RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0092 – DCC SERVICE LEVEL AGREEMENTS FOR THE SWITCHING INCENTIVE REGIME

On 13 October 2023 the Code Manager issued a consultation to industry to seek feedback on the Proposals under R0092.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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PROPOSAL 1 – MAXIMUM DEMAND VOLUMES

Question 1:	Do you agree with the proposed Maximum Demand Volume of 1.088 million? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** – Yes, we agree. During the R0092 Working Group meeting, industry representatives identified where the volume of messages were logically connected to a Switch Request (as listed above). The maximum volume of those messages was then prorated against the current volumes which represented 924,000 out of the 1.088m threshold. The remainder of the message types were determined using standard deviation against the current observed volumes. That was then the average seen in addition to the standard deviation. **Netcompany** - No Netcompany impact. Netcompany assume that, while this proposes a change to Service Levels, and therefore non-functional requirements, no Non-Functional Testing is required to ensure that those NFRs are met or to provide a new NFR baseline. **Landmark** - Yes. However, a Change Request is required to cover a system design review (PVT – to test thresholds), to assure service performance and future proofing of the CSS application as 'average daily volume' is regularly being exceeded e.g., 26 days in October 2023: [26 instances over AVP, 13 instances 2x AVP, max for period 139k]. Sync/Async Message Thresholds will require performance	Your comments have been noted, thank you.

	testing as part of the implementation of the change before SLA's are approved. There will be a cost associated with this for impact assessment and implementation of any recommendations. • Changes in the requirement of the CSS system to handle message behaviour changes e.g., 'batching' of message types and/or switches will require a Change Request to cover a system design review to assure CSS can successfully handle any required batch processing.	
SPEN (DNO)	SPEN agree with the proposed maximum demand volumes and support the inclusion of switching related messages (rather than just switches).	Your comments have been noted, thank you.
NGED (DNO)	We agree that the SLAs defined within the CSS definition relate to all messages and the Maximum Demand Volume should reflect this.	Your comments have been noted, thank you.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Yes.	Your comments have been noted, thank you.
Xoserve (GRDA)	The value of 1.088million has been based on observed figures when switching volumes are comparatively low so we question whether this is appropriate average / benchmark to be used. We think this should be a scalable figure, if and when the switching reaches the levels prior to CSS go live. The proposed Maximum Demand Volume of 1.088 million relates to all messages and isn't limited to switching. As the GRDA, we interpret these figures do not represent any actual increase in switching volumes, therefore we haven't assessed any impacts in higher gas switching volumes. We don't believe gas switching metrics are being increased as a result of this proposal.	The proposed Maximum Demand Volumes were calculated based on Switching volumes being at the current peak demand level defined in the REC of 281,600. These figures relate solely to the inbound messages received by the CSS Provider and are not intended to amend current estimates of current gas switching volumes.

	If this isn't correct, we would need to understand that and what the switching messages relevant to gas are that are attributed to gas, to enable us to undertake an assessment. Whilst we understand the logic being applied which has been described in the supporting information, we recommend that this logic is articulated within an enduring REC document so that consequential impacts to other SDSP's and Market Participants are clear on an enduring basis. We think it would be appropriate to see this in final legal text of the CSS Service Definition.	

Question 2:	The proposed figure of 1.088 million has been based on desktop analysis completed by DCC and does not include risk weighting or optimism bias. Do you feel this figure should be subject to an optimism bias of 5 – 10% to account for the risk that the desktop analysis may not be representative of true user behaviour?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - The 1.088m figure was derived by taking the average of three months (June, July and August 2023) with the standard deviation added. It was agreed at the working group that this method was a more thorough and accurate way to derive the maximum demand volume figure when compared to the figure currently defined in the REC. We consider the analysis to be robust and do not agree with adding the 5-10% buffer as this will add uncertainty. We would however support the figure being reviewed annually and recalibrated where necessary. **Netcompany** - No Netcompany impact.	Both R0092 and R0092A have incorporated an optimism bias of approximately 5% as confirmed at a later date with the DCC.

	Landmark - Yes	
SPEN (DNO)	No	Your comments have been noted, thank you.
NGED (DNO)	We believe that currently switches are at a low point therefore there should be a mechanism to be able to reflect any changes in user behaviour.	Both R0092 and R0092A have incorporated an optimism bias of approximately 5%.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Yes, a risk weighting should be applied to accommodate any fluctuations in the change of supplier market.	Both R0092 and R0092A have incorporated an optimism bias of approximately 5%.
Xoserve (GRDA)	For the reasons in the previous answer above, in terms of volumes, we would have concerns that the period analysed has been where switching volumes were reduced, and as a consequence other ancillary transactions necessary to facilitate switching such as agent appointments will be understated, therefore some uplift in the numbers is required. We believe some contingency should be applied to the volumes.	Please see response to question 1. Both R0092 and R0092A have incorporated an optimism bias of approximately 5%.

