

Switching Programme Change Request Form



Ofgem use only:

Change request No.	CR-E15	Date CR submitted	28/09/18
Change request status:	Withdrawn	Current CR version:	V0.2
Change Window:	7	Version date:	15/03/2019

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: Elisabeth Rekker

Organisation: Gemserv Ltd

Email address: FSEG@hotmail.com

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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

Retrospectively updating MPAN's Import/Export Indicator

Change summary – Change Requestor to complete

It has been identified that the Central Switching Service (CSS) design assumes that the electricity supply (either import or export) to a premise will not change in the lifetime of the Meter Point Administration Number (MPAN). This is not reflective of the demands made by customers nor does it reflect the functionality currently in operation. The current CSS design assumption is essentially a retrograde step, which will impact customers and the ability of the Industry to serve and meet their needs, if the design requirement is carried through to other central systems.

The change requested is to allow the Distribution Network Operators (DNOs) to update CSS with the import and export status of a supply via the Meter Point Administration Service (MPAS) in any data refresh as changes to the import / export Statuses are made. This will ensure that the enduring processes can continue outside of the CSS and ensure that the CSS continues to remain synchronised with MPAS.

Additionally, as the import / export status will be derived by an enduring DNO attribute, LLFC (line Loss Factor Class) ID for pricing, billing and settlement and not related to switching, a change is requested to continue refreshing the Electricity Central Online Enquiry Service (ECOES) with this information directly from MPAS rather than from the CSS.

Justification for change – Change Requestor to complete

As the electricity needs of customers change; customers are changing the configuration of the electricity supplies at their premises, to enjoy the export opportunities through solar, wind and battery storage facilities and the import opportunities from peer to peer trading. Consequently, the import / export indicator at any Registered Meter Point (RMP) needs to be updated to accurately reflect the supply situation at their premises when changes occur. The expectation is

that the need to change the import / export indicator is highly likely to increase in the future, with the increasing local renewable generation opportunities.

If the policy in the industry (driven by the design of the CSS) is to NOT allow changes to the import / export status once set, this will hinder suppliers' abilities to serve and bill their customers correctly and may become a barrier to disrupter organisations who offer innovative supply solutions and more localised supply opportunities.

The industry solution to ensure systems correctly reflect the customers' import / export configuration at their premises would probably require the logical termination of an MPAN and the creation of a new MPAN for the same physical supply. This rectification would delay the customers initial bill for the supply, and may result in confusion to the customer, by receiving a closing bill for the old MPAN followed by an opening bill for a new MPAN. Additionally, the industry would have to work together to agree the design and the additional consequential changes for existing central, DNO and supplier systems.

Any change in MPAN would also have to be highlighted to the customer to ensure there would be no consequential effect on their switching experience. Customers may inadvertently refer to the old bill as part of their switching actions and attempt to switch the old MPAN rather than the new. This would lead to unnecessary confusion and delay for that customer. The possibility of this risk can be mitigated by implementing this change.

Requested Decision Timing – Change Requestor to complete

The decision on this change is needed as soon as possible to provide clarity on:

- Industry workload in respect of redesigning the current process to update the import / export status, reflecting the implied policy intent of the CSS design.
- Workload and impacts on all central systems (that will remain post the delivery of the CSS) in implementing the CSS design intent
- Workloads and impacts on the systems of all DNO and supplier parties and their agents.

Programme Products affected by proposed change – Change Requestor to complete

Solution architecture document D-4.1.5

Detailed Switching Design Repository (ABACUS) (<https://dcc2-pub.avolutionsoftware.com/Switchingbaseline>)

Please note that this is not exhaustive and there could be subsequent changes in other associated documents.

Change Advisory Team (CAT) Lead:	Name and organisation:
Contact details:	Email address:
PMO Lead:	Name: Sharina Begum - Ofgem
Contact details:	Email address: sharina.begum@ofgem.gov.uk

Change Assessment Team – Initial Assessment (Triage)	
<i>Please provide a summary of the initial assessment made by the Change Advisory Team (CAT) which includes Ofgem PMO, Design, Implementation, Alignment, Commercial, Regulatory and Security Workstream Leads and DCC.</i>	
Design Impact and resource input required for IA?	
Implementation Impact (including impacts to industry readiness, procurement timelines and the Programme Plan) and resource input required for IA?	
Alignment Impact and resource input required for IA?	
Commercial/Procurement Impact and resource input required for IA?	
Regulatory Impact and resource input required for IA?	
Security Impact and resource input required for IA?	
Confirm Programme Products impacted by the change request?	
Major or Minor Change?	<Major – Minor> [assessment of effort to complete IA, FTE impact for implementation of change or assessment of consequential impacts]
Change Process Route	<Full – Abridged – Prioritised>
Change Window	<Could be revised based on IA effort>
To be submitted to the Design Forum on:	<Paper Date> <Date of Design Forum>
Approval Authority:	<Programme Manager, Programme Director, SRO, Chair - Design Authority, Security Board>
Target Change Decision Date:	<Date of Approval Authority meeting>
Checked for completeness by: (Name & Role)	Date:

Impact Assessment – Overall	
<p><i><Insert/embed a summary of overall impacts resulting from the change, for example industry/consumer costs and benefits etc.</i></p> <p><i>Ensure coverage of Benefits - what will be achieved by making the change, who do those benefits accrue to; Costs - what sort of cost will be imposed as a result of the change, who will those costs fall to, what impact does that have on the business case, is there a clear cost benefit equation?></i></p>	
Assessment completed By: (Name & Role)	Date:

Impact Assessment – Resource Effort	
<i><Insert/embed the resource costs in £ or FTE required to enact the change e.g. update documents etc. Covering - Who will bear the costs of making the change? Is resource available to do the work on the required timescales? Does the change significantly divert resource in the programme or within industry away from established plans.></i>	
Assessment completed By: (Name & Role)	Date:

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>	
Assessment completed By: (Name & Role)	Date:

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.	
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.	
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.	
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.	
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.	
6 Design – simplicity	The new supply point register and arrangements should be as simple as possible.	
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.	
8 Design – flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	
Impact on Delivery, Costs and Risks		
9 Solution cost/benefit	The new arrangements should be designed and implemented so as to maximise the net benefits for customers.	
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.	

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	
2 Future Proof Design	Common design approaches will better enable designs to support future developments e.g. A mechanism for achieving non-repudiation	
3 Standards Adoption	Adopt appropriate standards for products, services or processes. e.g. ISO/IEC 11179 for data definition	
4 One Architecture	One single definitive architecture prevails	
5 Data is an asset	Data is an asset that has value to the enterprise and is managed accordingly	
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.	
7 Common vocabulary & data definitions	Data is defined consistently throughout the enterprise, the definitions being understandable and available to all users.	
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.	
9 Quality Characteristics	Maintain a comprehensive set of quality characteristics by which to gauge the completeness of requirements for Applications and Services.	

Summary: -

Assessment completed By: (Name & Role)	Date:
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Impact Assessment –Programme Plan	
<p><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?></p>	
Assessment completed By: (Name & Role)	Date:

Impact Assessment – Security	
<p><Insert/embed the assessment of impacts against the Programme's Security Strategy and baselined security products.></p>	
Assessment completed By: (Name & Role)	Date:

Programme Recommendation	
<p><Insert the Programme's recommendation for decision, note this could be a minded to decision in advance of Design Forum></p>	
Assessment completed By: (Name & Role)	Date:

Next Steps
<p><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></p>

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: