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1. Introduction and Context

The Data Communications Company (DCC) is Britain's digital energy spine, supporting the
transformation of the energy system. DCC is licensed by the Government and regulated by
the energy regulator Ofgem to connect smart meters in homes and small businesses across
Great Britain to a single secure, digital network. DCC supports the roll-out and operation
of second-generation (SMETS2) smart meters, as well as the migration and operation of
existing first-generation (SMETS1) meters onto our network.

1.1. Background

- 2. Smart Energy Code (SEC) H13.4 requires DCC to report against Performance Measures (PMs). PM include Code Performance Measures (CPMs) as detailed in SEC D11.3, H13.1 and L8.6 and those measures detailed in the Reported List of Service Provider Performance Measures (RLoSPPM) as defined in SEC A1. DCC reports performance monthly in the Performance Measures Report (PMR).
- 3. SEC H13.5A and H13.5B describe the development of Performance Indicators (PI) and the requirement for DCC to report on those PI alongside the Performance Measures Report. PI are described in the Performance Indicator Document (PID).
- 4. SEC H13.6 requires DCC to produce and periodically review, through industry consultation and with SEC Panel approval, the Performance Measurement Methodology (PMM) which describes the methodology DCC will use to calculate the performance of PM. SEC H13.2 allows DCC to modify the RLoSPPM though industry consultation.
- 5. DCC has highlighted an error with the calculation of averages for establishing the performance level against CPM 1, 2 and 3 and proposes that these errors are corrected.
- 6. CPM 9 detailed in SEC D11.3 does not currently have a methodology within the PMM, and it is proposed that this is added.
- 7. The RLoSPPM includes an all CSP Regions Communications Hub (CH) delivery measure 1.1. DCC Users have, through the SEC Operations Sub-committee and the Global Supply Chain Working Group asked for the methodology of this measure to be amended. DCC is in support of this request and recommends changes in the PMM to reflect the change in reporting.
- 8. <u>SEC MP096</u> is expected to introduce a new CPM 3a requiring new reporting of power outage AD1 alerts, and new Performance Indicators on Power Outage Alert (POA 8F35) and Power Restoration Alerts (PRA 8F36).
- Additionally, Network Parties requested that measures covering POA and PRA contained within the RLoSPPM are removed. It is proposed that the PMM and RLoSPPM are amended to reflect SEC MP096 requirements. Should SEC MP096 be rejected or withdrawn these changes will not be implemented.

1.2. Purpose of the consultation

- 10. The purpose of this consultation is to describe the proposed changes to the PMM and the reasoning, including changes to the RLoSPPM, and to seek Parties' feedback.
- 11. Parties can respond to this consultation by e-mailing consultations@smartdcc.co.uk. This consultation will close on the 7th October 2022 at 1700.

2. Amendments to existing Code Performance Measures

2.1. Code Performance Measures 1, 2, and 3

- 12. Under SEC H13 DCC is required to report on CPM 1, 2 and 3, these measures are:
 - Percentage of On-Demand Service Responses delivered within the applicable Target Response Time.
 - Percentage of Future-Dated Service Responses delivered within the applicable Target Response Time.
 - Percentage of Alerts delivered within the applicable Target Response Time. Alerts consolidated in accordance with the Alert Management Mechanism will not be counted.
- 13. An error in the current methodology has been identified which results in inaccurate data being reported in the PMR. This error is related to the way the average Target Response Time (TRT) for each measure is calculated.
- 14. The current methodology groups performance by individual DCC Service Providers (SPs), calculates an average for each SP and then averages those average figures across all SPs. This, therefore, does not represent the true performance across 1) On-Demand Service Responses 2) Future Dated Service Responses and 3) Alerts, and is rather the average of the subsets of data.
- 15. This error in calculation could result in either a better that actual figure, or worse than actual figure, being reported.
- 16. DCC considers that the methodology for each CPM should be amended so that the true mathematical average across all Service Responses or Alerts is captured and reported, which will more accurately report on the DCC service.
- 17. The amended methodology can be viewed in the tracked changes version of the PMM published alongside this consultation see sections 2.3, 2.4 and 2.5.

Q1

Do you agree that the methodology for CPM 1, 2 and 3 should be amended, as provided in the tracked changes version of the PMM, to provide the true mathematical average? Please provide a rationale for your response.

2.2. Code Performance Measure 9

- 18. Under SEC D11.3 DCC is required to report on CPM 9:
- 19. Out of the DCC Assessments required to be completed during the Performance Measurement Period, how many were completed within the required timescales.
- 20. This measure relates to the timely completion of impact assessments by DCC Service Providers. While DCC have reported this data the methodology has not been formally been incorporated in to the PMM.
- 21. DCC have now made this addition to the PMM and the methodology for this measure can be viewed in the tracked changes version of the PMM published alongside this consultation see section 2.17.

Q2

Do you agree that the methodology for CPM 9 should be added, as provided in the tracked changes version of the PMM? Please provide a rationale for your response.

