Market Performance Framework (MPF) Reform

Part C – key performance indicators

25 July 2024

Agenda

	Item	Presenter	Time
1	**Welcome & update**	**Chris Dawson (Chair)**	**10 mins**
2	Bilateral KPIs • M15 Average lateness of failed SLAs for bilateral Requests • M18 Proportion of SLAs for bilateral requests completed on time	Oli Robins	95 mins
3	Consultation 4	Miles Robinson	5 mins
4	Upcoming PAG workshop(s) & AOB	Chris Dawson	10 mins
			Total: 2 hours

Housekeeping

Welcome all - Please introduce yourself in the chat

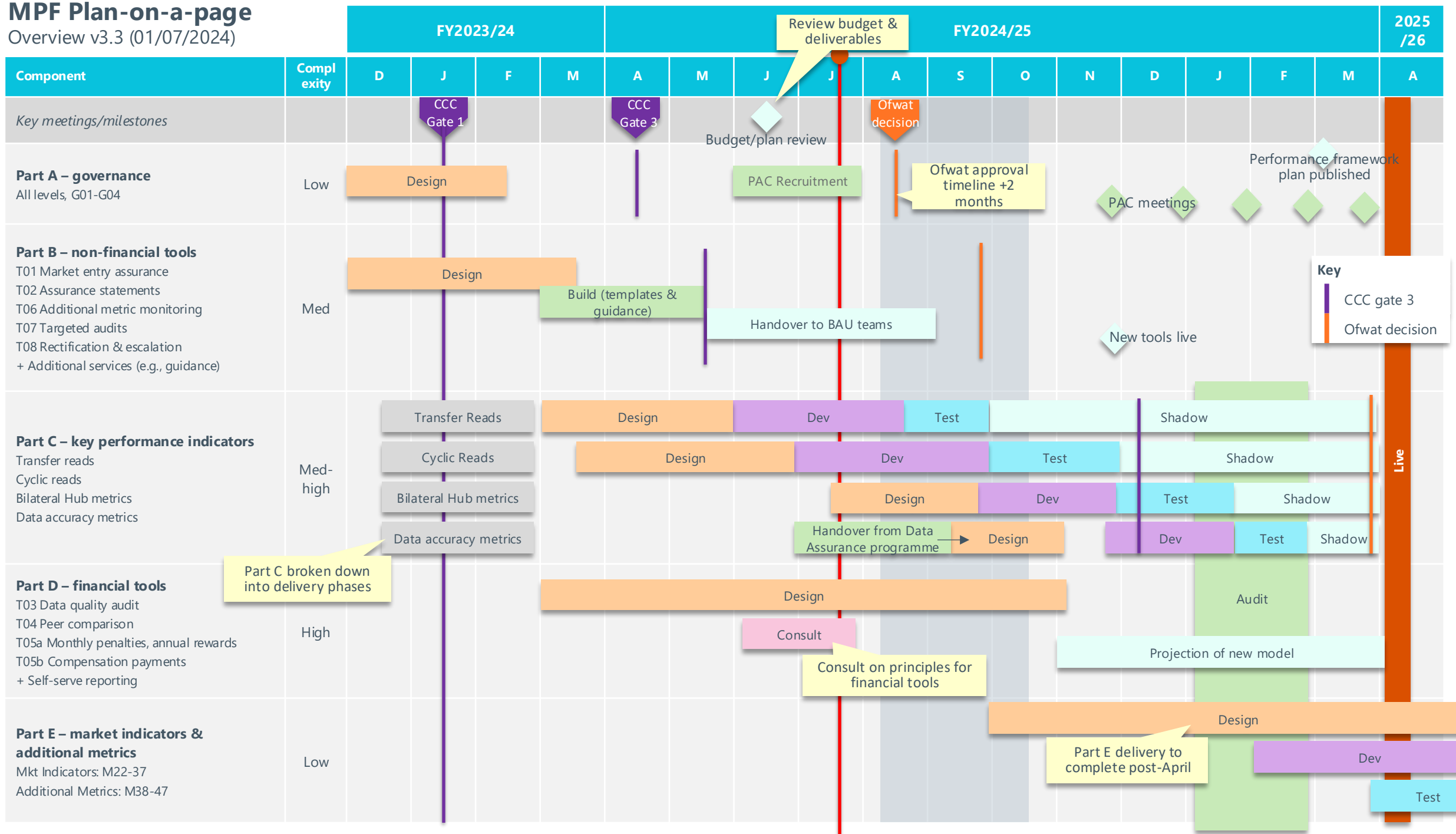
Workshop format – Input and feedback needed

We will allow time for questions
Chat and Questions mpfreform@mosl.co.uk

MOSL Website for Agenda, Minutes & Slides -
Minutes format to change due to cadence.

MPF Plan-on-a-page

Overview v3.3 (01/07/2024)



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Market Performance Framework (MPF) Reform

PAG workshop on Bilateral Requests Key Performance Indicators (M18 & M15)

25 July 2024

Agenda

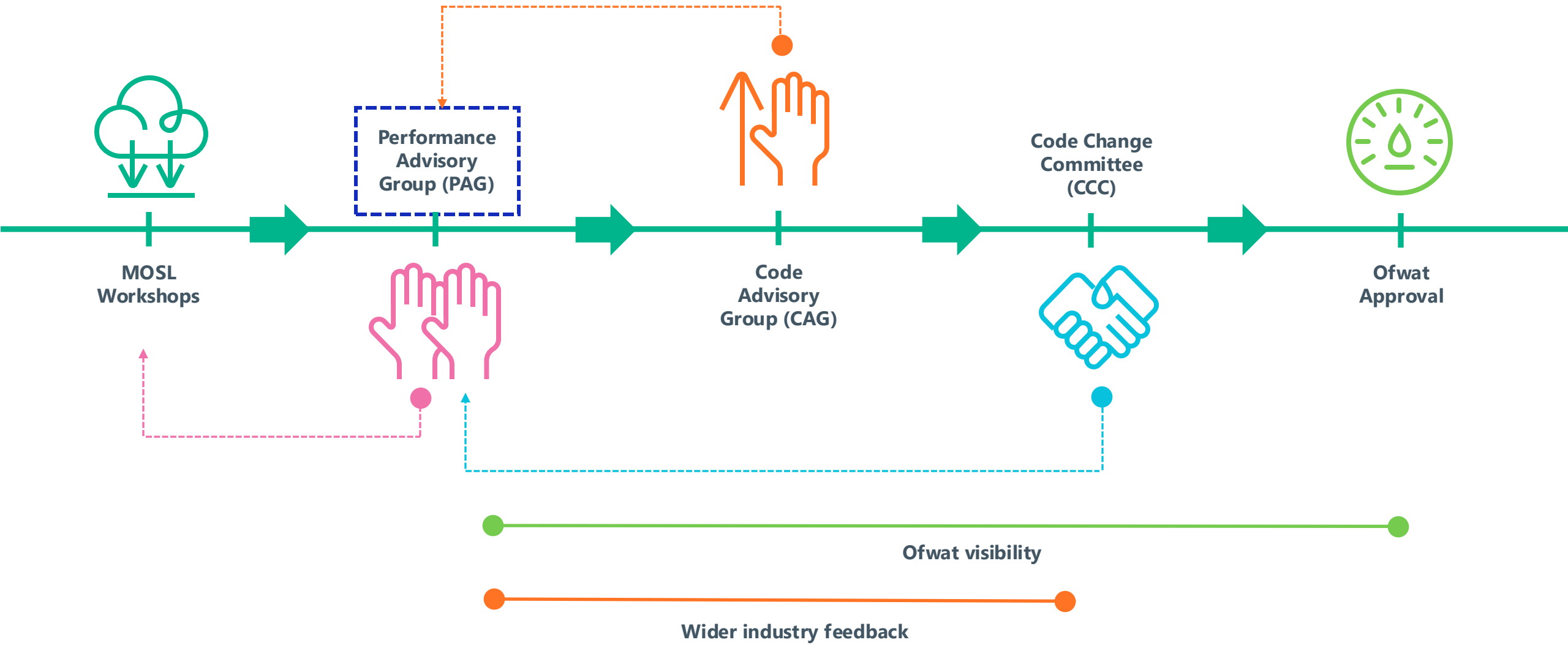
- Summary of previous workshop
- Key design options for discussion
- Exclusions and scenarios to consider

