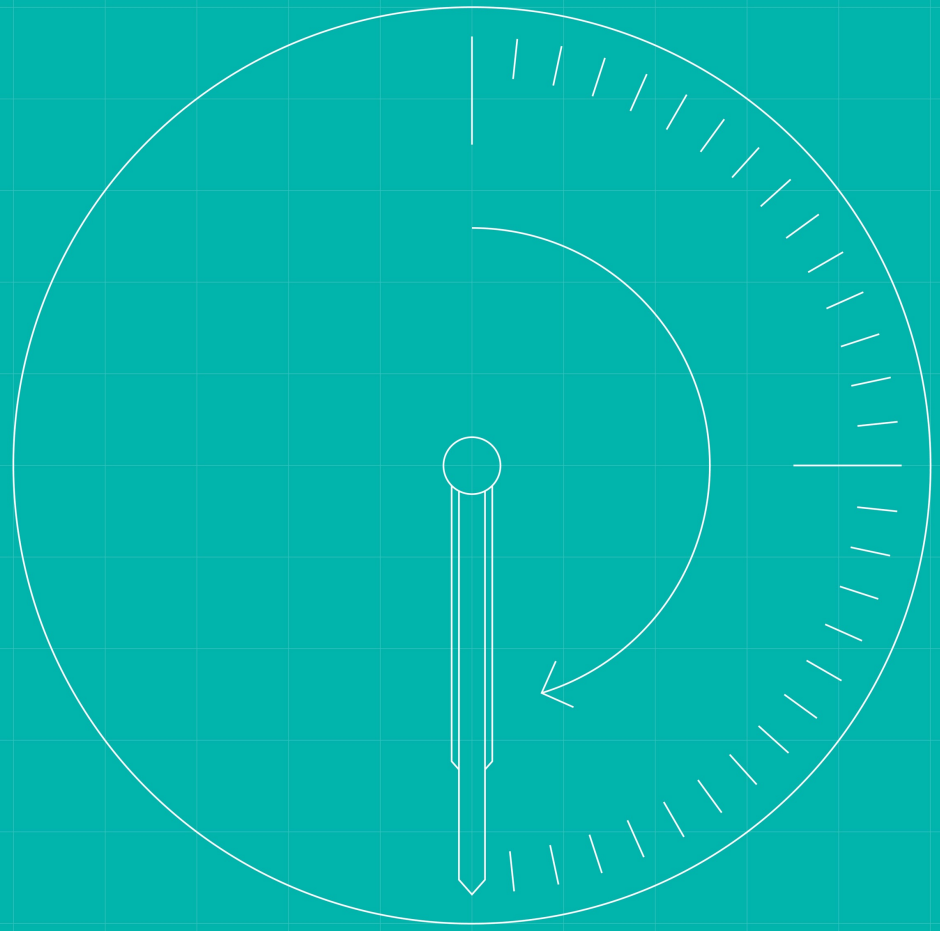
CR046 Impact Assessment Report & Recommendations



DECISION: CR046: '*Enabling Metering Point Energy Flow to be changed more than once*' Review the outputs of Impact Assessment and make a decision on next steps

MHHS PROGRAMME
Industry-led, Elexon facilitated

CR046 – Impact Assessment Summary

Objective:

DAG to review the outputs of the issued CR046 Impact Assessments and advise SRO on their decision to approve or reject the Change Request.

Headlines:

- Overall: **17 respondents supported the change; 3 respondents rejected the change; and 4 respondents abstained.**
- **Those who supported the implementation of the Change Request did so on the following basis:**
    - It is important to be able to correct energy flow where it is incorrect without the need to create a new MPAN. The existing process brings about a poor consumer experience.
    - The Change Request enables the change associated with REC R0062, and if not implemented would result in a degradation of processes. Retaining the current MMHS drafting would represent a retrograde step and would introduce additional costs to remove the upgrade.
    - The change has a minimum impact on the existing design, whilst making a significant improvement to the existing process.
- **Those who rejected the implementation of the Change Request did so on the following basis:**
    - The ability to change energy direction is already in existence, and the need for multiple changes seems to be an extreme edge case that does not warrant a change to the programme at this stage.
    - Allowing such a change is departing from the TOM to fix a downstream issue rather than fixing the source. The change encourages poor behaviour by allowing a back door fix. Restrictions like this are intended to encourage better practice upfront to get things right first time. Allowing multiple changes negates the need to have robust processes.
    - The change does fix a defect in the design, nor is it critical to reaching M10, and therefore does not meet the Change Freeze criteria. Additionally, the change and subsequent testing needed creates unnecessary risk to successful Programme delivery
- **Further comments:**
    - Sufficient guard rails need to be built to ensure that this change does not adversely impact the downstream systems. Consideration needs to be given to how the supporting systems would be updated if there is a change in direction mid-contract.
    - It should be noted LDSOs have been advised to change this parameter in MPRS as part of REC CP R0062 after the batch run on 11th April 2024. Unless advised otherwise, this change will be implemented and will become effective from 12th April 2024, meaning multiple changes to the Energy Direction Indicator can be made after this date.
- **Implementation:**
    - The Programme does not believe the Change Request meets the Change Freeze criteria, and therefore does not believe the change should be implemented ahead of M10.

CR046 – Submitted Impact Assessments

Programme Parties	CR046 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	3	1	-	1
Medium Suppliers	1	-	-	6
Small Suppliers	-	-	-	33
I&C	2	-	-	39
DNOs	5	-	-	1
iDNOs	1	-	-	12
Ind. Agents	1	1	1	44
Supplier Agents	-	-	-	7
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	-	-	-
Totals	**17**	**3**	**4**	**169**

Market Share			
Yes	No	Abstain	No Reply
70%	18%	-	12%
10%	-	-	90%
-	-	-	100%
45%	-	-	55%

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 Independent Agent abstained from providing a recommendation as they suggested an alternative solution to the issue identified.
- The IPA, DCC and a Software Provider abstained from providing recommendations as they are not impacted by the proposed changes.

