



**Operational
Performance
Regime for
RY2020/21
Customer Engagement**

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1. Introduction and Summary of Scores

In preparing this Customer Engagement OPR submission, DCC reviewed factual details of its engagement with customers during the Regulatory Year 2020/21 and made objective assessments of its performance against the performance assessment criteria laid out in Ofgem's OPR Guidance published at the end of the Regulatory Year¹. As far as possible DCC has engaged with SECAS to discuss the overall approach to submissions. DCC and SECAS are working together to consider further alignment and a more joined up approach for 2021-22.

Assessment Question No.	Summary of Assessment Question	Suggested Score
1	Proactive engagement with customers.	2
2	Clear time frames for customer contributions.	3
3	Timeliness and frequency of broader engagement.	3
4	Quality and detail of cost/benefit information.	2
5	Quality of information for broader engagement.	3
6	Provision of appropriate information to relevant audiences.	3
7	Ensuring customers understand which views inform Decisions.	3
8	Taking customer views into account in decision-making.	2
9	Communication of rationale for decisions.	2

Table 1: Summary of DCC Suggested Scores

2. Assessment Questions

2.1. Q1: Proactive Engagement with Customers – Suggested Score 2

Has DCC engaged proactively with customers, enabling them to feed in views at appropriate points in decision-making cycles?

Like all organisations, DCC has to make decisions on a daily basis ranging from identifying how to resolve issues in live services to setting a strategic direction for future years. DCC strongly recognises the value and importance of involving customers in the decision-making process, particularly where the decisions made can have a significant and lasting impact on customers' operations or the fees that are charged. As such, DCC has embedded customer engagement at the heart of its decision-making Change Delivery Methodology (CDM) processes.

Within the Regulatory Year, DCC undertook a Business and Development Planning (BDP) cycle (described in detail in Case Study 4) in which DCC engaged directly with customers through a series of webinars and supporting materials, proactively seeking early input on key aspects of DCC's developing plans for the next five years, including a focus on emerging drivers and outcomes for DCC's Data Service Provider (DSP) Programme. Business-wide engagement is also conducted regularly through the Quarterly Finance Forum (QFF) and subsequent publications of the charging statements and budget, with forums held quarterly during the Regulatory Year. Topics covered include programme updates, discussions on new areas of work, financial updates and a general Engagement Update which provides customers with a forward plan of engagement so they know when and how to engage.

Alongside ensuring that customers have an opportunity to help shape the longer term strategic direction and priorities for DCC, a primary conduit for involving customers in decision making processes is through engagement on strategic programmes. DCC's customer engagement starts at programme initiation and continues through the lifecycle of the programme, with the CDM mandating the production, sharing and maintenance of an engagement plan to ensure that customers are involved in key decisions as the programme progresses. The engagement plan sets out the detailed engagement that will take place during the next CDM stage and is a pre-requisite at each stage gate to inform DCC's decision on whether the programme is ready to proceed.

¹ Draft OPR Guidance ([ofgem.gov.uk](https://www.ofgem.gov.uk))

Depending on the stage of the programme and the expected outcome, DCC utilises a range of engagement mechanisms at appropriate points including attendance at SEC Panel and Sub-committees, wider stakeholder engagement (including webinars), industry events and bilaterals. Examples during the Reporting Year included:

- **SMETS1 Final Operating Capability (FOC)** – Throughout the programme over 50 online consultations were conducted and responses were incorporated into decision making. For example, in August 2020, DCC consulted on proposed changes to the Joint Industry Plan (JIP) in relation to milestones for the SMETS1 FOC. The consultation closed on 3 September 2020 with DCC receiving responses from 7 organisations. The programme also appointed a dedicated Customer Stakeholder & Engagement Manager who held bilateral meetings with stakeholders and provided industry updates to ensure customers can feed in views at appropriate points in the decision-making cycle.
- **SMETS2 Self Service Interface (SSI)** - In February 2021, DCC consulted on the proposed changes to the SSI as part of the SMETS2 programme. The consultation provided detail of the improvements proposed, including example screen shots of new functionality, and invited customers to provide comments and feedback.
- **Data Services Provider (DSP)** - Since March 2020, DCC has attended fourteen SEC Panel or Sub-committee meetings on DSP, discussion at which supported early understanding of customers' experiences and needs. During the early stages of the DSP programme, Chief Technology Officer (CTO) peer to peer bilaterals were also an important channel for raising awareness of the programme and discussing the drivers for change. In October 2020 DCC took a discussion paper to SEC Panel on future DSP engagement and in March 2021 DCC defined the engagement approach for Sub-committees and sought views on the proposed approach. Moving into Reporting Year 21/22, DCC has set up a NEP group with SEC Sub-committee Chairs to ensure the timing of SEC engagement is further improved.
- **SMETS2 Go-Live and Roll Out** – The SMETS2 Great Britain Companion Specification (GBCS) and Dual Band Communications Hubs (DBCH) programmes attended the Implementation Managers Forum to agree forecasted User Integration Testing (UIT) and Go Live activities, and asked for feedback before agreeing to a plan. In June and July 2020, the DBCH programme used the Dual Band questionnaire to provide anonymised input into four workshops covering Dual Band UIT, 1st Pallet and mass roll out. All customer Test and Operational teams were invited to attend the workshops.
- **Elective Communication Services (ECS)** - Customers have identified concerns with the accessibility of the ECS process. To date DCC has only ever received 3 ECS requests, none of which have progressed. From March to July 2020 DCC engaged proactively with customers to ensure their views of potential improvements to the ECS process were considered. DCC published an online questionnaire which included seven principles and five ideas for improvements and customers confirmed which principles they agreed with and which they did not. Question 9 covers DCC's response to this feedback.

During the Regulatory Year, BEIS has begun to apply Licence Condition 16.6, which requires DCC to develop HMT Business Cases at three key decision points in the programme lifecycle (prior to approaching market through Requests For Information (RFI), prior to sharing Invitations To Tender (ITT) and prior to contract signature). This provides a further layer of rigour to customer engagement with a requirement to engage and capture customer input in advance of each of these decision points.

DCC initially applied this approach to the Comms Hubs and Networks (CH&N) Programme. DCC attended SEC Panel three times, TABASC 11 times and Ops Group four times as the Outline Business Case (OBC) was developed, covering topics such as the Technical Requirements, High Level Designs and Cost Benefit Analysis. Although these engagements were important in shaping the final OBC and Cost Benefit Analysis (CBA), there were lessons learned around the timing of the consultation, level of detail shared and clear identification of where customer views can inform decisions (see case study 1 for details). DCC is already implementing these as work continues towards a Full Business Case (FBC) and in other programmes, including DSP.

DCC believes that it proactively engaged with customers during the Reporting Year, enabling them to feed in views at appropriate points in decision-making cycles. DCC is committed to further improvement and is currently working on a joint project with SECAS and Sub-committee Chairs to review the process for engagement throughout the decision-making cycle, set a standard framework and agree specific artefacts to be shared at each gate across all programmes, in order to ensure that DCC can provide strong evidence next Reporting Year. For 20-21, DCC therefore suggests a score for this question of 2.

2.2. Q2: Clear Time Frames for Customer Contributions – Suggested Score 3

Has DCC set clear time frames such that customers understand when they can contribute views with sufficient lead times to enable them to do so?

DCC recognises that there are a lot of pressures on customers' time and seeks to maximise forward notice for engagement and consultation activities. When undertaking direct engagement activities, DCC also provides pre-reading materials wherever appropriate one week (or longer if required) in advance of meetings or webinars.

