

Switching Programme Change Request Form



Ofgem use only:

Change request No.	CR-E08	Current CR version:	0.3
Change request status:	Approved	Version date:	05/12/2018
Change Window:	9		

Please submit this completed form to the Ofgem Switching Programme PMO Team
(SwitchingPMO@ofgem.gov.uk)

Change Requestor's details – Change Requestor to complete

Name: Jenny Boothe/Kate Goodman

Organisation: DCC Switching Programme

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Telephone number: 020 3263 9818 / 07342 975 140

Please note that by default we will include the name and organisation of the Change Requestor in Switching Programme's published Change Log. If you do not wish to be identified please tick this box ☐

Change Title – Change Requestor to complete

Automated interface for forced registrations

Change summary – Change Requestor to complete

Background

During the normal course of events once a meter point becomes available the shipper will register against it. However, there are circumstances where shipper does not register the site in a timely fashion. The Gas Transporter (GT) must ensure a shipper is accountable at each site on its network and will undertake a forced registration should the shipper not do so.

Xoserve, on behalf of the GTs or otherwise in accordance with the UNC, currently register shippers at meter points in three circumstances:

1) To comply with Gas Safety Regulation.

GTs visit sites where a meter has been removed after 9 months to check if gas is still flowing. Where they find the meter is still there or a new one has been fitted, they inform the shipper and tell them to confirm the site. If the shipper does not confirm the site, Xoserve does this at the request of the GT. There have been 3,800 forced registrations Jan to Aug 2018

2) IGT auto confirmation

- Where a shipper is linked to a new connection on an IGT site, this information is notified by the IGT to Xoserve. If a meter, installer notifies Xoserve that a meter has been fitted then Xoserve will tell the recorded shipper to confirm the site. A shipper has 15WD to do so or Xoserve will register the site on their behalf. This is a new process introduced by Project Nexus. There were 6,400 forced registration Jan to Aug 2018.

3) UNC431 Reconciliation

- Shippers provide MPRN data to Xoserve on yearly basis for a reconciliation. The first reconciliation run took place in June 2018, which resulted in 2,600 forced registrations.

Given the current numbers of forced registrations it is not feasible for these to be managed by a manual process. Although it is anticipated that these numbers will reduce over time. Therefore, this CR is proposing that an automated arrangement be included within the new switching arrangements to enable a force registration to be reflected in the Central Switching Service.

Note that this CR is related to CR E09, which removes the supplier's ability to withdraw a forced registration.

Summary

The current design to support forced registrations is:

- Xoserve raises a ticket in CSS Service Management Service including all the necessary details of the forced registration (possibly contained within a file of pre-determined format) or by some other administrative means sends details of the required registration to the CSS operations team.
- CSS operations team staff submit the registration request to CSS via a direct interface.
- Once submitted, all processing carried out is the same as if the registration had been submitted by a supplier in the normal way (e.g. validation failure is notified to the supplier).

This was based on the projection of a very low volume of forced registrations. However, a short study has concluded that there will be a few thousand forced registrations per month and therefore this manual facility alone will not be sufficient. An automated facility will be needed instead of the manual process already specified.

It is also felt that notification of failure should not be sent to the relevant supplier but to the submitter of the registration and that this facility should be available only for initial registrations and not for switches.

The change required is that CSS (Registration Service):

- records the submitter of the registration and if the registration fails validation, a resulting error message is returned to the submitter (which in the case of a forced registration is UK Link and not the supplier)
- carries out an additional piece of validation to check that this is an initial registration and not a switch
- has a new interface with UK Link named ForcedRegistration, over which a forced registration may be submitted and which carries an error message back to UK Link should validation fail
- the ForcedRegistration interface message contains the same data elements as for an initial registration submitted by a supplier, including identification of the associated supplier and shipper.
- records that a registration is either a forced registration (CSS operator-submitted or UK Link-submitted) or a normal registration submitted by a supplier
- carries out an additional piece of validation upon receipt of a withdrawal request – that the withdrawal fails if the registration is a forced registration, in order that the supplier cannot subvert the forced registration process.

The concept of a forced registration does not apply to the electricity market.

- The D-10.2 CSS Service Management requirements to be updated to remove the following requirements as a need for a human interface is no longer necessary:
 - BSR008 The SP shall ensure that there is an human interface to enable the manual data entry of forced initial registration requests to the supplier interface.
 - BSR009 The SP shall only process forced initial registration requests once assigned a Service Management Request that has received approval from the governing body.

Note: Should the DCC be required to submit forced registrations they will need to qualify as an Enforcing Energy Supplier. This is not a requirement of DCC at this stage.

Justification for change – Change Requestor to complete

Volume of forced registrations is higher than originally anticipated and it is not appropriate to deal with this transaction volume solely in a manual way. We note that it is possible that the volume will decrease over time, for example in response to improvements in performance by shippers. We have asked Xoserve to raise this issue at the UNC performance assurance forum.

It is more appropriate to inform the submitter of the registration of a validation failure than to inform the implicated supplier.

