



DCUSA CONSULTATION

DCP 153 - Service Level Agreement for Resolving Network Operational Issues

Second Consultation

Executive summary: This consultation seeks industry views on DCP 153 'Service Level Agreement for Resolving Network Operational Issues', which has been raised seeking to introduce establish a Service Level Agreement between suppliers and networks owners for the resolution of network issues.

1 PURPOSE

- 1.1 The Distribution Connection and Use of System Agreement (DCUSA) is a multi-party contract between electricity Distributors and electricity Suppliers and large Generators. Parties to the DCUSA can raise Change Proposals (CPs) to amend the Agreement with the consent of other Parties and (where applicable) the Authority.
- 1.2 This document is a Consultation issued to DNO, IDNO, Supplier, Meter Operator and other interested Parties and the Authority in accordance with Clause 11.14 of the DCUSA seeking industry views on DCP 153 'Service Level Agreement for Resolving Network Operational Issues'. Respondents are invited to consider the questions set out below and submit comments using the form attached as Appendix A to dcusa@electralink.co.uk by **Friday, 15 February 2013**.
- 1.3 This is the second DCUSA consultation to be issued in respect of DCP 153. The first consultation was issued in September 2012. Collated responses to the first consultation, along with the DCP 153 Working Group's comments, are provided as Appendix B.

2 BACKGROUND OF DCP 153

- 2.1 Whilst Suppliers are installing smart meters (both foundation and enduring) they are identifying network issues that are dangerous and are preventing a meter exchange from taking place.
- 2.2 Detailed work has already been carried out by the Energy Network Association's (ENA) Smart Meter Operations Group to categorise the network issues that are being or could be identified whilst attending a customer's property. This work has been used to create a new set of 'Asset Condition Codes' within the Master Registration Agreement's (MRA) Data Transfer Catalogue. These Asset Condition Codes are listed in Appendix C.
- 2.3 Data Transfer Catalogue (DTC) Change Proposal 3336 'Revisions to the asset condition reporting process - Revision of D0126¹ and D0135²' was implemented

¹ D0126 - Action Taken to Make Safe

² D0135 - Report Possible Safety Problem

in December 2012 to introduce the Asset Condition Codes and thus standardise the methods for reporting network issues. It also places an obligation on network owners to notify the supplier via the D0126 once the issue is rectified for category A and B situations.

- 2.4 DCUSA Change Proposal (DCP) 153 'Service Level Agreement for Resolving Network Operational Issues' has been raised seeking to build on DTC CP 3336, by introducing Service Level Agreements (SLAs) by which Distributors need to have carried out the work required to rectify the issues that have been brought to their attention, for the most urgent Asset Condition Code Categories A and B. Additional information on the CP is provided in the CP form attached as Appendix D.
- 2.5 The introduction of SLAs will support the installation of smart meters, AMR meters and also legacy meter exchanges. It should be noted that these SLAs will endure beyond the smart meter roll out unless subsequently varied.

3 WORKING GROUP ASSESSMENT OF DCP 153

- 3.1 The DCUSA Panel has established a Working Group to assess DCP 153. This group consists of Supplier, DNO, IDNO, Meter Operator and Ofgem representatives.
- 3.2 In September 2012 the Working Group issued a consultation document seeking industry feedback on the SLAs proposed by the group. Based on the feedback received, a Network SLA Straw Man Specification has been drafted. The straw man document sets out the suggested legal text amendments to the DCUSA for DCP 153 and is provided as Appendix E. This consultation seeks industry feedback on the straw man document.

4 THE NETWORK SLA STRAW MAN SPECIFICATION

4.1 Definitions

- 4.2 The first section of the straw man document sets out proposed new definitions for inclusion in DCUSA Section 1A. The network asset condition category definitions were consulted on in the September 2012 DCP 153 Consultation and no respondents disagreed with the proposed definitions. The September 2012 consultation responses are provided in Appendix B.