PROPOSAL 2 – SYNCHRONOUS RESPONSES

Question 3:	Do you agree with the CSS Provider's proposal for synchronous responses? If not, please provide rationale.

RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
DCC (CRS Provider)	**DCC** - During the first year of CSS operations DCC have found certain user end points have on occasion struggled to respond within the average timescales. This is having an impact on the way DCC measure performance of the system as a whole but at the same time is not having a detrimental effect to the service the user end points are receiving and to date, there has been no detrimental impact reported. Therefore, the proposal will improve the reporting of the actual performance of the system. **Netcompany** - No Netcompany impact. Netcompany assume that, while this proposes a change to Service Levels, and therefore non-functional requirements, no Non-Functional Testing is required to ensure that those NFRs are met or to provide a new NFR baseline. **Landmark** – Yes. However, a Change Request is required to cover a system design review (PVT – to test thresholds), to assure service performance and future proofing of the CSS application as 'average daily volume' is regularly being exceeded e.g., 26 days in October 2023: [26 instances over AVP, 13 instances 2x AVP, max for period 139k]. Sync/Async Message Thresholds will require performance testing as part of the implementation of the change before SLA's are approved. There will be a cost associated with this for	Your comments have been noted, thank you.

	impact assessment and implementation of any recommendations. Changes in the requirement of the CSS system to handle message behaviour changes e.g., 'batching' of message types and/or switches will require a Change Request to cover a system design review to assure CSS can successfully handle batch processing.	
SPEN (DNO)	Yes	Your comments have been noted, thank you.
NGED (DNO)	We agree with the proposal for synchronous responses subject to a maximum synchronous message threshold being included to capture unreasonable outliers.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Yes.	Your comments have been noted, thank you.
Xoserve (GRDA)	Where we are talking about CSS's response to messages, we are largely ambivalent regarding the timings, but we believe that retention of the 90th percentile SLA means that there is control that individual messages should not be excessive. Without this metric, or a measure that provides something similar, we would have concerns.	Both R0092 and R0092A have retained the 90th percentile.

Question 4:	Do you believe that a maximum threshold should be added to this service level to ensure that there is a limit on the length of time any one message takes to be responded to? Please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**

DCC (CRS Provider)	**DCC** - DCC do not believe a maximum threshold is necessary unless there is a reason provided by Industry which can be evaluated by the working group. **Netcompany** - No Netcompany impact. **Landmark** - Yes – to be discussed further. Operating an SLA based on AVP's could be challenging when c.26 days could exceed these in any month as demonstrated above. We believe there should be a reasonable cap, which would be better understood from the outcome of the PVT proposed above.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
SPEN (DNO)	We believe that there is benefit in a maximum threshold to ensure that the integrity of the processing remains.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
NGED (DNO)	Yes we agree that a maximum threshold should be added to this service level to ensure there is a limit on the length of time any one message takes to be responded to.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Yes, ensures a timescale applies to all response messages.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
Xoserve (GRDA)	We would be supportive of a maximum time for individual messages – provided that is a sensible level is suggested, agreed and implemented. If this was to be implemented, we would be more comfortable with the removal of the 90th percentile SLA. We think generally the subject of maximum response times should be considered across all parties.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.

Question 5:	If you do believe that a maximum threshold of service level should be incorporated, what should this be in seconds? Consider the maximum response time prior to this causing a risk to your organisation. Please provide any rationale to your response	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark** - Subject to outcome of Answer 4 above and threshold testing. Whilst we are currently achieving <2 seconds we would request more work done to challenge all volumes before an SLA is set.	Your comments have been noted, thank you.
SPEN (DNO)	We are not able to provide a value, however, see the need to ensure that all messages to the industry are processed and that none are side-lined (or significantly delayed).	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
NGED (DNO)	Ultimately our database must align with CSS. Therefore it is imperative that any anomalies are dealt with as a time sensitive matter. If a supplier is not updated on MPRS due to a message not being processed, the implications are that other downstream systems are not in alignment and the impact of this essentially is that we will UOS/Asset bill the incorrect supplier. Customers have an expectation of a faster switching experience therefore the maximum threshold should be set to a minimum value.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.

C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	10 seconds for the maximum response is a reasonable timescale for any outlier messages.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.
Xoserve (GRDA)	In principle we think that a maximum threshold is appropriate which will enable parties to set their time out value when that value is exceeded and manage their retry functionality accordingly. Where this relates to CSS issuing messages, if there is a risk that a party may delay the issue of a message to another party at Gate Closure then this should be considered as part of a broader REC Change.	Both R0092 and R0092A have retained the 90th percentile measure rather utilising a maximum response time.

