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Re: Consultation on increasing DCC's revenue at risk against the OPR

Dear Jacqui,

Thank you for sending the latest consultation regarding the Operational Performance Regime (OPR).

Regarding the specific question set out in the consultation; *"What are your views on our minded-to position to increase the revenue at risk against the OPR to be equal to the sum of the BM and ECGS?"*.

The Panel strongly believe that the OPR must sufficiently incentivise the DCC to deliver services efficiently and to quality. Equally, the regime must ensure that appropriate emphasis is placed on DCC engaging with its customers effectively. Increasing the DCC revenue at risk under the OPR will help ensure that DCC focus remains on delivering its core services in line with the expectations of Users. As such the SEC Panel fully support increasing the revenue at risks under the OPR, and the inclusion of ECGS to achieve this.

We note the consultation details two potential options for including ECGS in the OPR. Since the consequences of selecting one option over the other are not immediately clear, the SEC Panel encourage individual SEC Parties to respond to the consultation since they are best placed to comment on how the revenue they fund is distributed in this mechanism.

The Panel also note the intended work to expand the ECGS incentive. The expansion of ECGS to include further DCC activities and contracts seems a sensible evolution. Consideration will need to be given to the sorts of contracts and activities that will be included and how assurance will be provided that all relevant areas have been captured. The Panel offer any support that can be provided in reaching a successful conclusion to this subject.

If you would like to discuss this further, please do not hesitate to contact myself or the SECAS team on 020 7090 7755 or SECAS@gemserv.com.

Yours sincerely,



Peter Davies
SEC Panel Chair