For strategic programmes, to ensure that customers are given sufficient lead times to enable them to contribute views, DCC routinely develops Engagement Plans. These plans identify where DCC is seeking customer inputs, the mechanisms/channels through which the inputs are being sought and, critically, the timing of planned customer engagements to ensure sufficient lead times to enable customer views to be received and used. An example summary Engagement Plan for CH&N from August – December 2020. This document was managed jointly with SECAS was shared with SEC Panel and Sub-committee Chairs. During the Reporting Year DCC also communicated forward timing of key future engagement such as the DSP webinars through ExCo peer to peer bilaterals.

DCC maintains a consultation page on [DCC's website](#) which contains open consultations as well as a forward look of upcoming consultations, alongside a calendar of engagement events on its customer portal. In some cases, such as the SMETS1 programme, a list of open and upcoming consultations was also shared with committees (specifically TAG and TBDG). DCC's consultation process allows for a period of four to six weeks for customers to provide views. The specific time frames for each for consultation were clearly specified in the respective Consultation Paper November 2020 SMETS1 Common Test Scenarios Document (CTSD) consultation, pages 3 and 6).

Where DCC's engagement activities include attendance at existing forums and committees, DCC ensures that standing processes are followed for providing future notice of attendance (with DCC stakeholder managers holding regular meetings with SEC Panel and Sub-committee Chairs to plan future attendance) and papers are sent out to members according to the agreed terms of reference (for example SEC Panel and Sub-committees require papers five working days in advance). For SEC Panel and Sub-committees, SECAS monitors DCC's compliance with these terms of reference and between Sept 2020 and the end of the Regulatory Year DCC presented 92% of papers on time for SEC Panel and 75% across its Sub-committees, with DCC having made recent further improvements on the timeliness of papers to Sub-committees.

DCC has received feedback from SEC Panel and Sub-committees that complex discussions need to be spread over more than one meeting. This approach has been built into DCC's planning, alongside offering detailed working group sessions which also allow more time for discussion, for example as part of understanding customer business needs for DSP.

For broader engagement activities, DCC endeavours to achieve at least the same standard of lead-times for customers to prepare, for example:

- **Switching Programme** – DCC ran monthly communications sessions for customers with DCC's suppliers or suppliers' representatives which were diarised for the whole year. If DCC was asked by customers to put on an event on a specific topic, it was scheduled with sufficient time for Customers to plan for attendance depending on the urgency; but not less than four weeks.
- **Quarterly Finance Forum** – Events dates were provided to SEC Party customers six months in advance, followed by invitations to register for each event, one month in advance. Supporting material was provided one week prior to the event to encourage active participation on the day. A six month forward look of engagement across all strategic programmes was shared with customers as part of each meeting.
- **Business Development Planning** – DCC started advising customers of the Business and Development planning workshops well in advance with clear notification of the workshop dates four weeks in advance with materials provided five working days in advance. Similar patterns were followed for feedback webinars. Further details of this approach can be seen in Case Study 4.

DCC believes that there is strong evidence of clear advance planning and communication to customers of engagement activities across both strategic programmes and wider DCC activities, and therefore recommends a score for this question of 3.

2.3. Q3: Timeliness and Frequency of Broader Engagement – Suggested Score 3

Has DCC's broader engagement (e.g. general updates, reactive engagement on unplanned issues impacting customers) been delivered in a timely manner and with sufficient frequency?

Alongside targeted communications on specific topics as outlined above, DCC conducts regular engagement activities to provide updates on operational activities and performance as well as general programme updates.

- **Strategic Programmes** - Programme and operational updates are presented to SEC Panel on a monthly basis. These monthly updates cover major incident reporting, SMETS1 releases and prepayment success and failure rates and provide opportunity for discussion and challenge, with deeper dives on programmes where requested by the Panel chair. Programme progress updates to wider DCC Customers are also presented at the Quarterly Finance Forum. Programmes also regularly provide updates at other forums and committees, including TBDG, TAG, IMF, SMDG, SSC and SEC Ops Group. During the reporting year DCC started more regular engagement with the DNOs and DNOs' representative groups as part of the DNO transformation programme.
- **Bilaterals** - In the reporting year DCC established a peer-to-peer Exco bilateral programme. The first phase of this focused on relationship building and agreement of frequency of future engagement, moving into more strategic discussions in subsequent meetings. From March 2020 until April 21 DCC had 43 senior bilaterals with major energy suppliers, including with CEOs, CFOs, CTOs, CSOs, corporate affairs directors and Board level regulatory and compliance colleagues. Bilaterals covered topics such as the status of the Smart Meter roll out, firmware issues and the stability of the network in the North, future technology, the Switching programme and perspectives on EV charging.

In addition to the regular programme and bilateral engagements outlined above, in RY20/21, in line with established processes, DCC also undertook the following regular and reactive engagements.

- **Change Management** –A schedule of maintenance windows is shared a year in advance, with monthly updates on changes and communications on the night of deployment (both planned and unplanned) covering details of the change. A dashboard is also shared with Operations Group (OPSG) on a monthly basis and a forward schedule of change is updated every two hours and available on the Self-Service Interface. An example of the change management updates provided directly to industry are included below.
- **Logistics** - Forward logistics communications, including order confirmations, order amendments, delivery confirmations, and delivery amendments are shared with customers at appropriate points throughout the logistics cycle. Where requested by individual customers, monthly calls are scheduled to discuss processes, order pipelines, any outstanding issues, and any other relevant matters. On emergence of issues related to orders, immediate communications are undertaken with continued communication at a frequency appropriate to the issue, until a resolution deemed acceptable to the customer is reached.
- **Invoicing and Credit Cover** – Invoices are sent to customers on working day three of every month with Credit cover request/refund notifications (where requirements have changed) sent to customers at intervals throughout the month. DCC aims to respond to customer queries within one working day in relation to invoices and/or credit cover calculations, and continued communication with the customer at a frequency appropriate to the issue, until resolution.

DCC also undertakes unplanned, reactive engagement where necessary to update customers:

- **Service Management** - DCC engages with customers in a reactive manner to deal with various issues outside of incidents and service requests. This includes general queries, guidance, facilitation of sessions with other areas of DCC, complaints, requests for work orders, escalations and other similar issues. The Service Management function operates within business hours and communicates with customers on an as-needed basis, in a timely manner and with a frequency appropriate to the issue in question.
- DCC tracks engagement across several operational customer journeys on an ongoing basis. DCC has received good feedback from customers about the quality of this engagement via customer experience surveys which follow the Gartner 1-7 score format. For RY20/21 DCC achieved a 12-month average of 5.4 against a Gartner benchmarked target of 5.2.
- **Operational Reporting** - DCC engages with customers through the provision of operational reports, on a regular basis, covering various aspects of DCC's operations. The production of reports is a 24/7 operation within DCC, producing reports on a daily, weekly, monthly or quarterly basis as appropriate for each report. Over the RY, DCC published circa 64,000 report instances for customers, with an average of 98% of reports being sent out on time.

DCC believes it undertook timely and frequent engagement with customers covering both general updates and reactive engagement to unplanned issues in the Reporting Year. Based on this, DCC believes that there is strong evidence it met the required standard and recommends a score of 3.

2.4. Q4: Quality and Detail of Cost/Benefit Information – Suggested Score 2

Has DCC provided its customers with information of sufficient quality and detail to enable them to compare costs and benefits of different options, and understand the drivers of those costs and benefits?

