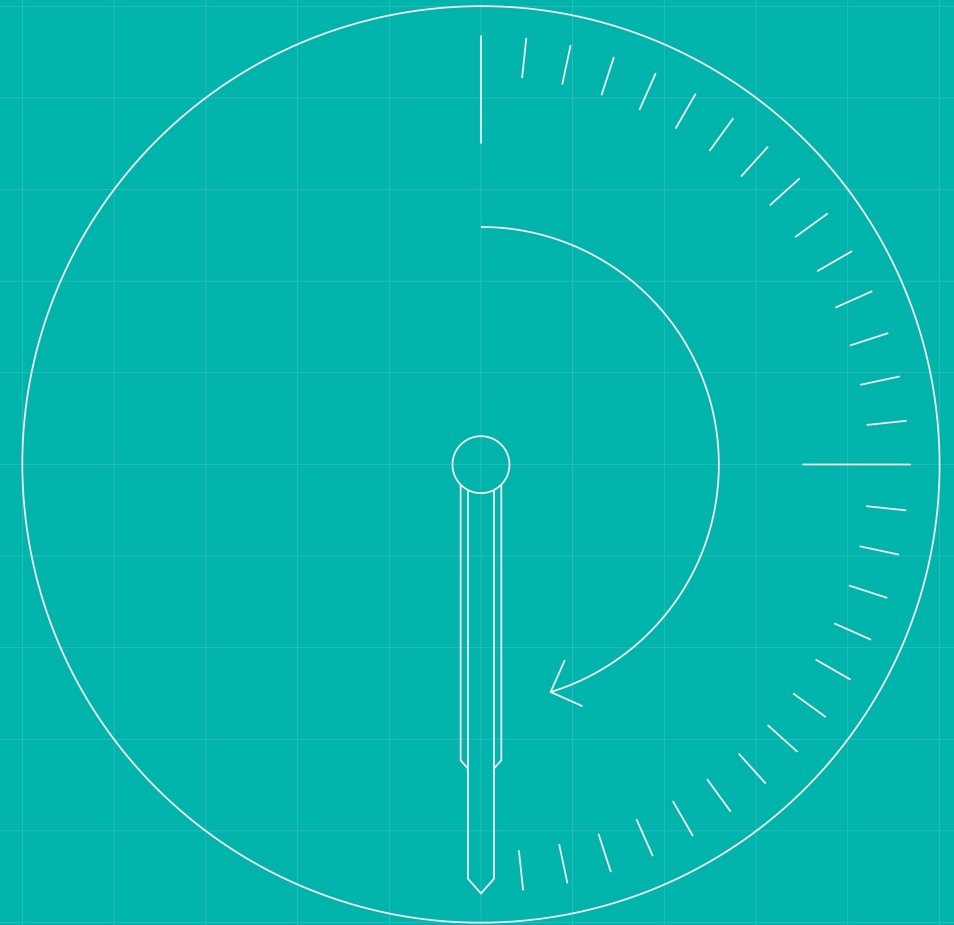


# CR036 Impact Assessment Report & Recommendations



**DECISION:** CR036: Review the outputs of Impact Assessment and make a decision on next steps

### Objective:

DAG to review the outputs of the issued CR036 Impact Assessments and advise SRO on their decision to approve or reject the redlining in the Change Request.

