

## Switching Programme Change Request Form

### Part A – For the requestor to fill in

#### Change Requestor's Details

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Organisation: On behalf of Ofgem

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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

Switching Domain Data Management

#### Change Summary

The drafting of the REC Data Management Schedule (DMS) and the Abacus baseline design related to the processes and management of Switching Domain Data (SDD) is at present incomplete and requires further detailed design.

A review within the Switching Programme has taken place to further elaborate the design of the data and end to end processes which support SDD, this included a review of the required CSS Messages and interactions between Elexon, Xoserve, REC Code Manager, CSS and other Market Participants.

##### Summary of Current High-Level Design:

**SDD can be categorised as being composed of 4 types of data, which require different processes, governance arrangements and privacy controls:**

##### 1. Management of Market Participant Role identifiers and Energy Companies

This data is key reference data within the current and future market arrangements and is utilised across the end to end market processes including settlements, agent appointments and transportation. The mastership of this data will not change from Elexon and Xoserve. Those two parties will need to make that data available within the CSS to support switching activities.

Energy Companies can perform a number of roles, such as gas Supplier, electricity Supplier or gas Shipper, in addition Energy Companies may also hold a number of licences for the same role, in each instance this is uniquely identified via the Market Participant Role identifier.

- 1) Elexon will master all electricity Market Participant Role Identifiers and Energy Company data.
- 2) Xoserve will master all gas Market Participant Role Identifiers and Energy Company data.

## Proposed changes to support effective management of Market Participant Role identifiers and Energy Companies

Currently the Abacus Logical Data Model (LDM) and CSS Message Model (MM) contains data elements and messages required to support the provision of this data between Market Participants.

However, several defects have been identified with the message structures, data element contents and source and target services.

The following recommendations for changes are made to more effectively manage this data type:

- 1) MM: Create a single message containing Market Participant Role and Energy Company.
- 2) MM: Remove the current Market Participant message from the model as a Market Participant is not a unique entity (it only becomes unique when combined with a Market Role to create a Market Participant Role).
- 3) MM: Remove the current source of related messages being the CSS and all Market Participants being the target services for these messages.
- 4) Solution Architecture (SA): Update to define the new mastering services to replace generalised 'Governance Data Service', to include REC Code Manager Service and BSCCo Data Service.
- 5) Data Services Landscape (DSL): Update to define the new mastering services to replace generalised 'Governance Data Service', to include REC Code Manager Service and BSCCo Data Service.
- 6) Abacus Process Map (APM): Create Process Map (or update process 2.19 to include) management of Market Participant Roles.
- 7) Abacus ISD (ISD): Create ISD for management of Market Participant Roles.
- 8) Non-Functional Requirements (NFR): Update NFR to include BSCCo Data Service where appropriate.
- 9) User Requirements Specification (URS): Update NFR to include BSCCo Data Service where appropriate.
- 10) MM and Data Management Schedule (DMS): Introduce a direct message from the data master to the CSS to maintain this data. This is to align with the principle that the data master should have control of the data quality via a direct provision to the CSS. This change would require:
  - i. MM: Elexon to CSS Market Participant Data (MPID, Market Role and Energy Company) message.
  - ii. MM: Xoserve to CSS Market Participant Data (MPID, Market Role and Energy Company) message.
  - iii. DMS: Interface timetable to be changed to reflect the new process flows and messages.
  - iv. DMS: Change defined terms in the DMS from 'Switching Data Element and Switching Object Class' to 'Switching Domain Data Item' and 'Switching Domain Data Type' respectively'.

This CR recommends that the CSS supports direct messaging from both Xoserve and Elexon to the CSS to maintain this data. Both parties currently have industry messaging capabilities via the IX and DTN respectively. These interfaces will ensure that the data masters have direct access to the CSS to maintain the data and ensure that the data is always current and of a high quality without additional process steps via other parties such as the REC Code Manager or via a CSS Operations process.

## **2. Management of Market Participant Role Events**

Market Participant Role Event data is required within the CSS to enable business rules which facilitate Suppliers' ability to submit new Registration Requests. The qualification of Suppliers to operate within the switching market will be controlled by the REC Code Manager via the REC Market Entry and Exit process.

The Entry Assessment and Qualification Schedule and the Data Management Schedule will define the linear sequence of events and interactions between Code Managers and industry services required to support each event.

In addition, the REC, BSC and DCUSA Panels may also raise Market Sanctions against specific Suppliers preventing them from submitting new Registration Requests whilst that Market Sanction is in place.

Market Sanction data is commercially confidential and should not be shared with other Market Participants other than those impacted by the application of that Market Sanction.