DCC understands the importance of cost and benefit information when assessing the value of potential change and is committed to providing the best information available to customers at each stage of the decision making process. However this will always be subject to prevailing commercial considerations (for example relating to procurement activity or conditions under which costs were provided to DCC). For this reason it is likely that there will be an continuing gap between the level of detail on costs DCC is able to provide against customer expectations.

During the regulatory year DCC presented cost and benefits through a variety of updates and processes, including:

- **SEC Modifications** – As a key participant in the SEC Modification process, DCC is responsible for presenting costed technical solutions for system impacting modifications with full transparency of costs proposed by providers. This enables SEC Parties to understand the cost-benefit analysis of change and informs decision making. During the Development phase DCC offers insight on possible impacts of SEC Change, the Refinement phase provides preliminary impact assessments, and, where progressed, final impact assessments that set out the timescales and costs of change in greater detail. These impact assessments ensure that industry have a clear view of the costs versus the benefits of SEC change. One example is the SEC modification work relating to the impact of Covid and UK lockdown on CH ordering and delivery processes. To ensure continuous improvement, during the Reporting Year DCC started work with its Fundamental Service Providers and SECAS to improve the timeliness, quality and value for money in DCC's assessments. This work is focused on developing a proposal to implement a dedicated multi-party cross functional design team to accelerate the delivery of impact assessments for SEC modifications and create better value for money solutions, and on developing a proposal and plan for implementing an Agile Delivery Methodology as a Proof of Concept.
- **Arqiva Commercial Reset** – DCC started the Arqiva Commercial Reset project in October 2020 to ensure that the DCC is paying the right price for the right outcomes and has the correct contractual mechanisms in place to achieve key DCC objectives. The objectives of the commercial reset were not just to reduce costs, but to ensure that the DCC is paying for outcomes not activity and can achieve improvements in Cost Management assured by increased transparency, certainty of delivery, cost of failure payments and quality of service. DCC engaged regularly with SEC Panel with papers presented in December 2020 and March 2021 covering the proposed approach, including details of impacts of costs and charging over the lifetime of the contract and attended the QFF in March 2021. Final engagements on the project were held after the end of this Regulatory Year prior to approval by DCC Board in June 2021.
- **Quarterly Finance Forum (QFF)** – One of the regular updates at the QFF is the Cost Forecast Update, through which DCC presents costs of upcoming programmes together with any change from previous forecasts, alongside specific business case discussions as appropriate, including DCC's approach to sharing business case information with customers and updates on specific business cases such as Production Proving. Attendee responses to the QFF customer satisfaction (CSAT) scores in RY2020/21 average 3/5 suggesting that content is generally of a good enough quality to help inform customer opinions and understanding. However, in feedback via the QFF, customers have expressed a desire for improved or more regularly updated Cost Benefit Analyses and external Business Case summaries for some programmes, which DCC will look to provide where possible in RY 21/22.

As set out above, at various points in any programme or procurement lifecycle DCC is significantly limited in the level of cost / benefit detail that it can share due to commercial constraints, in particular for LC13 programmes. Over the Regulatory Year DCC has been working closely with BEIS and SEC Panel and Sub-committee Chairs to learn lessons from previous consultations on costs and benefits. Discussions included identification of what information can be shared with customers at each stage of the programme lifecycle within prevailing commercial constraints, consideration of how best to present cost and benefit information for programmes in the future, and setting realistic customer expectations. DCC acknowledge that where it is not possible to share detailed costs and benefits more work can be done to effectively communicate the known drivers of costs and benefits to ensure that they accurately reflect customer expectations. Each year DCC also offers customers the opportunity to audit DCC accounts under an NDA, although this is rarely taken up.

In the Regulatory Year, DCC has shared cost and benefit information in relation to key programmes, for example:

- **Communications Hubs and Networks** – In October 2020, DCC consulted on details of the emerging business case through a ‘Cost Benefit Analysis’ (CBA) document developed to provide an overview of the preferred technical solution and details of potential delivery approaches including high level cost and benefit information (detailed cost/benefit information could not be shared at this point due to commercial constraints related to the impending ITT process). The consultation was supported by a webinar to ensure that customers had the right level of information and could ask questions to make informed responses. While there was some positive feedback, some customers felt that there was insufficient cost and benefit detail available to assess the potential value of the presented options. DCC conducted follow up sessions with SEC Sub-committees, including providing updates on the Economic Analysis as the programme milestones changed, and through bilaterals to respond to this feedback.
- **SMETS2 Fylingdales** - In January and February 2021, the GBCS 2.1 Fylingdales programme undertook a series of one-to-one discussions and included a presentation in the regular Implementation Managers’ Forum (IMF) pack to outline the costs and options for DBCH-F test facility.
- **DCC Boxed** – DCC Boxed provides a simulated DCC development or testing environment and was initially developed as an internal testing tool so that DCC could keep pace with mandatory testing requirements. DCC believes this tool could also be useful for any party who uses DCC Service Requests or those who manufacture devices for use as part of Smart Metering Systems. From March to May 2021 DCC ran a survey, supported by an online webinar, on the proposed DCC Boxed approach to gauge demand for the product, with supporting literature covering all aspects of product, cost (including pricing points and funding options) and SEC mod options. The survey was promoted via emails to a wide range of customers and stakeholders, and bilateral meetings were held for those wanting more information.

DCC recognises that, although there are examples of good practice in some areas, it needs to be more consistent in the quality and detail it presents to customers to enable them to compare costs and benefits of different options, and understand the drivers of those costs and benefits, particularly in relation to strategic programmes. However, considerable commercial constraints prevent DCC from sharing detailed cost information, even under NDA, which could lead to poor value for money outcomes. In this context, for the 20/21 Regulatory Year, DCC believes the evidence reflects a score of 2. To improve this, DCC is committed to ongoing improvement in communications with customers about what cost/benefit evidence will be available, as well as sharing the information itself.

2.5. Q5: Quality of Information for Broader Engagement – Suggested Score 3

Has DCC provided sufficient quality of information in its broader engagement (e.g. general updates, reactive engagement etc) for customers to understand the issues and the actions DCC is taking?

As noted in the answer to question 3, DCC undertakes a wide variety of broader engagement activities, each delivering information on specific issues or actions DCC is taking (or proposing to take). Across these various activities, DCC believes that it has provided high quality supporting information.

DCC has been working with SECAS to ensure that information of a consistently high quality is provided to customers in support of SEC Panel and Sub-committee engagement activities. SECAS have been measuring DCC performance via an enhanced dashboard since September 2020. Alongside a range of other metrics, the dashboard marks DCC on quality of documentation and meeting participation for both planned and reactive engagements. During the period from September 2020 to March 2021, the Dashboard shows an overall ‘quality’ rating of around 90%. Specific examples of positive feedback on paper quality include from February 2020 when the SSC Chair noted ‘*Feedback on Network Evolution has been implemented with items tailored for SSC presentation*’, and in March 2020 when the SEC Panel Chair noted ‘*The Adverse Weather paper (Evidence item 20) in particular required no changes and referenced the relevant December paper which was really useful, especially as it was a later addition to the agenda*’. DCC is continuing to work with SECAS to resolve any remaining concerns and further drive up the quality of information provided.

DCC is committed to improving the quality and appropriateness of all its engagement, actively seeking input from customers in support of this. For example, during ExCo bilaterals, DCC asks customers how DCC can improve engagement, including whether DCC provides relevant, appropriate information during those discussions.