Requested Decision Timing – Change Requestor to complete

Before the design enters into the procurement Best-And-Final-Offer (BAFO) stage, because any vendor participating in BAFO will be required to include this in its solution.

Programme Products affected by proposed change – Change Requestor to complete

D-4.1.2 E2E Detailed Design Models V2.0 22nd June 2018
 D-4.1.3 E2E Data Architecture and Data Governance V2.0 22nd June 2018
 D-4.1.5 E2E Solution Architecture V2.0 22nd June 2018
 D-4.2.1 CSS User Requirements Specification V2.0 22nd June 2018
 D-4.2.2 CSS Non-Functional Requirements V2.0 22nd June 2018
 D-10.2 CSS Service Management Requirements V1.0 22nd June 2018

Change Advisory Team (CAT) Lead:	Jenny Boothe
Contact details:	jenny.boothe@ofgem.gov.uk
PMO Lead:	Sharina Begum - Ofgem
Contact details:	sharina.begum@ofgem.gov.uk

Change Assessment Team – Initial Assessment (Triage)

Change has a Design Impact?
 Yes, the creation of a new interface between the CSS and Xoserve

Name: Jenny Boothe

Date: 27/09/18

Role: Design Lead

Change has an Implementation Impact (including Programme Plan)? Yes – a new interface to be designed, implemented and tested Name: Jenny Boothe Date: 27/09/18 Role: Design Lead	
Change has an Alignment Impact? No impact. Creating an additional interface between two already connect systems. Name: Jenny Boothe Date: 27/09/18 Role: Design Lead	
Change has a Commercial/Procurement Impact? Yes – a new interface will need to be created and implemented which will need to be articulated at the BAFO stage Name: Jenny Boothe Date: 27/09/18 Role: Design Lead	
Change has a Regulatory Impact? Yes - requirements will need to be captured in the REC Name: Jenny Boothe Date: 27/09/18 Role: Design Lead	
Change has a Security Impact? No – security protocols will not change with the implementation of this CR Name: Jenny Boothe Date: 27/09/18 Role: Design Lead	
Change IA Effort	Minor
Change Process Route	FULL
Change Window	6
To be submitted to the Design Forum on:	24 September 2018 01 October 2018 (Meeting)
Approval Authority:	Programme Manager (Chair DA)
Target Change Decision Date:	12 October 2018
Checked for completeness by: (Name & Role)	
Sharina Begum Switching PMO Manager, Ofgem	Date: 05/10/18

Impact Assessment – Overall	
The cost to industry will be minimal in that the CSS will incorporate this new interface in its design rather than requiring a change to the final design. Xoserve will also need to interact with this new interface and convey the necessary data in the correct format and , therefore may incur additional development and implementation costs	
Assessment completed By: (Name & Role)	Date:
Jenny Boothe	05/10/18

Impact Assessment – Resource Effort		
DCC will bear the cost to update the DB4 products would be 1FTE over a period of 3 days.		
Assessment completed By: (Name & Role)	Date:	
Kate Goodman - DCC	05/10/18	

Impact Assessment – Programme OBC		
<i><Insert/embed the assessment of impacts against the Programme's Outline Business Case (OBC), especially taking account of any costs and/or benefits to external parties.></i> Any additional costs should be minimal as the design will be amended before DBT		
Assessment completed By: (Name & Role)	Date:	
Jenny Boothe	05/10/18	

Impact Assessment –Programme Design & Architectural Principles		
Design Principle	Description	RAG Status & Summary
Impact on Consumers		
1 Reliability for customers	All switches should occur at the time agreed between the customer and their new supplier. The new arrangements should facilitate complete and accurate communication and billing with customers. Any errors in the switching process should be minimised and where they do occur, the issue should be resolved quickly and with the minimum of effort from the customer. The customer should be alerted in a timely manner if any issues arise that will impact on their switching experience.	This approach will enable a new gas RMP to be available to the retail market in a timely manner.
2 Speed for customers	Customers should be able to choose when they switch. The arrangements should enable fast switching, consistent with protecting and empowering customers currently and as their expectations evolve.	As above
3 Customer Coverage	Any differences in customer access to a quick, easy and reliable switching process should be minimised and justified against the other Design Principles.	All gas customers
4 Switching Experience	Customers should be able to have confidence in the switching process. The process should meet or exceed expectations, be simple and intuitive for customers and encourage engagement in the market. Once a customer has chosen a new supplier, the switching process should require the minimum of effort from the customer. The customer should be informed of the progress of the switch in a timely manner.	Having an accountable supplier in place will enable customers on a new site find out who the incumbent supplier is and make an informed decision on whether to switch
Impact on Market Participants		
5 Competition	The new supply point register and switching arrangements should support and promote effective competition between market participants. Where possible, processes should be harmonised between the gas and electricity markets and the success of the switching process should not be dependent on the incumbent supplier or its agents.	Ensures that accountability for an RMP and costs for gas provision are allocated to the appropriate supplier in a timely fashion

