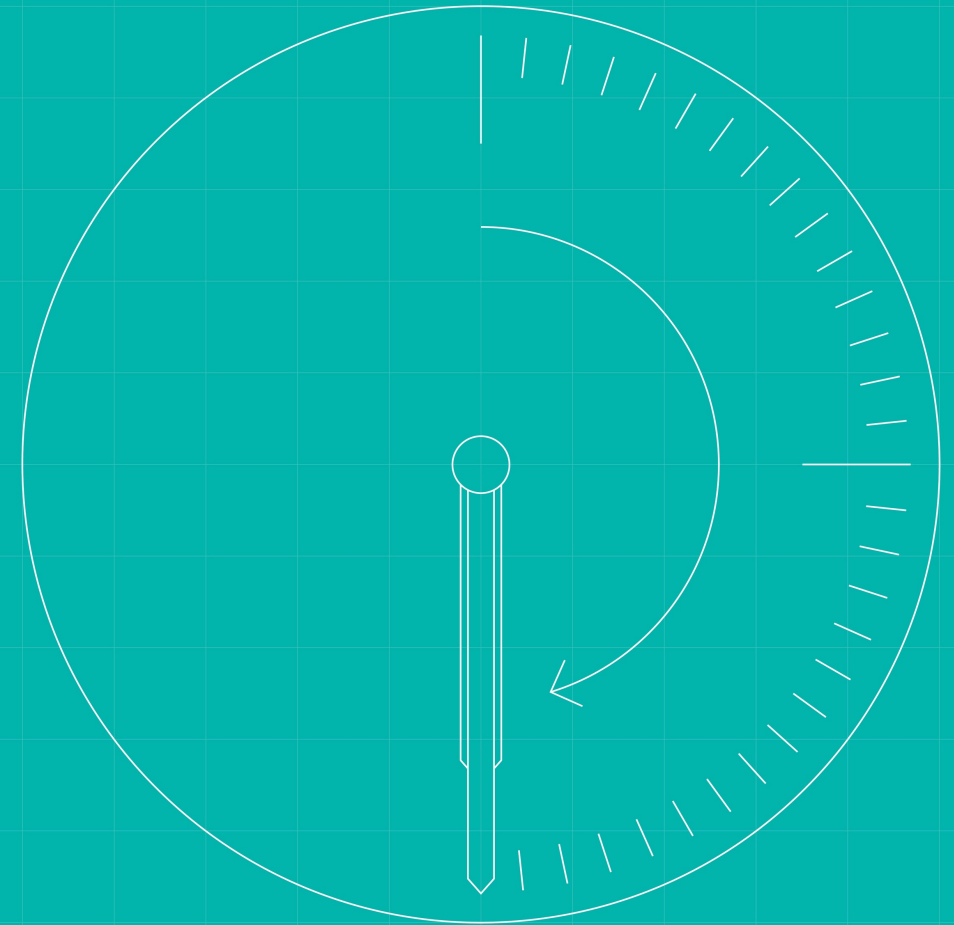


CR045 Impact Assessment Report & Recommendations

DECISION: CR045: *'Supply Start Date (SSD) Correction Tool'*
Review the outputs of Impact Assessment and make a decision on
next steps



CR045 – Impact Assessment Summary

Objective:

DAG to review the outputs of the issued CR045 Impact Assessments and advise SRO on their decision to approve or reject the Change Request.

Headlines:

- Overall: **16 respondents supported the change; 9 respondents rejected the change; and 4 respondents abstained.**
 - Of the 9 rejecting respondents, 4 support the implementation of the solution, but have raised concerns regarding the ability to implement ahead of M10.
- **Those who supported the implementation of the Change Request did so on the following basis:**
 - The change will ensure that the correct supplier is liable for all obligations without any ambiguity around responsibility because of a discrepancy between CSS & central registration systems and services.
 - The change ensures continuity between current and future arrangements and reduces post-implementation risk.
 - There should be a mechanism to correct MPRS/ERDS where the information held does not align with the CSS. Not retaining a solution to correcting registration errors within the MHHS solution would cause data issue and settlement inaccuracies.
- **Those who rejected the implementation of the Change Request did so on the following basis:**
 - There is no capacity to deliver this functionality prior to the M10 milestone without impacting other MHHS deliverables. A more realistic timeline is to develop this functionality to go live in the early months following M10.
 - A fundamental element of the MHHS design is to hold a single view of the truth. Mismatches between CSS and the Reg Service should be corrected rather than introducing a workaround.
- **Further comments:**
 - A number of queries were raised in response to the Change Request. Many of these are answered by the appendix issued with the Change Request. Others have been responded to by the Programme in the following slides.
- **Implementation:**
 - Due to the risk associated with not implementing the change, combined with the risk to M10 if the change is implemented prior to go-live, implementation options and their associated risks should be brought to the PSG in May 2024 for discussion. The Programme recommends a decision on the implementation approach and timeline should then be made at the PSG in May 2024 after consideration of the conflicting risks.

CR045 – Submitted Impact Assessments

Programme Parties	CR045 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	3	1	-	1
Medium Suppliers	1	-	-	6
Small Suppliers	-	-	-	33
I&C	3	-	1	37
DNOs	3	3	-	-
iDNOs	1	-	-	12
Ind. Agents	1	3	1	42
Supplier Agents	1	-	-	6
S/W Providers	-	2	-	23
REC Code Manager	1	-	-	-
National Grid ESO	-	-	-	1
Consumer	-	-	-	1
Elexon (Helix)	-	-	-	1
DCC	-	-	1	-
SRO / IM & LDP	1	-	-	-
IPA	-	-	1	-
Avanade	1	-	-	-
Totals	16	9	4	163

Market Share			
Yes	No	Abstain	No Reply
70%	18%	-	12%
10%	-	-	90%
-	-	-	100%
55%	-	13%	32%

Market Share information is according to the latest Meter Point Administration Number (MPAN) data held by the Programme as of August 2023. Market Share has not been provided for constituencies where MPAN data is not currently available.

Notes:

The classification of Independent and Supplier Agents is maintained by the Programme Party Coordinator and is subject to change.

Rationale for being marked down as abstained:

- The IPA and DCC abstained from providing recommendations as they are not impacted by the proposed changes.
- One Independent Agent and one I&C Supplier abstained from providing a recommendations without noting specific rationale for doing so.

CR045 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR045)
<p>Large Suppliers</p>	<ul style="list-style-type: none"> + Three of the four responding Large Suppliers supported the implementation of Change Request. + This update mechanism is not expected to be used on a routine basis, but it is useful to have a fallback to address any mismatches that may occur. + It is important that this mechanism is in place prior to go-live to address misalignment of registration data. – One of the four responding Large Suppliers rejected the implementation of the Change Request. – It is unclear what benefit this would deliver prior to migration, as the data cleanse and migration activity should resolve many issues. Therefore, this would only be required at a future date post migration. – The timing of the Change Request does not seem appropriate, and a lack of information on potential downstream impacts by changing key industry data has been provided. • One Large Supplier requested clarification on the following: <ul style="list-style-type: none"> • Is this limited to missed and invalid switches? Yes - these are the two scenarios in which the solution would be used. • Will suppliers and agents be notified via a report, if this is being used to rectify multiple SSDs? No, but new message flows will be used to notify. • Will the registration system treat the “Annulment” scenario as a new supply period, or a continuation of the old one? It will be treated as a new supply period, subject to working group discussions. • What date will be used in the IF-001 flow? The revised dates will be used, subject to working group discussions. • What would the SSD be in EES for a site which has undergone an SSD fix? This is subject to working group discussions. • The solution should be returned to the DRG before implementation due to open questions remaining in the design.
<p>Medium Suppliers</p>	<ul style="list-style-type: none"> + The one responding Medium Supplier supported the implementation of the Change Request. • They requested clarification on the following: <ul style="list-style-type: none"> • Who identifies and is authorised to initiate this process? Triggered by the Registration Service being notified by CSS (existing process). • Are the affected suppliers informed before the identified change in SSD is completed? No, this will be an automated process. This can be discussed in working groups. • Is this tool expected to be used during migration, or only after all MPANs are migrated to the MHHS environment? Any MPANs suffering this issue, which have been migrated. • Annulment of switch <ul style="list-style-type: none"> • Is this used only to reinstate the previously lost supplier as the current active supplier, and to reinstate SP appointments? Yes. • Are suppliers expected to receive any messages from CSS? Suppliers should already receive messages from CSS. • Is the sole purpose of the new IF-001 to manage SP date changes? Yes. • Is it guaranteed that the dates between CSS and the new MHHS messages will align? Yes. • Missed switch <ul style="list-style-type: none"> • Missed switch in CSS, or REGS only? REGS only. • Which party makes sure the date used for correction aligns with CSS dates? Registration Services.

CR045 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR045)
Small suppliers	<i>Did not respond.</i>
I&C	<ul style="list-style-type: none"> + Three of the four responding I&C Suppliers supported the implementation of the Change Request. + The change is timely and desirable given a recent incident experienced in the gas industry, following which a significant amount of work was created for many parties as UK Link could not be realigned to CSS. + The change ensures continuity between current and future arrangements and reduces post-implementation risk. + The change will ensure that the correct supplier is liable for all obligations without any ambiguity around responsibility because of a discrepancy between CSS & central registration systems and services. • One of the four responding I&C Suppliers abstained from providing a recommendation. • It would be pertinent to consider any time constraints should be based on the DF run as opposed to the RF run, this would require additional controls where an SSD amendment could be conducted but only if it was subject to an approved Trading Dispute committee decision to allow it. Whilst it is expected that this should be rare exception, if a misaligned SSD impacted settlement data over the materiality threshold, then DF could be utilised to correctly reapportion the discrepant days volume to each supplier if required, which could matter to larger consuming sites who have not been remedied prior to the RF run.
DNOs	<ul style="list-style-type: none"> + Three of the six DNOs supported the implementation of the Change Request. + The Change Request recognises the need to ensure data alignment. + This was a key component missing from the MHHS design baseline and is required to provide Registration Services super users with the ability to correct the mis-aligned data and re-issue in a refresh file to other industry parties. + The three rejecting DNOs are supportive of the implementation of the functionality. Their rejections are based on implementation timelines. – Two of the three supporting DNOs do not believe this can be completed ahead of M10. – Three of the six DNOs rejected the implementation of the Change Request. – There is no capacity to deliver this functionality prior to the M10 milestone without impacting other MHHS deliverables. A more realistic timeline is to develop this functionality to go live in the early months following M10. • The change would require significant development effort and, although the functional change is supported, DNOs have been informed that SCS will be unable to deliver the code for implementation within the SIT cycles. Therefore, this will likely mean that the functionality would not be in place on production systems for current M10 (April 2025). SCS report that they would look to provide this functionality as close to M10 as possible. • Consideration is required as to whether the risk of being unable to correct data at go-live is more important than going live according to the existing plan.
iDNOs	<ul style="list-style-type: none"> + The one responding iDNO supported the implementation of the Change Request.

CR045 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR045)
Agents	<ul style="list-style-type: none"> + Two of the six responding agents support the implementation of the Change Request. + The Change Request provides a valid solution to fixing this existing issue. – Three of the six responding agents rejected the implementation of the Change Request. – A fundamental element of the MHHS design is to hold a single view of the truth. Mismatches between CSS and the Reg Service should be corrected rather than introducing a workaround. – The development and testing required would have an impact on timelines. – The SDS which should have been appointed but was not would feel the greatest impact. They would be required to estimate data for the retrospective period, leaving the MDS with two versions of data. – Costs would be incurred by both MS and DS through the redevelopment of the processing functionality of the IF-001 and IF-037 flows. • One of the six responding agents abstained from providing a recommendation. • Clarifications were requested on the following: <ul style="list-style-type: none"> • What are the implications on DS and MS appointments when a change is made? These are outlined in the proposal shared as an appendix to the Change Request. • What are the implications on any HH data already submitted by the DS, when an appointment is removed following a backdated change? This will stay, but can be overwritten by the new Data Service. • How far beyond an erroneous switch can a change be made? Programme suggests 45 days. To be decided as part of working group discussions. • What is the impact on customer billing? This is dependent on supplier processes. • What are the commercial considerations for parties that have fulfilled their role, and are then removed? This functionality is to resolve an existing CSS issue. • What work has been done to prevent this from happening, rather than implementing a fix? Our understanding is that there are no plans to resolve this at present. This is outside the scope of the Programme. • In the example, a period exists where no DS or MS is appointed. How will it be ensured that agents do get appointed? This is discussed in the proposed design, but effectively the enduring supplier may need to retrospectively appoint agents. • What would the IF-001 be used for and who would it be sent to? This is outlined in the proposal shared as an appendix to the Change Request. • In an annulment, how does the original DS/MS know that they should still be appointed? They are not made aware, so would need to be re-appointed. • Currently, DS and MS cannot be retrospectively de-appointed, does processing need to be amended so that this is now possible? Yes, this is part of the change proposal.
S/W Providers	<ul style="list-style-type: none"> – The two responding Software Providers rejected the implementation of the Change Request. – It is difficult to understand the benefits associated with the change as the document does not outline the scenarios affected nor provides associated volumes. • One respondent requested that more information would be provided, and the Change Request be circulated again. • One respondent was supportive of the implementation of the functionality, but due to existing programme commitments and the magnitude of the change, there is no capacity to deliver the change ahead of the M10 milestone.

CR045 Impacts – Views on the proposed approach (Page 4)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR045)
REC Code Manager	<ul style="list-style-type: none"> + RECCo are supportive of the implementation of the Change Request. + There should be a mechanism to correct MPRS/ERDS where the information held does not align with the CSS. Not retaining a solution to correcting registration errors within the MHHS solution would cause data issue and settlement inaccuracies. <ul style="list-style-type: none"> • It is recognised that significant work would be required to fully develop a solution.
National Grid ESO	<i>Did not respond.</i>
Consumer	<i>Did not respond.</i>
Elexon (Helix)	<i>Did not respond.</i>
SRO / IM & LDP	<ul style="list-style-type: none"> + The Programme is supportive of the implementation of the Change Request. + The Programme recommends that the Change Request is approved by the DAG, which will allow for the completion of the solution to be developed. <ul style="list-style-type: none"> • Due to the risk associated with not implementing the change, combined with the risk to M10 if the change is implemented prior to go-live, implementation options and their associated risks should be brought to the PSG in May 2024 for discussion. • The Programme recommends a decision on the implementation approach and timeline should then be made at the PSG in May 2024 after consideration of the conflicting risks.
IPA	<ul style="list-style-type: none"> • The IPA abstained from providing a recommendation as the change does not impact their activities.
Avanade	<ul style="list-style-type: none"> + Avanade is supportive of the implementation of the Change Request. • It is assumed that there will be no material changes in message volumes for the interfaces in scope of change. • A CCN will be required for the DIP SP.