Market Performance Framework (MPF) Reform

Part C – key performance indicators

14 August 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	Janet Judge, Evan Joanette	100 mins
3	Upcoming PAG workshop(s) & AOB (Future KPI review)	Chris Dawson	10 mins
			Total: 2 hours

Housekeeping

Welcome all - Please introduce yourself in the chat

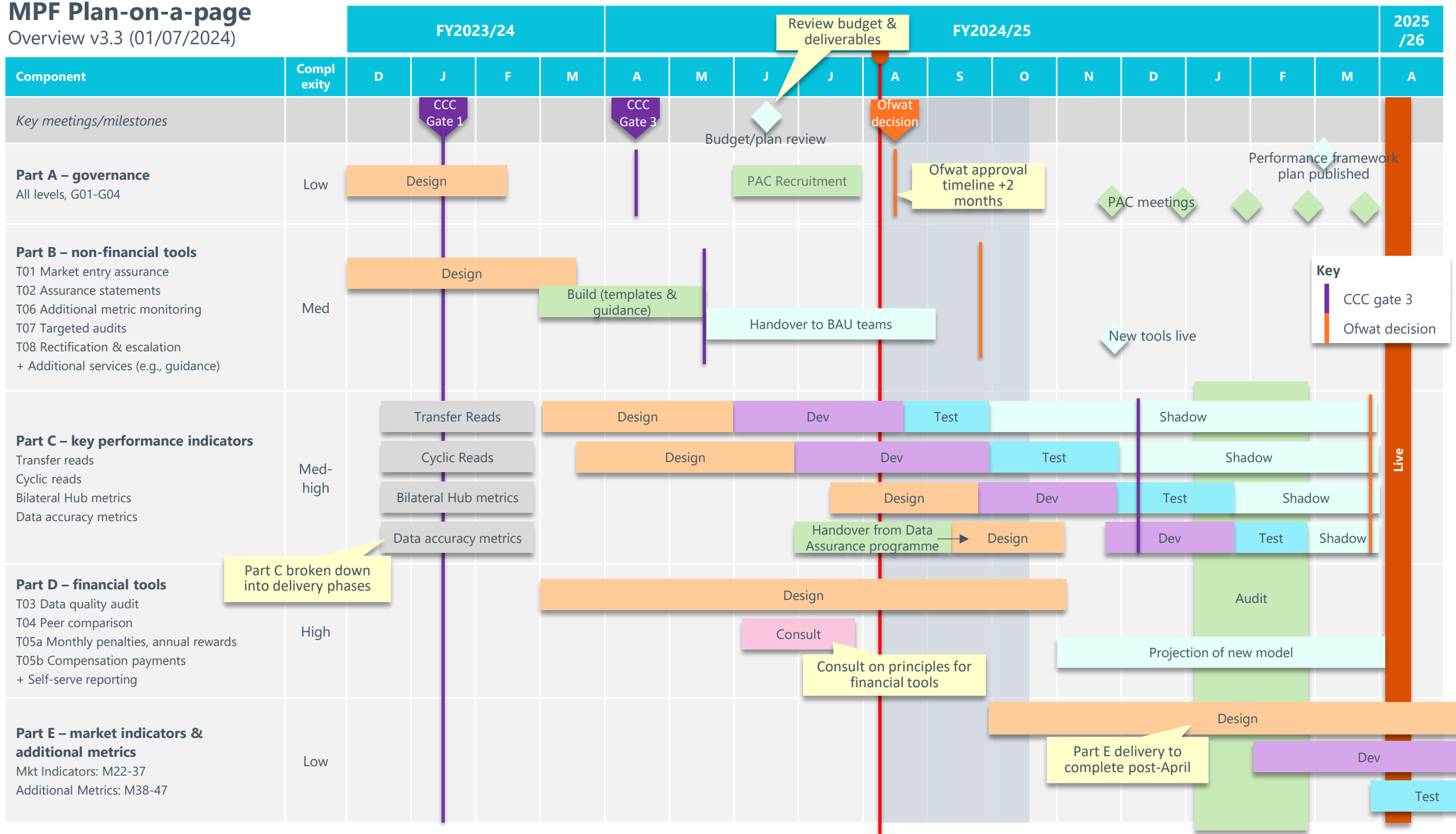
Workshop format – Input and feedback needed

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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3	Upcoming PAG workshop(s) & AOB	Chris Dawson	10 mins
			Total: 2 hours