2.1. Communications Hub Delivery

- 22. The RLoSPPM includes an all CSP Regions Communications Hub (CH) delivery measure 1.1. This measure has historically considered a CH deferral, allowed under SEC Appendix H 6.5 through 6.9, to be complaint with SEC requirements and these scenarios have not been reported as a failure to deliver.
- 23. DCC Users have, through the SEC Operations Sub-committee and the Global Supply Chain Working Group asked for the methodology of this measure to be amended to report on the original delivery date. DCC is in support of this request and recommends changes in the PMM to reflect the change in reporting.
- 24. DCC has also taken the opportunity to align the methodology across both CSPs, adding incorrectly omitted detail in to the measure for CSP C&S.
- 25. This is now reflected in the PMM for both CSPs. The amended methodology can be viewed in the tracked changes version of the PMM published alongside this consultation see sections 4.11 and 5.10.



Do you agree that the methodology for CSP Regions Communications Hub (CH) delivery measure 1.1 should be added, as provided in the tracked changes version of the PMM? Please provide a rationale for your response.

3. SEC MP096 Related Amendments

3.1. Code Performance Measure 3a

- 26. SEC MP096 is expected to require a number of changes to the PMM. On 24 August 2022, the Change Board voted to recommend this modification be approved and the modification is currently with the Authority for decision. While SEC MP096 has not formally been approved for implementation it is not anticipated that the requirements will change. DCC is consulting now so that these amendments can be incorporated in to the PMM as soon as possible once SEC MP096 has been approved and implemented. Should SEC MP096 be rejected these amendments will be withdrawn.
- 27. SEC MP096 will require DCC to report new CPM 3a. This will report on those Alerts which are subject to SEC H3.14(i), percentage of Alerts delivered within the applicable TRT.
- 28. This measure relates to the TRT for AD1 alerts notifying of power outage. DCC have reported on POA as required under the RLoSPPM, but the data required there is not considered to be as beneficial as the data required under new CPM 3a.
- 29. DCC have now made this addition to the PMM and the methodology for this measure which can be viewed in the tracked changes version of the PMM published alongside this consultation see section 2.6.



Do you agree that the methodology for CPM 3a should be added, as provided in the tracked changes version of the PMM? Please provide a rationale for your response.

3.2. Performance Indicator

30. SEC MP096 also introduced the Power Outage and Restoration Alerts Delivery Management Document (POaRADD) which describes the methodology for reviewing and determining Target Response Times (TRTs) for POA (8F35) and PRA (8F36).

- 31. The POaRADD is expected to be developed and amended over time through industry engagement and consultation and includes the methodology by which these alerts will be measured.
- 32. As part of the SEC MP096 work the performance of these Alerts will be added to the PID for inclusion in DCC reporting. It is intended for these Indicators to be reported in the PMR and therefore DCC will add the methodology to the PMM.
- 33. As such the addition to the PMM will not replicate the PaRADD but will point users to it. This will allow the management document to be updated as required but will not require an additional PMM consultation and is considered to be the most efficient option.
- 34. DCC have now made this addition to the PMM for this measure which can be viewed in the tracked changes version of the PMM published alongside this consultation see section 11.
- Q5

Do you agree that the methodology for Performance Indicator should be added, as provided in the tracked changes version of the PMM? Please provide a rationale for your response.

3.1. Amendments to the Reported List of Service Provider Performance Measures

- 35. SEC MP096 will introduce a new CPM and PI to better report on POA and PRA. The reporting of data on POA and PRA under the RLoSPPM is not considered useful.
- 36. It is therefore considered that the relevant measures in the RLoSPPM should be removed from that list. Those measures are reported by CSP Region performance measures 12.1 and 12.2. And that these measures should also be removed from the PMM.
- 37. DCC have now removed these measures from the PMM and the RLoSPPM in the tracked changes version of the PMM and RLoSPPM published alongside this consultation see sections 4.9, 4.10 5.8 and 5.9.

Q6

Do you agree that measures 12.1 and 12.2 should be removed from the RLoSPPM and PMM? Please provide a rationale for your response.

4. Next Steps

- 38. This consultation will close on 7th October 2022. DCC will review responses and consider if any changes to the proposals made are required.
- 39. DCC will present details of this consultation and a summary of responses received to SEC Operation sub-committee before presenting final recommendation to the November SEC Panel who will be requested to approve the amendments to the PMM.
- 40. Following the approval of the changes to the PMM, DCC will report against the amendments in the following PMR.
- 41. In the event some of the proposed amendments to the PMM receive support and others do not, DCC may decide to proceed to seek SEC Panel approval on those measure that do receive support and consider next steps for those that do not receive support.
- 42. In the event that SEC MP096 is rejected, any changes linked to that modification will be withdrawn and not implemented.

5. How to Respond

- 43. Please provide responses by 1700 on 17th October 2022 to DCC at consultations@smartdcc.co.uk
- 44. Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
- 45. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk

6. Attachments

- Attachment 1: Tracked Changes of the Performance Measurement Methodology
- Attachment 2: Tracked Changes of the Reported List of Service Provider Performance Measures
- Attachment 3: Response Template