CR046 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR046)
Large Suppliers	+ Three of the four responding Large Suppliers supported the implementation of Change Request. + The benefits that the change will bring to consumers and settlement are recognised. + It is important to be able to correct energy flow where it is incorrect without the need to create a new MPAN. – One of the four responding Large Suppliers rejected the implementation of the Change Request. – The benefits will be gained post MHHS programme delivery. – The ability to change energy direction is already in existence, and the need for multiple changes seems to be an extreme edge case that does not warrant a change to the programme at this stage. • Sufficient guard rails need to be built to ensure that this change does not adversely impact the downstream systems. • Higher costs than those noted in the Change Request are expected, as impacts to downstream systems have not been included. • As there is no effective from date for energy direction, it must be considered how the impact of the change would be captured. • Consideration needs to be given to how the supporting systems would be updated if there is a change in direction mid-contract. • The change requires discussion at the DRG to understand the implementation options, and the journey the MPAN would need to undergo following a mid-life change in direction. • There is a potential risk associated with how a change of energy direction is treated by the parties that are notified of it via the PUB-018, especially the Data Services. This allows room for interpretation on how changes in energy direction should be processed and how any settlement data should be updated/reprocessed as a result, which could result in inaccurate data.
Medium Suppliers	+ The one responding Medium Supplier supported the implementation of the Change Request.
Small Suppliers	*Did not respond.*
I&C	+ The two responding I&C suppliers supported the implementation of the Change Request. + As an energy supplier, no additional costs are expected. + The avoidance of creating new RMPs will have a positive impact on the consumer.

CR046 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR046)
DNOs	+ All five of the responding DNOs support the implementation of the Change Request. + The Change Request enables the change associated with REC R0062, and if not implemented would result in a degradation of processes. Retaining the current MMHS drafting would represent a retrograde step and would introduce additional costs to remove the upgrade. + The proposed solution resolves the issue of customer detriment where an MPAN requires a change in energy direction more than once in its lifetime. The current solution, which requires the MPAN to be disconnected and a new MPAN raised, is not good customer service. • In order to remove any misinterpretation in MHHS design, and to keep in line with REC code change, it is preferred that the proposed solution is delivered as soon as possible, ideally before M10 'Central systems ready for migrating MPANs' milestone. • It should be noted LDSOs have been advised to change this parameter in MPRS as part of REC CP R0062 after the batch run on 11th April 2024. Unless advised otherwise, this change will be implemented and will become effective from 12th April 2024, meaning multiple changes to the Energy Direction Indicator can be made after this date.
iDNOs	+ The one responding iDNO supported the implementation of the Change Request.
Agents	+ One of the three responding agents support the implementation of the Change Request. + The change has a minimum impact on the existing design, whilst making a significant improvement to the existing process. – One of the three responding agents rejected the implementation of the Change Request. – The benefits that implementing the change would make are not made clear within the Change Request. – Allowing such a change is departing from the TOM to fix a downstream issue rather than fixing the source. The change encourages poor behaviour by allowing a back door fix. Restrictions like this are intended to encourage better practice upfront to get things right first time. Allowing multiple changes negates the need to have robust processes. • One of the three responding agents abstained from providing a recommendation. • Advice is required as to whether the single DI-016 Connection Type Effective From Date applies to all data items in that B023 - MPAN Connection Info block in the PUB-036 and PUB-018, or whether they would add an additional date that applies to the Energy Direction or put it in its own independent Block. • Data Services we would need validation on the Effective From Date to ensure that it's being applied in the Current Data Service period, given the routing only goes to the current agents and not the past ones in those messages. The previous Data Service would not be notified, therefore historic corrections wouldn't be applied if the Effective From Date was in the past. • It is suggested that the current one-time change should be updated to allow for more than one change in circumstance where the update is needed to correct a data error, rather than completely removing it.

CR046 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR046)
S/W Providers	+ One of the two responding Software Providers supported the implemented of the Change Request. + There would be a detriment to the consumer should R0062 be reversed. • One responding Software Provider abstained from providing a recommendation as the change does not impact them.
REC Code Manager	+ As the change raiser, RECCo are supportive of the implementation of the Change Request. + R0062 is due to be implemented under REC governance on 12th April 2024 in advance of MHHS go-live. As such, rather than introduce a change to MHHS arrangements, this change enables the new status quo position to endure under MHHS arrangements.
National Grid ESO	+ ESO are supportive of the implementation of the Change Request. + The ESO uses MPAN information when instructing aggregated units and that process assumes that the MPANs will have unique identifiers that are unique and persistent. If these MPANs change frequently then the ESO will need to change its internal processes to ensure that existing processes can continue. This would be disruptive to internal ESO processes so on that basis the ESO is supportive of this change.
Consumer	*Did not respond.*
Elexon (Helix)	*Did not respond.*
SRO / IM & LDP	– The Programme rejects the implementation of the Change Request. – The Programme does not support the implementation of this Change Request. It does not believe that this change fixes a defect in the design, nor is it critical to reaching M10, and therefore does not meet the Change Freeze criteria. Additionally, the change and subsequent testing needed creates unnecessary risk to successful Programme delivery.
IPA	• The IPA abstained from providing a recommendation as the change does not impact their activities.
Avanade	+ Avanade is supportive of the implementation of the Change Request, on the basis that they are not impacted by the implementation of the change.