Market Performance Framework (MPF) Reform

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

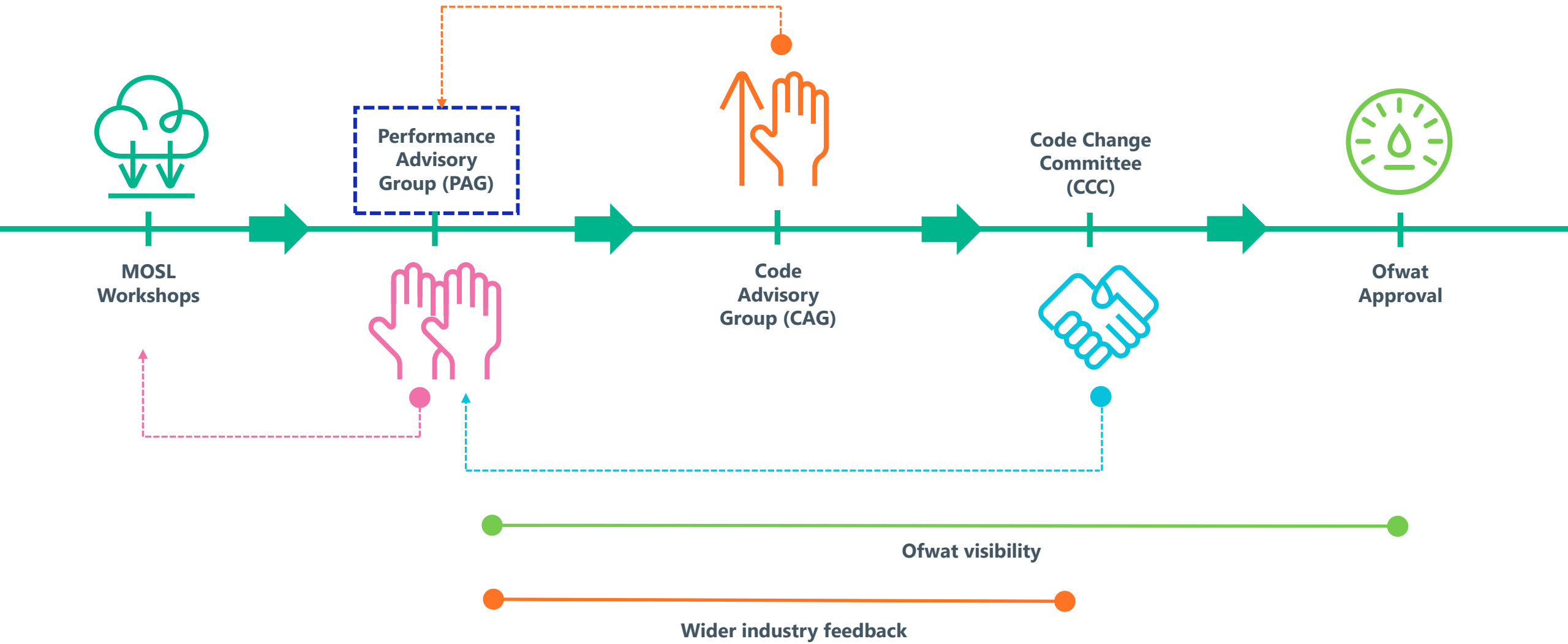
14 August 2024

Agenda

- Previous PAG feedback
- Updated design proposals for M15 and M18
- Alternative options explored
- Assessment against behaviors and principles

Seeking PAG feedback on the updated design proposals and rationale

Metrics – High Level Journey

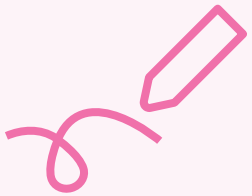


Metric Design Journey

Metric Title/Concept

Overarching metric name

Consultation feedback received



Metric design theory

Defining the **metric theory**

Input
Question
Output

Tools

Defining what **financial incentives and reports** should apply;
Penalties
Rewards
Compensation
Standards
BR-MeX?

Scenarios

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

Bilaterals 101

Term	Explanation
Request	A service request submitted in the Bilateral Hub which is related to the processes set out in the Operational Terms.
ORID	Operational Request Identifier for service requests submitted in the Bilateral Hub.
Requestor	The Trading Party that initiates a Request.
Responder	The Trading Party that is required to carry out the action(s) arising from a Request (may be the same Trading Party as the Requestor where a Request has been initiated by a Wholesaler).
SLA	Service Level Agreement, the timescales to complete processes and steps set out in the Operational Terms.
OPS SLA	Priority SLAs associated with Operational Performance Standard reporting and charging.

Bilaterals 101

Term	Explanation
In progress Request	A Request being worked on in the Bilateral Hub, i.e., not cancelled or closed.
Completed Request	A Request that has reached substantial completion (i.e., OPS SLA complete) and is awaiting final checks before being closed. Currently, only the first instance of an OPS SLA for a Completed Request shall be counted in OPS Performance.
Closed Request	A Request that has been closed by the Retailer after final checks or closed due to time-out (applies for all requests except F5 if Retailers have not reviewed the completion and closed the request within 15 BD of the request being marked complete). SLAs are not included in OPS performance until Requests are closed.

Bilaterals 101

Term	Explanation
Rejections	Wholesalers may reject requests from Retailers if the Request is materially inaccurate, a duplicate, refers to the wrong process, is not in the Wholesaler's policy or responsibility, or relates to a household customer. Retailers can agree to a rejection or resubmit the request. Currently, SLAs on rejected Requests are not counted in OPS performance.
Cancellations	A Requestor can cancel a Request at any time. A Wholesaler cannot cancel a Request raised by the Retailer (and vice versa). Currently, SLAs on cancelled Requests are not counted in OPS performance.
Resubmissions	Retailers may resubmit rejected Requests where it disputes the rejection or is rectifying the request as advised by the Wholesaler. Retailers may also resubmit completed Requests where it disputes the outcome, CMOS updates, corrections, or a quotation. This will trigger a new SLA for the same ORID, but only the first instance of an OPS SLA for a completed Request shall be counted in OPS performance.
Deferrals	Wholesalers can defer (pause) the SLA for a Request for certain permitted reasons throughout its lifecycle, for example when the Wholesaler is waiting for information either from the Retailer or third party which is inhibiting the Wholesaler from completing the Request.

Previous PAG feedback

PAG feedback – other metrics to consider

This list can be revisited and revised throughout M18 and M15 workshops. The MPF Programme will focus on delivering the **priority KPIs** for April 25, but these suggestions are already being shared with the Bilateral Hub Programme team in case of dependencies on advanced reporting functionality. These metrics can be developed in part E (**post KPI delivery)**.

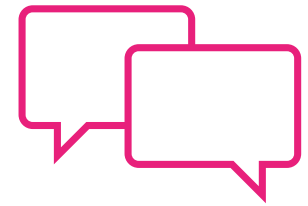
Candidate Metric	Rationale	Potential High-Level Design
Additional Metric on the total time for bilateral requests to be completed	• Successes under M18 may not reflect true customer experience • This metric provides greater context, transparency, and allows PAC to identify parties responsible for delays, 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 metric on resubmissions, repeat submissions and escalations.	• May highlight the most common areas of friction and provide a basis for further qualitative exploration through audit.	• Metric presents the proportion of ORIDs per Trading Party that are resubmitted, escalated, or followed by another request for the same process within X months. • Broken down by pairing and process.
Additional metric on request closures	• Required to better understand behaviours across parties and processes, but less of an urgent requirement if M18 and M15 are not dependant on request closure.	• Metric presents the average number of BDs taken for bilateral requests to be closed. • Broken down by pairing and process.

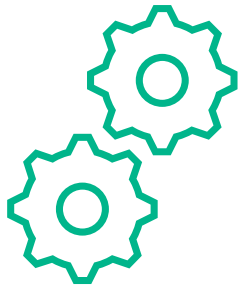
PAG feedback – inconsistencies and opportunities outside of MPF programme

The following **inconsistencies** have been identified by PAG members and will be shared with the OAG.