PAG Input

What do we need from PAG members?

- Feedback on the **design options and Qs**
- Feedback on **exclusions and scenarios** to consider
- Requests for **further data** (if required)

Metrics – High Level Journey

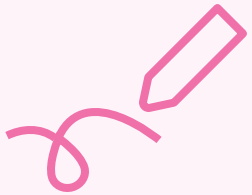


Metric Design Journey

Metric Title/Concept

Overarching metric name

Consultation feedback received



Metric design theory

Defining the **metric theory**

Input
Question
Output

Tools

Defining what **financial incentives** should apply;

Penalties
Rewards
Compensation
Standards
BR-MeX?

Scenarios

Defining **how** the metric should handle **specific** scenarios.

OR

MPF Principles

MOSL

Simplicity

Facilitate improved **customer** outcomes

Improve trading party **accountability**

Enduring & **Agile**

Transparent & proportionate

PAG 43 summary (M15 and M18 overview)

Bilateral Request KPIs Overview

Taken from PAG43 slides

KPIs in focus today

M18 – *Proportion of Bilateral Requests complete on time**

M15 – *Average lateness of failed SLAs for Bilateral Requests**

***Names to be reviewed with design**

Key code obligations

- Set out in **Operational Terms** (e.g., 2.1.1, 2.5.1, 2.5.2) and **Operational Subsidiary Documents**

Key Q being asked

- **M18** - What proportion of SLAs were completed on time (in report period)?
- **M15** - What is the total and average lateness of missed SLAs (in report period)?

Other KPIs/tools to consider

- **M10** – Number of LUMs with outstanding B5s/C1s
- **M16** – Proportion of ORIDs which have not been deferred
- **M17** – Average length of deferrals per ORID
- Peer comparison reports, Financial tools (plus **BR-MeX**), Audit, Rectification and Escalation, Additional Metrics and Market Indicators

Desired outcomes (M15 and M18)

Taken from PAG43 slides

Key Q being asked

M15 - What is the total and average lateness of missed SLAs (in report period)?

M18 - What proportion of SLAs were completed on time (in report period)?

Desired Behaviours

Pass all SLAs first time around (at least to minimum standard – standard TBC)

Failing that, complete SLAs as soon as possible once failed

Do not prioritise SLAs which are yet to/less likely to fail at the expense of failed SLAs

Desired Outcomes

Customers - assets, services and queries are resolved to quality and time expectations

Trading Parties - consistent and predictable levels of service, reduced customer contact, correct settlement and data.

Further PAG feedback (PAG 43 minutes): SLAs should not be forgotten about, need to drive behaviour that customer requests are completed in an efficient/timely manner **but with quality**, and guard against behaviours that promote gaming the system

OR

Problem statements (current OPS)

Taken from PAG43 slides

- Lateness of SLA completion is not directly reported or financially incentivized in MPF 1.0
- Reports only call out what is **late** (over SLA) and **extremely late** (over 2*SLA)
- OPS charges only consider the **first time** an OPS SLA has been missed

- MPF 1.0 does not provide a view on the **total time** for bilateral requests to be resolved
- Customer experience can be very different to what is published and attributed to individual parties.

- Comparisons (e.g., holistic reports) do not sufficiently account for different Wholesalers of different size and/or bilateral request volumes.

- **Inconsistencies** between *what is reported in performance* vs *what is charged*
- E.g., SLAs in cancelled requests included in performance reports but not charging
- E.g., SLAs in resubmitted request included in performance reports but not charging

Further PAG feedback on next slide

OR

Other factors to consider

Taken from PAG43 slides

Quality - Incentives (reports, charges) attached to M18 and M15 should not risk the quality of completion

Resubmissions - Unnecessary resubmissions could impact performance

Deferrals and rejections - M18 and M15 should acknowledge the legitimacy of deferrals

Request closure - Dependency of retailer's closing down requests - not all request types have time-out closures…

Proportionality - Incentives should fairly account for Wholesalers of different scale/request volumes, and reflect BR-MeX decision

Further PAG feedback (PAG 43 minutes):

- Can M18 and M15 reflect the **quality of request outcome**?
- Some initial views on how resubmissions and cancellations should be treated, but further discussion is required.
- **Other metrics** and/or **audits** might be required to track **resubmissions**, **rejections**, **cancellations** and **time-outs.**
- Should M18 and M15 cover SLAs on **in-flight** bilateral requests instead of waiting for requests to be **closed**?
- Should M18 and M15 treat **High Impacting Requests** and **Low Impacting Requests** differently?
- M15 should consider average lateness across all SLAs completed and not just those that are late.
- **Another metric** is required to supplement M18 and M15. This metric should track the **total time** taken per bilateral request.

Other Metrics required to support M18 & M15

This list of metrics can be revisited and revised throughout M18 and M15 workshops, but the MPF Programme will focus on delivering the **priority KPIs** for April 25. These other metrics will be developed and delivered post April 25 (**once all KPIs have been delivered**). KPIs focus on core code obligations for activities predominantly within control of one party.