During the Reporting Year, DCC prepared high-quality detailed engagement materials and attended or ran a variety of other sessions with wider customers to discuss specific topics. For example:

- **Switching Programme Updates** - An overall programme update and relevant detailed sub-programme details (such as progress update, high-level plan and issues) were provided in the Switching Programme industry summits. This material was prepared by DCC subject matter experts and underwent extensive review to assure quality. Material used for the October 2020 Switching Programme Industry Summit is provided in case study 2.

- **Change Management Planned Outages** - Information is provided on the planned dates of outages as part of the schedule of planned maintenance windows to enable customers to plan. Communications are also shared covering details of a change and its outcome on the night of deployment.
- **Logistics** – DCC provides individual logistics updates to customers. These include order references, volume details, delivery dates, alternatives delivery dates upon customer request or where there are delivery issues and reasons for delivery amendments.
- **Business and Development Planning** – DCC provided a range of materials for customers attending the Business and Development planning webinars, including pre-briefing information on topics for discussion at the webinar and presentations used to introduce each session on the day (which were also shared with customers afterwards).

DCC also applied its high standards of document quality to reactive communications with customers during the Reporting Year, with detailed processes and templates in place to ensure customers receive timely information relating to any issues identified. For example:

- **Service Management** - The information provided to customers who contact Service Management is dependent upon the issue raised or support required for the customer. In all cases, DCC provides information to customers that is accurate and appropriate to the matter in hand, ensuring a satisfactory outcome for the customer.
- **SMETS2** – Clear information was given to customers to make them aware of issues and actions DCC was taking on Plan progress, defect resolution, test environment configuration, Comms Hub and HAN device interoperability (ESME, GSME, PPMID).

DCC believes that it provided high quality information for broader engagement and general updates or reactive engagement in the Regulatory Year, and is focused on continuous improvement of the quality of documentation for customers. Based on the evidence above, DCC believes that it clearly met the required standard and recommends a score of 3.

2.6. Q6: Provision of Appropriate Information to Relevant Audiences – Suggested Score 3

Has DCC provided the appropriate information to the relevant audiences when engaging with customers?

When planning engagements, DCC reviews presentations in detail to ensure appropriate information is included, and that due consideration is given to the intended audience, balancing consistency of core messaging with clear focus on issues relevant to each engagement activity. In addition, for some discussions, DCC may need to share sensitive information. In these cases, DCC ensures that documents are classified appropriately and shared only with intended audience (with use of NDAs as appropriate). SECAS and DCC have appointed single points of contact who cover all the SEC committees and engagement, and jointly plan meetings to ensure topics to be discussed and information to be shared are coordinated and appropriate for the audience.

A key area where DCC has to focus on sharing appropriate information is in the development and delivery of strategic programmes, where the scope of change activity crosses a number of different subject matters. Examples in the reporting year include:

- **Communications Hubs and Networks Requirements** – As part of seeking approval for the Outline Business Case and Invitation To Tender materials by BEIS, DCC attended a series of meetings with each of the SEC Sub-committees in order to review and agree the requirements. To progress effectively, each Sub-committee was only asked to review requirements that fell within their specialism. DCC worked closely with TABASC to go through the detail of the CH&N technical designs, including discussing the end to end design solution, and other technical details around the design options. At SSC DCC only discussed the security requirements. To build further on this and ensure continuous improvement in this area, on DCC's suggestion, DCC and SECAS have recently introduced individual topic pre-meets with Chairs and DCC experts to agree how to best tailor the message for the specific committee and ensure the appropriate level of detail is available.
- **Elective Communication Services (ECS) Process Review** - DCC has recently engaged with technology and digital teams in several customer organisations and has provided use cases and potential solutions to solve customer issues. This has helped form longer term plans to address customer needs and will form part of the pilots for the new process that are being agreed over the coming months.
- **Switching Programme** - The DCC Switching Programme maintains a Distribution List of general industry stakeholders, which includes customers (energy suppliers and distribution network operators) and third-party adaptor service providers (ASPs). Engagements are carried out with contacts on this list. For each engagement event, DCC ensured that the appropriate materials were created and shared to support the particular event.

- **CSP North Performance and Reporting** - Customers have raised problems with the CSP North Performance and Reporting, where Firmware delivery has not been at the level required in the Smart Energy Code. To respond to this, DCC has driven a CSP North Service Improvement Plan focussing on key customer priorities and performance concerns. DCC has worked transparently with Ops Group on this plan and engaged with TABASC on technical elements. DCC set up the Arqiva Common Issues Forum to proactively engage with relevant representatives from industry on this issue. Additionally, DCC has initiated a piece of work to look in detail at the ability of the CSP North to meet current and known-future requirements, and to identify the impact of requirements that have evolved over time. DCC has engaged a selection of customers during this process to understand the critical requirements (and the underlying business processes) to enable DCC to work with Arqiva on the identification of cost-effective solutions (technical and non-technical) to bridge performance gaps, both now and at scale.

In undertaking wider communication activities, DCC also looks to ensure that the information presented sits at the right level for the attendees and where relevant, to support any decisions sought. For example:

- **Business and Development Planning** – To inform Business and Development Planning activities DCC engaged customers through workshops, a webinar and the distribution of a draft copy of the Business and Development Plan for comment. To ensure that the most appropriate representatives within customer organisations were engaged, DCC sent invitations to relevant nominated persons, and DCC subject matter experts engaged directly with counterparts within customer organisations to extend invitations to them. This approach ensured that delegates had relevant expertise to engage with the the material that was distributed ahead of the workshops, and could provide relevant customer views and insight to inform the Business and Development Plan.
- **Quarterly Finance Forum (QFF) Update** – As part of the regular agenda, the QFF provides transparency and seeks views on DCC’s latest financial forecasts and the underpinning assumptions as well as seeking feedback on new programmes and projects to nominated representatives from each customer.
- **Operational Reporting** – Operational reports are produced on a regular basis covering various aspects of DCC’s operations. Many reports are tailored to the individual customer ensuring that all the information they contain is relevant to the customer. There are currently 48 reports which are cut for the individual service user, ensuring each SEC Party get a report containing data pertinent to them. The majority of these reports have been developed and enhanced through interaction with Service Users through the various Committees and Forums and in response to direct feedback.

DCC believes it has regularly shared relevant information with appropriate audiences during the Regulatory Year, and there were no material areas of concern in the appropriateness of information presented to customers. Based on this, DCC has clearly met the required standard and recommends a score of 3.

2.7. Q7: Ensuring Customers Understand Which Views Inform Decisions – Suggested Score 3

Has DCC ensured its customers understand on which issues their views will inform decision-making?

As noted in the response to Question 1, in any given month DCC is likely to have to make multiple decisions, big and small, that impact customers from either an operational or financial perspective. This is particularly true where decisions guide strategic or operational change activities. DCC therefore recognises the importance of ensuring that customers understand which decisions they will be able to influence, which engagement activities are designed to capture relevant views, and how they will be taken into account.

DCC has a general “Inform; Shape; Survey” approach to engagement which is used to make it clear to customers whether they are being:

- informed on a mandated programme or regulatory change;
- invited to shape DCC’s approach to a particular programme or issue; or
- surveyed (in particular cases) for their views on how DCC should be acting on an issue.

Larger programmes of work, or future programmes, will generally fall under “shape” engagement, meaning engagement will take place at each stage of DCC decision making and that DCC will feedback to customers on how their input has helped inform propositions and recommendations to the Board. Key examples throughout the year where DCC set out how customer views would inform decisions are set out below.

