**Change Request Form**

## Change Request details

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| Change Request details |
| Change Request Title | *Change to Non-Functional Requirements for LDSOs* |
| Change Request Number | *CR054* |
| Originating Advisory / Working Group | *LDSO Discussion Forum* |
| Risk/issue reference |  |
| Change Raiser | *David Yeoman (UKPN)* | Date raised: | *05/07/24, revised 22/07/24* |

***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)*During various MHHS PMO lead workshops and session with LDSOs and others, it has been acknowledged, that some of the Non-Functional Requirements (NFR) are incorrect.       |
| **Description of change:***(the change being proposed)*     This change request is supported by and submitted on behalf of all LDSOs.During various MHHS PMO lead workshops and session with LDSOs and others, it has been acknowledged, that some of the Non-Functional Requirements (NFR) are incorrect. The NFR catalogue refers to ‘All Services’. Additional clarity is required as to the meaning of this term. It is unclear on the purpose of this term when referenced against some of the non-functional metrics quoted. ‘All Services’ should be defined as ‘All Services by market role’.For example, assuming the DIP is a ‘service’, by definition, any other metric quoted for any other service must require a lower volumetric to be tested, as the DIP is the totality of MHHS messages. Therefore, the same NFRs cannot apply to all services.LDSOs recognise the importance of valid and fit for purpose NFR testing, similarly the unnecessary costs if this is performed to incorrect parameters and metrics, especially when such thresholds can never be met. Specifically, this CR seeks to:* Amend the L4 performance and volumetric NFRs for the UMSO role / service for requirements: E2E1004, E2E1005, E2E1007, E2E1009 & E2E1011.
	+ Apply the UMSO portfolio coefficient of each individual LDSO party to each of the above requirements
	+ The volume of UMSO MPAN in the market is a de minimis amount[[1]](#footnote-2) and performance testing without this CR is currently disproportionate, and onerous for such volumes.

 For example, Electricity North West has an approximate total of 1,000 Unmetered MPANs for 1 Distribution region; UK Power Networks has an approximate total of 6,900 Unmetered MPANs spread across 3 Distribution regions.* Remove PUB-013, PUB-014, PUB-021, REP002, REP002A, REP900 & REP901 used in DUoS billing by LDSOs from the scope of NFR requirements: E2E1004, E2E1005, E2E1007, E2E1009 & E2E1011.
	+ DUoS billing does not receive any messages as a result of a MPAN switch or a Migration Event and therefore the volumetric requirements of E2E1004, E2E1005, E2E1007, E2E1009 & E2E1011 do not apply:
		- PUB-013 messages are only issued in the absence of consumption data i.e. where consumption data cannot be obtained from the Half Hour metering system
		- PUB-014 messages are only issued where MDS has cause to Reject the proposed Consumption Submission or to warn of consumption being sent on a de-energised MPAN.
		- PUB-021 messages are only sent for meters which are not Whole Current metered
		- REP002A, REP002B volumes are related to the number of Suppliers/Settlement runs and are not related to the overall number of registered MPANS
		- REP900, REP901 volumes are related to the number of meters which are not Whole Current metered for Site Specific billing and to the number of Suppliers/Settlement runs for Whole Current metered
	+ DUoS billing arrangements are governed by DCUSA.
	+ Inputs to DUoS billing do not generate time or performance critical responses to the DIP. Settlements data is received into DUoS daily, but billing is only actioned once a full billing period (a month’s) worth of data has been received.
	+ It is in LDSO best interests to ensure the inputs are processed and supplier bills are produced in a timely manner.
* **E2E1004**
	+ Update this NFR to expressly state each participant’s individual MPAN portfolio coefficient needs to be applied.
* **E2E1005**
	+ The quoted figure of 2.1M is understood to be based on a 300,000 Peak Daily Switch volume for CSS, with 7 DIP messages resulting from each switch event. It is incorrect to use the CSS Peak Volume as this includes switching activity for both Electricity and Gas metering points.
	+ The Peak Daily Switches is specified in CSS NFR PERF160:

*The system shall be capable of processing as a minimum the following volumes of switch requests:- average daily volume of 42,300- peak daily volume of 281,600- average hourly volume of 3,500- peak hourly volume of 25,300- annual volume of 15,450,000** + This specifies a total industry volume of 281,600 switch requests. This number being a combined load across both Electricity and Gas
	+ The accepted split between electricity switches vs gas switches is 58% vs 42%
	+ This gives a Peak value for Electricity Switch Requests of 281,600 \* 58% = 163,328
	+ Using the figure of 7 messages per switch, this would give a maximum theoretical capacity of 7 \* 163,328 = 1,143,296
	+ The figure of 1.14M (calculated above) should be used instead of the 2.1M
	+ Expressly state each participant’s individual portfolio coefficient needs to be applied to the revised 1.14M figure.
	+ Remove reference to annual volumes of 110M as this is irrelevant, as based on the above, this would be achieved in c100 days.
* **E2E1007**
	+ This requirement is superseded by E2E1011 and should be removed as a requirement and documents updated as such.
	+ E2E1011 should reference the Migration Thresholds Document (DEL1648). As per DEL1648 maximum Migration volumes (and the resulting DIP message volumes) for each LDSOs Registration Service are already defined.
 |
| **Desired implementation date and rationale:** *(proposed implementation date of the change and why this date is required)*This CR would be required to be implemented ahead of M10 and specifically before the completion of Non-Functional PIT testing (30 September 2024).LDSOs will not attempt to prove the currently stated NFR volumes during Non-Functional PIT testing, which will then require a decision from the Programme and Code Bodies with respect to LDSOs achieving the Qualification Test entry criteria.  |
| **Justification for change:***(please attach any evidence to support your justification including why it should be exempt from the change freeze)*LDSOs recognise the importance of valid and fit for purpose NFR testing, similarly the unnecessary costs if this is performed to incorrect parameters and metrics, especially when such thresholds can never be met. The NFR catalogue refers to ‘All Services’. Additional clarity is required as to the meaning of this term. It is unclear on the purpose of this term when referenced against some of the non-functional metrics quoted. For example, assuming the DIP is a ‘service’, by definition, any other metric quoted for any other service must require a lower volumetric to be tested, as the DIP is the totality of MHHS messages. Therefore, the same NFRs cannot apply to all services.‘All Services’ should be defined as ‘All Services by market role’.If this CR is not accepted, collectively, LDSOs are concerned of an impact to M10, this is by virtue of impacts to other programme milestones. The CR should not impact the programme, the design, other parties or M10, as it simply seeks to set fit for purpose NFRs for LDSOs and their 3 market roles of Registration Services, UMSO & LDSO (formerly referred to as Network Ops). | **Change Freeze criterion impacted** | **Yes / No** |
| **Fixing a design defect** | **Yes** |
| **Critical to M10/M15** | **Yes** |
| **Consequences of no change:***(what would happen if the change was not implemented)*There would be increased unnecessary costs for infrastructure and resources to support testing of some NFRs, which are already collectively accepted as incorrect. Such costs would ultimately be borne by customers. |
| **Alternative options:***(alternative options or mitigations that have been considered)*None, the NFRs need correcting, this is binary. |
| **Risks associated with potential change:***(risks related to implementation of the proposed change that have been identified)*None identified. |
| **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).*Various MHHS PMO lead workshops and session with LDSOs and others. |
| **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***

|  |  |
| --- | --- |
| 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 |       |
| To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation |       |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) |       |
| To implement MHHS in accordance with the MHHS Implementation Timetable |       |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case |       |
| 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***

|  |  |
| --- | --- |
| Impacted areas | Impacted items |
| Impacted Parties |       |
| Impacted Deliverables |       |
| Impacted Milestones | *<Ofgem’s MHHS Transition Timetable is linked above>* |

**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***Ensures NFRs are fit for purpose, any resulting testing effort and ongoing application infrastructure to support the same is efficient.* |
| *<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*
 |
|  |  |  |

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| **Effect on consumers***There would be increased unnecessary costs for infrastructure and resources to support testing of some NFRs, which are already collectively accepted as incorrect. Such costs would ultimately be borne by customers.* |
| *<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*
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|  |  |  |

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| **Effect on schedule***If this CR is approved, arguably this helps ensure the current schedule is not impacted. If this CR is not accepted, collectively, LDSOs are concerned of an impact to M10, this is by virtue of impacts to other programme milestones* |
| *<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*
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|  |  |  |

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| **Effect on costs***There would be increased unnecessary costs for infrastructure and resources to support testing of some NFRs, which are already collectively accepted as incorrect. Such costs whilst initially sitting with LDSOs, would ultimately be borne by customers.* |
| *<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.*

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| --- | --- | --- |
| 1. *Minor impact*
 | 1. *Medium impact*
 | 1. *Significant impact*
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|  |  |  |

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| **Effect on resources***There would be increased infrastructure and resources to support testing of some NFRs, which are already collectively accepted as incorrect*.  |
| *<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.*

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| --- | --- | --- |
| 1. *Minor impact*
 | 1. *Medium impact*
 | 1. *Significant impact*
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|  |  |  |

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| **Effect on contract***Differs per LDSO but likely to have impacts on existing arrangements for multiple parties.* |
| *<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*
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| **Risks***Low risk CR. LDSOs believe this poses little risk or impact the programme, the design, other parties or M10, as it simply seeks to set fit for purpose NFRs for LDSOs and their 3 market roles of Registration Services, UMSO & LDSO (formerly referred to as Network Ops).* |
| *<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***LDSOs recommend this CR is approved and implemented ahead of M10 and specifically before the completion of Non-Functional PIT testing (currently 30 September 2024).* **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*
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|  |  |  |

 |
| **Change Freeze***LDSOs believe this CR should not impact the programme, the design, other parties or M10, as it simply seeks to set fit for purpose NFRs for our 3 market roles of Registration Services, UMSO & LDSO (formerly referred to as Network Ops).**It is not a design change or something that materially impacts SIT. This is arguably an ‘admin’ CR and requires limited rework by other programme participants.* |
| *<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** |
|       |       |       |
|       |       |       |

1. [↑](#footnote-ref-2)