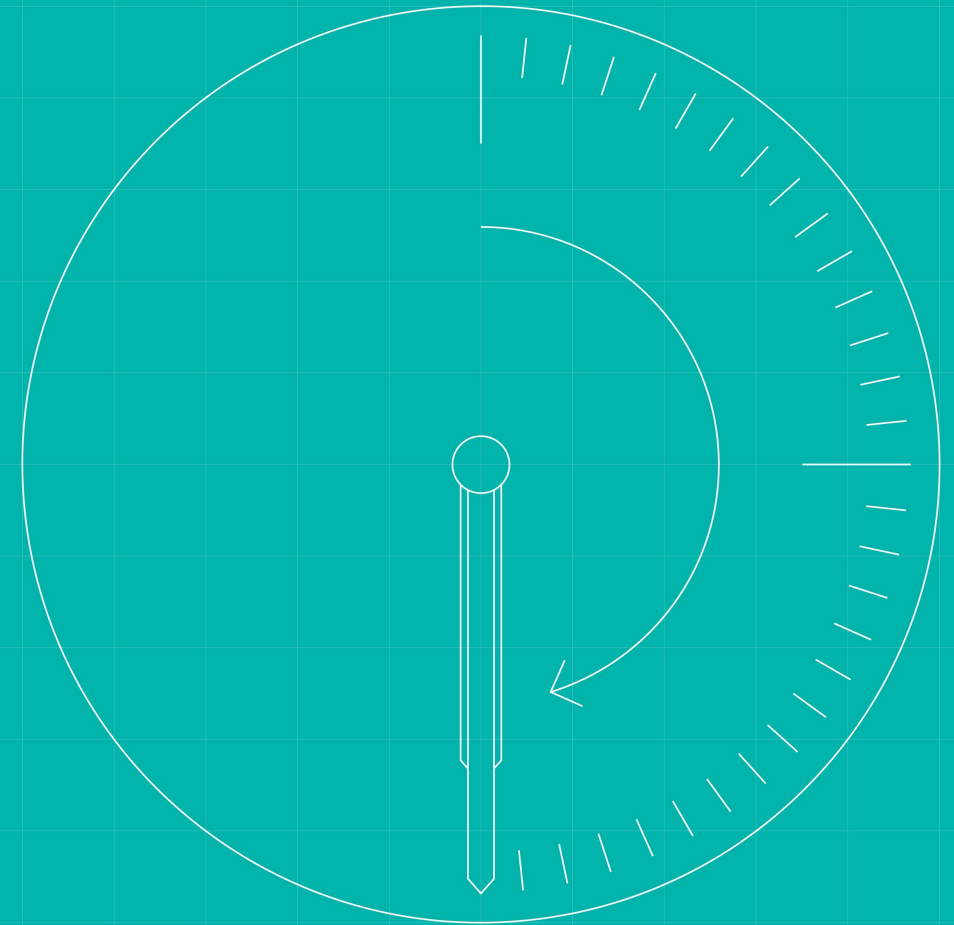


CR040 Impact Assessment Report & Recommendations



DECISION: CR040: Review the outputs of Impact Assessment and make a decision on next steps

CR040 – Impact Assessment Summary

Objective:

DAG to review the outputs of the issued CR040 Impact Assessments and advise SRO on their decision to approve or reject the redlining in the Change Request.

Headlines:

- Overall: **24 respondents supported the change; 3 respondents rejected the change; and 4 respondents abstained.**
- Support was spread across a wide variety of constituencies, whilst the rejections came from Large Suppliers and an Independent Agent.
- **Those who supported the implementation of the Change Request did so on the following basis:**
 - The change would bring alignment between the L4 validation response NFR and the Operational Choreography.
 - The change would negate DBT costs, which could be passed down to the consumer. It would also remove the requirements to change existing systems to run more frequently, which could impact M10.
- **Those who rejected the Change Request did so on the following basis:**
 - A Large Supplier raised a concern that, when implemented alongside CR034, the change could lead to delays of up to two hours. It would be difficult to handle rejections or exceptions in-day, leading to potential customer detriment.
 - An Agent stated that they can not be not supportive of any change which lowers ambitions as part of the transition to Net Zero.
- **Further comments:**
 - A Medium Supplier requested that the 60-minute response time frame was extended to all market participants that use a DIP adapter, whilst an Agent stated that their support is provisional to a review of NFRs for all services.
- **Implementation:**
 - If approved, the change would be implemented in IR8 (April 2024) and the Programme testing approach would be developed around the change.