- Requests completed without the required CMOS transactions or follow on ORID references.
- Inconsistent working practices for resubmissions, repeat submissions, and escalations.
- Inconsistent working practices around customer contact
- Inconsistent working practices for bilateral requests impacted by internal/external vacancy.

Solutions could include code clarifications, RWG guidance, new Bilateral Hub functionality or audits.





The following **opportunities** for new Bilateral Hub functionality have been specifically identified by PAG members – these will be also shared with the OAG:

- New flags for high and low impacting requests
- New reason codes for resubmissions
- Bulk deferral functionality
- Autoclosure on F5 requests

PAG feedback – to consider in M15 and M18 design

The following feedback from previous workshops has been considered in the updated designs of M15 and M18:

SLA successes and failures and lateness on cancelled requests should be included if request is cancelled after the SLA

SLA lateness should focus on what is overdue and outstanding, not just completed late.

SLA successes and failures should be reported as close to events as possible (i.e., not waiting for requests to be closed)

M15 and M18 designs should be based against the desired behaviours and outcomes and programme principles.

Proposed designs for M18 and M15

Proposed M18 Design

Input

All OPS SLAs **completed** in month, **including**:

SLAs on cancelled Requests **IF** cancellation occurred after SLA completion

SLAs on resubmitted Requests

Excluding:

SLAs on rejected Requests (as per OPS today)

SLAs on cancelled Requests **IF** cancellation occurred before SLA completion (PAG suggestion)

SLAs where time-outs have occurred at request for info stage (as per OPS today)

Query

Has the OPS SLA been completed in the permitted time?

Excluding:

Days for permitted deferrals (all reason codes as per OPS today)

Report

M18 = % of OPS SLAs completed in month that were completed on time

Underlying data available (line by line view available for the subject party) including total OPS SLAs complete, total complete on time, and breakdown by process

Peer comparison and MPF financial incentives

(or BR-MeX)

Proposed M18 Design

Improves on current OPS ★

Input

All OPS SLAs **completed** in month, **including**:

SLAs on cancelled Requests **IF** cancellation occurred after SLA completion ★

SLAs on resubmitted Requests ★

Excluding:

SLAs on rejected Requests (as per OPS today)

SLAs on cancelled Requests **IF** cancellation occurred before SLA completion ★

SLAs on request for info time-outs (as per OPS today)

Query

Has the OPS SLA been completed in the permitted time?

Excluding:

Days for permitted deferrals (all reason codes as per OPS today)

Report

M18 = % of OPS SLAs completed in month that were completed on time

Underlying data available (line by line view available for the subject party) including total OPS SLAs complete, total complete on time, and breakdown by process

Peer comparison and MPF financial incentives

(or BR-MeX)

Explanation of proposed design

Improves on current OPS ★

- ★ Success and failures will be included in performance reporting once the task for the SLA has been marked complete (potential for M15 to pick up what becomes overdue and outstanding). No dependency on request closure.
- ★ SLAs successes or failures will still be included if the request is cancelled after SLA completion.
- ★ SLA successes and failures on a request will continue to be included in performance reporting until the requestor is satisfied with the request outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for success or failure).

Proposed M15 Design

This is all NEW as no current MPF metric on OPS SLA lateness

Input

All OPS SLAs **overdue and outstanding** at end of reporting month + all OPS SLAs **completed late** in reporting month, **including**:

SLAs on cancelled Requests **IF** cancellation occurred after SLA is overdue and outstanding

SLAs on resubmitted Requests

Excluding:

SLAs on rejected Requests

SLAs on cancelled Requests **IF** cancellation occurred before SLA is overdue and outstanding

SLAs on request for info time-outs (as per OPS today)

Query

How far is the OPS SLA beyond the permitted time?

Excluding:

Days for permitted deferrals (all reason codes)

Report

M15 = Total and average days late and days late in month for overdue and outstanding OPS SLAs and late completed OPS SLAs

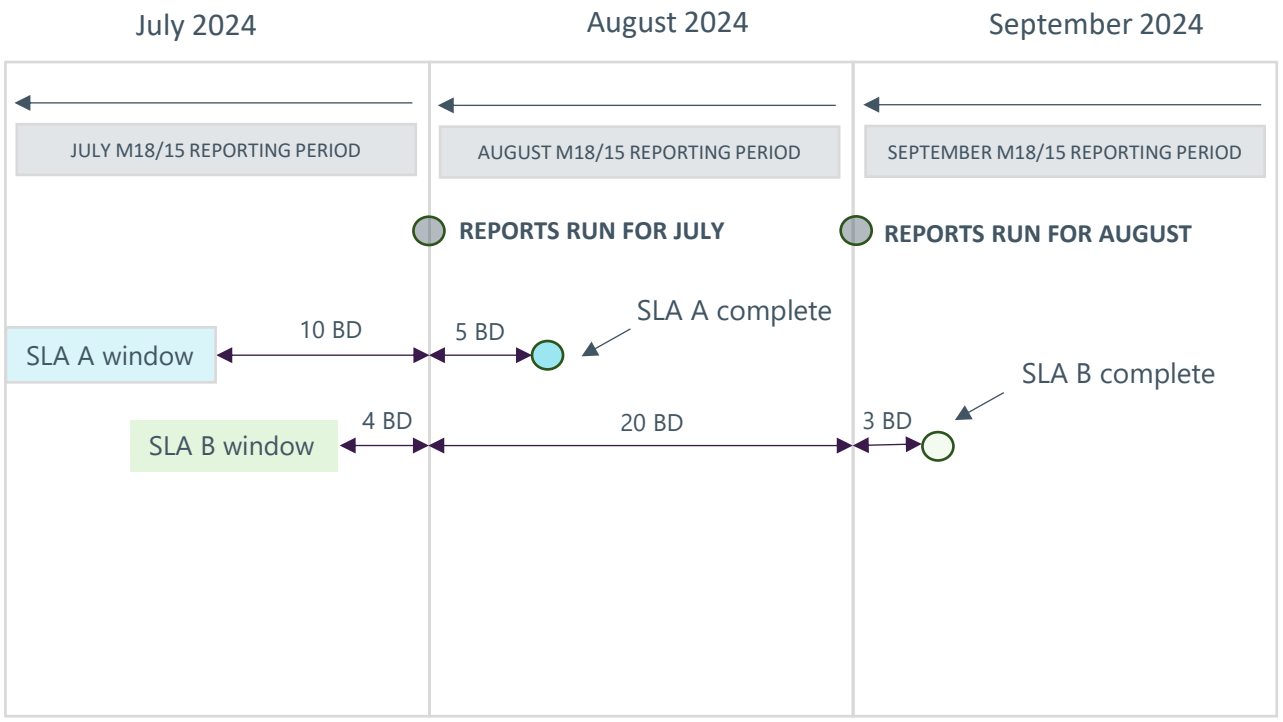
Underlying data available (line by line view available for the subject party) including total OPS SLAs overdue and outstanding, total days late, breakdown by process

