

# Switching Programme Change Request Form



Ofgem use only:

<b>Change request No.</b>	CR-E19	<b>Date CR submitted</b>	19 October 2018
<b>Change request status:</b>	Approved	<b>Current CR version:</b>	0.1
<b>Change Window:</b>	9	<b>Version date:</b>	19 October 2018

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

## Change Requestor's details – Change Requestor to complete

Name: Ofgem  
 Organisation: Ofgem  
 Email address: [jenny.booth@ofgem.gov.uk](mailto:jenny.booth@ofgem.gov.uk)  
 Telephone number: 0203 263 9818

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

Non-qualified supplier loss notification

## Change summary – Change Requestor to complete

<Please provide an explanation of the change to be made. Please include details of any dependencies and impacts of the change if known e.g. likely timescales and costs, should the change go ahead>

- We want to ensure that when a consumer switches, the losing supplier receives the information it needs to trigger its activity to close down the consumer's account and meet its other obligations and commercial requirements.
- There is no defined process under the CSS logical design currently for a losing supplier to receive this information where:
  - it has not passed UEPT in preparation for go-live of the new switching arrangements or,
  - During enduring operation, if there is a need to repeat some form of UEPT, for example following a major upgrade to central systems.
- We propose that suppliers should have two independent mechanisms that would allow them to get this data.
- Firstly, we propose to clarify that suppliers who are currently operating in the market will, if they have a valid network connection, be sent loss notification messages by the CSS. They will be sent this information if they have a valid network connection, regardless of whether they have passed UEPT and is "Qualified". To do this we will clarify that the relevant loss notification message is sent to a supplier, regardless of whether it is Qualified. The CSS will not accept any messages sent by the supplier that is not Qualified.
- Secondly, a supplier will be able to request daily or weekly reports from the Switching Operator. We propose to make these reports available to suppliers regardless of whether they are qualified. We believe that reports should be made available to

suppliers in three instances; if the CSS has evidence that loss notification messages are not being received by the supplies (i.e. receipts not provided), if the supplier self-declares that it wants the reports, and at cut-over for suppliers that have not passed UEPT. These reports would provide the required information contained within a loss notification. The Switching Operator will obtain this information from the CSS and send it via a secure communication mechanism, to the losing supplier. This information would be made available to suppliers over the Switching Portal. Access to the Switching Portal will be defined in an Access Matrix and this will need to ensure that non-Qualified suppliers can access these reports. We welcome views on whether a supplier should to pay any associated charges for the provision of these reports.

- As noted above, the CSS will not accept inbound messages from a supplier that has not passed the testing required for go-live and is not Qualified to operate with the CSS. For new entrants after go-live, the arrangements for becoming Qualified will be described in the REC Entry Assessment and Qualification Schedule which is currently being consulted on. For go-live, we propose that a REC Party that is currently operating in the market will be deemed to be Qualified if it has passed the necessary UEPT during the DBT Phase.
- We do not yet know what a supplier must do to demonstrate that it has a valid network connection so that they can receive loss notification messages from the CSS. We expect to be able to clarify this once the CSS has been procured. We expect that messages will be sent to the gateway requested by the supplier based on the supplier's MPID.
- An alternative approach would be to consider prioritising the elements of UEPT that focus on a supplier being able to receive loss notification messages from the CSS. In this alternative, messages would only be sent to a supplier if it had passed this element of UEPT. We have rejected this proposal, as it would require unnecessary additional functionality on the part of the CSS to record which suppliers had in effect partially qualified.
- We note that other parties that receive messages from the CSS will not need to be Qualified or to have passed UEPT. For example, MAPs. However, we expect that a test environment will be made available for such parties. For shippers, who are not parties to the REC, we expect a test environment to be made available and for Programme Assurance to ensure that they have appropriate arrangements in place to receive notifications of a change in their responsibilities. This might be via the CSS directly or from their supplier.

New requirements:

The D-10.2 CSS Service Management requirements to be updated with new requirements:

- The Registration Service Provider shall facilitate the generation of daily reports that set out all the RMPs that are subject to a loss notification for an Energy supplier that is unqualified in the CSS system at the date and time when a 'invitation to object' is generated from the CSS system.

The Registration Service Provider shall provide an automated facility that transmits generated loss notification reports from the Registration Service to Energy suppliers.

### **Justification for change – Change Requestor to complete**

<Please provide your business case for why the change is necessary and any consequences of not making the change>

- If the losing supplier does not receive a loss notification then there are significant risks to consumer service. For example,
  - Risk of double billing
  - As the supplier that has not qualified cannot initiate a switch, there is no mechanism to return a consumer that has been erroneously switched.

- No trigger for the losing supplier to send a "sorry to see you go" communication to the consumer – which is likely to be confusing to the consumer and cause a poor switching experience.
- Meter exchanges commissioned by old supplier
- For the supplier, there are likely to be other required processes that will not be triggered without a loss notification. For example, electricity settlement, agent de-appointment, ceasing communication with a smart meter etc.
- One option would be to wait until all suppliers have passed the required testing needed to send and receive messages with the CSS. Our stated policy is that we do not want the benefits of the Switching Programme to be delayed because some suppliers are not ready. Instead, we want to make sure that suppliers are able to lose customers effectively in the market. We believe that our proposals meet that aim.
- We have assessed and discarded the following options:
  - **Do nothing:** As described above, we do not think that this meets consumer requirements and will have a risk for suppliers (including those that have passed testing and are qualified to operate in the market). Note that this was the approach adopted for Project Nexus.
  - **CSS provide loss notification over a temporary interface:** We think that setting up and testing a separate interface would be inefficient and is likely to be an unnecessary increase in the workload of suppliers who are looking to progress through the standard entry process and testing.
  - **Retain loss notification messages from MPAS and UK Link:** At the Design Forum there was some support for this approach. However, the main concern was the potential cost of running two systems at the same time and changes needed to ensure that the choreography of information being sent to suppliers met their requirements.
  - **Sourcing data from ECOES and DES:** Suppliers could search ECOES and DES on a regular basis to see where they are losing or have lost a consumer. However, this is unlikely to be an efficient approach. ECOES and DES are not currently set up to push reports to suppliers and, were such a change to be made, suppliers would still need to interrogate these reports and input them into their systems. This alternative way of capturing data is likely to increase the workload of suppliers who are likely to trying to complete entry processes and testing at the same time.