CR040 – Submitted Impact Assessments

Programme Parties	CR040 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	1	2	1	1
Medium Suppliers	1	-	-	6
Small Suppliers	-	-	-	33
I&C	3	-	-	38
DNOs	5	-	-	1
iDNOs	7	-	-	6
Ind. Agents	2	1	-	44
Supplier Agents	-	-	-	7
S/W Providers	3	-	-	22
REC Code Manager	-	-	1	-
National Grid ESO	-	-	-	1
Consumer	-	-	-	1
Elexon (Helix)	-	-	-	1
DCC	-	-	1	-
SRO / IM & LDP	1	-	-	-
IPA	-	-	1	-
Avanade	1	-	-	-
Totals	24	3	4	161

Market Share			
Yes	No	Abstain	No Reply
17%	46%	24%	13%
10%	-	-	90%
-	-	-	100%
44%	-	-	56%

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 Large Supplier abstained from providing a recommendation due to the Change Request having a minimal impact on them.
- RECCo, DCC and IPA abstained from providing a recommendation as the change will not impact them.

CR040 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR040)
Large Suppliers	<ul style="list-style-type: none"> + One of the four responding Large Suppliers supported the implementation of Change Request. - Two of the four responding Large Suppliers rejected the implementation of the Change Request. - They raised a concern that, when implemented alongside CR034, the change could lead to delays of up to two hours. It would be difficult to handle rejections or exceptions in-day, leading to potential customer detriment. - It was noted that the Change Request does not address all interfaces impacted by the change. - One respondent stated that they felt there was a lack of clarity as to why the Change Request had been raised. • One Large Supplier abstained due to the Change Request having a minimal impact on them.
Medium Suppliers	<ul style="list-style-type: none"> + The one responding Medium Supplier supported Change Request. • The respondent requested that the 60-minute response time frame should be extended to all market participants that use a DIP adapter.
Small Suppliers	<i>Did not respond.</i>
I&C	<ul style="list-style-type: none"> + The three responding I&C Suppliers supported the implementation of the Change Request.
DNOs	<ul style="list-style-type: none"> + The five responding DNOs supported the implementation of the Change Request. + Implementing the Change Request would bring alignment between the L4 validation response NFR and the Operational Choreography. + The change would negate DBT costs which could be passed down to the consumer. It would also remove the requirements to change existing systems to run more frequently, which would impact M10 whilst serving no benefit to the Programme. + The change would introduce stability to current architecture and will allow DNOs to focus on Testing & Qualification.
iDNOs	<ul style="list-style-type: none"> + The seven responding iDNOs supported the implementation of the Change Request. + Not implementing the change would mean making extensive changes to systems with associated costs, which would materially impact iDNO delivery of the MHHS Programme.

CR040 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR040)
Agents	<ul style="list-style-type: none"> + Two of the three responding Agents supported the implementation of Change Request. + Over stringent NFRs introduce additional costs, which will be ultimately borne by the customer. - One responding Agent rejected the implementation of the Change Request. - Their rejection was based on the fact that they have invested in cutting edge technology to play their part in the transition to Net Zero. They are not supportive of any change which lowers ambitions as part of the transition to Net Zero. <ul style="list-style-type: none"> ▪ One respondent stated that their support is provisional to a review of NFRs for all services.
S/W Providers	<ul style="list-style-type: none"> + The three responding Software Providers supported the implementation of the Change Request. + C&C Group, as a service provider to the majority of DNOs and iDNOs, are in full support of the change to the NFR. + NFRs as written for Level 4 validation would require a change to MPRS and LDSO infrastructure to connect to the DIP directly using a PUSH model. This would greatly complicate the design which in turn would require significant delays to M10, delaying the MHHS Benefits for consumers.
REC Code Manager	<ul style="list-style-type: none"> ▪ The change does not have an impact on REC processes. ▪ The changes to the Operational Choreography need to be clear to ensure that these are correctly reflected in code. Before approval, we would expect that the MHHS Programme SRO and Design Team are happy that the change to a 60-minute SLA is aligned to MHHS Programme design principles.
National Grid ESO	<i>Did not respond.</i>
Consumer	<i>Did not respond.</i>
Elexon (Helix)	<i>Did not respond.</i>
SRO / IM & LDP	<ul style="list-style-type: none"> + The Programme supports the implementation of the Change Request. + The change will align response times to the Operational Choreography. <ul style="list-style-type: none"> ▪ The change would be implemented in IR8 (April 2024) and the Programme testing approach can be developed around this change if it is approved.
IPA	<ul style="list-style-type: none"> ▪ The IPA is comfortable that the change request is not expected to have an impact on their activities.
Avanade	<ul style="list-style-type: none"> + Avanade support the implementation of the Change Request. <ul style="list-style-type: none"> ▪ Their support is contingent on the observations on intra-day message volumes being noted and addressed via separate discussions with the SRO.