RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0092 – DCC SERVICE LEVEL AGREEMENTS FOR THE SWITCHING INCENTIVE REGIME

On 13 October 2023 the Code Manager issued an impact assessment to industry to seek feedback on the Proposals under R0092.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	**NON-CONFIDENTIAL**
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RESPONSIBLE COMMITTEE	PERFORMANCE ASSURANCE BOARD
LEAD ANALYST	ELISE HANDY

DATE CONSULTATION ISSUED	13/10/2023
RESPONSE DEADLINE	10/11/2023

PROPOSAL 1 – MAXIMUM DEMAND VOLUMES

Question 1:	Do you agree with the proposed Maximum Demand Volume of 1.088 million? If not, please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	SPEN agree with the proposed maximum demand volumes and support the inclusion of switching related messages (rather than just switches).
NGED (DNO)	We agree that the SLAs defined within the CSS definition relate to all messages and the Maximum Demand Volume should reflect this.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes.

Question 2:	The proposed figure of 1.088 million has been based on desktop analysis completed by DCC and does not include risk weighting or optimism bias. Do you feel this figure should be subject to an optimism bias of 5 – 10% to account for the risk that the desktop analysis may not be representative of true user behaviour?
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No

NGED (DNO)	We believe that currently switches are at a low point therefore there should be a mechanism to be able to reflect any changes in user behaviour.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes, a risk weighting should be applied to accommodate any fluctuations in the change of supplier market.

PROPOSAL 2 – SYNCHRONOUS RESPONSES

Question 3:	Do you agree with the CSS Provider's proposal for synchronous responses? If not, please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	Yes
NGED (DNO)	We agree with the proposal for synchronous responses subject to a maximum synchronous message threshold being included to capture unreasonable outliers.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes.

Question 4:	Do you believe that a maximum threshold should be added to this service level to ensure that there is a limit on the length of time any one message takes to be responded to? Please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We believe that there is benefit in a maximum threshold to ensure that the integrity of the processing remains.
NGED (DNO)	Yes we agree that a maximum threshold should be added to this service level to ensure there is a limit on the length of time any one message takes to be responded to.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes, ensures a timescale applies to all response messages.

Question 5:	If you do believe that a maximum threshold of service level should be incorporated, what should this be in seconds? Consider the maximum response time prior to this causing a risk to your organisation. Please provide any rationale to your response
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We are not able to provide a value, however, see the need to ensure that all messages to the industry are processed and that none are side-lined (or significantly delayed).
NGED (DNO)	Ultimately our database must align with CSS. Therefore it is imperative that any anomalies are dealt with as a time sensitive matter. If a supplier is not updated on MPRS due to a message not being processed, the implications are that other downstream systems are not in alignment and the impact of this essentially is that we will UOS/Asset bill the

	incorrect supplier. Customers have an expectation of a faster switching experience therefore the maximum threshold should be set to a minimum value.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	10 seconds for the maximum response is a reasonable timescale for any outlier messages.

Question 6:	Do you have an alternative suggestion for this proposal? If yes, please specify.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No
NGED (DNO)	-
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	n/a

PROPOSAL 3 – ASYNCHRONOUS RESPONSES

Question 7:	Do you agree with the CSS Provider's proposal for asynchronous responses? If not, please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	Yes
NGED (DNO)	As noted, there is a concern with the Service Level moving from hourly to daily. If at critical times a message is being processed one day and then held and sent the next day this will create rejections. We believe that there should be processing deadlines included to ensure obligations within the REC are met.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes

Question 8:	Do you believe that an additional layer should be added to this service level to ensure that there is a limit on the length of time any one message takes to be responded to? Please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We believe that there is benefit in a maximum threshold to ensure that the integrity of the processing remains.
NGED (DNO)	Yes we agree that an additional layer should be added to ensure that there is a limit on the length of time any one message takes to be responded to.

C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Post Gate closure window, the DNO systems have until 23:00 to process the messages and the business impacts of a small number of individual messages delayed more than 3 seconds is not a concern. However, it would be good to put a cap on the maximum timescales to ensure any systemic issues are identified sooner.

Question 9:	If you do believe that an additional layer of service level should be incorporated, what should this be in seconds? Consider the maximum response time prior to this causing a risk to your organisation. Please provide any rationale to your response.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We are not able to provide a value, however, see the need to ensure that all messages to the industry are processed and that none are side-lined (or significantly delayed).
NGED (DNO)	Ultimately our database must align with CSS. Therefore it is imperative that any anomalies are dealt with as a time sensitive matter. If a supplier is not updated on MPRS due to a message not being processed, the implications are that other downstream systems are not in alignment and the impact of this essentially is that we will UOS/Asset bill the incorrect supplier. Customers have an expectation of a faster switching experience therefore the maximum threshold should be set to a minimum value.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Propose a maximum response time of 60 seconds.

Question 10:	Do you have an alternate suggestion for this proposal? If yes, please specify.