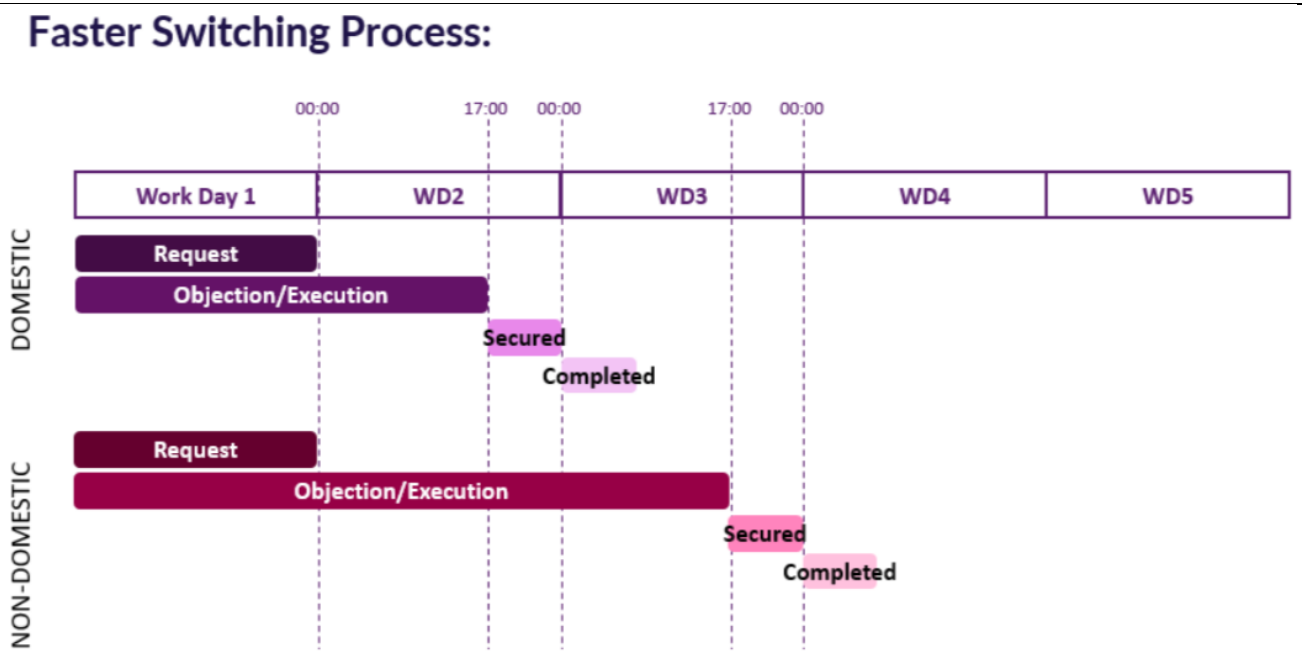
Question 6:	Do you have an alternative suggestion for this proposal? If yes, please specify.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark** - Subject to outcome of Answer 4 above and threshold testing. Whilst we are currently achieving <2 seconds we would request more work done to challenge all volumes before an SLA is set.	Your comments have been noted, thank you.
SPEN (DNO)	No	Your comments have been noted, thank you.

NGED (DNO)	-	-
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	n/a	-
Xoserve (GRDA)	Keep the 90th percentile or all 100% messages responded to in a defined period of time as to not impact gate closure. Generally, the subject of synchronous message responses needs to be dealt with across all parties that interact with CSS. We understand DCC's concerns regarding recipient synchronous message performance impacting their performance as a central service provider – so synchronous message response needs to be considered across all parties, potentially differentiating the queues at Gate Closure based on priority of message receipt.	Your comments have been noted, thank you.

PROPOSAL 3 – ASYNCHRONOUS RESPONSES

Question 7:	Do you agree with the CSS Provider's proposal for asynchronous responses? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - We have clarified some of the working group points highlighted above in the following section:	Your comments have been noted, thank you.

	1. "*It was noted that a move from hourly to daily is not as granular and could mean that there are extreme outliers that impact market participants, which are averaged out and there is no incentive for DCC to address this issue".* DCC Response: DCC monitor all market participants and where we find extreme outliers, we will flag these to the REC Manager/RECCo for follow-up. DCC would also work closely with the necessary parties to resolve any issues. To note that this proposal is not looking to allow DCC to back away from any of its obligations under the REC. The aim is to better measure performance of the system so that it accurately reflects the service REC customers is receiving. 2. *"There was also a concern where a switch request came with a delay was received close to Gate Closure, it could be missed from Secured Active processing and Gate Closure for that day."* DCC Response: Data shows that this is not the case and that, for a switch to miss gate closure for that day would have to come in seconds before 5pm, and to date, DCC have not seen any evidence of this. The working group discussed putting in place a cut-off time, but it was not felt necessary based on performance seen. Below is an illustration of the timings involved in a Switch Request to further show the steps undertaken in the end-to-end process.	



