**Change Request Form**

## Change Request details

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| Change Request details | | | |
| Change Request Title | Batching of ERDS to CSS Agent Appointment Files | | |
| Change Request Number | *CR056* | | |
| Originating Advisory / Working Group |  | | |
| Risk/issue reference | I179 | | |
| Change Raiser | Jonny Moore – RECCo | Date raised: | 04/09/2024 |

***For further guidance on how to complete this document please see the supporting Change Request Form Guidance for Programme Participants. The guidance will support raising a change and responding to a change request via Impact Assessment. The Change Raiser should consider sharing the draft Change Request Form with impacted programme parties, prior to submission to PMO. The guidance, as well as other key documents are referenced below and can be found via the MHHS website.***

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| Change Request to be read in conjunction with: |
| MHHS Change Request Form Guidance for Programme Participants |
| MHHS Change Control Approach |
| MHHS Governance Framework |
| Ofgem’s MHHS Transition Timetable |

### Part A – Description of proposed change

**Guidance *– This section should be completed by the Change Raiser when raising the Change Request.***

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| Part A – Description of proposed change | | |
| **Issue statement:**  *(the issue that needs to be resolved by the change)*  Currently, within legacy arrangments, agent appointment changes can be submitted to MPRS in a single file (D0205) and therefore generate a single CSS00200 from the Elecricity Registration Data Service (ERDS) to the Central Switching Service (CSS). However, in the MHHS design, agent appointments have been separated into separate requests and so each appointment would generate an individual CSS00200. As each CSS00200 message is a refresh of all the current & future dated MS and MDR appointments the ordering the messages are loaded in to the CSS must be correct. If messages are received by CSS in the wrong order, the file received last will overwrite data previously provided, resulting in the wrong active Metering Service /Smart Meter Date Reteriver (SMDR) appointment being recorded both within CSS and the Smart DSP.  An issue has been identifed whereby multithreading used by CSS Adaptors operated by Electricty Registration Data Agents (ERDAs) may switch the order of the messages and send the CSS00200 messages to the CSS in the incorrect order. There is no mechanism within the CSS to identify the order in which the messages should be received.  Although the frequency of the multithreading issue occurring is not currently understood, there is a significant risk that the numbers will be material and cause significant negative impacts to MHHS Migration and Settlement processes. As the Agent appointment process is used as a key part of the MHHS Migration process even a small error rate of 1% would potentially impact 330,000 MPANs through the Migration Period. In realiity we expect the volumes to be much higher than this.  If the incorrect SMDR is recorded, the appointed SMDR will be unable to retrieve HH data from the installed Smart Meter, this will impact the accuracy of Settlement for the impacted MPAN.  If the incorrect Metering Service is appointed the correct agent will not be able to engage with Smart Metering processes operated by the DSP.  In both instances this will create a potentially high volume of manual exceptions for the Electricity Supplier, SMDR, Metering Service, ERDA and CSS; directing resource away from the the MHHS migration.  This issue was raised by St Clements as REC Issue I0204 ‘Sequence Order of CSS00200 Messages’ and discussed at the REC Technical Change Workshop on 20th August 2024. It was agreed at this Workshop that a MHHS Programme CR was required to implement the working groups preferred solution and that this solution should be implemented prior to M10. | | |
| **Description of change:**  *(the change being proposed)*  The solution agreed at the REC Technical Change Workshop was for the MHHS Operational Choreography to be updated so that a single CSS00200 message is sent from the ERDS / Registration Service updating both the MDR and MS. This single message will detail all agent appointments confirmed on that particular date.  Proposed Changes to Operational Choreography  Update to table 4.4 ‘Activity Required at Secured Active Window.   * Remove the actions ‘Registration Service Issues CSS Sync Message updating MDR’ and ‘CSS updates DCC of MDR’ from 20.00 – 21.00 window. * Add ‘Registration Issues single CSS Sync Message (CSS00200) updating MDR and / or MS’ and CSS updates Smart DSP of MDR and / or MS’ into 20.00 – 23.00 window.   Update to Section 7.0 ‘Out of Hours Processing’ CSS Messages   * Requirement to be updated to ‘Required to be issued as a single file in the Secured Active Processing window on all Calendar Days.   The reduction of messages received into the CSS for agent appointments should also be reflected in the Migration Thresholds document.  Consequential Changes to Code Documents.  If this change is approved the approved MHHS text in the ERDS Service Definition will require the following update:  7.3B The ERDA shall provide Supplier Agent and SMDR Appointment data in a single CSS00200 Market Message by 23:00 hours on the day the agent appointment is issued by the equivalent SMRA. | | |
| **Desired implementation date and rationale:**  *(proposed implementation date of the change and why this date is required)*  To prevent any impact this issue may have on the MHHS Migration process alongside BAU agent appointments within MHHS, the REC Technical Change Workshop supported a pre-M10 implementation date. | | |