Formal Consultations

DCC regularly uses consultations to engage with customers on specific areas of regulation or strategic programmes when seeking specific customer input. When undertaking consultations, DCC operates a formal process, with prior notification of upcoming consultations published on DCC's website and a window for responses of between 4 and 6 weeks. Each consultation sets out details of the issue under consideration, including relevant contextual information, identifies where DCC is seeking input and details how responses to the consultation will be used to inform decisions. The consultation process also includes a formal feedback loop as described in the next questions.

In the regulatory year DCC has used consultations to obtain customers views on a range of different issues and potential changes. Two particular examples include:

- **SMETS2 Communication Hub (CH) Ordering and Delivery Rules** – DCC carried out urgent SEC modification work relating to the impact of Covid and UK lockdown on CH ordering and delivery. DCC listened to customers concerns and worked to issue consultation on temporary Communication Hub Ordering and Delivery Rules. This is the fastest SEC MOD to date, including two consultations to get customer feed back: [Proposed changes to the Temporary Communications Hub Ordering Delivery Rules | Smart DCC](#) and [Consultation on TCHODR | Smart DCC](#). Through this modification, DCC worked to industry requirements in reducing CH delivery and production volumes, saving cost and resource for Users.
- **Communications Hubs and Networks** – While not a regulatory consultation, DCC opted to follow a formal consultation approach for customers to input into the development of the Outline Business Case for BEIS. Due to commercial sensitivity constraints and feedback from customers when DCC had shared business cases previously, the full business case document was not shared, but a Cost Benefits Analysis document was developed providing details of key aspects of the business case, together with a series of questions identifying where customers could inform DCC's decision making.

Engagement through SEC Panel and Sub-committees

When undertaking change activities, a key mechanism for capturing customer views is attendance at one or more of the SEC Panel / Sub-committees. When attending these committees, DCC uses SECAS's classifications to identify whether the paper is to inform, for discussion or for decision, for the latter clearly noting what decision or decisions are required.

Examples include:

- **Data Service Provider (DSP)** – In July 2020 DCC attended TABASC to provide an update on the (DSP) programme. DCC set out the Problem Statements which it had identified based on experience of managing the service over the last several years. Members noted that the problem statements did not reflect users' concerns adequately. Following this feedback, DCC engaged more closely with users, and returned to TABASC in October 2020 with an uplifted version of the Problem Statements, better reflecting user needs.
- **SMETS 1 Live Service Criteria** – BEIS set DCC criteria to meet for Middle and Final Operating Capability (MOC and FOC) prior to go-live, on which DCC engaged and received approval from all SEC Sub-committees and SEC Panel.

Engagement through DCC managed forums or activities

In addition to the formal consultations and engagements through SECAS managed committees, DCC also undertakes a range of other engagement activities in which it uses the 'Inform, Shape, Survey' approach described above to signpost the purpose of the engagement. For example:

- **Quarterly Finance Forum** – Slides within packs are clearly marked with Inform or Shape to signpost to customers where we are seeking their feedback. During the Reporting Year DCC started to "close the feedback loop" with "You said, we did" presentations to the QFF.
- **Business and Development Planning** – DCC engagement with customers included workshops sessions with delegates from customer organisations. The workshops were designed by DCC so that delegates were divided into breakout groups with the intention to discuss specific questions that DCC was seeking views on. These questions can be viewed in the material distributed to delegates in the workshops on Pages 19, 33, 37 and 44. Page 5 of this workshop material lays out that DCC's intention was 'for the workshop to be a productive interactive session from which it can take customer input and incorporate it into the Business & Development Plan'. Case study 4 sets out the outcomes of the workshop and positive feedback from customers.

- **DCC Boxed** – DCC has consulted customers on a SEC mod and finance options as well as some product specifications. Following a customer workshop of 1st March 2021 DCC put out a survey to as wide an audience as possible in response to customers requesting this, followed by a Webinar in April. This clearly set out questions, including on pricing and regulatory change, with supporting information to help customers take a view, which would inform DCC's decisions.

Overall DCC believes that it sets out clearly where customers views can influence decisions, and is committed to continuing to work with SECAS, as set out in Question 1, to agree greater clarity on all engagement processes throughout the decision-making cycle. DCC believe there is evidence of good practice across a range of different engagement activities and approaches, and that this is especially strong in the examples demonstrated in the second half of the Reporting Year. DCC therefore recommends a score for this question of 3.

2.8. Q8: Taking Customer Views into Account in Decision-Making – Suggested Score 2

Has DCC taken customer views into account in its decision-making?

While some engagement activity exists to inform and update customers on DCC's core operational business and progress with change activities, DCC also engages regularly with customers to discuss and shape potential future changes, both strategic and operational, with the understanding that customer views will be considered as part of the investigation and design stages.

In the Regulatory Year there were a number of areas where there is evidence that DCC took customer views into account. For example:

- **SMETS2 Self Service Interface (SSI)** – In February 2021, DCC consulted on the proposed changes to the SSI as part of the SMETS2 programme. The consultation provided detail of the improvements proposed, including example screen shots of new functionality, and invited customers to provide comments and feedback. Feedback was reviewed and considered by DCC with initial responses to that feedback presented to SEC Ops, including via a decision paper, and the SSI Improvement Proposal progressed through the SSI Change Governance Process. One DCC consultation response in particular related to customer feedback requesting greater reporting. DCC recognised the benefits of this but noted that to allow the SIP to be implemented in time for a linked SEC Modification due for November 2021 release, the solution could not be expanded. DCC did however commit to taking this as another SSI improvement Proposal if desired.
- **Business and Development Planning** – DCC's engagement with customers included a feedback webinar to discuss the views that had been collated in the previously held workshops. For each customer view, DCC reported what actions DCC would carry out in response and when these would happen. These actions, customer views, key themes raised by customers, and how DCC has incorporated them, such as the way DCC has responded to concerns from DNOs, can be seen in the draft Business and Development Plan.
- **SMETS1** – DCC has consistently considered the impact on suppliers, particularly for dormant meters, and supplier views when making decisions regarding enrolment. DCC considered responses from the seven organisations who responded to the Final Operating Capability (FOC) Joint Industry Plan (JIP) consultation and incorporated this feedback into the plan.
- **Elective Communications Services (ECS)** – The ECS process as currently drafted in the SEC and DCC licence does not deliver for DCC customers. Following an online webinar and discussion at the Business and Development Planning webinar, DCC has considered customers views on why and developed a revamped process that will deliver customer requirements.
- **DCC Boxed** – DCC Boxed provides a simulated DCC development or testing environment and was initially developed as an internal testing tool. The outcome of a customer survey run between March and May 2021 was published on DCC 's website with customer responses indicating that:
 - There is sufficient User demand for DCC Boxed product
 - The £5.5k price point is attractive to support sales of DCC Boxed
 - DCC should make this available via an explicit charge
 - DCC should raise a new SEC MOD for DCC Boxed
 - DCC should explore the option to hire DCC Boxed in the future

Based on the customer's feedback, DCC have raised a draft SEC Mod. DCC defined the problem statement and will be proposing an explicit charge for this service. DCC will continue to engage with customers about the optimal route to market.

