

Switching Programme Change Request Form

Part A – For the requestor to fill in

Change Requestor's Details

Name: Paul Harding
 Organisation: Data Communications Company
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 Telephone number: 07891 265695

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

Amendment to the geographic location of SP provided services in D-10.2 Service Management Requirements spreadsheet V1.0

Change Summary

Introduction

During the tender for Project 1 (Service Management requirements for Address and Registration Service) we spotted an inconsistency between the document sets D-10.2 Service Management Requirements (SM009) and CSS Security Approach Requirements (DCC_PS04).

A clarification response has already been issued to correct this and this CR is to ensure that the D-10.2 Service Management Requirement spreadsheet is update and aligned to ensure its clear to the CSS Providers.

To remove the inconsistency between the D-10.2 Service Management requirements and with Part F, 8.15 of the Smart Meter Communication Licence (See below) the below change is required.

D-10.2 Service Management requirements - SM009 Current wording

All services, for which the SP is responsible for, shall be managed and carried out within the GB or the European Union.

Smart Meter Communication Licence - Part F: Legal and operational location of the Licensee

8.15 The Licensee must at all times:

- (a) remain a company that is incorporated in the European Economic Area;*
- (b) procure the SMKI Service (within the meaning that is given to that term in Schedule 5 to this Licence), except to such extent as is otherwise permitted by the SEC, from*

Relevant Service Capability the provision and management of which are carried on within the United Kingdom; and

(c) ensure that all sites and systems that the Licensee relies upon to detect and prevent events that:

(i) appear to be anomalous; and

*(ii) may have the potential to impact on the Supply of Energy to Energy Consumers, **are configured, operated, and maintained within the United Kingdom.***

Instead of referring to the solution being hosted, operated and maintained in Great Britain and EU, it should simply state UK.

SM009 Wording to be changed to (red text is the change):

All services, for which the SP is responsible for, shall be managed and carried out within the United Kingdom.

Change Effort

It is anticipated that making the changes will take around 1 hour for a DCC Service Architect.

Change Cost

There should not be any cost associated with this change as the clarification has already been made to the bidders and this is to bring the requirements in line with the current understanding.

Change considerations & viewpoint

Please provide your considerations and views on change using information available to you and stakeholders you have engaged.

Priority assessment for Change Request

A Must; the final deliverable will not work without this change

This change is required to align the requirements with DCC's wider security policy that stipulates the service must be operated from the UK. Without this requirement, the service will not be security compliant and will therefore not be approved. This update is to be issued as a clarification but is to be approved in time for BAFO.

Base reason for Change

Security - Changes to security products

Change needed to ensure that any proposed solution is DCC security compliant.

<p>Rating of Change implementation</p> <p>MEDIUM - Significant consequences requiring redesign or rework; Significant cost impact ; Significant impact to schedule</p>	<p>Making the change to the requirement is straightforward, however there are significant cost and operational consequences for bidders if their solutions do not comply with the DCC's need for a UK-based service.</p>
<p>"Do nothing" implications</p>	<p>The solutions proposed by bidders will not be compliant with DCC's security policy. This will either incur additional time rework the solution and add to the estimated cost of the solution if they cannot support an exclusively UK-domiciled solution. This has been mitigated by way of a clarification response issued to bidders.</p>
<p>Potential stakeholders affected by the Change</p>	<p>Industry Stakeholders will be consulted on the change. CSS Service Provider bidders</p>
<p>Alternative sought to reduce negative impact</p>	<p>DCC has provided the Security policy and requirements separately as part of the tender packs. This has been mitigated by way of a clarification response issued to bidders.</p>
<p>Identify any risks to the implementation of the Change</p>	<p>The main risk around making the change is that it could increase the cost to provide the solution if they cannot support an exclusively UK-domiciled solution. This has been mitigated by way of a clarification response issued to bidders.</p>
<p>Specialists and/or stakeholders consulted</p>	<p>DCC Security</p>

<p>Justification for Change</p>	
<p>After the tenders were issued to bidders we identified an inconsistency between the Service Management requirements and the DCC security policy.</p> <p>The changes to the requirements are needed to ensure that the proposals submitted by bidders are compliant with DCC's security policy.</p> <p>The impact of not approving these changes are that the bidders will be preparing their solutions and cost estimates on the basis of incorrect assumptions. These will then have to be revised, which will negatively impact on the bidders' original cost estimates and potentially force them to drop out. This has however been mitigated by way of a clarification response.</p>	

Programme Products affected by proposed change

D-10.2 – Service Management Requirements (requirements spreadsheet)

Please submit this completed form to the Ofgem Switching Programme PMO Team (SwitchingPMO@ofgem.gov.uk) with the subject as the Change Request number and title.

