, month-by-month, in influencing the choices that we are required to make. We expect that this will result in improved decisions, as well as a growing confidence amongst customers that we are aligning our activity more closely with the needs of customers.

4 Sharing of cost data

We understand that transparency and the availability of cost data are important to customers. There are a number of means through which we already do this, but we would be interested in your thoughts on how we could improve this disclosure.

4.1 Price Control

Q3. What steps could we take to increase customer engagement in the Price Control process?

The annual Price Control is the key regulatory test of the economic and efficient delivery of our activities. While this falls within the remit of Ofgem, the Regulator values customer input in applying additional scrutiny.

Over the last two years, we have sought to shed greater light on this process by placing more of the Price Control submission in the public domain. The intent has been that customers can better understand the information presented to Ofgem, and to facilitate them in being able to provide a better informed response to Ofgem's consultation on their Price Control Proposal.

We are mindful that there are redactions in what has been published, which are largely driven by confidentiality considerations, whether in respect of information relating to our staff or certain service provider contracts. In the case of service provider contracts, we commit to examine the scope for sharing further information. We will engage customers before we make any payments to our service providers to facilitate variations in their contracts to enable disclosure.

In addition, last year Smart DCC and Ofgem hosted a joint event for customers, which will be repeated this year.

4.2 Quarterly finance forums

Q4. If you have attended a Finance Forum, either online or in person, how could they be improved?

What other ways would you like to see actual and forecast cost data shared?

We run regular finance forums, alternating between webinars and face to face sessions. At these forums we present cost information to customers, primarily to give visibility in the movement of forecast costs, which will influence future charging statements.

These forums are well-received, and the use of face to face sessions every six months has been warmly welcomed.

In addition, our Finance team are in regular contact with many of our customers and routinely hold bilateral discussions where specific issues or questions can be addressed.

5 Channels and Forums

We are mindful of the diverse nature of our customer base and the range of stakeholders which have an interest in our activities.

We have a licence obligation to facilitate competition within the energy market and to enable this we may need to adopt a range of approaches to ensure that the different needs of customer groups are met. Smaller companies in particular may need tailored or enhanced support to ensure that they can play their full part in engagement processes.

This has influenced our proposals in relation to the primary channels of engagement we should make use of.

5.1 Online Customer Portal, CRM platform

Q5. What features would customers wish to see incorporated within an online engagement platform?

Given the need to share information which could be sensitive or is simply early in its development, our view is that an effective on-line presence is a fundamental element of our engagement going forward.

Historically, feedback on the use of *SharePoint* has been mixed, with users, both internal and external, questioning how intuitive it is, lacking confidence about access control and finding it slow and sometimes unreliable. In response, we have been thinking about alternatives, based on off-the-shelf platforms which are designed specifically to support customer engagement activities.

5.1.1 Proposed features

As a minimum, any online engagement platform should provide a secure forum where we can share information with customers. It should make it easy to alert customers that new information is available, and then support a number of mechanisms through which customers can access this, respond or seek clarification.

We will provide additional tools to engage customers, driven by the nature of the subject matter. For example, some topics will require a formalised consultation process, with some customers preferring to upload written documents, whereas others may prefer to complete an online form, perhaps over a number of visits. Another consultation might lend itself to a more informal survey type approach or even 'voting'..

Like many organisations, we are increasingly using other media, such as video, in its internal communications. We will consider the use of similar approaches to provide insight into topics that we are sharing with customers, for example, a two-minute video summary may be sufficient that a customer can decide whether they have any interest in exploring a consultation further.

We would also see the customer portal as a means for customers to initiate communications with us on topics of their choice. Best practise would suggest that we might include facilities such as

suggestion boxes or noticeboards through which ideas or questions might be submitted, or perhaps shared with other customers to solicit their views.

The customer portal has the potential to provide a collaborative space where ideas and information can be aired, shared and responded to.

A final benefit of establishing the portal is that it will enable us to record and measure participation. This can be then be used in interpreting the views and information presented to us. It will also aid us in identifying areas where engagement has not been effective and where we may need to consider modifying our approach.

We would be keen to understand customer and stakeholder views as to how technology could facilitate effective information sharing and engagement. We would be particularly interested in any insights that customers are able to share from experiences in their own organisations.

Note: We are developing a proof of concept for this engagement platform. We would be interested in hearing from customers who would be willing to participate in providing feedback on this, prior to us committing to a fully-functional version.

5.2 Face to face engagement

Q6. Which existing forums do you believe would be best suited to engagement on expenditure decisions?

How would these forums need to be reconstituted to make them effective for this purpose?

Since our formation, we have met with customers and stakeholders routinely on a bilateral and collective basis, as well as through various formal and informal forums.

We would contend that we have a strong track record of engaging with customers and that this has benefited both ourselves and our customers. However, we do accept that the nature of our engagement needs to evolve as we mature. Likewise, we recognise that our customers are starting to ask different questions of us, as the scope of our operations expands

Face to face discussions will continue to form the central focus of our engagement approach and will play a crucial role in the success of our revised approach to business planning.

However, it should be recognised that face to face engagement can be resource intensive, whether that is in relation to the time required from executive / senior management or subject matter experts and their counterparts in industry. Equally, we are striving continually to streamline our processes associated with the co-ordination and preparation of materials for meetings and forums.

The current industry governance arrangements provide representation for the industry and forums, such as SMDG, the SEC panel and its associated working groups, where substantive discussion of issues impacting upon Smart DCC and the wider industry can be had.