Netcompany - No Netcompany impact. Netcompany assume that, while this proposes a change to Service Levels, and therefore non-functional requirements, no Non-Functional Testing is required to ensure that those NFRs are met or to provide a new NFR baseline.

Landmark - Yes

However, a Change Request is required to cover a system design review (PVT – to test thresholds), to assure service performance and future proofing of the CSS application as 'average daily volume' is regularly being exceeded e.g., 26 days in October 2023: [26 instances over AVP, 13 instances 2x AVP, max for period 139k]. Sync/Async Message Thresholds will require performance testing as part of the implementation of the change before SLA's are approved. There will be a cost associated with this for impact assessment and implementation of any recommendations.

	Changes in the requirement of the CSS system to handle message behaviour changes e.g., 'batching' of message types and/or switches will require a Change Request to cover a system design review to assure CSS can successfully handle batch processing.	
SPEN (DNO)	Yes	Your comments have been noted, thank you.
NGED (DNO)	As noted, there is a concern with the Service Level moving from hourly to daily. If at critical times a message is being processed one day and then held and sent the next day this will create rejections. We believe that there should be processing deadlines included to ensure obligations within the REC are met.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Yes	Your comments have been noted, thank you.
Xoserve (GRDA)	We don't think it should move to daily, it should remain at hourly because of the critical messages that are being submitted by suppliers for example, just before Gate Closure that the target should remain at hourly to ensure there is no adverse impacts. Any changes proposed need to be carefully considered to ensure that there are no risks or impacts to Gate Closure.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure.

Question 8:	Do you believe that an additional layer should be added to this service level to ensure that there is a limit on the length of time any one message takes to be responded to? Please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**

DCC (CRS Provider)	**DCC** - DCC do not believe an additional layer should be added unless there is a reason provided by Industry which can be evaluated by the working group. **Netcompany** - No Netcompany impact. **Landmark** - Yes – to be discussed further. Operating an SLA based on AVP's could be challenging when c.26 days could exceed these in any month as demonstrated above. We believe there should be a reasonable cap, which would be better understood from the outcome of the PVT proposed above.	Your comments have been noted, thank you.
SPEN (DNO)	We believe that there is benefit in a maximum threshold to ensure that the integrity of the processing remains.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure and retain the 90th percentile.
NGED (DNO)	Yes we agree that an additional layer should be added to ensure that there is a limit on the length of time any one message takes to be responded to.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure and retain the 90th percentile.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Post Gate closure window, the DNO systems have until 23:00 to process the messages and the business impacts of a small number of individual messages delayed more than 3 seconds is not a concern. However, it would be good to put a cap on the maximum timescales to ensure any systemic issues are identified sooner.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure and retain the 90th percentile.
Xoserve (GRDA)	In principle it seems sensible that there should be a maximum transaction time so that users of the system can understand the point at which transactions can be guaranteed to be fully processed if they are submitted. The GRDA does not exchange asynchronous responses with CSS.	Your comments have been noted, thank you.

Question 9:	If you do believe that an additional layer of service level should be incorporated, what should this be in seconds? Consider the maximum response time prior to this causing a risk to your organisation. Please provide any rationale to your response.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark** - Subject to outcome of Answer 7 above and threshold testing. Whilst we are currently achieving Whilst we are currently achieving <2 seconds we would request more work done to challenge all volumes before an SLA is set.	Your comments have been noted, thank you.
SPEN (DNO)	We are not able to provide a value, however, see the need to ensure that all messages to the industry are processed and that none are side-lined (or significantly delayed).	Your comments have been noted, thank you.
NGED (DNO)	Ultimately our database must align with CSS. Therefore it is imperative that any anomalies are dealt with as a time sensitive matter. If a supplier is not updated on MPRS due to a message not being processed, the implications are that other downstream systems are not in alignment and the impact of this essentially is that we will UOS/Asset bill the incorrect supplier. Customers have an expectation of a faster switching experience therefore the maximum threshold should be set to a minimum value.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure and retain the 90th percentile.
C&C (EES Provider)	N/A	-

Northern Powergrid (DNO)	Propose a maximum response time of 60 seconds.	The Code Manager has proposed an alternative change proposal R0092A to retain the hourly measure and retain the 90th percentile.
Xoserve (GRDA)	As we do not exchange asynchronous responses with CSS we do not offer an opinion. There is more of an impact to Suppliers.	Your comments have been noted, thank you.