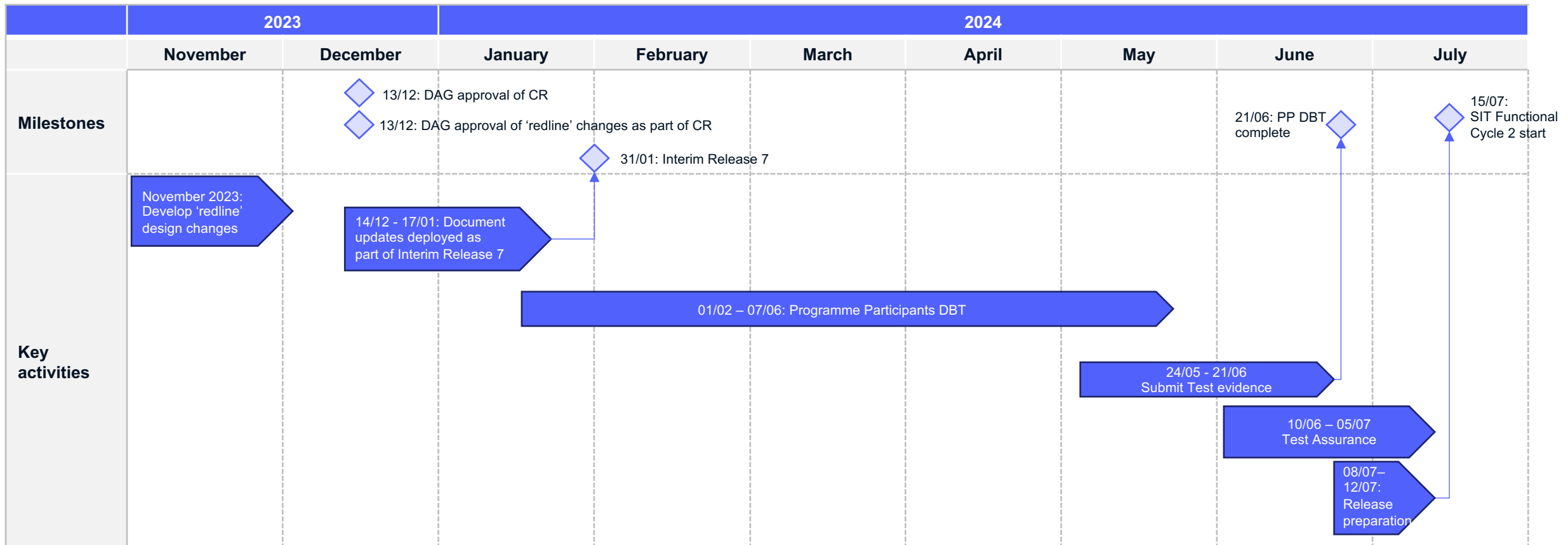
### Headlines:

- Overall: 6 respondents supported the change; 9 respondents rejected the change; and 5 respondents abstained.
- It is noted by the Programme that the majority of those rejecting the Change Request did so on the basis that they do not support the change to Clock Time. This is a decision that has already been agreed and was not an intended outcome of the Impact Assessment.
- Of the 9 respondents who voted against the Change Request, 5 made comments on the redlining. The Programme is addressing these concerns ahead of DAG.
- Those who rejected did so on the following basis:
  - The Change Request lacked the detail required for such a significant change, and the Programme has not fully explained the rationale behind the change to Clock Time.
  - The MHHS Design was not ambiguous as noted. The Design Principles published on the MHHS website state that the appointment date is in UTC.
  - Implementing to Clock Time will put at risk the Programme schedule and increase workload, with an increased cost to deliver, requiring unexpected rework. Industry Participants have been working to a common understanding of UTC requirements. Changing this would result in further development work at additional cost.
  - The proposed process makes the gaining supplier wholly reliant on their losing supplier for consumption data. This creates a risk that there will be an increased need to estimate data where transfers of data fail.
  - This is a significant change at a late stage in the Programme, and may therefore have an impact on the ability of SIT participants to meet the SIT schedule, and risks wider Programme delivery.
- Further comments:
  - The Programme has met with a number of respondents on a bilateral basis to address specific questions or concerns raised in their Impact Assessment responses. These include minor drafting comments on the redlined design changes. There will be further opportunity to incorporate minor comments as part of the IR7 implementation process (see next slide)
  - The Programme will raise an agenda item at SITWG to establish whether Participants see the change causing any blockers to successful testing.

# CR036 – Implementation Plan

## Summary

- The detailed design for CR036 is well formed and the redlined changes have been made by the Design Management team and shared with Participants.
- These changes will be included for publication into Interim Release 7 on 31 January 2024.
- Design changes in Interim Release 7 will be deployed into testing at SIT Functional Cycle 2, scheduled currently for July 2024.
- This will allow testing of the functionality for CR036 at the start of SIT Functional Cycle 2.



## CR036 – Submitted Impact Assessments

Programme Parties	CR036 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	-	3	1	1
Medium Suppliers	1	1	-	5
Small Suppliers	-	-	-	33
I&C	-	-	1	40
DNOs	1	-	-	5
iDNOs	-	-	-	13
Ind. Agents	1	3	1	42
Supplier Agents	-	-	-	7
S/W Providers	-	1	-	24
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>4</b>	<b>9</b>	<b>5</b>	<b>174</b>

Market Share			
Yes	No	Abstain	No Reply
-	64%	24%	12%
10%	43%	-	47%
-	-	-	100%
-	-	20%	80%

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:

- Two suppliers abstained from providing a recommendation due to the 5 working day Impact Assessment window.
- The IPA and DCC are comfortable that the change request is not expected to have an impact on their activities.
- One Agent abstained, as without clarity on the changes to the baselined documents, they found it impossible to fully assess the magnitude of the changes required.

## CR036 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR036)
<b>Large Suppliers</b>	<ul style="list-style-type: none"> <li>- Three of the four responding Large Suppliers rejected the Change Request.</li> <li>- The potential downstream impacts of changing away from UTC have not been understood in the necessary amount of detail. The potential future consequences of doing so requires further analysis.</li> <li>- Smart and UTC have been running for ten years, and all supplier systems are aligned to this way of working. Working in Clock Time during the summer requires the development of complex processes to be able to convert smart meter data to align with the use of Clock Time. BST applies for over half of the year, so a complicated process will be in place for around 60% of settlement days every year.</li> <li>- The MHHS Design was not ambiguous as noted. The Design Principles published on the MHHS website state clearly that the appointment date is in UTC.</li> <li>- The use of Clock Time rather than UTC is a material design change, and should therefore be subject to a robust impact assessment, rather than a decision based on feedback obtained through a PPIR.</li> <li>- The proposed process makes the gaining supplier wholly reliant on their losing supplier for consumption data. This creates a risk that there will be an increased need to estimate data where transfers of data fail.</li> <li>- The impact on consumers of moving away from this design principle and the current design, based on UTC, do not appear to have been considered.</li> <li>- A change to Clock Time could require unplanned for changes and add additional complexity which may result in additional delivery costs and resource requirements. <ul style="list-style-type: none"> <li>▪ One supplier was not able to determine whether the use of Clock Time would impact their contracts with their service providers due to the expedited Impact Assessment.</li> <li>▪ One supplier was unable to complete the Impact Assessment with their Data Services, therefore abstained from providing a recommendation.</li> </ul> </li> </ul>
<b>Medium Suppliers</b>	<ul style="list-style-type: none"> <li>+ One responding Medium Supplier supported Change Request. The supporting document accompanying the Change Request covers the key aspects that need to change to implement Clock Time for CoS reads and Agent Appointments.</li> <li>- One responding Medium Supplier rejected the Change Request.</li> <li>- They recommended that the Change Request should undergo re-consultation or a second round of Impact Assessment due to the omission of key consequential factors that introduce unknown risk factors. They have raised a number of questions which the Programme is addressing on a bilateral basis.</li> </ul>
<b>Small Suppliers</b>	<i>Did not respond.</i>
<b>I&amp;C</b>	<ul style="list-style-type: none"> <li>▪ The one responding I&amp;C Supplier abstained from providing a recommendation.</li> <li>▪ They have argued that the expedited Impact Assessment has meant they have not been able to conduct a thorough impact assessment against the CR.</li> </ul>

## CR036 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR036)
DNOs	<ul style="list-style-type: none"> <li>+ The one responding DNO supported Change Request.</li> </ul>
iDNOs	<p><i>Did not respond.</i></p>
Agents	<ul style="list-style-type: none"> <li>+ One of the five responding Agents supported the Change Request.</li> <li>+ They accept the choice to change to Clock Time, although it isn't their preference, but would require some clarifications on a few elements ahead of developing, testing and delivery.</li> <li>– Three of the five responding Large Suppliers rejected the Change Request.</li> <li>– Implementing to Clock Time will put at risk the Programme schedule and increase workload, with an increased cost to deliver, requiring unexpected rework.</li> <li>– The Change Request does not include an assessment of how many, if any, suppliers are currently working on Clock Time.</li> <li>– Midnight reads are taken in UTC. There is therefore potential for significant additional traffic towards the DCC to obtain a read at midnight Clock Time.</li> <li>– The issue statement in the Change Request is incorrect. The design has always been based on UTC.</li> <li>– Industry Participants have been working to a common understanding of UTC requirements. Changing this would result in further development work at additional cost.</li> <li>– The Change Request does not include enough clarity to ensure Participants can work with a common understanding. It adds further anomalies.</li> <li>– There will be an additional requirement to resource for Data Services as additional testing and development will be required, which will divert important, allocated resource away from progressing the main build activity.               <ul style="list-style-type: none"> <li>▪ One responding Agent abstained from providing a recommendation.</li> <li>▪ Without clarity on the changes to the baselined documents, it is not possible to fully assess the magnitude of the changes required.</li> </ul> </li> </ul>
S/W Providers	<ul style="list-style-type: none"> <li>– The one responding Software Provider rejected the Change Request.</li> <li>– They recommended that the Change Request should undergo re-consultation or a second round of Impact Assessment due to the omission of key consequential factors that introduce unknown risk factors. They have raised a number of questions which the Programme is addressing on a bilateral basis.</li> </ul>

## CR036 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR036)
<b>REC Code Manager</b>	<ul style="list-style-type: none"> <li>+ RECCo agree that there is a design gap in terms of splitting the IF-21, and support the change to clarify the approach to splitting this message.</li> <li>- RECCo rejected the Change Request.</li> <li>- The Programme has not fully explained the rationale for the change to Clock Time.</li> <li>- The design is not ambiguous. It is clearly stated in the design principles that appointment date is in UTC. Definitions within the DES138 state that the effective from date of the Data Service and Metering Service is in UTC.</li> <li>- In order to propose such a fundamental change to BAU arrangements, not directly required for MHHS, they would have expected more detailed analysis of the impacts.</li> <li>- This is a significant change at a late stage in the Programme, and may therefore have an impact on the ability of SIT participants to meet the SIT schedule, and risks wider Programme delivery.</li> <li>- They have raised concerns that the Programme is not open to considering views from industry regarding the change.</li> <li>- RECCo also noted that, if the Change Request is approved, the following changes would be required: PR019 would need to be updated; the definition of DI-089 Cumulative Register Reading Date / Time would need to be updated; BP003C will require a fundamental change.</li> </ul>
<b>National Grid ESO</b>	<i>Did not respond.</i>
<b>Consumer</b>	<i>Did not respond.</i>
<b>Elexon (Helix)</b>	<i>Did not respond.</i>
<b>SRO / IM &amp; LDP</b>	<ul style="list-style-type: none"> <li>+ As the Change Raiser, the Programme is supportive of the Change Request. The Programme reiterates that the decision made to move to Clock time happened independently to the Change Request, and that the purpose of the Change Request is to Impact Assess the proposed redlined changes to the MHHS Design.</li> <li>+ The Programme will continue to work with Participants to ensure the redlining suits all Participant needs. Feedback will be responded to on a bilateral basis where required.</li> <li>- The Change Request will impact Code drafting as the appointment processes and read processes have already been drafted. If part of IR7 delivery, the Programme notes that amending multiple code artefacts risks delaying the Mop-up consultation and potentially M6 delivery date.</li> </ul>
<b>IPA</b>	<ul style="list-style-type: none"> <li>▪ The IPA is comfortable that the Change Request is not expected to have an impact on their activities.</li> <li>▪ The IPA is aware of concerns that have been raised by a number of constituent groups in relation to this CR and will review these separately to completion of this CR form.</li> </ul>
<b>Avanade</b>	<i>Did not respond.</i>