In light of this, and given the overhead associated with servicing multiple forums, we would be cautious about creating additional forums purely for engagement purposes. In many cases, we believe that it would be preferable to have a holistic discussion about a particular topic, including any implications for expenditure, in one forum, rather than parallel discussions across several forums or working groups.

We would be interested to hear customer views on the use of forums and working groups, and how best to balance the needs of effective engagement with the time and cost for both Smart DCC and customers.

5.2.1 Effective forums

In our view, it is essential that, as an industry, we strive to make the best use of existing forums and recognise that by the nature of forums it can be difficult to gain a whole of market view. In support of this, DCC is keen to improve the information flow and wider engagement to help better inform discussion and decisions in these forums.

Furthermore, if certain forums are to be given additional responsibility, as a setting where customer views can be articulated and captured, it is our view that their terms of reference and membership should be reviewed to ensure they are truly effective.

We would welcome discussions with industry, as well as the chairs and members of relevant governance forums, to discuss how improvements can be made and how DCC can facilitate greater information flow.

Having proposed change to some forums, we have a responsibility to ensure that the engagement which follows is effective for all participants. As such, we will commit to adapting our processes to ensure that quality documentation is provided to attendees, and sufficiently ahead of the meeting, so that they have an opportunity to study them in advance.

5.3 Other Channels

Q7. What alternative or additional channels of communication would you like us to consider introducing?

Are there any areas which you would like to engage with us on, but don't feel that existing forums or online engagement will provide the right environment to do so?

Whilst we believe that the online portal and face-to-face forums will be the primary means of engaging with our customers, we are open to considering additional channels of communication or use of alternative media.

We would be particularly interested in any of the following:

- Topics that do not lend themselves to face-to-face or online engagement
- How new media can be used to improve the engagement process
- Webinars

6 Continuous Improvement

We indicated earlier that it was important that the online portal provides two-way communication with customers, so they can provide ideas, suggestions and feedback on their experiences.

One of the key benefits we think extending engagement will bring, is identifying and driving improvement opportunities. These improvements will benefit our customers. This is a virtuous circle that we are keen to encourage.

We have recently established an Internal Audit function and, alongside this, plan to create a small Continuous Improvement team, which will bring skills such as Six Sigma to facilitate improvement and efficiency across the business.

6.1 Benchmarking of performance and costs

Q8. We would welcome customers' views on the proposal for the use and sharing of benchmarking.

Which functions do you believe should be our priority for the application of benchmarking?

We have already started to make use of benchmarks in our Operations function to assess performance and identify opportunities for improvement. We plan to make this a key management tool going forward and a number of other functions are looking at how benchmarking can be applied.

In support of this, we would like to propose that we commission benchmarking studies in areas identified as important to our customers and stakeholders

We intend to undertake such studies as an open exercise, publishing our performance metrics and action plans that result. In addition, we have had conversations with some customers about them contributing relevant data of their own to enrich benchmarking and would be interested in any views on this.

We will make the results of our benchmarking available to customers and stakeholders, so they can be deployed in their own businesses, should they so wish.

6.2 Measuring the effectiveness of engagement

One of the benefits of an online portal is that we will be able to track usage of the platform, i.e. who enters, how long they spend online, what they access etc. This information will be useful both to inform the evaluation of any consultation process hosted on there, as well as in assessing the use and effectiveness of the features provided.

We propose to present information on engagement to the SEC panel, on a regular basis. This will be used to debate the various channels in use and will draw upon the information sourced from the online portal as appropriate.

In addition, we will consider the use of independent research with customers to gather views on our engagement methods, as a driver to continuous improvement.

7 Responding to this consultation

We would welcome responses to any or all of the questions posed in this consultation document.

In addition, we would be interested in any additional views which would help us effective processes of engagement for all parties.

Please provide your feedback by **31st January 2019** to the following email address:

Consultations@SmartDCC.co.uk

We will consider the views expressed and provide a formal response by 28 February 2019, together with details of our early priorities for engagement.

Appendix A – Consultation Questions

For reference, this is the consolidated list of questions found in this document.

Q1	<p>We welcome customers views on the principles described in section 2.</p> <p>Are there any other considerations which we should take account of when designing engagement activity?</p>
Q2	<p>In section 3, we outline our proposals to extend engagement with customers and stakeholders.</p> <p>We would value any feedback from customers on the proposals as described. We also welcome ideas as to how these could be improved or suggestions of alternative / additional actions we could take</p>
Q3	<p>What steps could we take to increase customer engagement in the Price Control process?</p>
Q4	<p>If you have attended a Finance Forum, either online or in person, how could they be improved?</p> <p>What other ways would you like to see actual and forecast cost data shared?</p>
Q5	<p>What features would customers wish to see incorporated within an online engagement platform?</p>
Q6	<p>Which forums do you believe would be best suited to engagement on expenditure decisions?</p> <p>How would these forums need to be reconstituted to make them effective for this purpose?</p>
Q7	<p>What alternative or additional channels of communication would you like us to consider use of?</p> <p>Are there any areas which you would like to engage with us on, but don't feel that forums or online engagement will provide the right environment to do so?</p>
Q8	<p>We would welcome customers' views on the proposal for the use and sharing of benchmarking.</p> <p>Which functions do you believe should be our priority for the application of benchmarking?</p>

In addition, supplementary questions are included in the text, typically focusing on specific aspects of our proposals. These are highlighted in bold.