Switching Programme
Change Request Form

Ofgem use only:

Change request No.	CR-E14	**Date CR submitted**	28/09/18
Change request status:	In Triage	**Current CR version:**	V0.1
Change Window:	7	**Version date:**	28/09/18

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

Telephone number: 020 7090 1029

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

CSS Address Format

Change summary – Change Requestor to complete

At the Faster Switching Expert Group meeting held on 9th August 2018, an issue was noted about the difference in the address format between that proposed for the Central Switching Service (CSS) and that used within all electricity systems currently. Specifically there is a difference in the number of address lines being proposed for the CSS versus what the industry currently uses (See Appendix).

The concern raised is that the proposed MeteringPointSync Interface (between the Meter Point Administration Service (MPAS) and CSS) has eight lines allocated for address information. Currently the electricity industry has commonly adopted a nine line + post code address template for their interfaces (Nework Operators, Suppliers and Balancing and Settlement(BSC) Agents)

This Change Request proposes that this same standard is adopted for the Meter Point Address in the CSS MeteringPointSync Interface (and therefore within the CSS). This would require an additional line to be added to the address format specified.

The extract below shows how the address is defined within the MRA currently:

1.6.3 References to a Metering Point Address within this MAP include (as appropriate) the following defined elements, as defined in the PAF or otherwise identified:

Metering Point Address Line 1	being a free text field
Metering Point Address Line 2	being the sub-building name and/or number
Metering Point Address Line 3	being the building name and/or number
Metering Point Address Line 4	being the dependant thoroughfare as defined within the PAF, or otherwise identified
Metering Point Address Line 5	being the thoroughfare as defined within the PAF, or otherwise identified
Metering Point Address Line 6	being the double dependant Locality as defined within the PAF, or otherwise identified
Metering Point Address Line 7	being the dependant Locality as defined within the PAF, or otherwise identified
Metering Point Address Line 8	being the Locality as defined within the PAF, or otherwise identified
Metering Point Address Line 9	being a county
Metering Point Address Postcode	being the Postcode as defined within the PAF, or Outcode where no Postcode is available from the PAF

Figure 1 MRA Meter Point Address (MAP 9):

Justification for change – Change Requestor to complete

As Meter Points refer to premises and address information is fundamental to identifying these accurately, it is important that the integrity and accuracy of the address data is not impacted by the delivery of the Switching Programme.

If the change is not made then all industry systems, both central systems and those within parties will need to be changed. Alternatively a mapping process could be applied to ensure that address data can be moved between systems. Both solutions would lead to additional costs on all parties and might also impact the integrity of the address data.

The result of this Change Request would be to avoid these potential costs, by building the CSS and the CSS Metering Point Address Interface ahead of implementation to the industry standards currently used. This would also limit the system changes required by parties and centrally, thereby reducing implementation risk and data integrity risks.

Further Industry impact:

To reduce the current nine line addresses to eight lines will require additional work from the industry over and above what is currently anticipated. It will be important that the mapping that will be required is conducted in a standard manner. Essentially, the Industry will have to agree logical algorithms and rules for when and how nine address lines will be fitted into the eight line interface. It is likely this will require considerable industry engagement; additional industry meetings and potentially further changes. The agreement of these algorithms and rules would place additional and significant time pressures on parties, alongside those present due to the roll out of the CSS.

Customer impact:

Mapping exercises that reduce the granularity of data will reduce the quality of the data and the risk may be that the mapping is detrimental to it. Any detrimental impact to address data will impact customers and this may manifest itself by increasing erroneous transfers, increasing the time taken to verify a customer's address and thereby slowing registrations or impacting on-site services provided by supplier agents, such as fitting smart meters.

If rules and algorithms cannot be agreed, or if this takes longer than anticipated, this could have considerable customer impact. Addresses could end up being incorrect in systems or not the same in all systems and this could have negative effects for customers.

Migration impact:

Data cleanse activities could be negatively affected and deteriorated by addresses being incomplete or incorrect.

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 data mapping and data migration.
- Workload and impacts on all central systems that will remain post the delivery of the CSS, to identify mechanisms to ensure Industry address data Integrity.
- Workloads and impacts on the systems of all supplier parties and their agents.

Programme Products affected by proposed change – Change Requestor to complete

D-4.2.6 CSS Data Migration Plan (v2.0; published on 22 June 2018)

D-4.1.5 E2E Solution Architecture (v2.0; published on 22 June 2018)

Please note that this list 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)

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.

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

<Insert/embed a summary of overall impacts resulting from the change, for example industry/consumer costs and benefits etc.

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?>

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

Impact Assessment – Resource Effort

<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.>

Assessment completed By: (Name & Role)	Date:

Impact Assessment – Programme OBC

<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.>

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:**

Impact Assessment –Programme Plan

<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>

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:**