Part B – For Ofgem Use Only

Change request No.	CR-E29	Date CR submitted	13/12/18
Change request status:	Approved	Current CR version:	0.2
Change Window:	13	Version date:	21/12/18

Change Advisory Team (CAT) Lead:	Name and organisation: Jenny Boothe - Ofgem
Contact details:	Email address: jenny.boothe@ofgem.gov.uk
PMO Lead:	Name: - James Hardy
Contact details:	Email address: james.hardy@ofgem.gov.uk

Initial assessment/Triage	
<i>Please provide a summary of the initial assessment, detailing any changes made by the Change Advisory Team (CAT) which includes Ofgem PMO, Design, Implementation, Alignment, Commercial, Regulatory and Security Workstream Leads and DCC.</i>	
Design & Data Impact and resource input required for IA? N/A	
Implementation Impact (including impacts to industry readiness, procurementA timelines and the Programme Plan) and resource input required for IA? N/A	
Alignment Impact and resource input required for IA? N/A	
Commercial/Procurement Impact and resource input required for IA? N/A	
Regulatory Impact and resource input required for IA? N/A	
Security Impact and resource input required for IA? N/A	
Confirm Programme Products impacted by the change request? N/A	
Major or Minor Change?	Minor

Change Process Route	Standard
Change Window	13
To be submitted to the Design Forum on:	09/01/19 16/01/19 (Meeting)
Approval Authority:	Chair - Design Authority
Target Change Decision Date:	29/01/19
Checked for completeness (Name & Role):	Date:
Jenny Boothe	18/01/2019

Impact Assessment

Green - Requestor to complete

Orange – Ofgem to complete

Blue - Impact Assessment Team to complete

The change to the requirements are needed to better reflect DCC's security obligations, and to provide prospective bidders more clarity on how where their service must be configured, operated, and maintained.

From a cost perspective, this change will give bidders more information for ensuring they meet the requirements when proposing their solution.

Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

Impact Assessment – Industry cost

This will not have any impact on Industry costs as this is an established requirement on DCC that has been provided to the bidders to ensure they are fully aware of the security requirements. This change is to bring the requirements in line with the clarification responses.

Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

Impact Assessment – Resource Effort

It is anticipated that making the changes will take around 1 hour for a DCC Service Architect. Cost of change is zero as only the DCC SMS requirements is to be changed.

Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

Impact Assessment – Programme

This will not have an impact on the programme as this change is to bring the requirements in line with the clarification responses.

Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

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.	N/A
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.	N/A
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.	N/A
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.	N/A
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.	N/A
6 Design – simplicity	The new supply point register and arrangements should be as simple as possible.	N/A
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 change will ensure that all end-to-end solutions are configured, operated, and maintained within the UK.
8 Design – flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	N/A
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.	N/A

Green - Requestor to complete

Orange – Ofgem to complete

Blue - Impact Assessment Team to complete

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
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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	This change is to meet with the DCC Security Requirements.
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	This is to ensure that data is configured, operated, and maintained within the UK.
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: - This change is to ensure that the architecture is held within the UK

Checked for completeness (Name & Role): 18/01/19	Jenny Boothe	Date:
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Impact Assessment – Data cleansing / migration		
N/A		
Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

Impact Assessment – Programme Plan
N/A

Green - Requestor to complete

Orange – Ofgem to complete

Blue - Impact Assessment Team to complete

Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

Impact Assessment – Security		
<i>This change is a result of identifying a mismatch between the D-10.2 Service Management Requirements (SM009) and CSS Security Approach Requirements (DCC_PS04) documents. This change is required to ensure alignment and compliance with the DCC license.</i>		
Checked for completeness (Name & Role):	Jenny Boothe	Date: 18/01/19

Programme Recommendation	
<i>Approve</i>	
Checked for completeness (Name & Role):	Date:
Jenny Boothe	18/01/2019

Change Request Decision	
<i>Approved by Design Authority</i>	
Changed Approved:	Yes
Decision Maker (Name & Role):	Date:
Arik Dondi, DA	29/01/2019

Next Steps		
<i><If the change is approved, insert a summary of next steps here including which products are to be updated as a result of this CR and details of any stakeholder engagement required. Complete the table below detailing agreed timescales for product update, review & approval></i>		
D-10.2 – Service Management Requirements (requirements spreadsheet)		
If Change Request is approved:-	Role	Date
Products updates to be completed by:	DCC	15/02/2019
Ofgem review dates:		28/02/2019
Product approval to be completed by:	Ofgem	28/02/2019

Green - Requestor to complete

Orange – Ofgem to complete

Blue - Impact Assessment Team to complete