6 Design – simplicity	The new supply point register and arrangements should be as simple as possible.	This arrangement does add some additional complication to the new arrangements initially. However, it is envisaged that the poor behaviour of suppliers will be minimised over time.
7 Design – robustness	The end-to-end solution should be technically robust and integrate efficiently with other related systems. It should be clearly documented, with effective governance. The new arrangements should proactively identify and resolve impediments to meeting consumers' and industry requirements. These arrangements should be secure and protect the privacy of personal data.	This proposed change aims to provide an automated solution to meet a specific gas issue.
8 Design – flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	This change can be readily removed if no longer required.
Impact on Delivery, Costs and Risks		
9 Solution cost/benefit	The new arrangements should be designed and implemented to maximise the net benefits for customers.	This approach will ensure costs are levied at the appropriate supplier
10 Implementation	The plan for delivery should be robust, and provide a high degree of confidence, taking into account risks and issues. It should have clear and appropriate allocation of roles and responsibilities and effective governance.	N/A

Architectural Principle	Description	RAG Status & Summary
1 Secure by default & design	All risks documented & managed to within the tolerance defined by the organisation or accepted by the Senior Risk Owner	N/A
2 Future Proof Design	Common design approaches will better enable designs to support future developments e.g. A mechanism for achieving non-repudiation	N/A
3 Standards Adoption	Adopt appropriate standards for products, services or processes. e.g. ISO/IEC 11179 for data definition	N/A
4 One Architecture	One single definitive architecture prevails	N/A
5 Data is an asset	Data is an asset that has value to the enterprise and is managed accordingly	N/A
6 Data is shared & accessible	Users have access to the data necessary to perform their duties; therefore, data is shared across enterprise functions and departments.	N/A
7 Common vocabulary & data definitions	Data is defined consistently throughout the enterprise, the definitions being understandable and available to all users.	N/A
8 Requirements-based change	Only in response to business needs are changes to applications and technology made. E.g. only industry arrangements affecting switching will be impacted.	N/A
9 Quality Characteristics	Maintain a comprehensive set of quality characteristics by which to gauge the completeness of requirements for Applications and Services.	N/A

Summary: -

Assessment completed By: (Name & Role)	Date:

<Insert/embed the assessment of impacts against the Programme Plan. Ensure coverage of what the change does to programme timelines, taking into account impact on the procurement process, parties' implementation activities or diversion of programme resources?>

**Assessment completed By:
(Name & Role)**

Date:

Impact Assessment – Security

<Insert/embed the assessment of impacts against the Programme's Security Strategy and baselined security products.>

**Assessment completed By:
(Name & Role)**

Date:

Programme Recommendation

<Insert the Programme's recommendation for decision, note this could be a minded to decision in advance of Design Forum>

**Assessment completed By:
(Name & Role)**

Date:

Next Steps

<If the change is approved, insert a summary of next steps including which products are to be updated as a result of this CR and details of any stakeholder engagement required>

Note on deferred updates:

The following products are not critical for Project 1 (CSS Registration Service and Address Service) BAFO. Therefore, they will be updated in the new year:

- D-4.2.3 CSS Service Management and Operational Approach V1.0 28th March 2018
- D-10.2 CSS Service Management Requirements V1.0 22nd June 2018
- D-10.3 CSS Operational Requirements V1.0 22nd June 2018
- D-10.4 CSS Service Management Tools Requirements V1.0 22nd June 2018

Note on approach taken:

The CR suggested that a new interface is created to enable Xoserve to submit forced registrations in an automated manner. Upon further analysis, DCC concluded that creation of a new interface for this sole purpose would duplicate the functionality of an existing interface for a specific (low volume) scenario that in essence results in the same outcomes.

The decision was taken to address this at the Logical Data This was added to the data model as a specialisation of the Market Participant Role object. Within the Logical Data Model the introduction of the new object class Enforcing Energy Supplier builds naturally upon the existing object class Energy Supplier to fully embed the meaning of the required new concept into the existing data structure.

The Enforcing Energy supplier would utilise the existing interface (RegMgmtRequestSubmission) for forced registrations. The system would detect that this is a forced registration as the role code of the submitting organisation would be that of an Enforcing Energy supplier. Xoserve would be required to become an Enforcing Energy supplier licenced party to qualify for utilisation of this functionality.

The design was then further clarified in terms of routing the notifications to the correct supplier organisation. In a forced registration, registration request status updates go to the Enforcing Energy supplier through a newly introduced message type, while the status updates for the Registration go to the Gaining supplier. In a normal registration, both status updates go to the Gaining supplier using the existing message types.

An added benefit through this approach is that Xoserve would be able to, through proper governance, delegate the responsibility of Enforcing Energy supplier to other organisations. These organisations would need to become Enforcing Energy supplier licenced parties to qualify for this functionality.

The changes implemented as part of this CR address the requirements for CR-E09 which requires the system to prevent Gaining suppliers to withdraw Forced registrations. The Forced registration is submitted by an Enforcing Energy supplier, but the associated registration is created for a Gaining supplier; one that is not the Enforcing Energy supplier. This separation achieves the objectives of CR-E09.

Change Request Decision

<Insert the decision of the Approval Authority together with any conditions of the approval>

Change Approved:	Yes/No
Decision maker: (Name & Role)	Date: