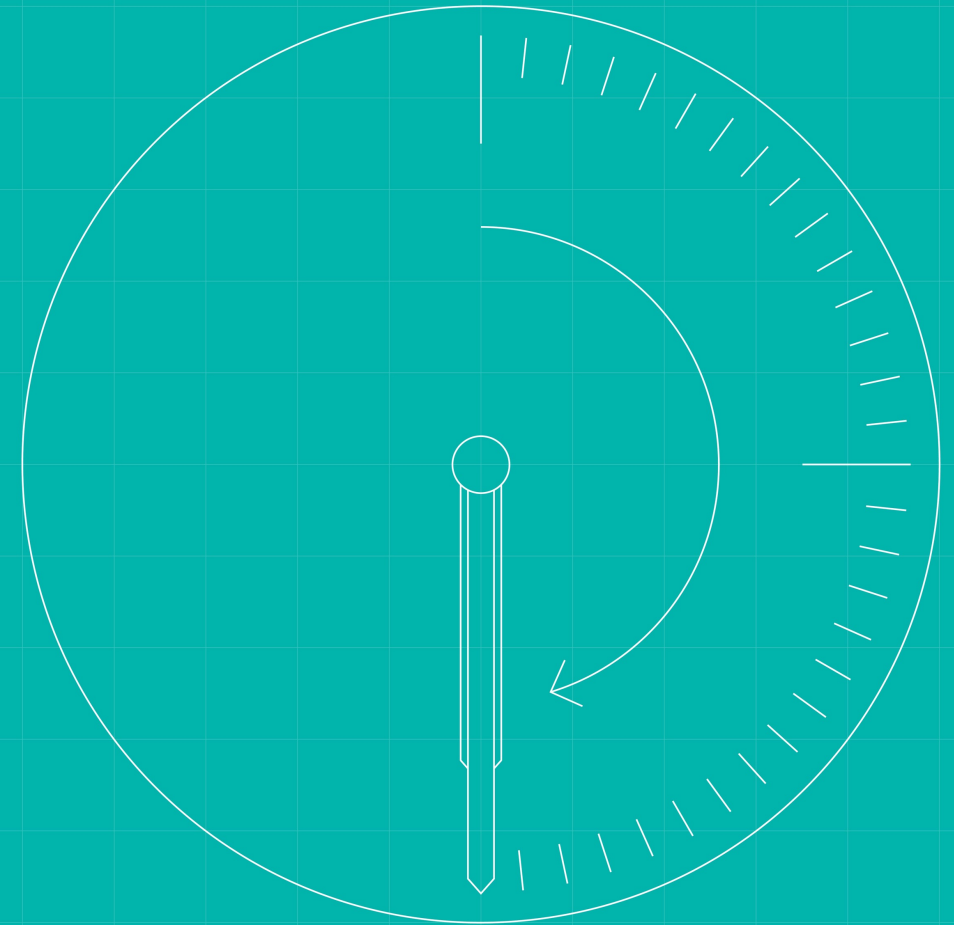


# CR044 Impact Assessment Report & Recommendations

**DECISION:** CR044: *'Implementation of 'Data Refresh' Message IF-051'* Review the outputs of Impact Assessment and make a decision on next steps



## CR044 – Impact Assessment Summary

### Objective:

DAG to review the outputs of the issued CR044 Impact Assessments and advise SRO on their decision to approve or reject the Change Request.

### Headlines:

- Overall: **16 respondents supported the change; 5 respondents rejected the change; and 3 respondents abstained.**
  - A significant number of respondents, both those who supported and those who rejected the change, noted that they supported the implementation of the change, but did not see this being possible ahead of M10.
- **Those who supported the implementation of the Change Request did so on the following basis:**
  - A CSS failure in July last year highlighted the importance of having the tools available to be able to align and retrospectively correct supply start and end dates. If the change is not implemented, this carries a significant risk should this event be repeated.
  - The existing ECOES refresh mechanism is utilised under current arrangements for this same purpose and works well, and so it would be sensible to provide this equivalent functionality under MHHS operation.
  - The change is a pre-migration contingency measure and is required before go-live, so that if any incidents occur the solution can be called upon in early life.

### **Those who rejected the implementation of the Change Request did so on the following basis:**

- It was questioned what benefit this change would deliver prior to migration, as it is believed that the data cleanse and migration activity will resolve many issues.
- Given existing Programme commitments, the delivery of this Change Request prior to the M10 milestone may impact the success of other MHHS deliverables. There is no capacity to deliver this functionality prior to the M10.
- The MHHS design is based on the principle of a single view of truth. This change disregards the requirement to align the rest of the industry to the registration services truth following such an incident.
- **Further comments:**
  - Only one rejecting respondents stated that they did not support the implementation of the change at some stage. Other concerns were based entirely on delivery timelines.
  - A number of respondents suggested implementing the change in the first post-M10 release.
- **Implementation:**
  - The Programme suggests that the change is implemented ahead of migration. It will need to be tested in SIT Operational. Exact implementation timelines are dependent on Impact Assessment responses, as the Programme is conscious of constraints on Participants' development capacity.

## CR044 – Submitted Impact Assessments

Programme Parties	CR044 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	3	1	-	1
Medium Suppliers	1	-	-	6
Small Suppliers	-	-	-	33
I&C	1	-	1	39
DNOs	4	2	-	-
iDNOs	-	-	-	13
Ind. Agents	1	1	-	45
Supplier Agents	1	-	-	6
S/W Providers	1	1	-	23
REC Code Manager	1	-	-	-
National Grid ESO	1	-	-	-
Consumer	-	-	-	1
Elexon (Helix)	-	-	-	1
DCC	-	-	1	-
SRO / IM & LDP	1	-	-	-
IPA	-	-	1	-
Avanade	1	-	-	-
<b>Totals</b>	<b>16</b>	<b>5</b>	<b>3</b>	<b>168</b>

Market Share			
Yes	No	Abstain	No Reply
70%	18%	-	12%
10%	-	-	90%
-	-	-	100%
20%	-	32%	48%

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:

- One I&C Supplier abstained from providing a recommendation because they support the rationale but do not believe it meets the Change Freeze criteria.
- The IPA and DCC abstained from providing recommendations as they are not impacted by the proposed changes.

## CR044 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR044)
<b>Large Suppliers</b>	<ul style="list-style-type: none"> <li>+ Three of the four responding Large Suppliers supported the implementation of Change Request.</li> <li>+ They did not see the mechanism being used on a routine basis but agree that it is useful to have a fallback to address any incidents that may occur. It is important that this mechanism is in place prior to go-live to address misalignment of registration data.</li> <li>+ The change and the associated additional effort can be delivered without impacting the current scope and milestones.</li> <li>+ A CSS failure in July last year highlighted the importance of having the tools available to be able to align and retrospectively correct supply start and end dates. If the change is not implemented, this carries a significant risk should this event be repeated.</li> <li>– One of the four responding Large Suppliers rejected the implementation of the Change Request.</li> <li>– It was questioned what benefit this change would deliver prior to migrations, as it is believed that the data cleanse and migration activity will resolve many issues, so the change would only be required at a future date post migrations.</li> <li>– They do not believe the timing is correct for this change and sees a lack of clarity on downstream impacts to changing key industry data.</li> <li>• It was noted that in order to make a more informed recommendation on the Change Request, it would have been useful for the change raiser to provide the quantifiable rationale, especially regarding the impacts on schedule and cost.</li> <li>• One respondent stated that as a supplier, they align to CSS supply period dates, however, believe it would be of some benefit for the IF-051 to also be sent directly to suppliers so that they have confirmation that the wider industry has been aligned.</li> <li>• One respondent offered their support with the following caveats: <ul style="list-style-type: none"> <li>• The data refresh message must be time bound – a refresh should be triggered next calendar day and/or out of working hours.</li> <li>• All downstream parties impacted by the refresh would need to be notified of the impacted MPANs as the changes need to be reconciled in downstream systems.</li> <li>• The context(s) for using refresh must be clearly documented.</li> <li>• The data should be sent using the DIP interfaces to ensure GDPR compliance.</li> </ul> </li> </ul>
<b>Medium Suppliers</b>	<ul style="list-style-type: none"> <li>+ The one responding Medium Supplier supported the implementation of the Change Request.</li> <li>• They requested clarity on what data attributes are part of this interface / refresh exercise. <b>This is included in the appendix to the Change Request.</b></li> </ul>
<b>Small Suppliers</b>	<p><i>Did not respond.</i></p>

## CR044 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR044)
I&C	<ul style="list-style-type: none"> <li>+ One of the two responding I&amp;C suppliers supported the implementation of the Change Request.</li> <li>• One of the two responding I&amp;C suppliers abstained from providing a recommendation.</li> <li>• Whilst they agree that a change of this nature would be beneficial, they do not believe that it meets the Change Freeze criteria, and so should be done as a post go-live change to mitigate the risks of an incident causing a misalignment of data in the future.</li> <li>• The supporting respondent requested clarity on the intended audience and use of the IF-051.               <ul style="list-style-type: none"> <li>• <b>Programme response:</b> The IF-051 use is for “bulk correction” of data following a data incident, and not anticipated for BAU correction of individual MPANs or groups of MPANs.</li> <li>• Any use of the refresh flow, the mechanism of its exchange and processing timescales, would be agreed bi-laterally between the Registration Service &amp; the required recipient(s), taking into account the nature of the incident and the wider co-ordinated industry response to address it.</li> </ul> </li> </ul>
DNOs	<ul style="list-style-type: none"> <li>+ Four of the six responding DNOs supported the implementation of the Change Request.</li> <li>+ There is a propensity for data to be misaligned across the Industry, and the ability to download from the DIP is not certain to cover every eventuality. A refresh functionality would be an industry benefit.</li> <li>+ Currently, there is no agreed mechanism which could be deployed to realign any mismatched data. This change would speed up the restoration of normal operations.</li> <li>+ The existing ECOES refresh mechanism is utilised under current arrangements for this same purpose and works well, and so it would be sensible to provide this equivalent functionality under MHHS operation.</li> <li>+ There is a risk of doing nothing. If data were to become misaligned in live production environments there would not be a mechanism to correct this.</li> <li>+ Both rejecting DNOs agree with the Change Request in principle, and would like to see it implemented as soon as realistically possible,</li> <li>– Two of the six responding DNOs rejected the implementation of the Change Request.</li> <li>– The functional implementation of the change is supported, however there will be an impact on DNO Service Providers for the changes to MPRS and the DIP adaptor. Given existing Programme commitments, the delivery of this Change Request prior to the M10 milestone may impact the success of other MHHS deliverables. The implementation of the change at M10 is supported.</li> <li>• Five of the six respondents support the implementation of the change, but do not believe it can be implemented ahead of M10. The recommendation is to look to deliver this the first post M10 release.</li> </ul>
iDNOs	<p><i>Did not respond.</i></p>
Agents	<ul style="list-style-type: none"> <li>+ Two of the three responding agents support the implementation of the Change Request.</li> <li>– One responding agent rejected the implementation of the Change Request.</li> <li>– The MHHS design is based on the principle of a single view of truth. This change disregards the requirement to align the rest of the industry to the registration services truth following such an incident. Not aligning all parties would create extensive downstream processing failures after a proposed re-alignment.</li> <li>• They welcome involvement in future discussions as we are interested in the implementation and how this IF-051 message will be used operationally.</li> </ul>