Peer comparison and MPF financial incentives

(or BR-MeX)

Proposed M15 Design

An overdue & outstanding SLA will increasingly impact the days late in every report until the SLA is complete (average is taken from 'cumulative lateness'). But if MPF charges apply to M15, charges will only apply against total lateness in month to ensure that late days are not double charged.



M15 reporting focusses on the lateness of SLAs, not the lateness per month. **SLA A** is counted as 10BD overdue and outstanding in July, and 15BD completed late in August (10BD+5BD).

SLA B is counted as 4BD outstanding and overdue in July, 24BD overdue and outstanding in August (4BD+20BD) and 27BD completed late in September (4BD+20BD+3BD).

Proposed M15 Design

An overdue & outstanding SLA will increasingly impact the days late in every report until the SLA is complete (average is taken from 'cumulative lateness'). **But if MPF charges apply to M15, charges will only apply against total lateness in month to ensure that late days are not double charged.**

Month	SLA	Scenario for SLA		Lateness		
		Status	Lateness in month	In month (chargeable)	Cumulative	Average (cumulative/no. of late SLAs)
July	SLA A	Overdue & outstanding	10BD	14BD (10+4)	14BD (10+4)	7BD (14/2)
	SLA B	Overdue & outstanding	4BD			
August	SLA A	Completed late	5BD	25BD (20+5)	39BD (10+4+5+20)	19.5BD (39/2)
	SLA B	Overdue & outstanding	20BD			
September	SLA A	Not included (already complete)	n/a	3BD	27BD (4+20+3)	27BD (27/1)
	SLA B	Completed late	3BD			

Explanation of proposed design

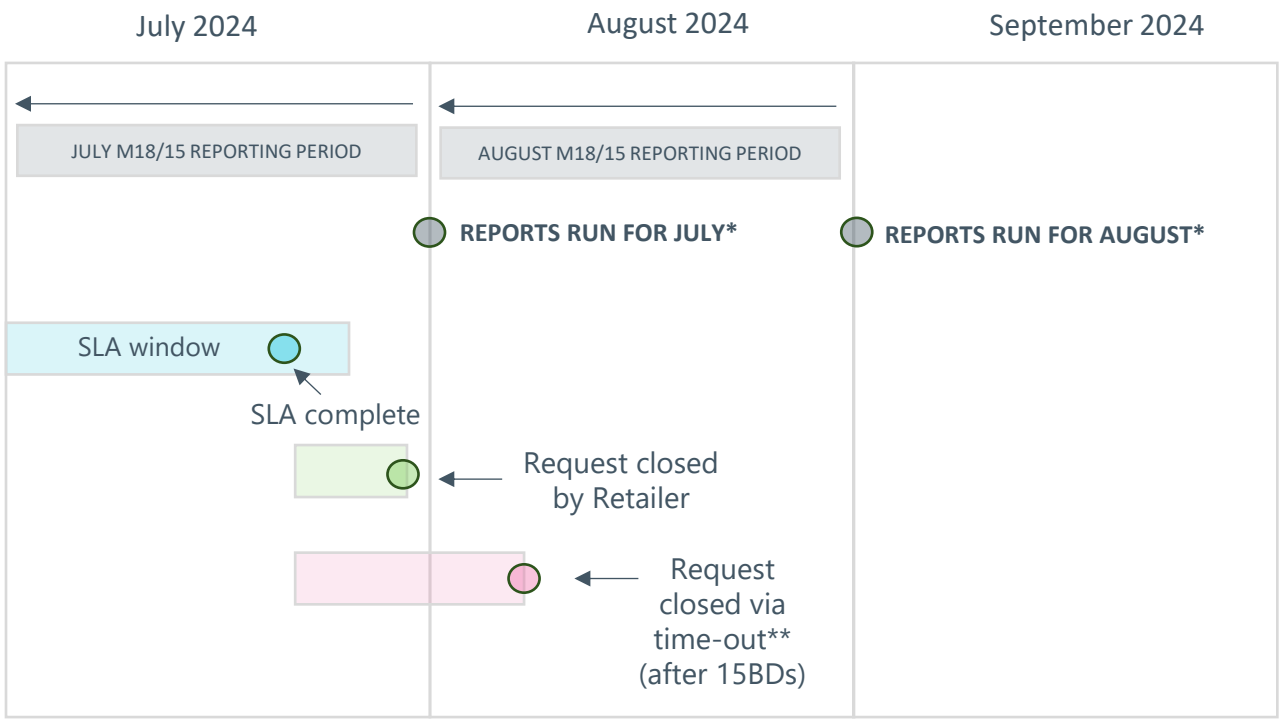
Improves on current OPS ★

- ★ Each M15 report will add up the days late for what is sitting at overdue and outstanding (at the end of the month) and what has been completed late in that reporting month. An overdue & outstanding SLA will increasingly impact the days late in every report until the SLA is complete.
- ★ A deferral will need to be applied before the report is run to impact the days late from SLAs that are overdue and outstanding (incentivises prompt deferrals).
- ★ SLA lateness will be factored into total lateness if the request is cancelled after SLA has become overdue and outstanding.
- ★ SLA lateness on a request will continue to be factored into total lateness until the requestor is satisfied with the request outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for lateness).

For simplicity, and to avoid setting a priority amongst already late SLAs, lateness is treated equally on each SLA (1 day late on a 25-day SLA has the same impact on total lateness as 1 day late on a 12-day SLA).