- 4.3 The definition of Working Hours is taken from Schedule 1 of the Electricity (Standards Of Performance) Regulations 2010.
- 4.4 The Working Group is seeking responses to the following consultation question in relation to the definitions:
- *Do you have any comments on the definitions provided in the straw man document?*
- 4.5 **Clause 30.5**
- 4.6 The next part of the straw man document sets out proposed amendments to DCUSA Clause 30.5.
- 4.7 In the straw man document it is proposed that Category A Situations should be reported by telephone only. It was the view of the Working Group that to report Category A Situations by both telephone and data flow would introduce a risk of them being logged twice.
- 4.8 It is proposed that Category B and C Situations should be reported by data flow within 10 Working Days of identification.
- 4.9 It has been suggested at the Working Group meetings that it would be unreasonable to expect the SLAs to be met 100% of the time, particularly during the period when Distributors are ramping their resources up to scale to support the smart roll out. The Working Group is therefore consulting on the proposal that Distributors should use reasonable endeavours to meet the SLAs on 90% of occasions in each calendar month. It is the view of the Working Group that this figure should be reviewed at a later date post DCC go-live to determine whether it remains appropriate.
- *Do you agree with the proposal that Distributors should use reasonable endeavours to meet the SLAs on 90% of occasions in each calendar month? Please provide supporting comments.*
- 4.10 The Working Group agrees that during the roll out of smart metering the ability of Distributors to meet the SLAs will be significantly influenced by the information provided by Suppliers on their roll out plans. These plans will aid

Distributors in ensuring that they have the appropriate resource levels across the country.

4.11 The Working Group agrees that the SLAs should be linked to Suppliers' smart meter roll out forecasts. In the straw man document it is proposed that if the average monthly volumes of meter installations across all Suppliers exceed 15% of Suppliers' forecast volumes, within the company's service area, then the Distributor relevant to that service area would be released from their obligation to meet the SLAs for that month. In these circumstances, the SLAs would still need to be reported, but below target performance would not be deemed a failure.

4.12 The Working Group is seeking responses to the following questions in relation to linking the SLAs and Supplier forecasts.

- *Do you agree with the proposal that if the average monthly volumes of meter installations across all Suppliers exceed Suppliers' forecast volumes, within the company's service area, by a certain percentage then the Distributor relevant to that service area would be released from their obligation to meet the SLAs for that month? Please provide supporting comments.*
- *Should this percentage be set at 15%? Please provide supporting comments.*
- *The Working Group does not believe that the forecasting in its current format will work for IDNOs. Do you have any views on how the Supplier Volume forecasting for IDNOs should work?*

4.13 It has been suggested at Working Group meetings that when the Distributor uses the D0126 to notify the Supplier and its Meter Operator Agent that a Category A or B situation has been remedied the flow should contain the Distributor's view of the correct Asset Condition Code, particularly if different from the code reported within the D135. This information would aid Suppliers and their agents in monitoring the accuracy of the codes that have been reported to Distributors.

- *Do you agree that the D0126 flow issued once a situation has been remedied should contain the Distributor's view of the correct Asset Condition Code, particularly if different from the code reported within the D135? Please provide supporting comments.*

4.14 The Working Group recognises that there may be situations where the Distributor is unable to meet the service level for the resolution of Category A and B situations. For instance, there may be a force majeure event or the customer may not wish to schedule a visit within the SLA timescales. The straw man specification proposes that where the Distributor is unable to meet the service level it should inform the Supplier and notify them of when an appropriate person will be sent to resolve the situation. The group recognises that for Category A situations this information is likely to be exchanged in a series of telephone calls. For Category B situations this information could be exchanged via data flow. The Working Group is seeking views on the following questions in relation to situations where the service level cannot be met:

- *Should there be specific clauses in the DCUSA that defines how the process for notifying the Supplier where an SLA cannot be met will work, or would it be preferable to include this information in a guidance document? Please provide supporting comments.*
- *If specific clauses are to be included in the DCUSA where an SLA cannot be met, which data flow should be used to inform the Supplier that the SLA cannot be met and notify them of when an appropriate person will be sent to resolve the situation?*

4.15 The Working Group notes that Ofgem, in its Strategy consultation for the RIIO-ED1³, has proposed that any additional costs caused by issues that do not relate to Distributors (for example, call outs that incur higher unit costs as the work is conducted out of normal hours or aborted call outs) should be funded by the Suppliers under their SLAs with the network companies.

4.16 The group discussed this proposal and it was agreed that it is reasonable that there should be a charge where a Distributor has been incorrectly called out.