| **Justification for change:**  *(please attach any evidence to support your justification including why it should be exempt from the change freeze)*  The identified issue will have an impact on a number of MHHS agent appointments, including those appointments made as part of the MHHS Migration process. Although the frequency of the multithreading issue occurring is not currently understood, there is a significant risk that the numbers will be material and cause significant negative impacts to MHHS Migration and Settlement processes.  This would have the following impacts:   * MDRs and MEMs not being appointed correctly as part of the migration process, preventing a successful MHHS migration and causing significant levels of manual intervention. This could put M15 at risk. * MDRs not being appointed correctly, preventing retrieval of HH data for Smart meters and impacting Settlement and Billing accuracy. This could put the achievement of overall MHHS project goals at risk. * Metering Services not being appointed correctly would impact numerous Smart processes at risk. Affecting items such as the Smart roll out and fault rectification processes.   As part of the MHHS design there is an expectation that appointment data will be issued in the correct order to enable data to be passed to the Smart DSP via the CSS. As testing this process at volume is not part of SIT it is not clear whether this issue will be seen in formal testing although we believe at least one defect has been raised in this area. | **Change Freeze criterion impacted** | **Yes / No** |
| **Fixing a design defect** | **Potentially** |
| **Critical to M10/M15** | **Yes** |
| **Consequences of no change:**  *(what would happen if the change was not implemented)*  If no change is made, MHHS agent appointments received in the wrong order will be updated into the CSS and onwards into the DSP incorrectly. This will prevent MDR and Metering Service processes operating correctly.  There is currently no automated way to identify and resolve incorrect appointments within the CSS. If no change is made a manual correction process will need to be implemented, with the problem only likely to be identified when a particular process fails.  If a very conservative estimate of 1% of appointments fail, this will impact 330,000 MPANs through the migration process. In reality, we expect volumes to be much higher than this. | | |
| **Alternative options:**  *(alternative options or mitigations that have been considered)*  The REC Technical Change Workshop discussed the option of adding sequence numbers into the CSS00200 flow. This would allow the CSS to identify in which order the flows should be processed. However, this was deemed to be a significant change to the CSS architecture and was discounted on this basis. | | |
| **Risks associated with potential change:**  *(risks related to implementation of the proposed change that have been identified)*  If this change is not implemented there is a significant risk of the following occurring post go-live:   * MDRs and Metering Services not being appointed correctly as part of the migration process, preventing a successful MHHS migration and causing significant levels of manual intervention. This could put M15 at risk. * MDRs not being appointed correctly, preventing retrieval of HH data for Smart meters and impacting Settlement and Billing accuracy. This could put the overall MHHS project goals at risk. * MEMs not being appointed correctly causing issues with Smart processes and causing risks for the Smart roll-out and fault rectification processes. | | |
| **Stakeholders consulted on the potential change:**  *(Please document the stakeholders, or stakeholder groups that have been consulted to date on this change. The Change Raiser should consult with relevant programme parties in the drafting of the request, prior to submission to PMO).*  This change has been discussed at the REC Technical Workshop and also with relevant personnel at the REC Code Manager, the DCC and St Clements. | | |
| **Target date by which a decision is required:** | ASAP | |

### Part B – Initial Impact of proposed change

**Guidance *– This section should be completed by the Change Raiser before being submitted to the MHHS PMO.***

***Please document the benefits of the change and to delivery of the programme objectives***

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| --- | --- |
| Programme Objective | Benefit to delivery of the programme objective |
| To deliver the Design Working Group’s Target Operating Model (TOM) covering the ‘Meter to Bank’ process for all Supplier Volume Allocation Settlement meters | MDRs will be correctly appointed allowing timely HH consumption data to be obtained and used in MHHS Settlement processes. |
| To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation | MDRs will be correctly appointed allowing timely HH consumption data to be obtained and used in MHHS Settlement processes |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) |  |
| To implement MHHS in accordance with the MHHS Implementation Timetable | Agents appointed as part of the MHHS Migration process will be correctly appointed, removing a potential risk to successful achievement of M15. |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case | MDRs will be correctly appointed allowing timely HH consumption data to be obtained and used in MHHS Settlement processes. |
| To prove and provide a model for future such industry-led change programmes |  |