Question 10:	Do you have an alternate suggestion for this proposal? If yes, please specify.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark** - Would be subject to outcome of Answer 7.	Your comments have been noted, thank you.
SPEN (DNO)	No	Your comments have been noted, thank you.
NGED (DNO)	-	-
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	No	Your comments have been noted, thank you.

Xoserve (GRDA)	As above	Your comments have been noted, thank you.

PROPOSAL 4 - GATE CLOSURE

Question 11:	Do you believe that the CSS Provider should only be measured on placing messages in a queue (only responsible for its control area)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** – Yes, DCC believe we can only be measured on aspects that are within full DCC control. We would also to edit the definition above that currently reads: *90th percentile =* *The time equal to which 90% of all days in the period have completed gate closure within the target time - which is 40 minutes.* We believe this could be better worded and propose the following: *90th percentile =* *The time equal to which 90% of all days in the period have completed gate closure. ~~within the target time - which is 40 minutes.~~*	Following this Impact Assessment, both R0092 and R0092A have been updated to provide clarification on the 90th percentile definition.

	Netcompany - No Netcompany impact. Netcompany assume that, while this proposes a change to Service Levels, and therefore non-functional requirements, no Non-Functional Testing is required to ensure that those NFRs are met or to provide a new NFR baseline. **Landmark** - Yes.	
SPEN (DNO)	No, we believe that the CSS Provider should be responsible for the end-to-end process.	The Code Manager has raised R0092A which proposes that the DCC remains responsible for the end-to-end gate closure process with the ability to provide evidence to the REC PAB where failures were exclusively beyond the control of the DCC.
NGED (DNO)	No. Our understanding is that the CRS Provider encompasses the following roles: the CSS Provider, the CSS Systems Integrator, the SI Provider and the Switching Operator. We believe therefore that the CSS Provider is responsible for the end to end switching process.	The Code Manager has raised R0092A which proposes that the DCC remains responsible for the end-to-end gate closure process with the ability to provide evidence to the REC PAB where failures were exclusively beyond the control of the DCC.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	n/a	-
Xoserve (GRDA)	WE fundamentally disagree with what CSS believe is in their control. CSS define the event notifier queues and the number of channels with these and this fundamentally impacts how the queues are discharged into users. We therefore disagree that it is not in CSS's level of control. We also believe that there should be a review of the requirements for Central Parties as opposed to other parties to minimise any impact to gate closure.	The Code Manager has raised R0092A which proposes that the DCC remains responsible for the end-to-end gate closure process with the ability to provide evidence to the REC PAB where failures were exclusively beyond the control of the DCC.

	We would also welcome a review of the queues and allocation of these queues. Would it be better if Central Service Providers (SDSPs) had their own queues similar to the way that we see that DCC have architected the DCC queues? In addition, we would be interested in understanding the queues in a little more detail for example: • How many channels are there in each queue? • Metrics - number of messages, time to clear, etc. • How are remaining messages distributed when some queues are cleared? Is it that they can move from one queue to another?	

Question 12:	Alternatively, do you believe that the current REC service levels should remain the same (and include the end-to-end process and other market participants' obligations) but be managed via exemptions?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - No, we do not believe the current service measures should remain the same. It is well known that several of the measures are out of date and require updating and for others, such as the incidents, will incur an exemptions process that could become unwieldly and time consuming, not just for DCC, but also the Performance Assurance function. This in turn could lead to cost implications that could otherwise have been avoided if the service levels were updated. **Netcompany** - No Netcompany impact.	The Code Manager notes that there should be no cost implications for the DCC as the exemptions process is an existing process within the REC.

	Landmark - No	
SPEN (DNO)	We believe that this service level should continue to be measured end to end, this allows the identification of issues to remain a priority and to be escalated as such. We are also supportive of the DCC being able to identify these areas (out with their control) to PAB for a derogation.	The Code Manager has raised R0092A which proposes that the DCC remains responsible for the end-to-end gate closure process with the ability to provide evidence to the REC PAB where failures were exclusively beyond the control of the DCC.
NGED (DNO)	Yes, there is currently a process for exemptions within PAB. The raising of exemptions via the PAB process on a monthly basis should already be a BAU process within DCC and therefore, there should be no requirement for the DCC to "invest time and resource" to use the current exclusions process.	The Code Manager has raised R0092A which proposes that the DCC remains responsible for the end-to-end gate closure process with the ability to provide evidence to the REC PAB where failures were exclusively beyond the control of the DCC.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	n/a	-
Xoserve (GRDA)	Yes, we agree that they should be responsible for the end to end. We understand and do have sympathy with DCC's argument that dilatory parties can impact the CSS performance. For this reason we recommend the full review of parties obligations in terms of maximum synchronous response times which should provide an opportunity for DCC to demonstrate non-compliance, and any instances of failures should be reported to the PAB. The REC service levels should be amended – a fundamental change is needed. The current ones are too ambiguous as evidenced by parties different interpretation of the 90th percentile. - We need an absolute end of gate closure target.	The Code Manager has raised R0092A which proposes that the DCC remains responsible for the end-to-end gate closure process with the ability to provide evidence to the REC PAB where failures were exclusively beyond the control of the DCC.