Scenario: SLA completed on time

Improves on current OPS ★

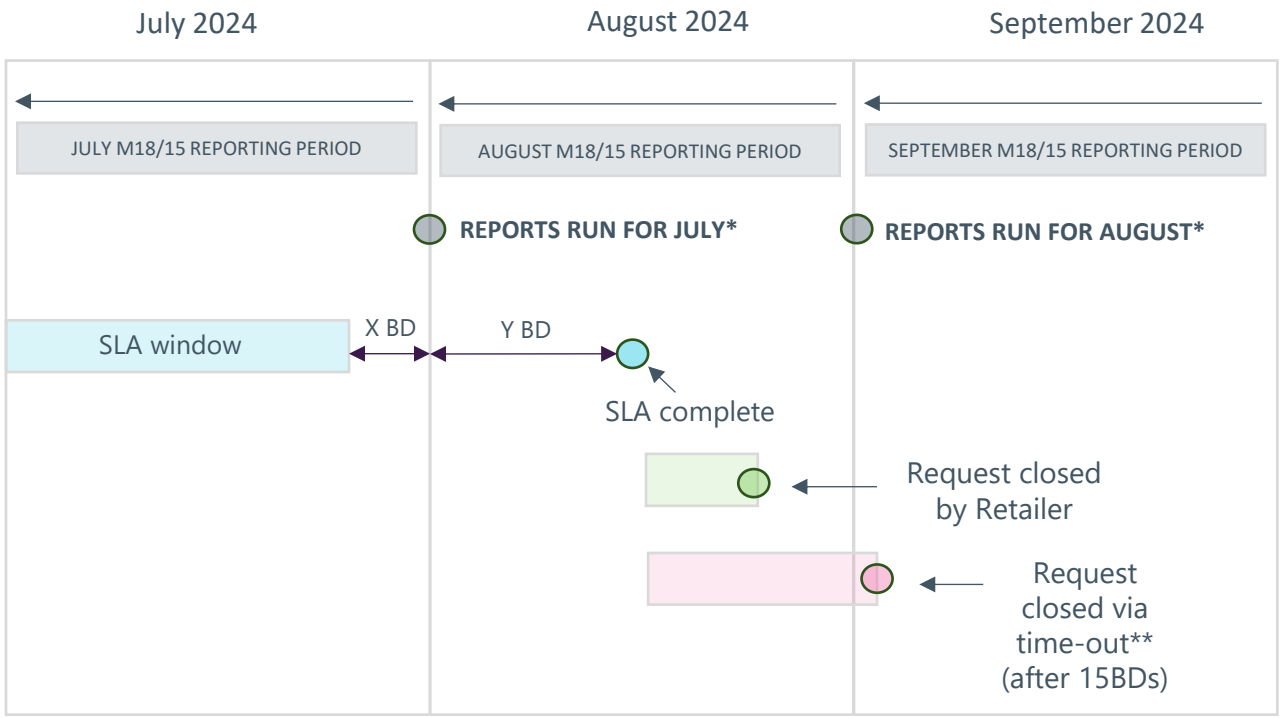


*Specific timing for report run and publication TBC
**Time out does not apply for F5 requests

Metric	Explanation
Current OPS	SLA success is not reported until **request is closed**. This could push the success into the report for August, or further for F5s (no time-out closure).
★ **M18**	SLA success is reported when the **SLA is complete**, so the success will appear in the report for July.
M15	No days outstanding and overdue or completed late.

Scenario: SLA completed late

Improves on current OPS ★

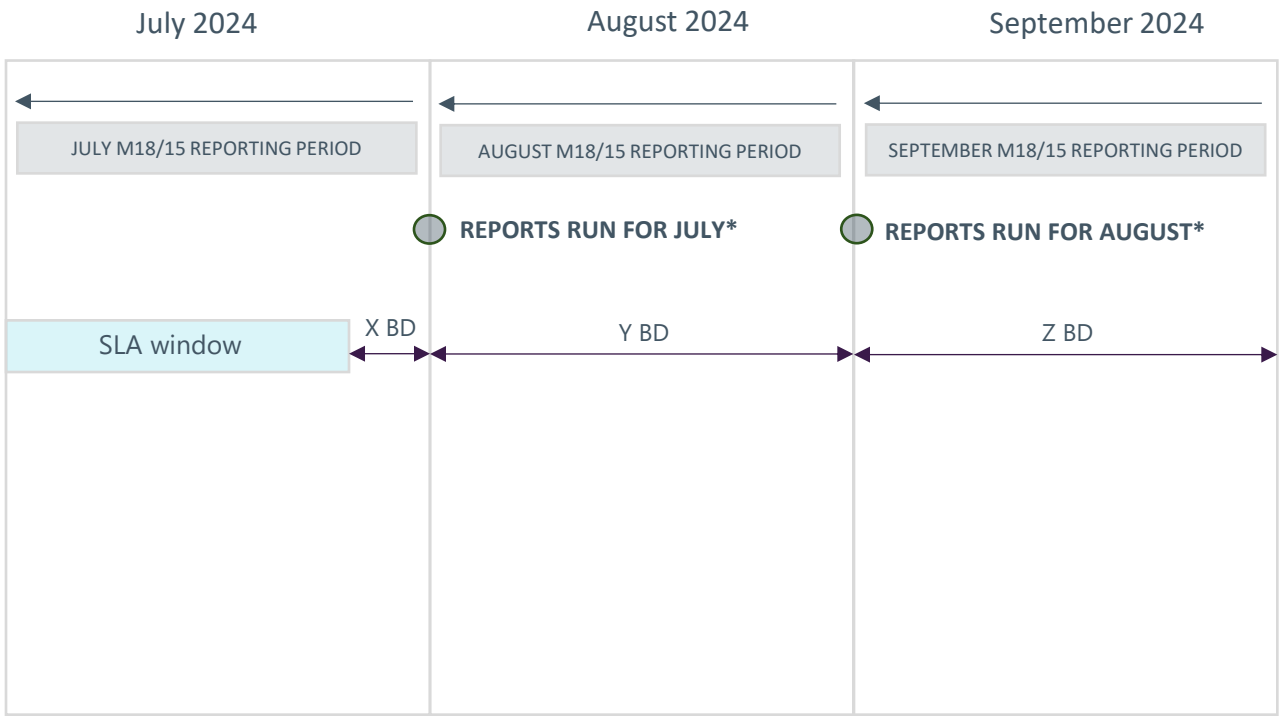


*Specific timing for report run and publication TBC
**Time out does not apply for F5 requests

Metric	Explanation
Current OPS	SLA failure is not reported until **request is closed**. This could push the failure into the report for August, or further for F5s (no time-out closure). **Days late not reported**.
★ **M18**	SLA failure is reported when the **SLA is complete**, so the failure will appear in the report for August.
★ **M15**	**X days overdue and outstanding** added to the report for July, **X + Y days completed late** added to the report for August.