DCC is committed to ensuring that customer views are taken into account over the entire lifecycle of strategic programmes, from initial discussions on drivers and options for change through delivery and transition into live operation. DCC's Network Evolution programme comprises a suite of programmes which together will underpin the operation of the Smart Metering network of the future. In October 2020, DCC ran a consultation on a Cost Benefit Analysis for the Communications Hub and Networks Programme, supported by a webinar and engagements with SEC Panel Sub-committees (see Case Study 1). While it was not possible to incorporate all feedback directly into the Communications Hub and Networks programme, at several points in the consultation DCC responded directly to customer views and demonstrated where it had taken them into account and if it hadn't why. For example:

- Following the webinar a written response was provided to all questions within 7 days (and before the end of the consultation period);
- Following closure of the consultation (and receipt of 8 responses), DCC provided a response document with a clear conclusion for each question, directly responding to customers' views; and
- Two additional questions were incorporated in the ITT relating to current and potential future coverage in the North (subject to a separate business case).

Building on lessons learned in the Communications Hubs and Networks engagement (including this consultation), when refining the Engagement Plan for the DSP programme DCC is ensuring that engagement is better timed and structured to enable customers to shape the solution and delivery approach. For example, in line with early customer input, DCC has reiterated that a core aim of the programme is to minimise the impact of transition to new services for customers, whilst delivering as a minimum the same level of services currently defined in the SEC.

DCC is confident that it took customers' views into account and has provided evidence to demonstrate specifically how these views have been considered in shaping strategic direction and operational change, particularly in the second half of the Regulatory Year. DCC recognises the need to gather and share the evidence on how it has done this more routinely with customers, and has started to do this more frequently moving into the current Regulatory Year. For 20-21 DCC therefore suggests a score for this question of 2.

2.9. Q9: Communication of Rationale for Decisions – Suggested Score 2

Has DCC communicated a clear rationale for decisions it has made to customers, explaining how customer views have informed its decision making, and where relevant why DCC has decided not to incorporate customer views? As outlined in previous questions, before making decisions, DCC regularly seeks customer input through a variety of different forums and consultation approaches. DCC is not always able to incorporate every customer view in final decisions, particularly if a consultation or engagement provides a wide range of views, or if the suggestion falls outside of DCC's licenced activities. However, DCC is committed to providing customers with a clear rationale for decisions it has made.

In the 20-21 Regulatory Year, DCC has regularly used the formal consultation process to solicit views from its customers. Consultation questions covering specific topics are included in all these consultations, and the documents set out next steps. Where consultation requirements are set out in regulation, DCC is obliged to set out its rationale for decisions, including where it disagrees with respondents. DCC builds this approach into its consultation conclusions process as a matter of best practice. Specific examples where DCC has set out conclusions to customers include:

- SMETS2 Firmware Tracking - DCC issued a consultation on changes to the Self Service Interface to describe new functionality proposed to report on Firmware Tracking for SMETS2 devices, which was proposed in order to support SEC MP007. Responses were reviewed and collated into categories (support, clarification and challenge). DCC developed responses to each comment and presented the consultation responses and DCC's response to the SEC Operations working group, as required under the SSI Change Governance Process. Discussion was welcomed and encouraged from SEC Operations Group Members. Comments received were supportive of the SSI Improvement, while most requested additional clarity which was duly provided. For example, one comment suggested that the proposed improvement be expanded in scope and it was noted that, although the suggestion could be beneficial, as it would not be possible to develop the solution in time to support SEC MP007, the proposal could be accepted as a separate SSI Improvement Proposal.
- Elective Communications Services (ECS) –DCC has provided clear rationale for the decisions made on ECS to date. DCC is also planning wider customer engagement to support Industry and SEC parties on the specific changes required in legislation to enable the new ECS process to be delivered.
- Switching Programme - DCC engaged heavily on Ofgem's Switching Programme, on the design of the Switching solution, the conduct of test phases and the resolution of data issues. In each case customer engagement

preceded discussion at further forums of the Switching Programme (eg. Design Authority or Implementation Group) that directly informed decision-making. Customer views were reflected in adjustments to the recommended way forward. Where customer input did not lead to any further changes, this was justified and documented. Evidence for this activity is held in the minutes of the relevant meetings (Design Forum, Working Groups, etc.) in the Switching Programme's Salesforce system.

- Quarterly Finance Forum – In QFF events, programme updates for non-mandated work include sections on 'you said, we did' – explaining how DCC has acted on feedback and how the decision was reached (see Evidence Item 12 for example)
- Communications Hubs and Networks CBA – DCC received 8 responses to the October 2020 consultation on the CBA. As a result, DCC provided a detailed Consultation Response document, in which the responses to each question were summarised with a detailed response from DCC identifying either where the responses had influenced DCC's OBC or reasons why they were not being considered at this stage. Following this document DCC also held follow up sessions at SEC Sub-committees.

ExCo Bilaterals also play a part in communicating back to customers the outcomes of DCC's decision making, for example in explaining to customers following consultation why DCC is procuring both dual and single band comms hubs as part of the CH&N Programme.

DCC believes there is good evidence to demonstrate how DCC has communicated a clear rationale for decisions made to customers. DCC is aware that if insufficient rationale for decisions is given, issues continue to be raised whenever customers are engaged in future, deflecting focus from the purpose of the engagement. This is a key lesson learned from the earlier part of the last Regulatory Year and DCC is now placing greater emphasis on ensuring customer concerns are managed effectively. On this basis DCC suggests a score for this question of 2, and will continue to make this a focus for improvement into 21-22.

3. Case Studies

The case studies in this section are a chronological description of events that took place related to DCC's customer engagement in relation to the stated subject matter.

3.1. Case Study 1: Cost-Benefit Analysis for CH&N Programme

3.1.1. Background

The Network Evolution Communications Hubs and Networks programme will provide new 4G SMETS2 Communication Hubs and supporting Communications Networks to be installed instead of the current 3G variants to mitigate against future obsolescence of the 2G/3G Communications Networks. This programme is the first to fall under Licence Condition LC16.6 which requires DCC to provide BEIS with an HMT-style Business Case to support investment decisions.

Prior to endorsement of the Outline Business Case (OBC) by BEIS in December 2020, DCC undertook a series of engagement activities to capture customer's views on the programme's drivers and high-level requirements as well as potential options to deliver these requirements. Key to this engagement activity was the Cost Benefit Analysis, shared with customers in the form of a consultation in October 2020.

3.1.2. Approach

DCC developed a consultation document, the Cost Benefit Analysis, to provide customers with contextual information about the programme and the current arrangements for Communications Hubs and Networks in the South and Central regions, the Case for Change, Scope of Potential Changes, Options for Delivery, high level Costs and Benefits by Option and an overview of the delivery approach.

The consultation document was shared with customers in October 2020, supported by a covering letter which provided further contextual information, including details of the commercial and delivery approach, noting that these limited DCC's ability to expose detailed cost information. The letter also set out how to respond to the survey (through a web-based survey or consultation response document) as well as contact details for any questions. The consultation ran for one calendar month to 30 November 2020.

During the consultation period, DCC also attended TABASC, SEC Ops and SSC as well as running a customer webinar in November to present the CBA and provide an opportunity for customers to request further clarity.

3.1.3. Consultation Responses and DCC Conclusions

DCC received seven written responses to the consultation. Together with views identified in the supporting webinar, these responses were consolidated in a Consultation Response document. In this document DCC summarised views into themes for each question and provided responses or further details as appropriate as well as setting out next steps for the programme. DCC communicated the themes of the response at the January 2021 Quarterly Finance update and the consultation response was published in March 2021.

3.1.4. How the Consultation Influenced the Programme

Consultation responses generally supported DCC's recommendation to deliver a 4G Minimum Viable Product (MVP) solution as soon as possible which helped DCC gain SEC Panel endorsement prior to OBC completion. A number of customer responses expressed concern with challenges in the North which have impacted the smart meter programme, DCC therefore added two options to the ITT relating to WAN coverage in the North Region (subject to separate business case in the future if the options were to be exercised):

- For DCC to use WAN suppliers' current 4G coverage in the North region.
- For 99.5% 4G coverage in the North region.