	- There needs to a daily metric instead of a monthly target. - The average and the percentile targets don't really work together. - 90% percentile should be in day and not across the month. As referenced above - Looking at the way the queues are managed is a must and there should be an obligation on receiving parties to acknowledge their messages in a reasonable timely manner.	

Question 13:	Do you agree with the CSS Provider's proposal for Gate Closure targets?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** – Yes we agree as the proposal means only the aspects of Gate Closure that are within DCC's full control have the SLA attached. **Netcompany** - No Netcompany impact. **Landmark** - Yes.	Your comments have been noted, thank you.
SPEN (DNO)	We believe that the alignment of the average and peak days does simplify this measure	Your comments have been noted, thank you.
NGED (DNO)	We do not agree with the CSS Provider's proposal for Gate Closure targets at this current time. We do not believe that the DCC are being penalised unfairly and therefore there is no justification to change the Gate Closure targets.	Your comments have been noted, thank you.

C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	n/a	-
Xoserve (GRDA)	No, we fundamentally disagree with the CSS providers proposal for gate closure targets for the reasons set out above. If DCC want to differentiate between the component levels within the DCC estate they can do so, and demonstrate the impacts of dilatory responses by parties, but there needs to be an overarching end to end which is the basis of the original DCC design of the Central Switching Service. As above, this needs a more fundamental review of the SLAs. We don't think that mean and 90th percentile work well together, an end of gate closure target is needed, the system has been designed to be responsive and time bound etc, reflecting the fact that the industry does need that information to perform effectively. Adding in a 100% metric for gate closure and the define the absolute end of gate closure time. We don't think the targets are effective at this time and we don't think that there is due priority being attached to gate closure by CSS – they need to fundamentally amend their treatment of gate closure and softening of the targets around the gate closure fundamentally highlights the lack of the understanding of the criticality of the role they have for the role of switching operator. We have mirror requirement of this – there is no relaxation of our parameters.	Your comments have been noted, thank you.

Question 14:	Do you believe there are other options for measuring Gate Closure?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - No, the existing SLA has been deemed unfair and out of DCC's full control to meet. **Netcompany** - No Netcompany impact. **Landmark** - We support an E2E review process for performance metrics to improve over functionality, however, this would need to be performance managed outside of SLAs as change requirements can fall outside of the control area. Measurement to be seen as commitment to partnering on solution via informal supplier forum reviews.	Your comments have been noted, thank you.
SPEN (DNO)	We have not identified any other options.	Your comments have been noted, thank you.
NGED (DNO)	-	-
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	n/a	-
Xoserve (GRDA)	When the RPA tried to implement the gate closure targets, everyone had a different opinion of what they meant. They are potentially ambiguous and need reviewing. We need an end of gate closure message.	Both R0092 and R0092A have been updated to provide additional clarity to how the service levels would be measured.

Question 15:	Do you see any risk in changing Gate Closure targets?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - No, we do not foresee any risks in changing the Gate Closure targets. **Netcompany** - No Netcompany impact. **Landmark** - No, based on answer to Q11.	Your comments have been noted, thank you.
SPEN (DNO)	We have identified no risk in these changes.	Your comments have been noted, thank you.
NGED (DNO)	Yes, we feel that there is a potential risk of a degradation in the service. We do not believe that the DCC are being penalised unfairly and therefore there is no justification to change the Gate Closure targets.	Your comments have been noted, thank you.
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	n/a	-
Xoserve (GRDA)	Softening the parameters will not improve the performance as it will take longer to process messages and will degrade performance as CSS will have longer to process stuff. No real case / justification has been put forward as to why these parameters should be moved. The suggestion that boundaries are being moved to the left and timescales increased, the two conflict with each other. There needs to a daily metric instead of a monthly target.	Your comments have been noted, thank you.

	The average and the percentile targets don't really work together.	

PROPOSAL 5 – SWITCHING INCIDENTS

Question 16:	Do you agree with the Switching Operator's proposal for switching incidents? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - Yes, we agree. It is also key to note that the Switching Operator is uniquely different to other REC Parties and REC Service Providers due to the nature of the Switching Operator SLA. The SLA is not measured against a single service desk but a collection of Service Providers who are handling much more complex incidents than a single service providers desk. We would also like to clarify the above drafting that currently reads: *"Response targets are only applicable to incidents raised by market participants which includes all CSS Users and Switching Data Service Providers via the Switching Portal".* We believe this could be clarified to read: *"Switching Operator Response targets are only applicable to Incidents raised by Market Participants via the Switching Portal to the DCC Switching Operator Service Centre".*	The Switching Service Management Schedule does not limit how Incidents can be raised and the Code Manager does not believe this should be restricted to particular Parties or via particular routes.