Scenario: SLA not completed

Improves on current OPS ★



*Specific timing for report run and publication TBC

Metric	Explanation
Current OPS	SLA failure will not be reported until SLA is complete AND request is closed. **Days late not reported**.
M18	SLA failure will not be reported until SLA is complete.
★ **M15**	**X days overdue and outstanding** added to the report for July, **X + Y days overdue and outstanding** added to the report for August. **X + Y + Z days overdue and outstanding** added to the report for September….

Desired outcomes (M15 and M18)

MOSL

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 feedback from PAG 43: SLAs are not forgotten, need to drive behaviour that customer requests are completed in an efficient/timely manner, and promote fairer prioritisation of SLAs/deferrals

Assessing solutions

Desired Behaviours

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Assessment criteria

Consolidated behaviours:

- Complete requests first time and to time
- Resolve failures as soon as possible
- Do not look to 'game' the system

MPF programme principles:

- Simplicity
- Transparent and proportionate
- Customer outcomes
- Party accountability
- Enduring and agile
- Supports competition
- Consistent and compatible with regulatory regime
- Value for money

Assessing solutions

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Selected principles for comparing KPI design

MPF programme principles:

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- Transparent and proportionate
- Customer outcomes
- Party accountability
- Enduring and agile
- Supports competition
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Assessing solutions

Desired Behaviours

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MPF programme principles:

- Simplicity
- Transparent and proportionate
- Customer outcomes
- Party accountability
- Enduring and agile
- Supports competition
- Consistent and compatible with regulatory regime
- Value for money

To be revisited once tools have been added

Solution	Assessment against behaviours		
	Complete requests first time and to time	Resolve failures as soon as possible	Prioritising SLAs/deferrals
Current OPS	Moderate	Low	Low
Proposed M18 & M15	High	High	High

Solution	Assessment against behaviours		
	Complete requests first time and to time	**Resolve failures as soon as possible**	**Prioritising SLAs/deferrals**
Current OPS	**Moderate** - only the first instance of a completed SLA is counted (SLAs on resubmitted requests are not counted), and SLAs on cancelled requests are excluded even if cancellation occurs after SLA is complete. Performance charges for underperformance but minimal incentive for outperformance.	**Low** - no metric reporting lateness and successes and failures are not reported until requests are closed.	**Low** - no metric reporting lateness so late SLAs can be deprioritised without a performance impact. Deferrals are excluded but no MPF metric to track use of deferrals.
Proposed M18 & M15	**High** - SLAs will continue to be included until the requestor is satisfied with the outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for success or failure and lateness), and SLAs on cancelled requests are included if cancellation occurs after SLA is complete. Potential for outperformance payments and penalty charges (or inclusion in BR-MeX).	**High** - introduces a KPI to specifically highlight the lateness of what is overdue and outstanding plus completed late, successes and failures will be reported at SLA complete, and lateness will be reported as it occurs (when SLAs become overdue and outstanding), instead of request closure. An overdue and outstanding SLA will increasingly impact performance until the SLA is complete. Potential for inclusion in BR-MeX.	**High** - late SLAs cannot be deprioritised without performance impact. KPIs will exclude deferrals days – and deferrals will be reported by other MPF metrics. Wholesalers are incentivised to apply deferrals promptly as reports will capture the lateness of what is overdue and outstanding plus completed late. Incentives must be carefully designed so it is not better to incur extra M18 failure to improve M15. Extra statistics on reports may be required.

Solution	Assessment against Principles				
	Simplicity	Transparent & proportionate	Customer outcomes	Party accountability	Enduring & agile
Current OPS	Low	Low	Moderate	Low	Low
Proposed M15 & M18	Moderate	High	High	High	Moderate

Solution	Assessment against Principles				
	Simplicity	**Transparent & proportionate**	**Customer outcomes**	**Party accountability**	**Enduring & agile**
Current OPS	**Low** - multiple charges and reports across different OPS SLAs.	**Low** - no metric reporting lateness, successes and failures are not reported until requests are closed. Performance charges for underperformance but minimal incentive for outperformance. Deferral days are excluded but no MPF metric to report these.	**Moderate** - OPS prioritises the timely completion of the most important SLAs, but late SLAs can be deprioritised without a performance impact.	**Low** - late SLAs can be deprioritised without a performance impact, only the first instance of a completed SLA is counted (SLAs on resubmitted requests are not counted), and SLAs on cancelled requests are excluded even if cancellation occurs after SLA is complete.	**Low** – all processes controlled through code change
Proposed M15 & M18	**Moderate** - combines performance across all OPS processes in two KPIs, but introducing a new concept of lateness does add complexity. Incentives must be carefully designed so it is not better to incur extra M18 failure to improve M15. Extra statistics on reports may be required.	**High** – introduces a KPI to specifically highlight the lateness of what is overdue and outstanding plus completed late. Successes and failures will be reported at SLA complete, and lateness will be reported as it occurs (when SLAs become overdue and outstanding), instead of request closure. Potential for outperformance payments and penalty charges (or inclusion in BR-MeX). KPIs will exclude deferrals days – and deferrals will be reported by other MPF metrics.	**High** - late SLAs cannot be deprioritised without performance impact, and an overdue and outstanding SLA has an increasingly impact until the SLA is complete. Potential BR-MeX inclusion. Prioritises most important SLAs as per current framework.	**High** - late SLAs cannot be deprioritised without performance impact, an overdue and outstanding SLA will increasingly impact performance until the SLA is complete, and SLAs on cancelled requests are included if cancellation occurs after SLA is complete. SLAs will continue to be included until the requestor is satisfied with the outcome. Wholesalers are incentivised to apply deferrals promptly as reports capture lateness of what is overdue and outstanding plus completed late.	Moderate – potential for some agility in the form of PAC-governed performance standards (TBC)

Alternative design options explored for M18 and M15

Combine M15 and M18?

