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Ayena Gupta
Ofgem via email
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17 February 2023

Revised OPR Guidance consultation January 2023

Dear Ayena

The Panel is pleased to have an opportunity to provide its views on the issues raised in the Revised Operational Performance Regime (OPR) consultation. Panel is also pleased to note that the consultation recognises concerns raised in our response to the OPR Price Control Regulatory Year 2021/ 2022. We note that increased audit scrutiny in areas such as DCC Data Service Provider Programme are in scope for the audit for this Regulatory Year (2022-2023).

The consultation has two questions, which we respond to below.

Question 1: What are your views on the options we considered for the scoring framework? Do you agree with our preferred option? (Option 3).

We firstly agree that there is a need to ensure the independent auditor can provide insightful reviews backed up with scores that are credible and of use to Ofgem, wider stakeholders and the DCC. In doing so, this ensures the integrity of the audit process and provides the DCC with practical feedback that it can action, and ensure improvements are made. We therefore welcome the proposals.

In review of the options, the proposal (Option 1) aligning scores across both Contract Management Audit and Customer Engagement OPR measures, may provide some benefit, but we do not consider this adds real value to parties in the longer term. Given the comprehensive links to the NAO framework, alignment to Customer Engagement may prove rather confusing.

We do not consider Option 2 provides greater benefit either. Whilst the additional granularity is welcome, this would be at the Independent Auditor discretion and may be open to challenge. Whilst Option 2 offers granularity in scoring which we called for in our Price Control response, we are minded to agree with the Ofgem proposed Option 3 as the better of the three proposals.

Option 3 provides additional granularity for the Independent Auditor in terms of awarding scores and provides improved certainty for DCC and wider Stakeholders. We therefore agree that Option 3 should be taken forward.

Question 2 Do you consider any further changes are required to the framework?

We do not consider any further changes are required at this stage. However, it would be beneficial once again to review the OPR post the Customer Engagement, and Independent Audit, to consider any amendments for the next Regulatory Year 2024-2025.

If you would like to discuss any elements of this response further, please do not hesitate to contact me on 020 7090 7755 or SECAS@gemserv.com

Yours Sincerely,



Peter Davies
SEC Panel Chair