	To avoid any confusion, we would also like to clarify that "*potential duplicates*" isn't a specific example of a Priority 3 Incident. **Netcompany** - No Netcompany impact. **Landmark** - Landmark understands the measure for incidents will not be passed down and therefore there are no changes to Landmark incident measures.	
SPEN (DNO)	No, we are not in agreement with the Switching Operators proposal to reduce the % resolution for Category 3 and 4. While these are lower impact they should still be tracked in an appropriate manner. These categories are usually easily resolvable (particularly Category 4), we believe that while there are a small number that are more complex and may take longer to resolve that these should be able to be reported as this and be considered appropriately and can be reported to the PAB as such.	Your comments have been noted, thank you.
NGED (DNO)	No. The Switching Operator is responsible for allocating the Priority Categorisation of a switching incident. There have been extended discussions in various forums around the prioritisation categorisation and that the Switching Operator can downgrade a switching incident if, in their opinion, it does not meet the relevant criteria. However, the Switching Operator is not always fully understanding of a switching incident and the impacts to parties and more importantly, the consumer as highlighted during the recent P1 incident. The lack of a full understanding therefore skews the reasonable opinion they are required to apply when categorising a switching incident. The Switching Operator has confirmed that the service is at 51% and they are proposing an interim target of 90% - we would question that if currently	Your comments have been noted, thank you.

	they are only achieving 51% how are they intending to achieve 90%? What measures are they proposing to put in place and if there are additional measures why have they not put these in place already in order to achieve their current SLAs. What timeframe is being proposed to improve the current performance of 51% to the proposed 90%? The Switching Operator has stated that there would be a commercial impact to reach 100%. If there is a commercial impact, this is for the Switching Operator to manage. At what point between the proposed 90% and 100% does the commercial impact happen? For each switching incident that falls outside of the proposed 90% there is a customer at the end. This could be a single customer, multiple customers or large I&C Customers. Each incident raised has the potential to also affect other parties and ultimately settlements. Reduction of SLA's will not help the current issue of slow resolution of tickets. We would prefer to see an improvement in their performance against the current SLAs before considering reducing them.	
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	Yes.	Your comments have been noted, thank you.
Xoserve (GRDA)	On paper we agree with the switching operator proposals for switching incidents – however we would need clarification on the below prior to giving full agreement. Current and proposed timescales for switching incidents. • It's feasible we will get a circumstance where a ticket is raised and we have a high priority incident where we are waiting for a resolution from the switching operator, where an answer is needed as to whether the switch has gone through or not. The current and proposed timescales would mean we would miss our SLA and we would have customers waiting, not knowing if the switch has been successful or not.	Your comments have been noted, thank you.

	• Missing messages are raised currently a P3… What are the criteria for an escalation to a P2? This needs to be clearly defined. • Illustrative examples of P1 and P2 tickets must also be made available for parties to view., we think it would be beneficial to include this in the service definition. • Consistency on the quality of responses may support a quicker resolution.	

Question 17:	If a maximum timescale were incorporated, what do you feel this should be? Consider the maximum response/resolution time prior to this causing a risk to your organisation.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark –** N/A	Your comments have been noted, thank you.
SPEN (DNO)	We are of the view that there should be no change to the current timescale for resolution. If there is a case for this, then we believe that appropriate rationale must be provided.	Your comments have been noted, thank you.
NGED (DNO)	We would agree that the introduction of a maximum timescale would be beneficial. Currently we have incidents that have remained unresolved since go live in July 2022 and we still have not reached a resolution. This has resulted in customers being unable to switch suppliers. If those	The Code Manager has raised R0092A which incorporates a maximum timescale for incident resolution.

	customers who cannot switch elect to take this issue to the Authority and raise a complaint this will have serious impacts. Ultimately, as a DNO, our database must align with CSS. Therefore it is imperative that any anomalies are dealt with as a time sensitive matter. If a supplier is not updated on MPRS due to a rejection (which is often what our incidents are) the implications are that other downstream systems are not in alignment and the impact of this essentially is that we will UOS/Asset bill the incorrect supplier. Due to the quick nature of faster switching and the change of supplier turnaround the ticket/incident must also be dealt with in this quick manner.	
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	In order to ensure any outliers are handled within a reasonable timeframe, we propose maximum response times of 5 days for Priority 3 and 15 days for Priority 4.	The Code Manager has raised R0092A which incorporates a maximum timescale for incident resolution.
Xoserve (GRDA)	As soon as possible would be the best outcome. We believe the maximum /resolution time should be no more than an additional 100% of the initial resolution timescale. For example: where the current target is 10 days, an additional 10 days should be added for the 1 in 10 that fall outside of the current targets. - this would give additional time for investigation. We would expect a 100% resolution at this point and clear justification why this isn't achievable. Clear timescales need to be included for communication points throughout resolution.	The Code Manager has raised R0092A which incorporates a maximum timescale for incident resolution.