RESPONDENT DETAILS	RESPONSE
SPEN (DNO)	No
NGED (DNO)	-
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	No

PROPOSAL 4 - GATE CLOSURE

Question 11:	Do you believe that the CSS Provider should only be measured on placing messages in a queue (only responsible for its control area)?
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No, we believe that the CSS Provider should be responsible for the end-to-end process.
NGED (DNO)	No. Our understanding is that the CRS Provider encompasses the following roles: the CSS Provider, the CSS Systems Integrator, the SI Provider and the Switching Operator. We believe therefore that the CSS Provider is responsible for the end to end switching process.
C&C (EES Provider)	N/A

Northern Powergrid (DNO)	n/a

Question 12:	Alternatively, do you believe that the current REC service levels should remain the same (and include the end-to-end process and other market participants' obligations) but be managed via exemptions?
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We believe that this service level should continue to be measured end to end, this allows the identification of issues to remain a priority and to be escalated as such. We are also supportive of the DCC being able to identify these areas (out with their control) to PAB for a derogation.
NGED (DNO)	Yes, there is currently a process for exemptions within PAB. The raising of exemptions via the PAB process on a monthly basis should already be a BAU process within DCC and therefore, there should be no requirement for the DCC to "invest time and resource" to use the current exclusions process.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	n/a

Question 13:	Do you agree with the CSS Provider's proposal for Gate Closure targets?
RESPONDENT DETAILS	**RESPONSE**

SPEN (DNO)	We believe that the alignment of the average and peak days does simplify this measure
NGED (DNO)	We do not agree with the CSS Provider's proposal for Gate Closure targets at this current time. We do not believe that the DCC are being penalised unfairly and therefore there is no justification to change the Gate Closure targets.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	n/a

Question 14:	Do you believe there are other options for measuring Gate Closure?
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We have not identified any other options.
NGED (DNO)	-
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	n/a

Question 15:	Do you see any risk in changing Gate Closure targets?
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	We have identified no risk in these changes.
NGED (DNO)	Yes, we feel that there is a potential risk of a degradation in the service. We do not believe that the DCC are being penalised unfairly and therefore there is no justification to change the Gate Closure targets.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	n/a

PROPOSAL 5 – SWITCHING INCIDENTS

Question 16:	Do you agree with the Switching Operator's proposal for switching incidents? If not, please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No, we are not in agreement with the Switching Operators proposal to reduce the % resolution for Category 3 and 4. While these are lower impact they should still be tracked in an appropriate manner. These categories are usually easily resolvable (particularly Category 4), we believe that while there are a small number that are more complex and may

	take longer to resolve that these should be able to be reported as this and be considered appropriately and can be reported to the PAB as such.
NGED (DNO)	No. The Switching Operator is responsible for allocating the Priority Categorisation of a switching incident. There have been extended discussions in various forums around the prioritisation categorisation and that the Switching Operator can downgrade a switching incident if, in their opinion, it does not meet the relevant criteria. However, the Switching Operator is not always fully understanding of a switching incident and the impacts to parties and more importantly, the consumer as highlighted during the recent P1 incident. The lack of a full understanding therefore skews the reasonable opinion they are required to apply when categorising a switching incident. The Switching Operator has confirmed that the service is at 51% and they are proposing an interim target of 90% - we would question that if currently they are only achieving 51% how are they intending to achieve 90%? What measures are they proposing to put in place and if there are additional measures why have they not put these in place already in order to achieve their current SLAs. What timeframe is being proposed to improve the current performance of 51% to the proposed 90%? The Switching Operator has stated that there would be a commercial impact to reach 100%. If there is a commercial impact, this is for the Switching Operator to manage. At what point between the proposed 90% and 100% does the commercial impact happen? For each switching incident that falls outside of the proposed 90% there is a customer at the end. This could be a single customer, multiple customers or large I&C Customers. Each incident raised has the potential to also affect other parties and ultimately settlements. Reduction of SLA's will not help the current issue of slow resolution of tickets. We would prefer to see an improvement in their performance against the current SLAs before considering reducing them.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes.

Question 17:	If a maximum timescale were incorporated, what do you feel this should be? Consider the maximum response/resolution time prior to this causing a risk to your organisation.

RESPONDENT DETAILS	RESPONSE
SPEN (DNO)	We are of the view that there should be no change to the current timescale for resolution. If there is a case for this, then we believe that appropriate rationale must be provided.
NGED (DNO)	We would agree that the introduction of a maximum timescale would be beneficial. Currently we have incidents that have remained unresolved since go live in July 2022 and we still have not reached a resolution. This has resulted in customers being unable to switch suppliers. If those customers who cannot switch elect to take this issue to the Authority and raise a complaint this will have serious impacts. Ultimately, as a DNO, our database must align with CSS. Therefore it is imperative that any anomalies are dealt with as a time sensitive matter. If a supplier is not updated on MPRS due to a rejection (which is often what our incidents are) the implications are that other downstream systems are not in alignment and the impact of this essentially is that we will UOS/Asset bill the incorrect supplier. Due to the quick nature of faster switching and the change of supplier turnaround the ticket/incident must also be dealt with in this quick manner.
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	In order to ensure any outliers are handled within a reasonable timeframe, we propose maximum response times of 5 days for Priority 3 and 15 days for Priority 4.

Question 18:	Do you have an alternate suggestion for this proposal? If yes, please specify
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No

NGED (DNO)	-
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	No.

PROPOSAL 6 – SERVICE REQUESTS

Question 19:	Do you agree with the Switching Operator's proposal for service requests? If not, please provide rationale.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No, we see no rationale for this change.
NGED (DNO)	-
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	Yes.

Question 20:	Do you have an alternate suggestion for this proposal? If yes, please specify.
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No, we do not see any reason to change this.
NGED (DNO)	-
C&C (EES Provider)	N/A
Northern Powergrid (DNO)	A maximum timescale defined for service requests as well. Propose 15 days.

Question 21:	Do you have any further comments?
RESPONDENT DETAILS	**RESPONSE**
SPEN (DNO)	No further comments.
NGED (DNO)	-

C&C (EES Provider)	N/A
Northern Powergrid (DNO)	-