Candidate Metric	Rationale	High Level Design
Additional Metric on the total time for bilateral requests to be completed	• Successes under M18 may not reflect true customer experience • This metric provides greater context, transparency, and allows PAC to identify parties responsible for delays, monitor trends and investigate and resolve performance	• Metric presents average number of BDs taken for bilateral requests to go from submission to closure. • Presented at a pairing level – can be broken down by requestor and responder activities and by process (e.g., C1, B5 etc). • Include deferral days except where **BULK** deferral code is used i.e., where Retailers and Wholesalers have an agreement in place for low impacting requests). • Includes Retailer and Wholesaler raised requests.
Additional Metrics on resubmissions, repeat submissions, rejections, cancellations…	TBC	TBC

Anything to add?

Potential M18 Design – high level overview

Initial feedback: focus on current codified OPS SLAs

Initial feedback: further discussion needed on whether to focus on in-flight vs closed requests

Initial feedback: ensure no double jeopardy with BR-Mex (if included)

Incentives to be discussed

M18

Proportion of *Bilateral Requests* complete on time

Input

All Bilateral Requests which have been **closed** in performance month

Question

Was the SLA(s) completed in time (**excluding** BDs with permitted deferrals)?

Output

Yes = Pass

No = Fail

Performance

All SLAs from Bilateral Requests closed in performance month **vs** SLAs completed on time from Bilateral Requests closed in performance month **(%)**

OR

Potential M15 Design – high level overview

M15

Average lateness of *failed SLAs* for bilateral Requests

Initial feedback: should M15 focus on M18 failures or M18 successes and failures?

Incentives to be discussed

Input

M18 failures each month

(previous slide)

Question

How many BDs over the permitted SLA was the SLA complete?

Output

Total number of BDs late across all late SLAs

Performance

Total number of BDs late across all late SLAs **/** number of late SLAs

= mean (or other) average

OR

Initial feedback: these decisions should be data driven

Design questions, options and discussion

Should M18 and M15 cover in-flight or closed requests?

MOSL

Context

- Initial proposal is that M18 and M15 will wait until a request is closed before checking for completion and lateness, as per OPS today.
- PAG concern is that waiting for closure lessens the incentivization and timeliness of intervention on performance issues.
- From April 23-March 24, **61%** of request closures happened through time-out. Manual F5 closures took **46 calendar days** on average.
- F5s complete but still open at start of July 24 are **283 calendar days old** on average.

Time out closures

- From April 23-March 24, 61% of request closures on OPS happened through time-out, but there is a significant range across processes
- Average is driven by most common processes (C1 and B5)

OPS SLA	Number Auto-closed	Retailer Closed	% Auto-closed
SLA I3-1	146	31	82%
SLA C3-1	4148	960	81%
SLA B3-2	271	71	79%
SLA B3-3	99	33	75%
SLA B7-1	1592	559	74%
SLA C5-1	15822	7158	69%
SLA H1-1	4382	2277	66%
SLA B1-2	1090	620	64%
SLA C1-1	27369	16808	62%
SLA B5-1	22864	15018	60%
SLA I1-1	463	325	59%
SLA C4-1	26	31	46%
SLA B1-4	47	69	41%
SLA F5-2	0	2915	0%
	78319	**46875**	**61%**

Should M18 and M15 cover in-flight or closed requests?

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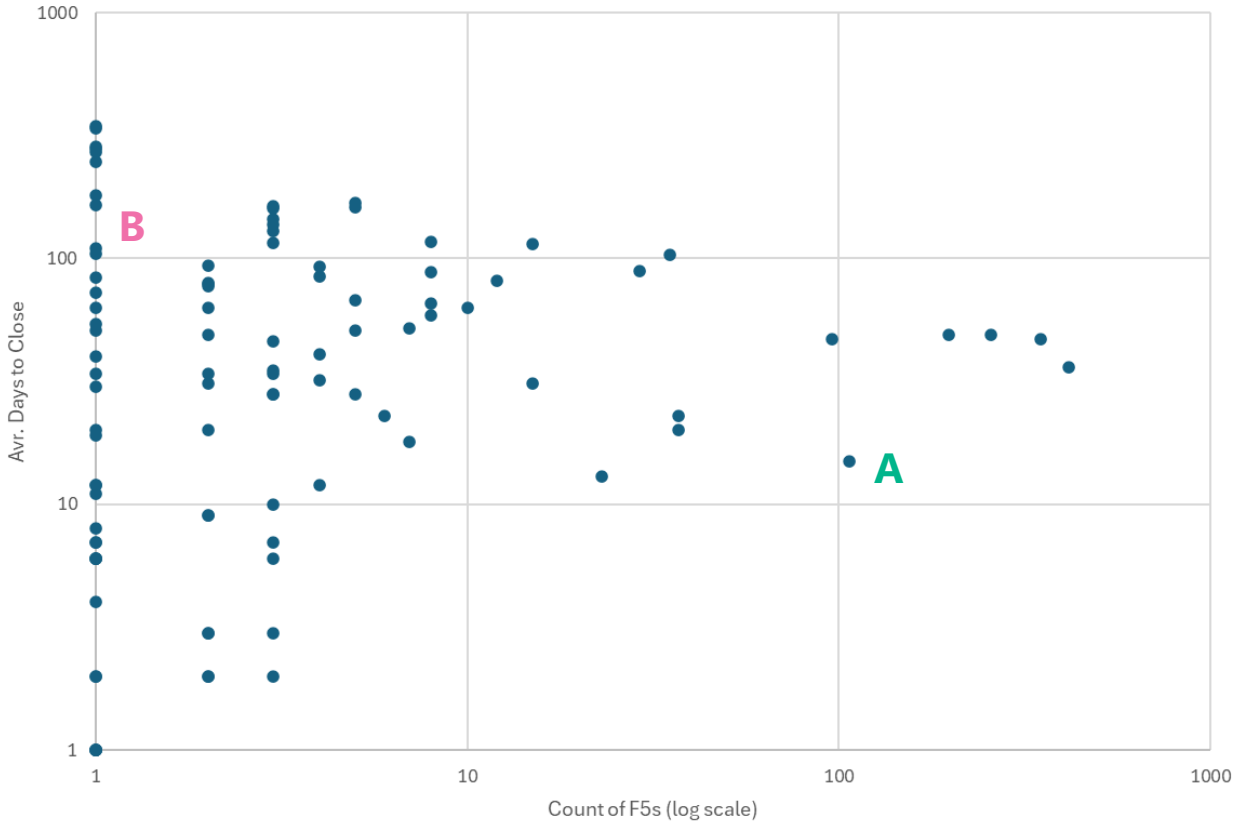
- From April 23-March 24, **61%** of request closures happened through time-out. Manual F5 closures took **46 calendar days** on average.
- F5s complete but still open at start of July 24 are **283 calendar days old** on average.

F5 closures

- At an average market level, F5s take **46 calendar days** to be closed by a retailer, but there is a significant range
- Each ● on this chart represents a trading party pairing, e.g., pairing **A** had over 100 F5s and saw these closed at an average of ~25 days, pairing **B** had only 1 F5 and this was closed ~100 days after SLA completion.
- The longest closure observed in party pairing was 345 days, several pairings saw requests closures on same day as SLA completion.