Question 18:	Do you have an alternate suggestion for this proposal? If yes, please specify

RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark** - N/A	Your comments have been noted, thank you.
SPEN (DNO)	No	Your comments have been noted, thank you.
NGED (DNO)	-	-
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	No.	Your comments have been noted, thank you.
Xoserve (GRDA)	We want CSS to demonstrate that they are taking a review of their current process and communicate what they are doing to improve the performance to date to achieve the proposed targets. From our perspective we would want gate closure messages prioritised and an element of responsiveness at Gate Closure.	Your comments have been noted, thank you.

PROPOSAL 6 – SERVICE REQUESTS

Question 19:	Do you agree with the Switching Operator's proposal for service requests? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - Yes, the aim of changing the Service Request SLAs is to remove any ambiguity that currently exists within the target levels (it is assumed all are set at 100% target, but this is not explicit in the REC) and to align the Service Requests with the Incident Management targets. Additionally, the target fulfilment times will remain the same but P3 and P4's will have a 90% target in order to prioritise P1 and P2 Service Requests, which have a 100% fulfilment target. **Netcompany** - No Netcompany impact. **Landmark** - Landmark understands the measure for service requests will not be passed down and therefore there are no changes to Landmark service requests measures.	Your comments have been noted, thank you.
SPEN (DNO)	No, we see no rationale for this change.	The Code Manager has raised R0092A which does not incorporate any changes for Service Requests.
NGED (DNO)	-	-
C&C (EES Provider)	N/A	-

Northern Powergrid (DNO)	Yes.	Your comments have been noted, thank you.
Xoserve (GRDA)	We agree with the service level targets. We believe the targets for resolving incidents are more important than service requests and should be reflected in the targets.	Your comments have been noted, thank you.

Question 20:	Do you have an alternate suggestion for this proposal? If yes, please specify.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** - N/A **Netcompany** - No Netcompany impact. **Landmark** - N/A	Your comments have been noted, thank you.
SPEN (DNO)	No, we do not see any reason to change this.	Your comments have been noted, thank you.
NGED (DNO)	-	-
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	A maximum timescale defined for service requests as well. Propose 15 days.	Your comments have been noted, thank you.

Xoserve (GRDA)	N/A	-

Question 21:	Do you have any further comments?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
DCC (CRS Provider)	**DCC** – DCC have supported the establishment of the Switching Incentive Regime (SIR). However, we highlighted in our December 2022 Ofgem consultation response that the Service Level Agreements to be used in the regime required further work before they could be used in any incentive regime and requested the implementation of the SIR be delayed until R0092 had concluded. This was not accepted and as such DCC have to date lost all potential margin related to the Switching Programme which we do not believe is reflective of the service provided to REC Parties. DCC formally wrote to Ofgem in May 2023 asking them to consider how this lost margin could be returned to DCC following the implementation of R0092, which will introduce SLAs that are fully within DCC's control, as opposed to the current arrangements. We propose the implementation of R0092 and the changes to the SLAs should apply from April 2023, when the Switching Incentive Regime went live, and for Ofgem to consider how any margin lost since April could be returned to DCC. The time taken to progress R0092 was a	The Code Manager and the PAB have been clear that the current Performance Charge Regime is applicable to the current service levels as defined in the REC. This will remain the case until any REC Change Proposal is approved and implemented into the Code. This aligns with the views expressed by the Authority within its decision letter on R0025.

	result of our initial request for Urgency being rejected and having to follow the standard REC Change process. **Netcompany** – None. **Landmark** – Landmark supports the direction DCC are looking to adopt and will provide full support to implement. We have recommended a Change Request to perform PVT thresholds to inform the AVP positioning for SLAs and adoption of maximum thresholds to ensure transparency on performance challenges at upper volumes.	
SPEN (DNO)	No further comments.	Your comments have been noted, thank you.
NGED (DNO)	-	-
C&C (EES Provider)	N/A	-
Northern Powergrid (DNO)	-	-
Xoserve (GRDA)	It's been difficult to review this without explicit legal text changes and it's unclear as to the extent of other REC change document changes, which has made it harder to undertake this review. We would expect that a formal review is conducted of the legal text changes.	Your comments have been noted, thank you.