Scenario	Total OPS SLAs	SLAs Completed		Lateness of late SLAs		Combined M15 and M18 (lower = better)	Notes
		On time (M18)	Late	Total	Average (M15)		
A	1000	999 (99.9%)	1	40	**40** (40/1)	**0.04** (40/1000)	M15 returns high average lateness despite only one SLA failure. Best combined score.
B	1000	995 (99.5%)	5	44 (40+1+1+1 +1)	**8.8** (44/5)	**0.044** (44/1000)	M15 average lateness is improved by additional but short failures on M18.
C	50	45 (90%)	5	44 (40+1+1+1+1)	**8.8** (44/5)	**0.88** (44/50)	M15 average lateness is same as B despite equal lateness over a smaller number of SLAs. Worst combined score.

The table above sets out hypothetical completion and lateness scenarios for SLAs in an example month. A combined KPI could divide [total lateness on SLAs completed in month] by the [number of SLAs completed in month]. For scenario A, this is 40 divided by 1000. Scenario A scores poorly on M15 separate but best in a combined KPI – the impact of the one very late SLA on final ranking is reduced. Scenario C returns the worse combined score given its poorer M18 separate performance and similar lateness performance across far fewer SLAs.

A combined KPI could also look to include what is overdue and outstanding by dividing the [total lateness on SLAs completed in month or overdue and outstanding at end on month] by [number of SLAs completed in month or overdue and outstanding at end of month].

Normalise SLAs?

Wholesaler A illustrative performance:

Standard	current SLA	Total tasks completed (from M18) (actuals 2024/25 YTD)	Total days late where SLA missed (from M15) (illustrative)	Normalised Total days late where SLA missed = Total days late where SLA missed ÷ SLA (illustrative)
		№	Days	Normalised days
B1	25	118	75	3
B3	25	78	525	21
B5	25	3,145	4,050	162
C1	12	3,431	2,637	220
C2	12	565	117	10
C3	25	308	525	21
C4	12	25	18	2
C5	25	2,044	1,125	45
F5	8	287	204	26
H1	25	704	356	14
I1	12	337	423	35
I3	2	103	2	1
TOTAL		**11,145**		**560**

$$Wholesaler\ A\ score = \frac{\sum_{s=B1}^{I3} Normalised\ Total\ days\ late\ where\ late\ (from\ M15)}{\sum_{s=B1}^{I3} Total\ number\ of\ tasks\ completed\ (from\ M18)} = \frac{560}{11{,}145} = 0.05$$

Instead of treating each day late equally on every OPS process, this option adjusts lateness relative to permitted SLAs.

Alternative proposals

Alternative	Rationale for discounting under MPF
Combine M15 & M18 into a single KPI	KPI = total lateness on SLAs completed in month **/** no. of SLAs completed in month + Reduces the impact of the one very late SLA + Provides an effective way to rank overall performance across different Wholesalers − Lateness is spread across all SLAs completed so does not answer 'how late are SLAs that are late?' and creates less incentive to address late SLAs (can improve combined performance by prioritising new yet-to-fail SLAs instead). − Does not provide the PAC with separate views of completion and lateness (both tracked but not directly presented). − KPI becomes a score that needs additional explanation rather than a simple proportion or average. − Successes/failures and lateness will not be reported until SLAs are complete – unless solution is amended to include lateness on SLAs overdue and outstanding. − The proposed solution can already mitigate concerns over outliers and gaming. If M15 and M18 are not included in BR-MeX, charges will be set so a Wholesaler cannot benefit by incurring extra M18 failures to improve M15 performance. M15 charges would apply against total, not average lateness, and reports could include lateness context. ❖ Can still be considered under BR-MeX – the proposed M18 and M15 can provide the required inputs.
Normalise SLAs by dividing total lateness per SLA (e.g., B5) by the permitted SLA (e.g., 25 BDs)	KPI in standalone M15 = total normalised lateness across SLAs completed late in month or overdue and outstanding at end of month **/** no. of late SLAs completed in month or overdue and outstanding at end of month KPI in combined KPI = total normalised lateness across SLAs completed late **/** no. of SLAs completed in month − Additional complexity − Lessens focus on the lateness of individual tasks − May unintentionally result in a priority order amongst what is late ❖ Can still be considered under BR-MeX – the proposed M18 and M15 can provide the required inputs.

Reminder of ask

Seeking PAG feedback on the updated design proposals and rationale

Any further feedback?

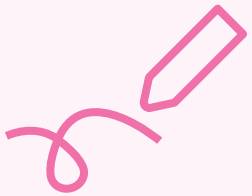
Next time (28th August)

MOSL

Metric Title/Concept

Overarching metric name

Consultation feedback received



Metric design theory

Defining the **metric theory**

Input
Question
Output

Tools

Defining what **financial incentives and reports** should apply, including consultation 4 feedback and BR-MeX

Scenarios

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

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	Janet Judge, Evan Joanette	100 mins
3	**Upcoming PAG workshop(s) & AOB** (Future KPI review)	**Chris Dawson**	**10 mins**
			Total: 2 hours

Upcoming PAG workshop(s)

Date	For discussion	Detail
14th August	MPF Metrics*	M15 – Average lateness of failed SLAs for bilateral Requests & M18 Proportion of SLAs for bilateral requests completed on time
21st August	MPF Metrics*	M12 – Premises address data accuracy coverage
28th August	MPF Metrics*	M15 – Average lateness of failed SLAs for bilateral Requests & M18 Proportion of SLAs for bilateral requests completed on time