³ <http://www.ofgem.gov.uk/Networks/ElecDist/PriceCtrls/riio-ed1/consultations/Documents1/RIIOED1SConOutputsIncentives.pdf>

However, it was suggested that it is questionable whether out of hours work should be included.

4.17 In the straw man specification it is proposed that a Distributor will be entitled to levy charges where 15% or above of situations are reported by a Supplier (or its agent) within the company's service area as a higher Category than is the case (for example, if an instance is reported as a Category A but is found to be a Category B or C). The charge will be classified in the relevant charging statement.

- *Do you agree with the proposal that Distributors should be entitled to levy charges where a certain percentage or above of situations are reported by the Supplier, or its Meter Operator Agent, within the company's service area as a higher Category than is the case? Please provide supporting comments.*
- *Should this percentage be set at 15%? Please provide supporting comments.*
- *Are there any other scenarios which should also incur charges (for example, aborted visits)? Please provide supporting comments.*

4.18 **New Clause 30.5A – Network SLA Reporting Requirements**

4.19 In the straw man document it is proposed that Distributors shall produce a report for each of their licence areas on performance against the SLAs within 15 Working Days of the end of each calendar month. This should be forwarded to the DCUSA Secretariat for publication on the DCUSA Website.

- *Do you agree that the report should be produced within 15 Working Days of the end of each calendar month? Please provide supporting comments.*
- *Should the Distributor reports be published on the private section (where it will only be visible to registered users) or the public section of the DCUSA website? Please provide supporting comments.*

4.20 It is proposed that Suppliers shall produce a report containing their best estimate of their smart meter roll out plans by the last Working Day of December, March, June and September in each year up to and including 2019. This should be forwarded to the DCUSA Secretariat for distribution to Distributors.

- *Do you agree that Suppliers should report on their smart metering roll out plans by the last Working Day of December, March, June and September in each year up to and including 2019? Please provide supporting comments.*
- *Do you agree that the Supplier reports should not be published on the DCUSA website but rather emailed directly to distributors by the DCUSA Secretariat? Please provide supporting comments.*

4.21 **New Schedule 23 – Part 1 - Network SLAs**

4.22 The next section of the Network SLA Straw Man Specification document defines the SLAs. These would be added to the DCUSA as a new Schedule.

4.23 The network SLAs set out in this section are based on the SLAs consulted on in the previous DCP 153 consultation (Appendix B). The Working Group is seeking views on the following questions in relation to the SLAs:

- *The majority of respondents to the previous DCP 153 consultation agreed that it is reasonable that category B visits should be scheduled within 10 days of receipt of the D0135 flow. Do you still feel that this is reasonable? Please provide supporting comments.*
- *It is proposed that where a Distributor has made reasonable endeavours to agree an appointment with a conectee for a Category B Situation and has been unable to secure one then the Distributor will have been deemed to have met the service level. Do you agree that a call to the conectee during working hours on a working day, and a call outside working hours and a letter should be considered reasonable endeavours? (Note, Working Hours would be as defined in the definitions section of the Straw man document i.e. the period between 7.00 am and 7.00 pm on each Working Day and 9.00 am and 5.00 pm on any other day). Please provide supporting comments.*

- *Do you have any further comments on the Network SLAs as defined in the straw man document? Please provide supporting comments.*

4.24 **New Schedule 23 – Part 2 – Asset Condition Codes**

4.25 The Asset Condition Codes used in the D0126 and D0135 flows are defined within the MRA Data Transfer Catalogue.

4.26 The Working Group has discussed moving the Asset Condition Codes from the MRA to the DCUSA. However, the Working Group has been advised that this cannot be done as there is not the ability under the MRA to say that an item is owned by the DCUSA, therefore, the valid set needs to remain with the MRA. An MRA change would need to be raised to change the governance rules to allow the valid set to be moved to the DCUSA. The Working Group therefore proposes to liaise with the MRA to determine how the arrangements can be amended to allow the valid set of Asset Condition Codes to be documented within the DCUSA rather than the MRA.

4.27 The group notes that if the Asset Condition Codes remain in the MRA then there is a risk that the Asset Condition Code categories could be changed in the MRA which could significantly impact the DCUSA SLAs and this impact may not be identified if there is not sufficient joined up thinking across the organisations. As an example, it was noted that a large change in volumes may result from an increase in the number of situations classed as Category A.