## CR044 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR044)
<b>S/W Providers</b>	<ul style="list-style-type: none"> <li>+ One of the two responding Software Providers supported the implemented of the Change Request.</li> <li>+ The Change Request is crucial to providing robust error resolution pathways in live production.</li> <li>+ The intent of the change is supported, and it is agreed that it mitigates a risk with data alignment.</li> <li>– One of the two responding Software Providers rejected the implementation of the Change Request.</li> <li>– Although supportive of this functionality, there is no capacity to deliver this functionality prior to the M10 milestone without negatively impacting other MHHS deliverables. A more realistic timeline is to develop this functionality to go live in the early months following M10.</li> <li>– To deliver this functionality would require several weeks of concentrated DBT effort, which cannot be accommodated for prior to the M10 milestone without negatively impacting other MHHS deliverables.</li> </ul>
<b>REC Code Manager</b>	<ul style="list-style-type: none"> <li>+ RECCo are supportive of the implementation of the Change Request.</li> <li>• The following clarifications were raised: <ul style="list-style-type: none"> <li>• What delivery mechanism is expected, does this change dependent on the volume of MPANs affected? <b>Yes, this depends on volumes.</b></li> <li>• Who decides on the use of the IF-051? <b>Any use of the refresh flow, the mechanism of its exchange and processing timescales, would be agreed bi-laterally between the Registration Service &amp; the required recipient(s), taking into account the nature of the incident and the wider co-ordinated industry response to address it.</b></li> <li>• What are the SLAs to be followed on receipt of the message? How quickly should a 'full refresh' be actioned? <b>Mechanism and thresholds will be agreed as part of the implementation of the Change Request should it be approved.</b></li> </ul> </li> <li>• They note that it was not possible to provide a full impact assessment as the process for triggering the flow, when it will be used, and the SLAs we would need to follow are unclear, and if any of their assumptions around these areas prove incorrect then the schedule, cost and resource impact could be greater.</li> </ul>
<b>National Grid ESO</b>	<ul style="list-style-type: none"> <li>+ ESO are supportive of the implementation of the Change Request.</li> <li>+ They recognise the importance of the Registration Data, and therefore see the importance and benefit of this change is supportive of the proposal.</li> </ul>
<b>Consumer</b>	<i>Did not respond.</i>
<b>Elexon (Helix)</b>	<i>Did not respond.</i>

## CR044 Impacts – Views on the proposed approach (Page 4)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR044)
<b>SRO / IM &amp; LDP</b>	<ul style="list-style-type: none"> <li>+ The Programme are supportive of the implementation of the Change Request.</li> <li>+ This Programme believes that this change is a must have before go-live – if any incidents occur, the solution can be called upon in early life. The change is a pre-migration contingency measure.</li> <li>+ In light of the Change Freeze, the Programme recognises that the Change Request is a risk mitigation – despite the risk being low probability, an occurrence would be high impact and needs to be prevented.</li> <li>• The Programme suggests that the change is implemented ahead of migration. It will need to be tested in SIT Operational. Exact implementation timelines are dependent on Impact Assessment responses, as the Programme is conscious of constraints on Participants' development capacity.</li> </ul>
<b>IPA</b>	<ul style="list-style-type: none"> <li>• The IPA abstained from providing a recommendation as the change does not impact their activities.</li> </ul>
<b>Avanade</b>	<ul style="list-style-type: none"> <li>+ Avanade is supportive of the implementation of the Change Request.</li> <li>+ The change will provide a mechanism for correction of data without manual intervention.</li> <li>• The addition of a new interface may require additional Azure resources and, dependent on message volumes for the new interface, may incur additional Azure consumption costs. A more informed assessment can be developed on the provision of volumetrics.</li> <li>• The support of Avanade is subject to a Programme CCN.</li> </ul>