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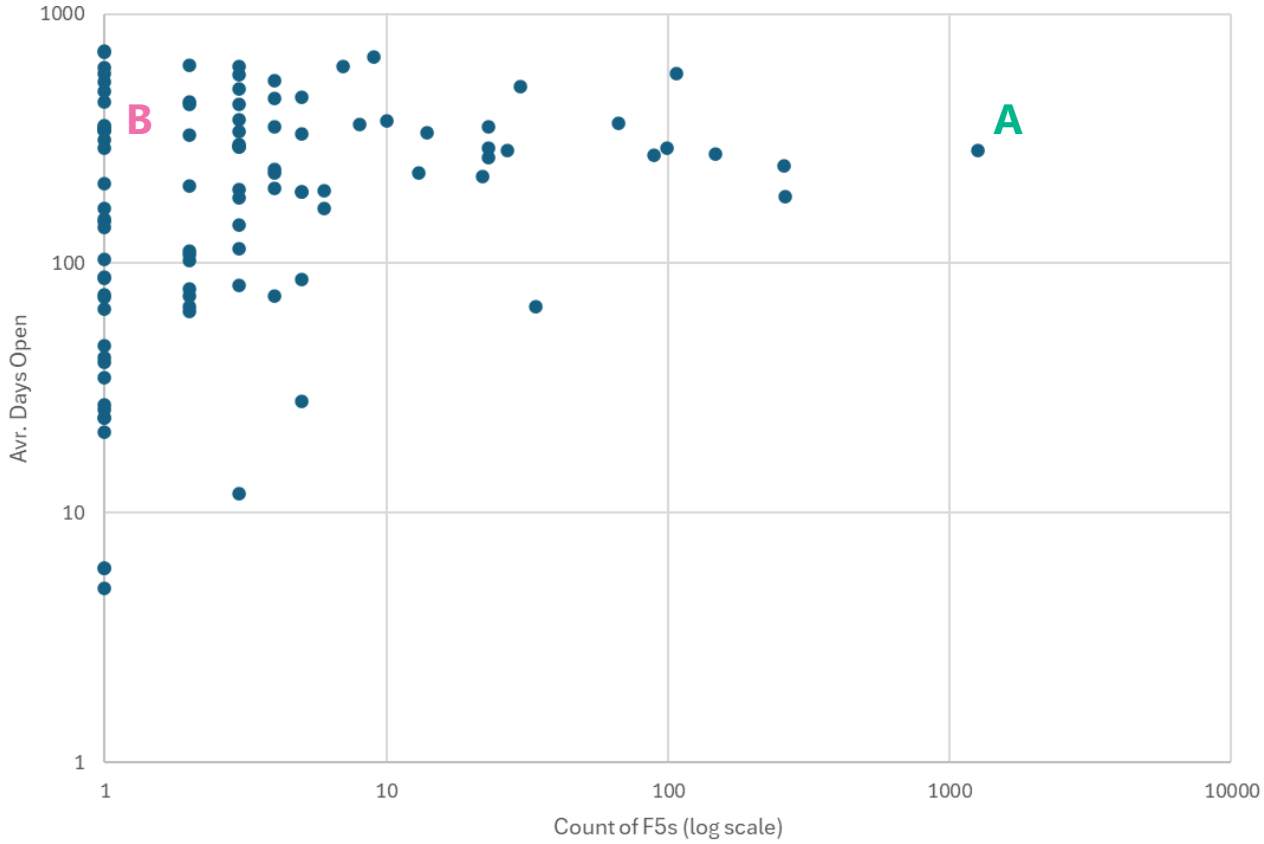
- PAG concern is that waiting for closure lessens the incentivization and timeliness of intervention on performance issues.
- From April 23-March 24, **61%** of request closures happened through time-out. Manual F5 closures took **46 calendar days** on average.
- F5s complete but still open at start of July 24 are **283 calendar days old** on average.

F5s open

- At a market level, 2.7K F5s open at start of July 24 - **283 calendar days old** on average, but there is a significant range
- Each ● on this chart represents a trading party pairing, e.g., pairing **A** has over 1000 open F5s averaging ~300 days old, pairing **B** has only 1 open F5 at ~500 days old.
- The oldest open F5 is ~700 days old.



Should M18 and M15 cover in-flight or closed requests?

Option 1 - Wait for closure

Explanation: Request closure becomes trigger for SLA going in report (as per today). Time-out process applies (except for F5) after 15BD if Retailer does not close following request marked complete by Wholesaler.

Potential issue 1: SLAs not guaranteed to be reported in month after completion - a completed SLA could be pushed into the report two months after completion if Retailer does not close the request promptly (or longer for F5).

Potential issue 2: Wholesaler will not be charged until a job is complete **AND** Retailer has closed request. Lateness accrues in background but not seen in reports/charges until both the above have happened.

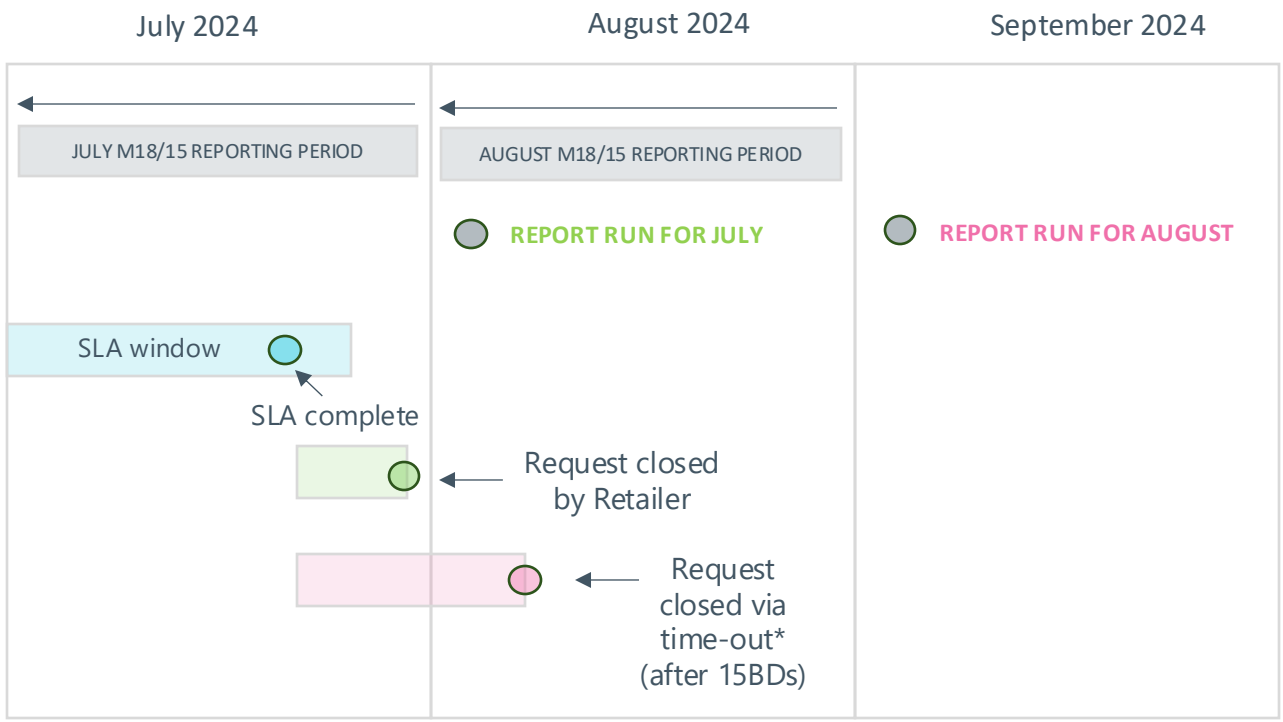
Option 2 – Wait for SLA complete

Explanation: SLA completion becomes trigger for SLA going in report. SLAs always reported in the month after completion.

Potential issue 1: No dependency on Retailer closure but Wholesaler will still not be charged until a job is complete. Lateness accrues in background but not seen in reports/charges until the above has happened.

Does either option create sufficient incentive for Wholesalers to complete an SLA once already late? Is there a viable alternative?

Scenario: SLA completed on time



*Time out does not apply for F5 requests

Trigger for SLA going in report

Option 1 – request closure

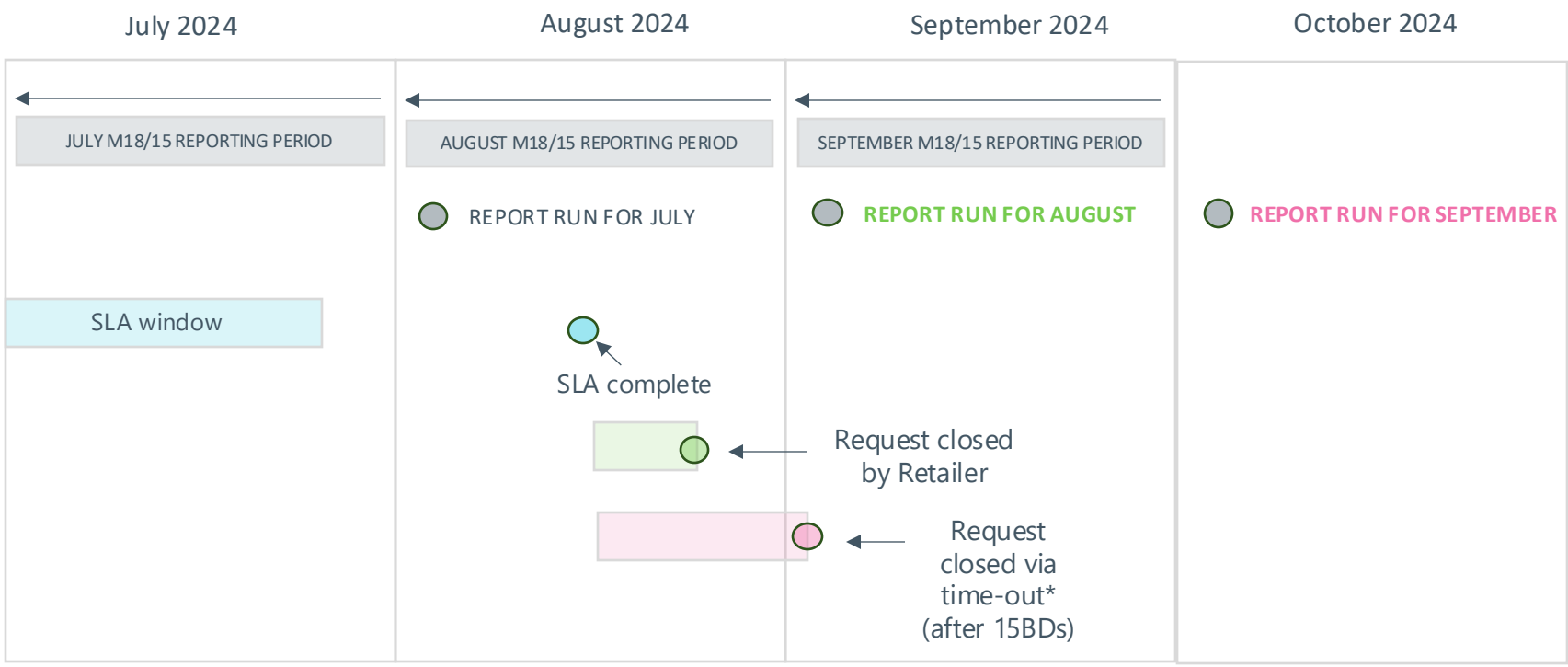
SLA success on M18 will be reported in August **IF** request is closed by Retailer **before** end of July.

If request is closed **after** end of July, **or by time-out**, SLA success on M18 will not be reported until September.

Option 2 – SLA completion

SLA success on M18 will be reported in August.