4.28 The Working Group is seeking responses to the following consultation question relating to the Asset Condition Codes:

- *The Working Group proposes to liaise with the MRA to determine how the arrangements can be amended to allow the valid set of Asset Condition Codes to be documented within the DCUSA rather than the MRA Do you agree with this approach? Please provide supporting comments.*

4.29 **New Schedule 23 – Part 3 – Company Reporting Requirements**

4.30 The Company Reporting Requirements section of the straw man document sets out the proposed reporting requirements for Distributors. The straw man

document includes a template demonstrating how the information will be presented.

4.31 The Working Group is seeking responses to the following consultation questions in relation to these requirements:

- *Do you believe that Distributors should report at an industry level or Supplier level? Please provide supporting comments.*
- *Reporting item (p) in the straw man document proposes that Distributors should report the number of times that they have gone out to a distribution fault at a Premises within a month of a smart meter being installed at the Premises and the fault is with the meter or the meter installation. Do you agree that the SLA reporting should include reporting on failures post smart metering installation? Please provide supporting comments.*
- *Do you have any further comments on the Distributor reporting requirements as defined in the straw man document?*

4.32 **New Schedule 23 – Part 4 - Supplier Reporting Requirements**

4.33 The Working Group recognises that it is important that information is shared on Supplier roll out plans to allow DNOs to plan their resource requirements.

4.34 To facilitate the effective provision of this information it is proposed that a new section be added to the DCUSA defining the reporting information that Suppliers would provide to DNOs on their smart roll out plans.

4.35 The Working Group is seeking responses to the following consultation questions on the proposed Supplier Reporting Requirements:

- *Do you have any comments on the Supplier reporting requirements as defined in the straw man document?*

4.36 **Other**

4.37 At various points in the straw man document percentage values and timescales have been included by the Working Group. The Working Group is seeking

responses to the following question in relation to the values given in the straw man document:

- *Are there any percentage values or timescales in the document that you do not support? If yes, please provide an alternative value and your reasoning.*

4.38 The Working Group notes that it is important for DNOs that Category C situations are reported to them. This helps DNOs to target their work more efficiently, leading to a lower use of system charge. The Working Group is seeking responses to the following question in relation to Category C situations:

- *Do you believe that DCP 153 should introduce any reporting requirements in relation to Category C situations?*

4.39 **The D0126 and D0135 Data Flows**

4.40 The Working Group notes that the Asset Condition Code field in the D0135 data flow is not populated in all D0135 data flows that are sent. It is the view of the Working Group that the D0135 data flow sent by the Meter Operator Agent (MOP) should be rejected by the DNO if it does not contain the Asset Condition Code.

4.41 The Working Group would also like to highlight that it is helpful to distributors if Suppliers and their agents include the customer name and preferred contact telephone number in the D0135 flow when sending the flow to the Distributor. This aids the Distributor in arranging an appointment to visit the premises and ensures that there are less aborted visits.

4.42 The Working Group notes that the D0126 and D0135 data flows sent over the Data Transfer Network (DTN) can be viewed by the operator of the DTN. Therefore, it is possible that centralised reporting based on the data contained in the D0135 and D0126 data flows could be introduced as an alternative to individual market participants developing their own systems to report on performance against the SLAs.

- *Do you believe that the Working Group should pursue a centralised reporting line of enquiry or should reporting on performance against the SLAs be the responsibility of individual market participants?*

5 SUMMARY OF CONSULTATION QUESTIONS

5.1 The following table provides a summary of each of the consultation questions that the Working Group is seeking responses to.

No.	Question
1	Do you have any comments on the definitions provided in the straw man document?
2	Do you agree with the proposal that Distributors should use reasonable endeavours to meet the SLAs on 90% of occasions in each calendar month? Please provide supporting comments.
3	Do you agree with the proposal that if the average monthly volumes of meter installations across all Suppliers exceed Suppliers' forecast volumes by a certain percentage then the Distributors would be released from their obligation to meet the SLAs for that month? Please provide supporting comments.
4	Should this percentage be set at 15%? Please provide supporting comments.
5	The Working Group does not believe that the forecasting in its current format will work for IDNOs. Do you have any views on how the Supplier Volume forecasting for IDNOs should work?
6	Do you agree that the D0126 flow issued once a situation has been remedied should contain the Distributor's view of the correct asset condition code, particularly if different from the code reported in the D0135? Please provide supporting comments.
7	Should there be specific clauses in the DCUSA that defines how the process for notifying the Supplier where an SLA cannot be met will work, or would it be preferable to include this information in a guidance document? Please provide supporting comments.
8	If specific clauses are to be included in the DCUSA where an SLA cannot be met, which data flow should be used to inform the Supplier that the SLA cannot be met and notify them of when an appropriate person will be sent to resolve the situation?
9	Do you agree that the Distributor report should be produced within 15 Working Days of the end of each calendar month? Please provide supporting comments.

