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DCC Service Provider Performance Charges

Consultation Response Form

Respondent Details

NAME	Diane Lyon
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ORGANISATION CATEGORY	Energy Supplier
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TELEPHONE NUMBER	0141 614 8450
RESPONSE CONFIDENTIALITY	Non-Confidential

Questions

1. Which of the individual DCC SLAs (set out in the 'DCC Service Level Agreements' section of this document) across all three DCC Services, do you consider are the most material and impactful, should they not be met? Please explain your reasons why, noting you can specify more than one.

The Central Switching Service (CSS) is the most material and impactful as it is our ability to process messages.

RESPONSE CONFIDENTIALITY Non-Confidential

2. Which of the individual DCC Services (if any), do you consider are the most material and impactful, should one or more of their SLAs not be met? Please explain your reasons why.

If you mean DCC services covered by the REC then as per Q1 above it would be CSS.

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3. Where do you consider that performance charges relating to some or all DCC SLAs should operate:
- the Switching Incentive Regime (SIR);
 - the REC Performance Assurance Framework (PAF); or
 - split between both the SIR and REC PAF?

Please explain your answer and detail which SLAs should be subject to the SIR, if any.

We believe that performance charges relating to DCC SLAs should operate as part of the REC Performance Assurance Framework (PAF). This would ensure simplicity, code efficiencies and that we would not be paying for the same service twice if across PAF and SIR. It would also remove any ambiguity and through operating through PAF we would have a full picture.

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4. Do you consider that any of the three DCC Services (CSS, CSS CA and Switching Operator) should have all their constituent SLAs assured under the SIR as opposed to the REC PAF? Please explain your reasons why, noting that you can specify more than one service to operate in this manner.

As with Q3 we believe the three DCC Services should have their SLAs assured under REC PAF as per reasons provided above.

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5. Do you agree with RECCo's concerns that splitting the assurance of the DCC, as a REC Service, between two regimes could undermine RECCo's ability to hold its Service Provider to account for the end-to-end delivery of its service?

Yes, as per response to Q3 & Q4.

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6. Do you consider there to be any other risks or issues with DCC SLAs being subject to the SIR instead of the REC PAF?

Yes. Lack of consistency, transparency and risk of duplication of effort.

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7. Do you agree that the REC PAB should continue to be responsible for monitoring DCC SLAs and providing a recommendation on whether these have been met if these are assured under the SIR?

Yes. It would be our preference that REC PAB should be responsible for monitoring DCC SLAs.

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8. If an SIR is introduced, do you consider this should be a temporary measure and reviewed as part of the DCC's Licence review in 2025?

Yes, however we do not favour this option and our preference would be for it to sit under REC PAB.

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9. Do you have any further comments?

Whatever option is chosen, it needs to be efficient and not cause any duplication of effort. I would also like to ask what the estimated cost projection of implementation and maintaining would be and how these have been documented in the REC published forecast?

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