Scenario: SLA completed late



*Time out does not apply for F5 requests

Trigger for SLA going in report

Option 1 – request closure

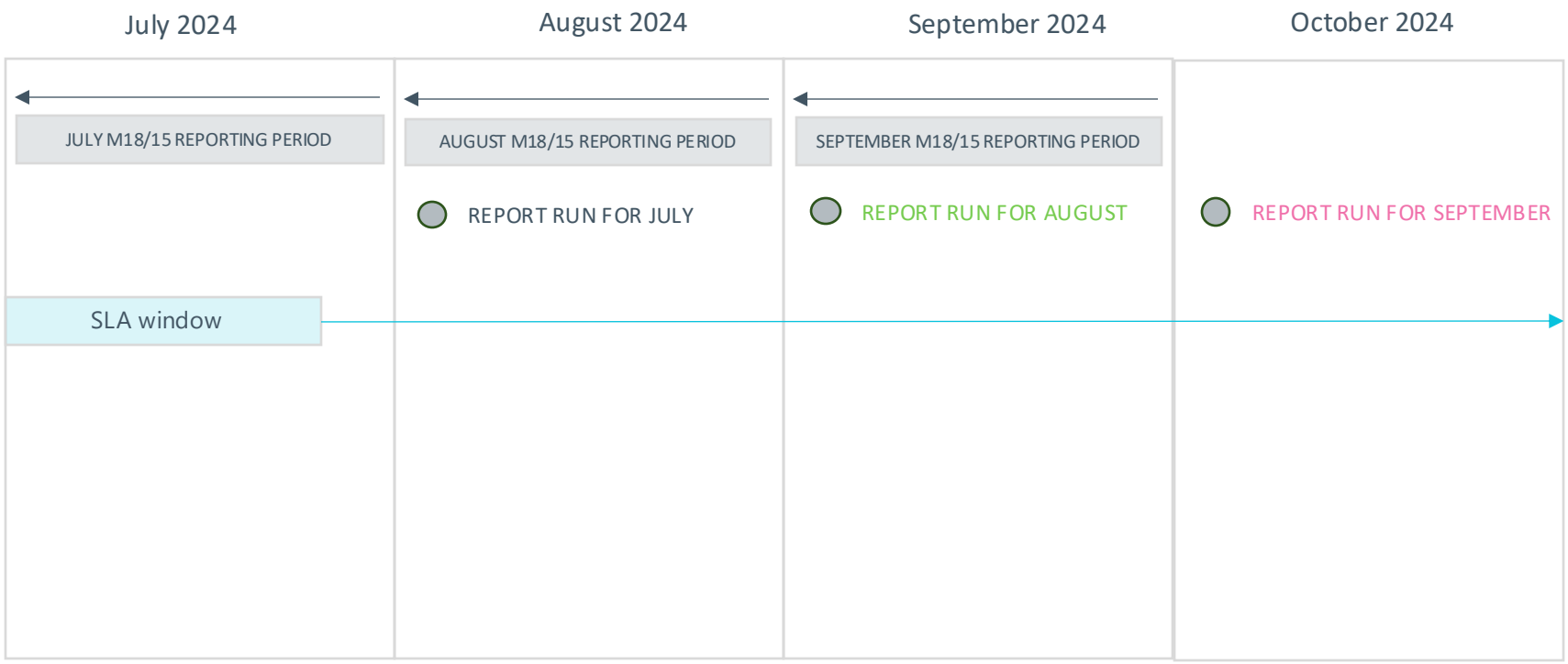
SLA failure on M18 and days late on M15 will be reported in September **IF** request is closed by Retailer **before** end of August.

If request is closed **after** end of August, **or by time-out**, SLA failure on M18 and days late on M15 will not be reported until October.

Option 2 – SLA completion

SLA failure on M18 and days late on M15 will be reported in September.

Scenario: SLA not completed



Trigger for SLA going in report

Option 1 – request closure

Lateness accrues in background but not seen in reports/charges until SLA is complete and Request is closed.

Option 2 – SLA completion

Lateness accrues in background but not seen in reports/charges until SLA is complete and Request is closed.

Should M18 and M15 cover in-flight or closed requests?

Option 1 - Wait for closure

Explanation: Request closure becomes trigger for SLA going in report (as per today). Time-out process applies (except for F5) after 15BD if Retailer does not close following request marked complete by Wholesaler..

Potential issue 1: SLAs not guaranteed to be reported in month after completion - a completed SLA could be pushed into the report two months after completion if Retailer does not close the request promptly (or longer for F5).

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Explanation: SLA completion becomes trigger for SLA going in report. SLAs always reported in the month after completion.

Potential issue 1: No dependency on Retailer closure but Wholesaler will still not be charged until a job is complete. Lateness accrues in background but not seen in reports/charges until the above has happened.

Does either option create sufficient incentive for Wholesalers to complete an SLA once already late? Is there a viable alternative?

How should M18 and M15 treat High and Low Impacting Requests?

Context

- The Operational Terms (2.2.4) require parties to prioritise the submission and delivery of High Impacting Requests over Low Impacting Requests. Defined as per the Objectives, Principles, Definitions:

Low Impacting Request

Any Request which on submission, or after investigation, would not have a substantial financial impact on a customer or on settlement calculations, and which the Trading Parties consider could wait to be resolved within a longer time period which is agreed between them for the completion of any Bulk Submission of Requests

High Impacting Request

Any Request which on submission, or after investigation would resolve a substantial financial impact on a customer or a substantial financial impact on settlement calculations (taking into account the nature of the customer and/or the Trading Party) and which the Trading Parties concerned consider could not wait to be resolved within a longer time period agreed between them for the completion of any Bulk Submission of Requests

Where parties have agreed to a bespoke agreement as per OSD 0701 (16.3)…

→ Retailers can flag Low Impacting Requests with **BULK** in the Additional Information field of the request

→ Wholesalers can manage these using the **BULK** request deferral code.

- **43** bilateral requests flagged with BULK since August 2022 (41 were C1 and of the same pairing). **None since 2023.**

Include both Low and High Impacting Requests from M18 and M15 for now but revisit if the use of the mechanism changes?

Can M18 and M15 reflect the quality of request outcome?

MOSL

Context

- A desired outcome of M18 and M15 is that customer requests are completed to quality (as well as time) expectations.
- Quality delivery should reduce resubmissions, repeat submissions on the same SPID, and improve settlement and data.
- Almost ¾ of resubmissions in past year (7,886) were due to disputed outcomes or CMOS updates.
- Suggestion at PAG43 that there needs to be greater emphasis on Wholesalers including CMOS updates and/or follow on ORID references when completing a request (noting these are not required in every case).

Suggested approach

- Additional tools or metrics can pick up concerns over quality of completion (e.g., audits on resubmissions and repeat submissions).
- Initial proposal is that M18 and M15 will allow for deferrals, will not set an expectation for 100% performance on time, may continue to count/charge SLAs on resubmitted requests, and could be supplemented by an additional indicator on total time -> these considerations should help ensure that speed is not prioritised over quality.

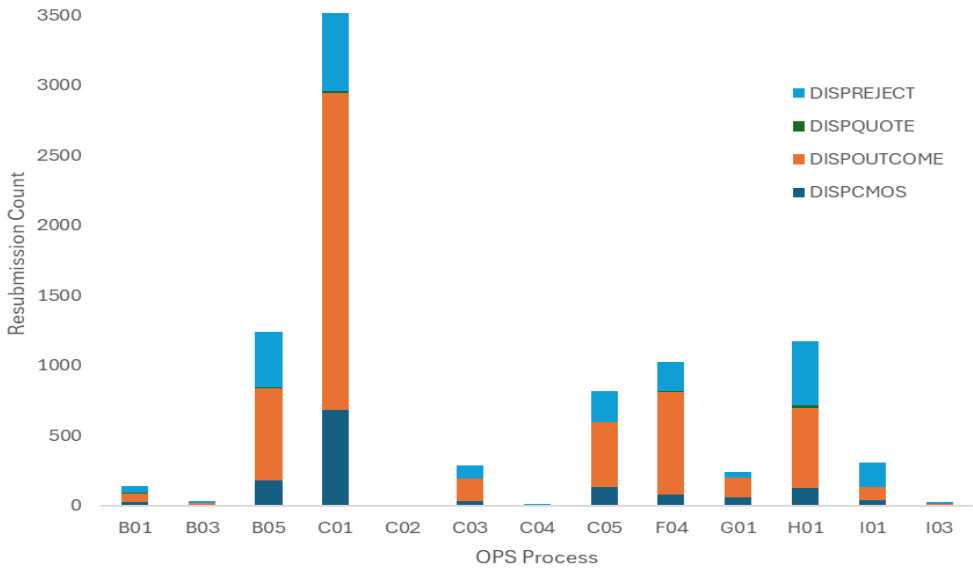
Anything to add?