**Guidance *– Please document the known programme parties and programme deliverables that may be impacted by the proposed change***

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| Impacted areas | Impacted items |
| Impacted Parties | We would only anticipate an impact to the Registration Service. |
| Impacted Deliverables | The change would impact the MHHS Migration Process and also BAU Change of Supply and Change of Agent processes. |
| Impacted Milestones | The potential for migration related agent appointments to not correctly update within CSS and the Smart DSP could impact the successful migration of affected MPANs. In addition manual resolution of errors could be resource intensive throughout the migration period. Both of these impacts could put the successful achievement of M15 at risk. |

**Note *– Please refer to MHHS DEL174 Change Request Guidance for Programme Participants for information on how to score the initial assessment.***

**Guidance *– Please include a reference and link to any additional documentation which the change relates to.***

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| Change Request to be read in conjunction with: | |
| **Title** | **Reference** |
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### Part C.1 – Summary of Impact Assessment

### Note – *This section will be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

### *All Impact Assessment responses will be considered public and non-confidential unless otherwise marked. If there are any specific elements of the response (e.g. costs) that are confidential, please mark the specific sections as confidential rather than the response as a whole. The MHHS Programme will publish all Impact Assessment responses and redact any confidential information as noted.*

**Guidance – Programme Participants are required to:**

**Respond with ‘Agree’, ‘Disagree’ or ‘Abstain’, deleting as appropriate. If the respondent agrees, they can provide additional evidence to further support the assessment. If the respondent disagrees or abstains, they should provide a detailed rationale as to why.**

**Add any additional effects that have not already been identified. In doing so, they should provide as much detail as possible to allow a robust assessment to be made.**

**Indicate whether the change would have a minor, medium or significant impact on their activities, referring to slide 16 of *MHHS-DEL171 Change Control Approach* to assess each criterion, using N/A to indicate no impact.**

**Proceed to Part C.2 for Impact Assessment Recommendation response once completed.**

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| Part C.1 – Summary of Impact Assessment (complete as appropriate) |
| **Effect on benefits**  Ensuring that MDRs in particular are updated correctly in the Smart DSP is key to ensuring that HH consumption is available for Smart Meters and used within the new Settlement Calculations. Without this affected MPANs may settle on estimates for a period, meaning MHHS benefits are not realised. Similarly, ensuring that Metering Services are updated correctly in the Smart DSP will enable them to access smart services. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on when a benefit will be realised; who will realise the benefit; the extent to which the benefit will be realised.*  *Where possible, contextual information should be included e.g. the benefit will be delayed by X weeks; the change means Y population will also realise the benefit.*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact Programme benefits.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Effect on consumers**  Ensuring that MDRs in particular are updated correctly in the Smart DSP is key to ensuring that HH consumption is available for Smart Meters and used within the new Settlement Calculations. Without this estimated data may be used to calculate elements of consumers invoices.  If Metering Services are not correctly appointed, timely resolution of metering issues may not be possible, impacting the customer experience. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on service delivery to consumers; will there be a cost impact to consumers; will there be a choice impact to consumers?*  *Where possible, contextual information should be included e.g. what is the scale of the effect? Will the effect be permanent?*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact consumers.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Effect on schedule**  Agent appointment issues through the migration period may impact on the success of migrations to MHHS and put the M15 milestone at risk. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the schedule/milestones be directly impacted; will the schedule/milestones be indirectly impacted.*  *Where possible, contextual information should be included e.g. the change will delay the project by X days; the change will require additional resource to complete (though detail resource in resource section); the delay can/cannot be recovered by condensing Y activity.*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact your ability to meet the Prohgramme schedule.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Effect on costs**  Costs to implement change for affected parties (Registration Services), also costs to implement for MHHS Programme in updating design documentation, test scripts, organising testing etc. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the change cause a loss of income; will the change cause additional cost; will the change cause a reprofiling of cost?*  *Where possible, contextual information should be included e.g. whether it is capital or operating expenditure that will be affected; what period costs will be affected in; what the rough order of magnitude of the cost impact will be and if organisation will be able to absorb it?*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact your organisation’s costs.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Effect on resources**  Potential impact on Registration Service/ ERDA and Programme resource to impact the solution.  If the solution is not implemented there is a potential impact on Supplier, Registration Service / ERDA, Metering Service, SMDR and CSS resource to resolve a high volume of manual exceptions. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will there be an impact on tools or equipment; will there be an impact on staff capacity; will there be an impact on staff skills or capability?*  *Where possible, contextual information should be included e.g. the change will require X additional staff for Y period of time; the change requires Z training or support.*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact your organisation’s resources.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Effect on contract**  No impact on contracts identified by the raiser. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on contracts with sub-contractors; whether there will be an impact on contracts with vendors; whether there will be an impact on contracts with regulators/ESO.*  *Where possible, contextual information should be included e.g. the changes will require new contracts to be created; the changes will variations to existing contracts; the changes will affect ability to meet contract requirements.*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact your organisation’s contracts.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Risks**  We have identified the following risks:   * A risk to M15 through agents not being correctly appointed through the migration process and significant manual rework being required to resolve the issue. * MDRs not being appointed correctly, preventing retrieval of HH data for Smart meters and impacting Settlement and Billing accuracy. This could put the achievement of overall MHHS project goals at risk. * Metering Services not being appointed correctly would impact numerous Smart processes at risk. Affecting items such as the Smart roll out and fault rectification processes. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will existing risks be affected; will new risks be created?*  *Where possible, contextual information should be included e.g. the change will affect the likelihood of a risk occurring, the change will affect the impact the risk would have, the change will require additional controls and mitigation.*  *Please state any additional risks introduced by the change.* |