Customer responses also influenced details shared within the LC13B consultation on the delivery plan early the following Regulatory Year.

3.1.5. Follow up Engagement Activities

In response to requests from some customers for further information regarding costs and benefits of the options as well as the assumptions which drive them, DCC has continued to attend SEC Committee meetings to provide more granular information, both prior to approval of the OBC in December 2020 and subsequently as work continues on procurement and development of the supporting Full Business Case. DCC also intends to provide a refreshed version of the CBA with updated costs and benefits prior to approval of the Full Business Case in Q4 2021.

The CBA gave customers an understanding of the drivers for the programme and has been a useful framework for subsequent discussions. In particular, when DCC published the industry plan with later delivery dates following the LC13B consultation, customers requested, and DCC provided, an updated version of the CBA to demonstrate that the option being pursued still made sense.

3.1.6. Lessons Learned

DCC believes that the Communications Hubs and Networks programme CBA provided a good overview of the key details within the OBC and that the consultation was useful in progressing approval of the OBC. However, in response to some customer feedback about the timeliness of the engagement and level of detail presented, for future programmes DCC will seek to:

- Undertake any similar consultations as soon as sufficient information is available and as far in advance of the formal approval of the business case by BEIS as possible in order to maximise potential to influence DCC's decision making process.
- Provide as much detail as possible (within prevailing commercial constraints) on the costs, benefits and driving assumptions.
- Indicate more clearly where customer views can influence decisions as the business case is finalised.

DCC continues to work closely with BEIS and SEC Panel and Sub-committee Chairs to learn lessons from this and other consultations on costs and benefits. Discussions include identification of what information can be shared with customers at each stage of the programme lifecycle within prevailing commercial constraints, consideration of how best to present cost and benefit information in the future, and setting realistic customer expectations. DCC is already applying these lessons learned across a range of programmes and update activities.

3.2. Case Study 2: October 2020 Switching Programme Industry Summit

3.2.1. Background

The overall objective of the Switching Programme is to build, test and deploy systems that will facilitate faster, more reliable consumer switching between energy suppliers. The objective is to enable gas and electricity consumers to reliably switch between energy suppliers within one day. The programme was mandated by Ofgem, and commenced in May 2018. The new switching service is due to go live in June 2022.

There are a significant number of stakeholders related to the Switching Programme, and as a result, the Programme is required to perform extensive stakeholder management. Stakeholders primarily include customers (i.e. energy supplier and distribution network operators), service providers, providers of other systems which will integrate with the Central Switching Service, wider industry contacts and regulatory bodies. DCC uses a variety of mechanisms to engage and communicate with the various stakeholders. A presentation on DCC's engagement approach within the Programme is provided as Evidence Item 25.

One stakeholder engagement mechanism used by DCC is to host two industry summits per year. The purpose of these is to provide updates on key areas and developments within a particular aspect of the Switching Programme. One such summit was held in October 2020.

3.2.2. Planning

DCC commenced its planning of the October 2020 Switching Programme Industry Summit in July 2020. Since a key component to the success of the Programme is data quality, DCC chose to use the summit to engage on the work that is being done to improve data quality within the Programme. Also, the programme was entering a key testing phase, and therefore DCC chose to also engage on User Integration Testing (UIT) at the summit.

DCC planned the summit agenda around these themes, and identified internal and external stakeholders (including customers) whose attendance were deemed to be important for the chosen themes. For example, involvement of the service provider responsible for data cleansing and address matching was deemed important. In August 2020, DCC sent emails to such parties requesting their involvement.

DCC firmed up a planned date for the summit, and sent placeholder emails to general industry stakeholders on a Distribution List maintained by the Switching Programme. The Distribution List consists of customers, service providers and wider industry contacts. The placeholder emails were intended to act as invitations to the summit at the specified time

During August and September 2020, relevant DCC subject matter experts developed the material to be used at the summit. This underwent extensive review, including sign-off by the Programme Director, as a means to assure its quality and accuracy.

3.2.3. Summit

DCC held the summit in October 2020 as an online event, and it was attended by around 90 stakeholders, of which around 75% were customers. The summit material was presented by relevant DCC subject matter experts, and additional subject matter experts were in attendance to ensure that the relevant knowledge was available to answer questions. The summit passed successfully with various updates provided, Q&A sessions and extensive discussion by attendees. DCC also took note of stakeholder views.

3.2.4. Customer Satisfaction Survey

Following the summit in October 2020, DCC initiated a Satisfaction Survey to gather feedback on how attendees felt various aspects of the summit went. Attendees were sent a link to the online survey and given a 2-week period to enter responses to specific questions.

DCC collated and analysed the results of the survey, and produced a report for internal use, including sharing it with management. DCC noted very good survey results, and had, in fact, seen continuous positive feedback from customers in such surveys. In accordance with usual practice, DCC used the feedback to improve its stakeholder engagement approach.

3.3. Case Study 3: Amended Approach to Enduring Planned Maintenance

The full story of this case study covers a period from January 2019 to February 2021, therefore covering a period prior to the regulatory year. However, since a significant amount of customer engagement took place within the regulatory year, this case study has been included in this OPR submission.

3.3.1. Background

Prior to 2019, there were a low number of service providers and a low throughput of changes to the DCC network. Changes followed the approach to planned maintenance that was laid out in the SEC at that time. For the changes being implemented, there was a very low success rate. For example, in January 2019, there were eight outage changes raised, and six of them failed.

A key underlying problem that led to this low performance was the poor visibility of the details of the changes being implemented. This included:

- Poor visibility of the level of risk associated with the changes, and of the potential impact that the changes could have on core service and to customers
- Poor visibility of all change activity because service providers only advised of the details of 'outage-only' changes within the windows that they had booked

In addition to the low success rate of changes, the change activity also had an adverse impact on the number of incidents on the network, and the average time taken for the incidents to be resolved.

A further key underlying problem that led to this adverse impact on incidents was that activities deemed as 'non-outage' by service providers were, in fact, changes. This meant that:

- Those changes were not managed with proper governance, which meant that they could result in unexpected outcomes such as incidents

- There was no proactive support from DCC for those changes, such as pre- and post-change assurance, leading to incidents occurring
- The DCC Incident Management Team had no awareness of the change activity taking place, resulting in slower diagnosis and resolution of incidents caused by those changes

3.3.2. Proposed Amended Approach

DCC announced at the Operations Group (OPSG) Meeting in December 2018 that it wished to consult customers on a potential amended approach to enduring planned maintenance, with a view to trialling it prior to submitting a formal SEC modification (SECMOD).

DCC shared full details of the proposal at the OPSG Meeting in February 2019. The proposal centred around a risk-based approach to implementing planned maintenance changes. A paper was shared with members prompting extensive discussion around the details of the proposal. DCC also shared details of the proposal at the SEC Panel Meeting in February 2019, also prompting extensive discussion. DCC took on board customer views in finalising the proposals, and also suggested performance measures and a reporting framework to be used as a formal trial for the proposals. Supported by the OPSG, these were presented to the SEC Panel in March 2019, and a 6-month trial based on the proposals was approved to commence in April 2019.