What to do with resubmissions?

Context

- Since July 2023, 8,656 ORIDs have been resubmitted at least once (**4.89%** of all ORIDs). 57% DISPOUTCOME, 27% DISREJECT, 15% DISPCMOS, 0.6% DISPQUOTE.
- C1s make up most resubmissions, followed by B5, H1, F4 and C5.

No. of resubmissions on one request	Count	% of resubmitted requests	% of total requests
10	1	0.01%	0.0006%
9	0	N/A	N/A
8	4	0.05%	0.0023%
7	2	0.02%	0.0011%
6	13	0.15%	0.0073%
5	27	0.31%	0.0153%
4	95	1.10%	0.0537%
3	280	3.23%	0.1583%
2	1170	13.52%	0.6614%
1	7064	81.61%	3.9933%
	8656		



Should SLAs in resubmitted requests be included in performance and charging for M18 and M15? Other metrics/tools required to focus in on resubmissions and resubmission reasons?

OR

What to do with repeat submissions?

Context

- Since July 2023, **6%** of completed OPS SLAs (Retailer raised) were followed by another request for the same process within 6 months by the same Retailer.
- A further **9%** had a request of a different process type raised by the same retailer within 6 months.
- Varies by process: F5-2 (13%) most likely to result in another request of same type being raised, B3-3 most likely to result in in another request of any type being raised (41%).
- Average is driven by most common processes (C1-1 and B5-1).
- The overall likelihood of another bilateral request being raised within six months (of same or different process) does not substantially change if Wholesaler raised bilateral requests are added as well – slightly more likely that another request of another type will be raised after first.
- Reasons for repeat submissions could be genuine or due to Retailer or Wholesaler fault.

OPS SLA	Total Raised	% with another request raised within 6 months	
		Of any type	Of same type
SLA B1-2	1916	25%	9%
SLA B1-4	185	13%	2%
SLA B3-2	158	32%	4%
SLA B3-3	133	41%	1%
SLA B5-1	44136	14%	6%
SLA B7-1	2540	21%	8%
SLA C1-1	72382	16%	7%
SLA C3-1	5342	0%	0%
SLA C4-1	19	26%	5%
SLA C5-1	15802	8%	4%
SLA F5-2	5175	35%	13%
SLA H1-1	5994	21%	9%
SLA I1-1	1148	24%	6%
SLA I3-1	409	32%	5%
	155339	**15%**	**6%**

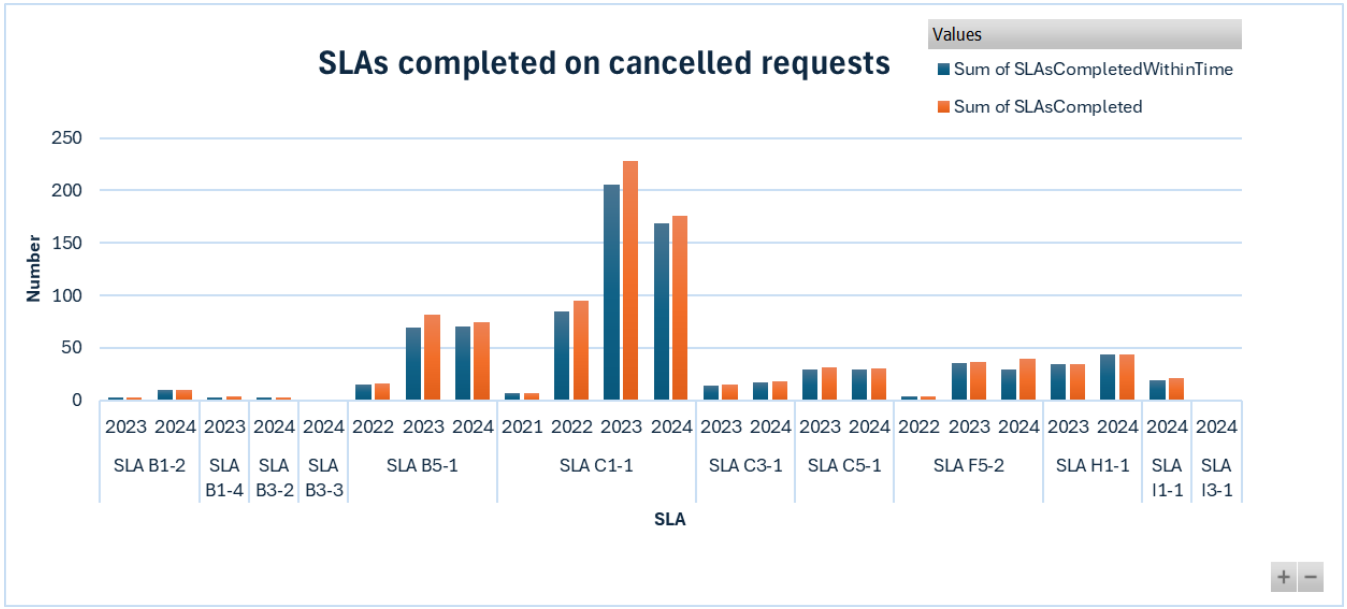
Other metrics/tools required to focus in on repeat resubmissions?
Does the code need to be tightened to improve consistency of processes?

OR

What to do with cancellations?

Context

- 976 SLAs have been completed on requests which ended up being cancelled since May 2021 (0.48% of all SLAs completed in this time)
- Performance on cancelled and closed requests is the same in this period (**92**% on time)
- PAG43 asked whether M18 and M15 should include SLAs on cancelled requests. Further discussion required, but there is some preference **NOT** to include these SLAs - the request should not have been raised in the first place and including these SLAs could distort/skew performance and incentivize incorrect behavior.
- Not including would be consistent with approach for meter reads where meter reads are not included in performance reporting or charging if the SPID is deregistered at time of report.
- PAG has noted however that Wholesalers might commit time and resource on a request before it is cancelled



Should SLAs in cancelled requests be included in performance and charging for M18 and M15?
Other metrics/tools required to focus in on cancellations?

OR

Should M15 focus on M18 failures or failures and successes?

MOSL

Context

- M18 will report the proportion of SLAs completed on time, M15 will capture lateness of SLA completion.

Option 1 – M15 tracks lateness of late SLAs

Explanation: M15 takes M18 failures (i.e., late SLAs) each month and calculates the total and average days late from these late SLAs. This aligns with the proposed approach for transfer reads (i.e., M06 tracks the lateness of missing transfer reads, not the lateness of all transfer reads).

Complication: The total and average days late may be significantly impacted by outlier lateness events (if not captured by deferrals).

