SUMMARY POLICY ISSUE PAPER – FOR EDAG DISCUSSION

Title of Paper	**Switching Programme Post-Implementation Strategy**		
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Summary and questions for consideration at EDAG

1. Unlike in the case of the Testing Strategy, the need for a post-implementation process is not explicitly referred to in the TOM v2. However, we recommend that some sort of post-implementation period is required

2. It is not possible to yet define what an appropriate level of enhanced early life support should be as it is dependent on the likely residual risks that will be present at transition, which in turn will be based on the solution architecture, testing, transition strategy, data cleanse strategy and other aspects of the programme that are still developing and maturing.

3. Based on the initial assessment of shortlisted Solution Architectures and an assumption of a low appetite for any early life instability in the retail energy market, our recommended approach is to 'proactively monitor and resolve issues and transfer knowledge' in the post-implementation period. This requires resources, structures and processes to be carried over from the Design, Build and Test (DBT) phase of the programme into early life until service stability is verified.

4. Who provides this enhanced early life support, how it is provided, and how it will transition to the steady state arrangements, will depend on the steady state service management model and other operational requirements. To this end, this strategy should be reviewed when the early life risks are better understood, and should be regarded as an enduring document to be used by (and available to) all parties in the programme. The strategy should be updated again in Detailed Level Specification (DLS) phase and periodically thereafter to ensure continued relevance.

5. In addition, a Post-Implementation Management Plan should also be developed during DLS, which will define the detailed approach and scope for the post-implementation period, entry and exit criteria, roles and responsibilities, performance and benefits reporting, and other factors affecting the performance of the scheme after go-live as appropriate. This plan will also cover detailed hand-over arrangements from DBT to 'steady state' operation. Market participants should use

this programme-level plan as the 'head mark' to develop individual post-implementation plans aligned to this over-arching plan.

6. Each party will be expected to provide a period of enhanced early life support for their part of the new arrangements to align with the final post-implementation strategy. A central body should be nominated for managing and co-ordinating this support at the whole programme/whole solution level, including assuring party readiness, reporting progress and managing any central support carried over from the DBT phase. Criteria for the transition of governance and assurance from DBT to steady state arrangements must be clear to avoid confusion on where responsibilities lie.

7. We propose that EDAG considers the following questions:

- Do you agree with our proposed approach to post-implementation?

- Are there any aspects of this approach that we have missed?

Options Analysis

8. Version 2 of the TOM does not specifically address the need for a detailed post-implementation plan; although we regard it as an essential element of the Transition and Implementation Scheme (TIS) as detailed in paragraphs 12.34 to 12.38.[1] However, we have considered a 'do nothing' option as part of a spectrum of post-implementation (early life) levels of enhanced support over and above /normal business/ operations.

9. The table below (Table 5 in the main document) outlines some activities and roles and responsibilities applicable to three illustrative post-implementation options. These options reflect the degree of enhanced early life support that is provided over and above steady state levels.

10. The requisite resources and knowledge for early life support will exist throughout the DBT phase of the project, and the options below reflect the variance in extent to which these resources will be retained during early life.

	Option	Activities	Roles & Responsibilities
1	Do Nothing (no additional service stability phase)	Monitor service performance using existing mechanisms. Hold individual parties to account in terms of code compliance.	Each party addresses early life stability issues. Normal code governance for monitoring performance and holding parties to account.
2	Monitoring and Information Sharing	Proactively monitor early life performance and issues. Report and share service performance achieved. Identify stability issues and enable parties to agree appropriate responsibility.	Each party rapidly resolves issues clearly falling within their boundary, based on agreed priorities. Additional governance to share information to enable parties to gain consensus on way forward for cross-cutting issues.

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[1] https://www.ofgem.gov.uk/sites/default/files/docs/2015/11/tom_v2_final_17112015_0.pdf, pp55-56

| 3 | Proactive Management and Intervention | Monitor and report early life performance and issues. Assign responsibility to proactively and rapidly resolve issues which cross-party boundaries. Retain cross-party delivery capability (test environment, governance, design teams, etc.) until service stabilised. | Each party rapidly resolves issues clearly falling within their boundary, based on agreed priorities. Additional governance to assign responsibility for issue resolution. DBT roles carried forward for managing issues and problems experienced in early life. Additional support and resources provided on top of own parties' normal support arrangements. |

Post-implementation Options

11. Options 2 and 3 above involve a continuation of some or all of the arrangements put in place for the DBT phase, and so would reflect a continuation of some of the roles and responsibilities of market participants established for DBT (e.g. issue and change management, testing, data cleansing, etc.). This enhanced support would be offered when the roles and responsibilities undertaken in the 'steady state' operation of the new switching arrangements was being established. How the enhanced support and ongoing 'steady state' responsibility would interact must be clearly delineated.

12. Participants in the new switching arrangements will be expected to provide adequate early life support for the roles that they cover within the new switching arrangements to ensure that they function properly in the immediate post-'go live' period. Co-ordination of the support and interaction of parties at whole programme level may be overseen by a central body. The potential roles and responsibilities of such a central body will be explored in later iterations of this strategy once the detailed post-implementation approach is finalised.

13. Our initial assessment of these options would indicate that to adopt a 'do nothing' option, particularly for solution architecture options that result in significant change to current switching arrangements, is high risk, may disrupt the effective operation of the energy retail market and may be inimical to the benefits of faster, reliable switching being realised.

14. Our view is that proactive management and intervention to resolve early life issues via a planned and well managed post-implementation support period best balances risk mitigation with our assessment of cost and meeting the Switching Programme Design Principles. A detailed plan address the early life risks must be developed once these are better understood.

15. A strategy for the post-implementation period should only be finalised when there is certainty around the solution architecture and transition arrangements, and the testing regime they will be subject to, as these will significantly impact the level of risk to early life stability and therefore the amount of support which will be necessary.

Related Issues

16. As already noted above, there are many interdependent areas with post-implementation strategy in the context of the programme. The key areas are:

17. **Choice and design of solution architecture.** The extent of change involved in the building the switching solution will affect the extent and type of support required after go-live. If a 'do nothing' or 'do minimum' solution is adopted, the support required might be less than for a more complex solution.

18. **Transition strategy.** Either approach to transition will present a risk of early life issues: a 'big bang' approach would be likely to produce a single high peak of early life issues, which would require an appropriate apportion of resource to address, whereas a phased approach would produce multiple smaller peaks, requiring fewer resources, but for longer. A phased introduction of uses (i.e. by meter, fuel type or service type) could also prolong a period of instability.

19. **Testing strategy.** Fully resourced and well designed and managed test phases should reduce the risk of early life issues. A market trial, if adopted, could further reduce these issues. Conversely, if testing is curtailed due to time and resources, or issues identified in testing are not fixed prior to release, this risk will increase.

20. **Data Cleanse & Migration.** Many early life issues are likely to be associated with data integrity for the new arrangements which in turn will depend on how well data is cleansed and migrated from the current arrangements.

21. **Governance and Assurance in the Design, Build and Test phase and immediate post-implementation period.** Ideally, the Governance and Assurance arrangements for the DBT phase of the programme should be designed to be readily extensible into the early life period to enable enhanced support to be provided over and above 'steady state' Governance and Assurance arrangements until the service is sufficiently stable to allow handover to the 'steady state'.