AOB:
Future KPI review

**Subject to change*

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Solution	Assessment against behaviours		
	Complete requests first time and to time	**Resolve failures as soon as possible**	**Do not look to game the system**
Current OPS	Moderate - only the first instance of a completed SLA is counted (SLAs on resubmitted requests are not counted), and SLAs on cancelled requests are excluded even if cancellation occurs after SLA is complete. Performance charges for underperformance but minimal incentive for outperformance.	Low - no metric reporting lateness and successes and failures are not reported until requests are closed.	Low - no metric reporting lateness so late SLAs can be deprioritised without a performance impact. Deferrals are excluded but no MPF metric to track use of deferrals.
Proposed M18 & M15	High - SLAs will continue to be included until the requestor is satisfied with the outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for success or failure and lateness), and SLAs on cancelled requests are included if cancellation occurs after SLA is complete. Potential for outperformance payments and penalty charges (or inclusion in BR-MeX).	High - introduces a KPI to specifically highlight the lateness of what is overdue and outstanding plus completed late, successes and failures will be reported at SLA complete, and lateness will be reported as it occurs (when SLAs become overdue and outstanding), instead of request closure. An overdue and outstanding SLA will increasingly impact performance until the SLA is complete. Potential for inclusion in BR-MeX.	High - late SLAs cannot be deprioritised without performance impact. KPIs will exclude deferrals days – and deferrals will be reported by other MPF metrics. Wholesalers are incentivised to apply deferrals promptly as reports will capture the lateness of what is overdue and outstanding as well as what is completed late. Incentives must be carefully designed so it is not better to incur extra M18 failure to improve M15. Extra statistics on reports may be required.
Combined M18 & M15	High - SLAs will continue to be included until the requestor is satisfied with the outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for success or failure or lateness), and SLAs on cancelled requests are included if cancellation occurs after SLA is complete. Potential for outperformance payments and penalty charges (or inclusion in BR-MeX).	Moderate – lateness is tracked but the KPI does not directly present the lateness of what is late. Lateness is spread across all SLAs completed (not just those completed late). Successes/failures and lateness will not be reported until SLAs are complete- there is no concept of overdue and outstanding. Potential for inclusion in BR-MeX.	High - late SLAs cannot be deprioritised without performance impact, although lateness is spread across all SLAs completed (not just those completed late). KPI will exclude deferrals days – and deferrals will be reported by other MPF metrics. Less incentive for prompt deferrals compared to proposed solution as successes, failures and lateness are not be reported until SLAs are complete. Mitigates the risk of incurring extra failures on M18 to improve M15 performance.

OR

Solution	Assessment against Principles				
	Simplicity	Transparent & proportionate	Customer outcomes	Party accountability	Enduring & agile
Current OPS	Low - multiple charges and reports across different OPS SLAs.	Low - no metric reporting lateness, successes and failures are not reported until requests are closed. Performance charges for underperformance but minimal incentive for outperformance. Deferral days are excluded but no MPF metric to report these.	Moderate - OPS prioritises the timely completion of the most important SLAs, but late SLAs can be deprioritised without a performance impact.	Low - late SLAs can be deprioritised without a performance impact, only the first instance of a completed SLA is counted (SLAs on resubmitted requests are not counted), and SLAs on cancelled requests are excluded even if cancellation occurs after SLA is complete.	Low – all processes controlled through code change
Proposed M15 & M18	Moderate - combines performance across all OPS processes in two KPIs, but introducing a new concept of lateness does add complexity. Incentives must be carefully designed so it is not better to incur extra M18 failure to improve M15. Extra statistics on reports may be required.	High – introduces a KPI to specifically highlight the lateness of what is overdue and outstanding plus completed late. Successes and failures will be reported at SLA complete, and lateness will be reported as it occurs (when SLAs become overdue and outstanding), instead of request closure. Potential for outperformance payments and penalty charges (or inclusion in BR-MeX). KPIs will exclude deferrals days – and deferrals will be reported by other MPF metrics.	High - late SLAs cannot be deprioritised without performance impact, and an overdue and outstanding SLA has an increasingly impact until the SLA is complete. Potential BR-MeX inclusion. Prioritises most important SLAs as per current framework.	High - late SLAs cannot be deprioritised without performance impact, an overdue and outstanding SLA will increasingly impact performance until the SLA is complete, and SLAs on cancelled requests are included if cancellation occurs after SLA is complete SLAs will continue to be included until the requestor is satisfied with the outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for success or failure and lateness). Wholesalers are incentivised to apply deferrals promptly as reports will capture the lateness of what is overdue and outstanding as well as what is completed late.	Moderate – potential for some agility in the form of PAC-governed performance standards (TBC)
Combined M18 & M15	Moderate - provides a single view of completion and lateness across all OPS processes in one KPI but is a complicated metric to explain and interpret (especially if SLAs are normalised). Lessens the impact of outlier lateness.	Moderate - KPI captures lateness, but lateness is spread across all SLAs completed (not just those completed late). Successes/failures and lateness will not be reported until SLAs are complete. Potential for outperformance payments and penalty charges (or inclusion in BR-MeX). KPI will exclude deferrals days – and deferrals will be reported by other MPF metrics.	Moderate to High - late SLAs cannot be deprioritised without performance impact, but lateness is spread across all SLAs completed (not just those completed late). No concept of overdue and outstanding. Potential BR-MeX inclusion. Prioritises most important SLAs as per current framework.	Low to moderate - late SLAs cannot be deprioritised without performance impact, but lateness is spread across all SLAs completed (not just those completed late). No concept of overdue and outstanding. SLAs will continue to be included until the requestor is satisfied with the outcome (an SLA on a resubmitted request will be counted as a new SLA with another opportunity for success or failure or lateness). Less incentive for prompt deferrals compared to proposed solution as successes, failures and lateness are not be reported until SLAs are	Moderate – potential for some agility in the form of PAC-governed performance standards (TBC)

Headline stats (from PAG45 slides)

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Request Closures

- From April 23-March 24, **61%** of request closures happened through time-out (ranging from 82% for I3-1 to 41% for B1-1).
- From April 23-March 24, 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.

Resubmissions

- Since July 2023, 8,656 ORIDs have been resubmitted at least once (**4.89%** of all ORIDs). Approximately 18% of these 8,656 were resubmitted more than once.
- 57% of resubmissions due to DISPOUTCOME, 27% due to DISREJECT, 15% due to DISPCMOS, 0.6% due to DISPQUOTE.
- C1s make up most resubmissions (~40%), followed by B5, H1, F4 and C5.

Repeat Submissions

- 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%).

SLAs on Cancelled Requests

- Since May 2021, 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).