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Dear Robyn,

**Re: DCC Operational Performance Regime - Principles and Objectives**

SSE welcomes the opportunity to respond to this consultation. We have provided responses to your questions in the attached Annex. If you have any questions or comments, please do not hesitate to contact me.

Yours sincerely,

Paul Clark  
Regulation and Smart Technology Lead  
Metering and Smart Transformation



## **Annex 1: SSE response to DCC Operational Performance Regime - Principles and Objectives**

### **1. Do you agree with our approach to apply the OPR to core smart metering activities only?**

SSE agrees that with only circa £2 – 3M per year at risk it is important to limit the OPR to core smart metering activities. This will ensure focus upon those areas that are important and prevent dilution of the associated incentives.

### **2. Do you agree with complementing the OPR with further reporting in order to provide transparency and potentially form the basis of future OPR metrics?**

SSE agrees that further reporting would provide valuable insight.

### **3. Do you agree with our proposed principles for developing the OPR metrics?**

SSE agrees that any proposed metrics must be evaluated using the four principles defined in the consultation document.

### **4. Do you agree with our proposal to prioritise the Service User and Service Delivery measures only in the immediate term?**

SSE agrees that these must be the areas for focus in the immediate term.

### **5. Do you have views on how DCC's operational performance can be measured without a baseline to compare it to?**

We consider it important that the DCC should capture a broad range of metrics to provide insight into its Operational Performance. These metrics should include:

- Overall availability of the User Gateway Connection per User;
- Availability of the User Gateway Interface;
- Number of fail-over events within the DCC Total System;
- Number of node failures within load balanced tiers of the DCC Total System;
- Number of performance based DCC Service Desk tickets logged; and
- Number of security events detected within the DCC Total System (these may be events logged by systems such as IPS/IDS, DLP etc.);

Consideration should also be given to how the DCC may measure the responsiveness of components within the DCC Total System. Without detailed insight into the DCC's component architecture it is difficult to be more precise about the metrics that may be reported and it is expected that there will be run-time governance tools deployed that can provide performance/responsiveness metrics.

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Within SSE we take pride in our strong safety culture and are keen to see this extend to our industry partners with whom we work. We feel it appropriate that safe working should also be built into the Operational Performance measures with the use of metrics such as the Total Reportable Injury Rate (TRIR).

**6. What specific performance metrics do you think will drive good consumer outcomes under each measure if incentivised?**

We have provided below comments on the performance metrics in each part.

**Part A: Service User Measure**

- Provision and effective commissioning of communications hubs – we strongly support this performance metric;
- Minimising second visits because of DCC WAN issues – we support the aim of this metric however we understand that the CSP contracts would not support this approach. The contracts establish milestones for coverage but give freedom for how and where this occurs. The postcode checker is indicative and only accurate 30 days in advance;
- Efficient management of DCC Service Desk incidents – we believe this should be managed via existing SLAs

**Part B: Service Delivery Measure**

- Solving Problems – we believe this would be difficult to effectively define leaving the metric open to abuse. SLAs should be sufficient in this area.

**Part C: Value for Money Measure**

SSE agrees with your analysis that this should not be the focus at this stage.

**Part D: Development and Improvement Measure**

SSE agrees with your analysis that this should not be the focus at this stage but agrees that establishing reporting metrics now will provide valuable insight to the development of future incentive regimes.

**7. What other metrics do you propose DCC should report on as part of wider reporting and/or which could become part of the OPR in the longer term?**

Paramount to our rollout and customer service provision is the availability of the User Gateway Connection and the User Gateway Interface. We suggest this would be a prime candidate for an operational performance metric. Depending upon the definition of the first metric under Part A this may be covered to some extent. We look forward to developing these metrics with you in future workshops.



**8. Are there any other points we should consider when designing the OPR?**

Please refer to our responses to question 6 and 7.