**Change Request Form**

## Change Request details

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| Change Request details | | | |
| Change Request Title | Validation of Service Provider CoS Appointment | | |
| Change Request Number | *TBD* | | |
| Originating Advisory / Working Group | *Design Resolution Group* | | |
| Risk/issue reference |  | | |
| Change Raiser | *Neil Strange* | Date raised: | *02/07/2024* |

***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:**  *(what is the issue that needs to be resolved by the change)*  Service Provider appointments messages require that a Service Provider Appointment Scenario is provided as part of the Supplier Service Provider Appointment Request and subsequent appointment messages  Following discussions at FTIG - agenda item - Obstacle D006 and DRG 16 both on 31 May– CR045 SSD Correction Tool the design team have stated “If you are the supplier either on or after SSD then it [the appointment scenario] will need to be CSP [ change of service provider]” this position is based on [DIN-172](https://mhhsprogramme.sharepoint.com/:x:/r/sites/Market-wideHalfHourlySettlement/_layouts/15/Doc.aspx?sourcedoc=%7BD01B2249-2DB9-4EFF-A808-358CFE049554%7D&file=MHHS%20DEL976%20Design%20Issue%20Notification%20Log%20(External)%20updated%20version.xlsx&action=default&mobileredirect=true&DefaultItemOpen=1) : - the description of this was “Noticed IF-031 is missing validation to ensure on CoS scenario the Supplier is the pending supplier not the current supplier. The CoS scenario should only be used as part of a CoS process as validation may differ slightly from other scenario types. The current supplier should instead use CSP or SEG as is appropriate.” and the proposed solution was “Validation rules updated to better match App Scenario with Supplier/SP. Requesting flexibility on error messages”  The Large Supplier Constituency does not agree with interpretation of the logic described above – we believe it will result in an increase in exceptions, problems in reporting, impact to settlement and customer detriment due to the cost of implementing flawed logic. The present design requires the appointment scenario to be changed if the appointment is processed late. This will cause rework for all parties. Such delays could be seen through system outages or through daily cut offs that could drive 'on time' appointments into late appointments.  The Design Team require a CR to be raised to change what was a DIN item. We believe that the change brought in as part of interim release 1 - [MHHS-DIN-172](https://mhhsprogramme.sharepoint.com/:x:/r/sites/Market-wideHalfHourlySettlement/_layouts/15/Doc.aspx?sourcedoc=%7BD01B2249-2DB9-4EFF-A808-358CFE049554%7D&file=MHHS%20DEL976%20Design%20Issue%20Notification%20Log%20(External)%20updated%20version.xlsx&action=default&mobileredirect=true&DefaultItemOpen=1) should have been brought in itself via Change Request or discussed at DRG and should have been better articulated in the release material – as evidenced above. There were 155 DIN items addressed in interim release 1. DIN-172 does not consider the possibility of late processing of appointment requests which could result from CR018 - Registration Service Operating Hours or anticipate the SSD correction tool (CR045).  We would like to point out that CR018 was only approved at DAG on 12 July 2023 – Interim Release 1 was issued on 15 June 2023.  If there an outage similar to that experienced at CSS on 6 July 2023 then this would result in all appointments being rejected and resubmitted. For more information see - and [Clarify & strengthen CRS Providers requirements - REC Portal](https://recportal.co.uk/group/guest/-/clarify-strengthen-crs-providers-requirements?p_l_back_url=%2Fsearch%3Fq%3DCLARIFY%2BAND%2BSTRENGTHEN%2BCRS%2BPROVIDERS%25E2%2580%2599%2BREQUIREMENTS).  <https://recportal.co.uk/group/guest/-/clarify-strengthen-crs-providers-requirements?p_l_back_url=%2Fsearch%3Fq%3DCLARIFY%2BAND%2BSTRENGTHEN%2BCRS%2BPROVIDERS%25E2%2580%2599%2BREQUIREMENTS>   * requires a rec portal log in.   That would not be required if the change in logic described below was implemented. | |
| **Description of change:**  *(what is the change you are proposing)*  If no Service Provider is in place this cannot be a Change of Service Provider event, the fact that the request is being processed after SSD is not material.  If the agent is being appointed from SSD (irrespective of the day it is being processed - pre or post SSD) then the IF031 with event code of CoS [Change of Supplier] should be valid.  This is required to handle appointments which are processed late or a retrospective SSD change.  If there is an SP appointed by the current Supplier and the new SP is being appointed from any date other than the SSD then it is a Change of Service Provider (CSP event). | |
| **Justification for change:**  *(please attach any evidence to support your justification)*  The cost of implementing the change at Registration Service will be significantly less than requiring all Suppliers and their Service Providers to handle flawed logic in their systems and reporting.  In terms of settlement risks the 2024-25 Risk Evaluation Register (RER) includes an ongoing settlement risk associated to agent appointments (settlement Risk 14) due to switching rates returning pre-pandemic levels so increased the risk rating from Low to Medium via the following rationale:  “Increased switching results in more appointment and de-appointments of Agents subsequently increasing the potential for error in the process” (https://www.elexon.co.uk/documents/performance-assurance/processes/paf/risk-evaluation-register-2024-25/)  The current design baseline is creating a new exception type that does not exist in today’s DTN derived appointment processes which will ultimately add to the probability of agent appointments being accepted in a timely fashion as close to SSD as is possible because of the need to amend the appointment reason code, despite the eventual outcome of MHHSP reducing settlement timings combined with a wider drive to complete CoS in shrinking timescales (currently 5 Working days) the baseline only provides rationale to maintain or increase settlement risk 14 risk rating.  The implementation of DIN-172 further compresses the timelines suppliers have to execute a switch, rectify an erroneous switch or initiate a new connection as ensuring the IF031 is sent immediately becomes critical.  Should there be an outage resulting in appointments being processed late then the appointments will need to be resubmitted – this will exacerbate what will already be a difficult situation for all market participants. | |
| **Consequences of no change:**  *(what is the consequence of no change)*  Due to Registration Service processing timing rules implemented under CR018 it is likely the currently implemented logic (as described in the document D006 and Interim Release 1, DIN-172)will result in more rejections as the supplier could have sent the IF031 pre-SSD but would not have been processed as it is received outside availability hours. This could become significant if there is an outage and would require suppliers to resend all their appointment requests.  The above risks having no Service Providers in place resulting in  a) potential customer detriment if metering work is required and in the case of customer own agents – the agent appointed at the correct contract date  b) impact to settlement as no consumption will be sent until the DS is appointed.  If the current position is followed it will be very difficult to distinguish Change of Supplier gain and Change of Agent in MI and operational reporting for Suppliers and Agents.  Suppliers will have to resend appointment requests in the event of a DIP outage and as a result of this there will be consequential additional processing of appointments by Registration Service and Service Providers.  Note that with respect to New Connections and Erroneous Switches/ Transfers, these could easily be processed without any full working day between the request and SSD (There is no objection window for either of these processes). | |
| **Alternative options:**  *(What alternative options or mitigations that have been considered)*  None either keep the DIN-172 logic or follow logic above and accept risks articulated above. | |
| **Risks associated with potential change:**  *(what risks related to implementation of the proposed change have been identified)*  Impact To registration Service timelines. | |
| **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).*  **Large Medium Small Suppliers**  **Data and Metering Services** | |
| **Target date by which a decision is required:** | ASAP, and needs to be implemented with CR045 at the very latest. Can the CR be expedited as this has a material effect on cost for suppliers and agents. |

### 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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| What benefits does the change bring |
| *(list the benefits of the change and how this improves the business case)*   1. Avoids changes to Supplier and Service Provide systems to cater for retrospective appointments – we do not believe Suppliers or Agents have interpreted DIN-172 in the way the Registration Service and MHHS programme has. This cost will ultimately be passed on to customers. 2. Avoids the risk of Metering Service not being appointed at SSD due to IF-031 rejection – if metering work is required this will result in customer detriment and the supplier will be in breach of BSCP709, paragraph 2.2 due to events outside their control. 3. Avoids the risk of Data Service not being appointed at SSD due to IF-031 rejection – if consumption is not being passed into settlement the supplier will be in breach of BSCP709, paragraph 2.2 due to events outside their control. 4. If no agent is in place at SSD due to late processing of IF-031 this will avoid mass resubmission of agent appointments by suppliers and consequent demands in processing which will affect most market participants. 5. If and when CR045 SSD correction tool is implemented then the event code will accurately reflect that the appointment relates to a CoS and is not a CoA. |

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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 | Aligned as there will be no interruption of consumption going into settlement |
| To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation | Aligned as there will be no interruption of consumption going into settlement |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) | Code does not go down to this level of detail |
| To implement MHHS in accordance with the MHHS Implementation Timetable | This will have an impact on Registration Service but overall a far greater incremental impact on Supplier and agent systems |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case | Avoids significant & costly later change to correct a design flaw |
| To prove and provide a model for future such industry-led change programmes | Aligned. There is significant support for this amongst Suppliers and Service Providers refer to DRG-16 and FTIG agenda item - Obstacle D006 responses from suppliers |

**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 | Registration Service |
| Impacted Deliverables | Validation of IF/PUB-031 and consequential appointment flows. |
| Impacted Milestones | *M10* |

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

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| Initial assessment | | | |
| Necessity of change |  | Expected lead time |  |
| Rationale of change |  | Expected implementation window |  |
| Expected change impact | Low |  |  |

**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.**

**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**  *Ensure consistent CoS process and reduced exceptions*  *Reduce impact on Agent Appointment Processes due to system outages and delays in processing due to CR0018 working hours agreement.*  *Agent Appointment Processes complete on time and using the correct scenario (CoS for Change of Supply and CSP for Change of Agent) for reporting purposes* |
| *<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.* |
| **Effect on consumers**  *Avoids Customer Detriment incurred by having no Metering Service or Data Service appointed at SSD*  *Avoids Customer Detriment for Customer Own Agents not being appointed at the agreed contract start date.* |
| *<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?* |
| **Effect on schedule**  *Change will negatively impact the Registration Service. As the original change was implemented by DIN, we do not see that this can be significant.*  *Development time will be less than that incurred by Suppliers and Service Providers implementing DIN-172 in their systems.* |
| *<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.* |
| **Effect on costs**  *Change will negatively impact the Registration Service.*  *That cost will be smaller than the one incurred by Suppliers and Service Providers implementing DIN-172 in their systems.*  *It will avoid the cost of having to submit late appointments following a delay in processing appointments of Service Providers.* |
| *<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?* |
| **Effect on resources**  *We believe the proposed change will have a longer term benefit in reducing MHHS exceptions when the programme goes live.*  *It also ensures substantial re-work is not required by suppliers agents and the registration service where process flows are delayed or outages cause disruption.* |
| *<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.* |
| **Effect on contract**  *None.* |
| *<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.* |
| **Risks**  *Risk is minimal this is a logical change in how the appointment event is evaluated. Since the interim release 1 change was via DIN the risk cannot be significant.* |
| *<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.* |

### 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.* |

**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** |
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