**Requested Decision Timing – Change Requestor to complete**

<Please provide your business case for why the change is necessary and any consequences of not making the change>

A decision is required as soon as possible so that the change can be fed into the procurement process before BAFO.

**Programme Products affected by proposed change – Change Requestor to complete**

<Please outline which product(s) are expected to be impacted by the proposed change. You **must** include the relevant product version number(s) and publication date(s) here. If possible, can you please also identify which section(s) of the document(s) would need to be changed>

D-10.2 CSS Service Management Requirements

<b>Change Advisory Team (CAT) Lead:</b>	Name and organisation:
<b>Contact details:</b>	Email address:

<b>PMO Lead:</b>	Name: - Ofgem
<b>Contact details:</b>	Email address:

### 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?**  
 Our proposal is expected to have a minimal impact on the design and IA. It utilises the proposed standard messages from the CSS and the proposed reporting functionality of the CSS. It is not expected that the costs of providing reports to suppliers will be high, in particular if the Switching Portal is the method of providing data.

**Implementation Impact (including impacts to industry readiness, procurement timelines and the Programme Plan) and resource input required for IA?**  
 This change is expected to support delivery by allowing a go-live decision when some suppliers have not passed UEPT.

**Alignment Impact and resource input required for IA?**  
 None

**Commercial/Procurement Impact and resource input required for IA?**  
 None

**Regulatory Impact and resource input required for IA?**  
 The regulatory framework may need to be updated to reflect the proposed new requirements for reporting.

**Security Impact and resource input required for IA?**  
 We will need to ensure that any reports are provided over a secure medium. We will also need to review any security and data protection issues that may arise from the provision of data to suppliers that have not been through UEPT.

**Confirm Programme Products impacted by the change request?**

<b>Major or Minor Change?</b>	Minor
<b>Change Process Route</b>	Full
<b>Change Window</b>	8
<b>To be submitted to the Design Forum on:</b>	22/10/18 29/11/18
<b>Approval Authority:</b>	DA
<b>Target Change Decision Date:</b>	09/11/18

<b>Checked for completeness by: (Name &amp; Role)</b>	<b>Date:</b>
<b>Andrew Amato</b>	02/11/18

### 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?>

The four key benefits of this change are:

- Suppliers that have not Qualified and have not passed the testing needed for go-live will receive the data that they require to service customers.
- Customers of those suppliers that have not completed testing will not be unduly disadvantaged.
- The change can be delivered with minimal change to services that are being procured and the DB4 design
- The proposal will mitigate risks with any decision to go-live with new switching arrangement (and for any future change programmes)

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### 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.>

1 FTE over two days

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### 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.>

No impact anticipated

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### Impact Assessment – Programme Design & Architectural Principles

Design Principle	Description	RAG Status & Summary
<b>Impact on Consumers</b>		

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.	Supports a reliable switch experience for consumers by providing the losing supplier with the info needed to close the customer's account.
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.	Our expectation is that data should be provided to a losing supplier that are not Qualified in time for it to be able to trigger the activity needed to close a consumer's account. We think that this would be support a 5WD switch and we welcome views on when information would be needed to support a next day switch.
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.	The proposal supports fast and reliable switching for all consumers, regardless of whether their current supplier has been Qualified.
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.	Should support a positive switching experience for consumers
<b>Impact on Market Participants</b>		
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.	This change will provide gaining suppliers with confidence that they will not need to manage problems that arise from the losing supplier not closing the customer's account.
6 Design – simplicity	The new supply point register and arrangements should be as simple as possible.	We have sought to limit any changes from the current design
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.	We expect suppliers to work with Programme Assurance to determine whether they will be Qualified in, time for go-live and have in place appropriate contingency arrangements to receive and process reports provided over a secure mechanism such as the Switching Portal.
8 Design – flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	We think that such an approach could be considered for future CSS change programmes. Its suitability would need to be assessed at the time and would depend on the specifics of the changes being made.
<b>Impact on Delivery, Costs and Risks</b>		
9 Solution cost/benefit	The new arrangements should be designed and implemented so as to maximise the net benefits for customers.	Expected to be low
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.	Supports a decision to go-live by mitigating risks for consumers and industry

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: -**

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### 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?>

Supports delivery plan

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### Impact Assessment – Security

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

As noted above - We will need to ensure that any reports are provided over a secure medium. We will also need to review any security and data protection issues that may arise from the provision of data to suppliers that have not been through UEPT.

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### Programme Recommendation

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

Approve

<b>Assessment completed By: (Name &amp; Role)</b>	<b>Date:</b>
Andrew Wallace	02/11/18

### 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>

<b>Change Approved:</b>	<b>Yes</b>
<b>Decision maker: (Name &amp; Role)</b>	<b>Date:</b>
Arik Dondi Chair, DA	02/11/18

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