3.3.3. Reviews During Initial Trial

Between April and July 2019, DCC provided updates at OPSG meetings as to how the trial was going. At the OPSG meeting in July 2019, there was wide agreement amongst OPSG members and DCC that the new approach to planned maintenance was yielding substantial benefits in the visibility of change activity, success rate of implemented changes and low adverse impact in respect of resulting incidents. With the agreement of OPSG members, DCC confirmed that it would begin the formal SEC Modification process. However, DCC continued to monitor the trial, and provide updates at OPSG meetings.

3.3.4. SEC Modification Proposal (MP092)

Based on the trial successfully demonstrating improvements across all agreed performance measures, a Problem Statement for the proposed new approach was presented at the SEC Panel in November 2019. The SEC Panel subsequently agreed to convert the Draft Proposal (DP092) to Modification Proposal (MP092). Since it would take time before the Modification Proposal would be approved and written into the SEC, DCC obtained agreement from OPSG in January 2020 to support the continuation of the trial in parallel with the steps required to approve the proposal. This was subsequently also approved by the SEC Panel.

3.3.5. Reviews During Continued Trial

During the continued trial period, DCC continuously reviewed the new approach against its agreed performance measures, and provided quarterly updates to the OPSG, allowing customers to challenge and engage in discussion on the details.

As an example, in September 2020, DCC presented an update summarising the changes and improvements that had been made to the approach to planned maintenance and their outcomes during the previous year.

A further example is in December 2020 where DCC outlined its progress against the planned maintenance trial objectives, outlined the issues that had been encountered, and following customer feedback, outlined the improvements in communicating Planned Maintenance activities so that it would be clear what the business impacts they would have.

3.3.6. Approval of SEC Modification (MP092)

At the SEC Panel Meeting in December 2020, the SECMOD MP092 covering the amended approach to enduring planned maintenance was approved, and was subsequently written into the SEC and published in February 2021.

3.4. Case Study 4: Production of Business and Development Plan for 2021

Customer engagement on the business and development planning cycle spans two regulatory years. For example, customer engagement activities for the production of the 2021 Plan commenced in January 2021, however, the Plan will be finalised in July 2021. Since the majority of customer engagement activity occurred within the 2020/21 Reporting Year, production of the Business and Development Plan for 2021 has been included in this submission.

3.4.1. Background

DCC have a regulatory requirement to produce a Business and Development Plan each year, covering details of its current operation and outlining its strategic priorities for the following five years, together with the activities that DCC will undertake to deliver them. DCC proactively engage with customers to allow them to provide input and feedback to help shape the content of the plan as it is developed.

For the 2021/22 to 2025/26 Plan, DCC proactively engaged with customers regarding the key areas of its proposed work plans over the coming years which included Smart Meters, Mandated Activity, System Enhancement, Re-Use, and Culture and Capability.

3.4.2. Workshops

In January 2021, DCC used the following channels to initiate a consultation with customers in the form of a business and development planning workshop:

- DCC sent invitations to customers to attend the workshop. The invitations were sent by email to the nominated persons within the SEC Panel member organisations.
- DCC advertised the workshop via various mediums, such as LinkedIn, industry newsletters and DCC website.
- DCC subject matter experts engaged directly with counterparts within customer organisations to extend invitations to them. This was to ensure that as many relevant and interested customer contacts as possible were invited to the workshop.

Through all of the above channels, DCC requested expressions of interest from customers so that expected numbers could be gauged. A further workshop was arranged to accommodate the volume of potential attendees. DCC eventually signed up 55 delegates for the two workshops.

In preparation for the workshops, DCC subject matter experts prepared pre-reading material for the delegates, covering the broad discussion areas upon which DCC intended to engage. These materials are provided as Evidence Item 23.

In preparation for the workshops, delegates were provided with pre-read material in February 2021. The purpose of the pre-read material was to aid delegate understanding of the discussion areas so that they attended the workshops with some knowledge so that they could have a more in-depth discussion.

The Business and Development Plan workshops took place on the last week of February 2021 and first week of March 2021, each workshop being split over two mornings. Workshop delegates were provided with workshop materials covering the timetable, discussion questions, various notes and background information.

Workshops were designed by DCC to split delegates into smaller 'breakout groups' to facilitate greater participation from each delegate, and to improve information sharing. Each breakout group was encouraged to focus on specific questions that aligned to the key areas of DCC's proposed work plans, although delegates were also free to comment and raise issues beyond these directed questions.

DCC subject matter experts were in attendance at the workshops to present material, and to participate in the breakout group discussions, addressing questions around alternatives and taking on board feedback points. This ensured that discussions were carried out in sufficient detail and based on in-depth knowledge to deliver the best outcomes from the workshop. The breakout group discussions were then followed by whole group discussions to highlight key points. These were captured by DCC and shared with attendees.

An additional workshop was held with smaller suppliers who were unable to attend the main workshops. This took place in mid-March 2021 at the Small Suppliers Forum, where a bespoke version of the main workshop material was presented.

3.4.3. Feedback Webinar

All customer views and feedback were analysed by DCC, and key themes were identified. DCC used the customer views and themes to inform decisions in the proposed work plans.

DCC advised workshop delegates via email in March 2021 that it planned to hold a webinar to:

- Confirm broad customer views and key themes that were identified during the consultation workshops

- Outline DCC's proposed work plans, including how the customer views and feedback had been used inform these decisions and shape the Business and Development Plan
- Outline when DCC intended to issue a draft of the Business and Development Plan to customers for comment

DCC prepared a Feedback presentation outlining the above details to be covered in the webinar. DCC hosted the webinar in mid-April 2021 with the customer delegates. A copy of the presentation was shared with delegates thereafter.

3.4.4. Customer Survey

DCC developed bespoke surveys to capture customers experience at the Business & Development Pan workshops and the post workshop feedback webinar.

14 Customer survey results were gathered from the first 2 workshops. The data showed some positive results.

- "How satisfied were you with the following: Quality of information provided?" 4 were Extremely satisfied, 7 were satisfied and 3 were dissatisfied.
- "How satisfied were you with the following: Relevance of information provided?" 6 were Extremely satisfied, 7 were satisfied and 1 was dissatisfied.
- "How satisfied were you with the following: DCC responses to questions raised?" 6 were Extremely satisfied, 8 were satisfied.

Of the 14 attendees at the feedback webinar DCC received 4 responses. The data showed some positive results. As a sample; the questions "How satisfied were you with the following aspects of the Business and Development Plan Feedback Webinar:"

"Transparency of information provided?" 3 attendees scored us a 10/10, 1 scored us 7/10.

"Opportunity to comment and share my views?" 3 attendees scored us 10/10 and 1 scored us 1/10.

A key area DCC would like to address is increasing the percentage of responses DCC is able to gather following engagement. These responses are invaluable to DCC's MI and analysis of the effectiveness of engagement. Direct quotes and views from attendees also help us to understand customers engagement needs. One quote DCC received following the feedback workshop was:

"Great to see the engagement, and hear overviews from Directors and Heads of covering the 4 themes.

In addition, we would hope that DCC can support bilateral discussions, in addition to these feedback session, for those parties that engage with DCC. We believe that this will allow a range of views to be shared in detail. "

3.4.5. Distribution of Draft Plan

In the Feedback webinar, DCC advised that it would produce and distribute the draft Business and Development Plan by 17 May 2021, although this timeline slipped and DCC recognises that better communication regarding revised timescales would have assisted customers with their planning and resourcing for providing feedback on the Plan. DCC acknowledges this and has adopted it as a lesson learned. DCC will consider and where appropriate reflect any customer comments on the draft Plan before its finalisation and publishing. This is planned to be completed by the end of July 2021.