### Part C.2 – Impact Assessment Recommendation

### Note – *This section must be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

**Guidance – The primary reporting metric of the Impact Assessment is the recommendation response. The consolidated response will be presented to the relevant governance group(s) and decision maker(s) with the totals for ‘Agree’, ‘Disagree’ or ‘Abstain’. As such, please ensure this section is completed before the form is returned to MHHS PMO. Provide detailed rationale and evidence in the commentary field.**

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| Part C.2 – Impact Assessment Recommendation (mandatory) |
| **Recommendation**  *Change Raiser to provide initial recommendation.*  **It is recommended by the Change Raiser the change is approved.** |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection.*  *Please indicate below, using an (X), the extent to which you believe implementing this change would impact the Programme and/or your organisation overall.*   |  |  |  | | --- | --- | --- | | 1. *Minor impact* | 1. *Medium impact* | 1. *Significant impact* | |  |  |  | |
| **Change Freeze**  In line with the discussion at the REC Technical Change Workshop, we believe that this change is required to resolve an issue with CSS Adaptor multithreading that will impact the agent appointment process within MHHS. If this is not implemented before M10, a proportion of agent appointments made for both MHH Migration and BAU purposes will fail.  We believe that the potential impact on the M15 milestone in particular, justifies this change being considered within the change freeze. |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection.* |

**Impact assessment done by:** <Name>

**Guidance*: If you are a third party responding on behalf of another Programme Participant, please state this in your response.***

**Impact assessment completed on behalf of:** <Name>

### Part D – Change approval and decision

**Guidance*: The approvals section will be completed by the MHHS PMO once the Impact Assessment has been reviewed.***

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| Part D - Approvals |
| **Decision authority level**  <Based on the impact assessment, state who is required to make a decision concerning this change> |

**Guidance** - ***This section will be completed by the MHHS PMO and Change Owner following the review of the impact assessment and decision reached by the SRO.***

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| Part D – Change decision | | | | |
| Decision: |  | Date | |  |
| Approvers: |  |  | |  |
| Change Owner: |  | | | |
| Action: |  | | | |
| **Changed Items** | **Pre-change version** | | **Revised version** | |
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### Part E – Implementation completion

**Guidance *- This section will be completed by the MHHS PMO at the end of the post-implementation process.***

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| Part E – Implementation completion | | | |
| Comment |  | Date |  |

**Guidance *– The Closure Checklist in MHHS DEL175 Change Log must also be completed by MHHS PMO at this stage.***

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| --- | --- |
| Checklist Completed | Completed by |
| Yes/No |  |

**Guidance – *This section will be completed by the MHHS PMO at the end of the post-implementation process and should be* used to add any appropriate references of the change once it has been completed.**

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| --- | --- | --- |
| References | | |
| **Ref** | **Document number** | **Description** |
|  |  |  |
|  |  |  |