

Umme Azad  
DCC Oversight and Regulatory Review  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

23 February 2024

Dear Umme

**REVISED OPR GUIDANCE JANUARY 2024**

We are grateful for the opportunity to respond to these proposals to amend the guidance in respect of the Operational Performance Regime (OPR) that will be applied to the Data Communication Company (DCC).

Our responses are set out in Annex 1; we hope you will find them helpful.

Please do not hesitate to get in touch, should you wish to discuss any aspect of our response to this consultation.

Yours sincerely,



**Richard Sweet**  
Director of Regulatory Policy

**REVISED OPR GUIDANCE JANUARY 2024  
– SCOTTISHPOWER RESPONSE**

**Question 1: What are your views on the proposed weighting changes?**

We agree with Ofgem's proposals to alter the applicable weightings for System Performance and Contract Management as set out in the consultation document, such that the baseline margin at risk under the System Performance incentive will be reduced to 60% while the baseline margin at risk under the Contract Management incentive will be increased to 25%.

**Question 2: What are your views on adjusting the weighting of the SRV8.11 performance measure for the remainder of the interim OPR?**

While we recognise why such 'unquantifiable' effects of customer actions might present some difficulty to the application of a metric to SRV8.11, it would nevertheless be disappointing were the DCC not subject to a meaningful SLA for what is a very important service request.

**Question 3: What are your views on the proposed changes to the contract management Terms of Reference? Do you agree with our proposals?**

We agree with Ofgem's proposed changes to the Contract Management Terms of Reference, including the addition of the five new terms as set out in the consultation document. Contract Management is, perhaps, the most fundamental role of the DCC and, as such, should be subject to the closest scrutiny. These changes to the Terms of Reference will strengthen the role of the auditor, and should allow for a more efficient, and effective, audit process.

**Question 4: Do you consider any further changes are required to expand the Terms of Reference?**

We do not consider any further changes are required to expand the Terms of Reference at this time.

**Question 5: Do you agree with the proposed changes for customer engagement?**

Yes, we agree that fewer, simplified, questions will foster better stakeholder responses, and that the proposed changes to the scoring methodology will both enhance the accuracy of scoring and allow for a more granular assessment of the DCC's performance in this area.

**Question 6: Do you think any additional considerations need to be made for customer engagement?**

Not at this time.