Option 2 – M15 tracks lateness of all SLAs

Explanation: M15 takes all M18 successes and failures (i.e., all on time and late SLAs) each month and calculates the total and average days late from these late SLAs. This will mitigate the impact of outlier lateness events on the average lateness which is reported.

Complications: Duplicates what is already reported (and possibly charged) under M18. Also does not align to the proposed approach for transfer reads (M06 does not average lateness by factoring in transfer reads which are on time).

Can concerns be managed by providing greater context around reports (e.g., M18 and M15 reported together alongside statistics such as task volumes)?

Next time

Next workshop

- Continue with key design questions from today
- Explore exclusions and scenarios - what do M18 and M15 need to account for?
  - E.g., Switches and volume transfers…

Anything to add?

Responses to:

mpfreform@mosl.co.uk

Agenda

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1	Welcome & update	Chris Dawson (Chair)	10 mins
2	Bilateral KPIs • M15 Average lateness of failed SLAs for bilateral Requests • M18 Proportion of SLAs for bilateral requests completed on time	Oli Robins	95 mins
3	**Consultation 4**	**Miles Robinson**	**5 mins**
4	Upcoming PAG workshop(s) & AOB	Chris Dawson	10 mins
			Total: 2 hours

Part D – Consultation 4 planning

Consultation 4
8 July – 2 August

Section 1

The **success criteria** that will be used to judge the proposed changes

Pre-reading document: **Mon 14 June**

Section 2

The **principles that will be used to design** the financial tool(s) and performance standards

Pre-reading document: **Mon 24 June**

Section 3

Based on 1 & 2, **align the most appropriate financial tool with MPF metric(s)**

Pre-reading document: **Mon 1 July**

Consultation 4 will focus on the **design** of financial tools and aligning them to metrics.

The scale of charges (penalties, compensations and rewards) and **actual performance standards** for each KPI will be determined in the Autumn

Part D – Consultation 4 planning

Consultation 4
8 July – 2 August

Section 1

The **success criteria** that will be used to judge the proposed changes

Including:

- Overview of Consultation 4
- What consultation will – and won't – include
- Content of three pre-reading documents
- Issues with financial tools included in current MPF and objectives of reformed financial tools

Section 2

The **principles that will be used to design** the financial tool(s) and performance standards

Including:

- Define potential financial incentives
- Principles for financial tools and performance standards
- Rationale for the principles and how they align with feedback from stakeholders

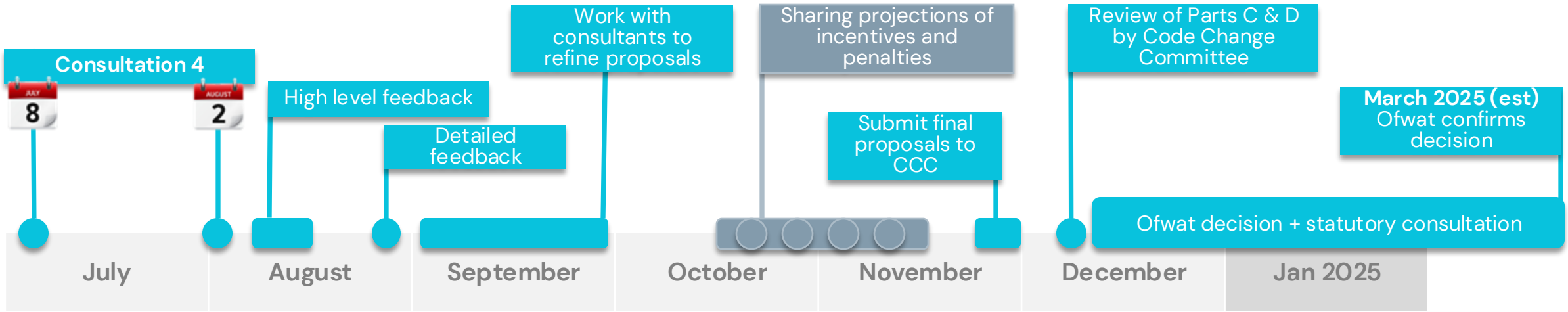
Section 3

Based on 1 & 2, **align the most appropriate financial tool with MPF metric(s)**

Including:

- Proposed charging model(s) and units for each metric
- Rationale for proposed charging models and link to principles in Section 2
- Indication of current performance and charges where there are equivalents in current MPF
- Examples of how the proposed charging models may apply in practice

Consultation 4 and beyond



Agenda

	Item	Presenter	Time
1	Welcome & update	Chris Dawson (Chair)	10 mins
2	Bilateral KPIs • M15 Average lateness of failed SLAs for bilateral Requests • M18 Proportion of SLAs for bilateral requests completed on time	Oli Robins	95 mins
3	**Consultation 4**	**Miles Robinson**	**5 mins**
4	Upcoming PAG workshop(s) & AOB	Chris Dawson	10 mins
			Total: 2 hours

Upcoming PAG workshop(s)

Date	For discussion	Detail
25th July	MPF Metrics*	M15 – Average lateness of failed SLAs for bilateral Requests & M18 Proportion of SLAs for bilateral requests completed on time
31st July	MPF Metrics*	M19 - Non-market meter reads performed within SLA (biannual or monthly) & M21 Lateness of overdue non-market meter reads
7th August	MPF Metrics*	M15 – Average lateness of failed SLAs for bilateral Requests & M18 Proportion of SLAs for bilateral requests completed on time

**Subject to change*

AOB

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List of Metrics -Key Performance Indicators (KPIs)

Ref	Group	Description
M01	Market meter KPIs	Cyclic meter reads performed within SLA (biannual or monthly)
M02		Proportion of smart meters read
M03		Lateness of overdue cyclic meter reads
M04		Proportion of transfer meter reads performed within SLA
M05		Proportion of transfer meter reads submitted within SLA
M06		Lateness of overdue transfer meter reads
M07		Proportion of consumption from cyclic meter reads performed within the biannual or monthly Service Level Agreement (SLA)
M08		Proportion of consumption settled on actuals vs estimates for smart meters
M09		Proportion of transferred SPIDs that have an estimated meter reading
M10		Number of Long Unread Meters (LUMs) with an outstanding B5 or C1 bilateral transaction request
M11	Data KPIs	Proportion of complete and accurate customer name/banner name and Standard Industry Classification (SIC) code
M12		Proportion of premises address data accuracy
M13		Proportion of unassured long-term vacant (LTV) premises
M14		Proportion of meters with credible GIS coordinates
M15	Service request KPIs	Average lateness of failed SLAs for bilateral Requests
M16		Proportion of deferred ORIDs
M17		Average length of deferrals per ORID
M18		Proportion of SLAs for bilateral Requests completed on time
M19	Non market meter KPIs	Cyclic non-market meter reads performed within SLA (biannual or monthly)
M20		Proportion of consumption from cyclic non-market meter reads performed within the biannual or monthly Service Level Agreement (SLA)
M21		Lateness of overdue cyclic non-market meter reads