10	Do you agree that Suppliers should report on their smart metering roll out plans by the last Working Day of December, March, June and September in each year up to and including 2019? Please provide supporting comments.
11	Do you agree that the Supplier reports should not be published on the DCUSA website but rather emailed directly to distributors by the DCUSA Secretariat? Please provide supporting comments.
12	Should the report be published on the private section (where it will only be visible to registered users) or the public section of the DCUSA website? Please provide supporting comments.
13	Do you agree with the proposal that Distributors should be entitled to levy charges where a certain percentage or above of situation are reported by the Supplier, or its Meter Operator Agent, within the company's service area as a higher Category than is the case? Please provide supporting comments.
14	Should this percentage be set at 15%? Please provide supporting comments.
15	Are there any other scenarios which should also incur charges (for example, aborted visits)? Please provide supporting comments.
16	The majority of respondents to the previous DCP 153 consultation agreed that it is reasonable that category B visits should be scheduled within 10 days of receipt of the D0135 flow. Do you still feel that this is reasonable? Please provide supporting comments.
17	It is proposed that where a Distributor has made reasonable endeavours to agree an appointment with a connectee for a Category B Situation and has been unable to secure one then the Distributor will have been deemed to have met the service level. Do you agree that a call to the connectee during working hours on a working day and a call outside working hours and a letter should be considered reasonable endeavours? (Note, Working Hours would be as defined in the definitions section of the Straw man document, i.e. the period between 7.00 am and 7.00 pm on each Working Day and 9.00 am and 5.00 pm on any other day). Please provide supporting comments.
18	Do you have any further comments on the Network SLAs as defined in the straw man document? Please provide supporting comments.

19	The Working Group proposes to liaise with the MRA to determine how the arrangements can be amended to allow the valid set of Asset Condition Codes to be documented within the DCUSA rather than the MRA Do you agree with this approach? Please provide supporting comments.
20	Do you believe that Distributors should report at an industry level or Supplier level? Please provide supporting comments.
21	Reporting item (p) in the straw man document proposes that Distributors should report the number of times that they have gone out to a distribution fault at a Premises within a month of a smart meter being installed at the Premises and the fault is with the meter or the meter installation. Do you agree that the SLA reporting should include reporting on failures post smart metering installation? Please provide supporting comments.
22	Do you have any further comments on the Distributor reporting requirements as defined in the straw man document?
23	Do you have any comments on the Supplier reporting requirements as defined in the straw man document?
24	Are there any percentage values or timescales in the straw man document that you do not support? If yes, please provide an alternative value and your reasoning.
25	Do you believe that DCP 153 should introduce any reporting requirements in relation to Category C situations? Please provide supporting comments.
26	Do you believe that the Working Group should pursue a centralised reporting line of enquiry on performance against the SLAs or should reporting on performance against the SLAs be the responsibility of individual market participants?
27	Do you have any further comments?

- 5.2 Responses should be submitted using Appendix A to dcusa@electralink.co.uk no later than **Friday, 15 February 2013**.
- 5.3 Responses, or any part thereof, can be provided in confidence. Parties are asked to clearly indicate any parts of a response that are to be treated confidentially.

6 NEXT STEPS

- 6.1 Responses to the Consultation will be reviewed by the DCP 153 Working Group. The Working Group will then determine the progression route for the CP.
- 6.2 If you have any questions about this paper or the DCUSA Change Process please contact the DCUSA helpdesk by email to dcusa@electralink.co.uk or telephone 020 7432 2842.

APPENDICES

- Appendix A – Response Form
- Appendix B – September 2012 DCP 153 Consultation Documents
- Appendix C – Asset Condition Codes
- Appendix D - DCP 153
- Appendix E – Network SLA Straw Man Specification