- 1) The REC Code Manager will master Supplier REC qualification events and Market Sanction events. The REC Panel may impose sanctions for issues such as financial default or poor performance identified by the REC Performance Assurance Board.
- 2) Elexon will master BSC Supplier Market Sanction events
- 3) The DCUSA Secretariat will master DCUSA Supplier Market Sanction events

#### Proposed changes to support effective management of Market Participant Role Events

There are currently two 'Market Participant Role Event Types' are detailed in the LDM, Green Deal Qualified and Market Sanction.

The process defined within the Data Management Schedule (DMS) states that the BSC, DCUSA, REC and UNC can raise 'Market Sanction' events via the REC Code Manager who in turn will interact with the CSS. Through further discussion with business experts it has been identified that the UNC Panel does not have provisions to raise sanctions against Shippers, although individual GTs can sanction Shippers which effectively breaks the alliance between the relevant GT and Shipper.

There is also a concept within the DMS to support the qualification (market entry) or market exit of a Supplier. This is not currently supported within the LDM which is misaligned to business rules in Abacus which support this event. The following changes are proposed to support Market Participant Market Sanction Event messages:

- 1) MM: Define CSS Message between REC Code Manager and CSS to support REC, DCUSA and BSC Market Sanctions and other events such as Market Entry.

The REC Code Manager as the data master for switching reference data will be required to have the necessary capability to support the configuration management of all data within its control. The establishment of a DTN or IX interface between the Code Manager and the CSS would be low cost. The justification being that this is critical data for successful operation of the switching arrangements and the mastering service (that operated by the REC Code Manager) should have the capability to manage the data and provide direct updates to the CSS and other Market Participants via the switching network and/or the existing industry networks.

- 2) A change to the LDM to facilitate this requirement would be to remove the current data element concept of 'Market Participant Market Sanction' and replace with 'Permission to Submit Registration Request Indicator'. The business rules would then require update to reflect the validation that the CSS performs to Registration Requests submitted by a Supplier. If the indicator is set to False, then the CSS would reject the Registration Request.

This new data element would be mastered by the REC Code Manager and be used within the CSS business rules to either allow or reject Registrations Requests submitted on behalf of that Supplier.

The following business rules in Abacus should be removed from the model:

- Supplier electricity sanction rule
- Supplier gas sanction rule
- Supplier qualification rule
- Authorisation shipper rule
- Shipper sanction status rule

The following business rules should be added (plain English below):

- Check Market Participant Role effective to date is not less than current date (for Suppliers and Shippers).
- Check that 'Permission to Submit Registration Request Indicator' is not "False" for the Supplier Market Participant Role which has submitted the Registration Request.

The REC Code Manager would change this indicator value based on either their own qualification criteria, as a result of REC Market Sanctions or requests from either the BSC or DCUSA Panels to apply or remove Market Sanctions, rather than the BSC or DCUSA being required to provide Market Sanctions directly to the CSS. The number and frequency of sanctions issued by the BSC and DCUSA does not warrant a direct messaging capability between those parties and the CSS.

- 3) MM: The MM should also be changed to show the correct source and target services.
- 4) Abacus decision services (DS): The existing decision services and business rules within Abacus are incorrect and require change irrespective of the change as data not supported in the current MM is referenced.
- 5) DMS: The DMS will need to be amended to reflect this approach including removing references to the UNC
- 6) DMS: Amend interface timetables to represent the new process and remove previous obsolete processes.
- 7) Abacus Process Map (APM): Update process 2.19 to include management of Market Participant Roles Events as per proposed process.
- 8) Abacus ISD (ISD): Create ISD for management of Market Participant Role Events.

### **3. Management of Market Participant Role Alliances**

This data is required to control which Suppliers are allowed by Shippers to submit Registration Requests on their behalf; and which Suppliers are allowed by (I)DNOs to submit Registration Requests for RMPs on their Networks; and which Shippers are allowed by (I)GTs to be included in Registration Requests for RMPs on their Networks.

Each alliance will be mastered by the following Market Participants:

- 1) UKLink will be the central repository for all gas alliances
  - a. Shippers will master the Shipper to Supplier Alliance
  - b. GTs will master the GT to Shipper Alliance
- 2) Each DNOs MPAS service will be the repository for their electricity alliances
  - a. DNOs will master the DNO to Supplier Alliance

The Market Participant Role Alliance data is commercially confidential and should not be shared with other Market Participants other than those impacted by the change to an alliance.

Proposed changes to support effective management of Market Participant Role Alliances

It is recommended that the MM clearly defines CSS Messages from the source service (which masters that data) to the CSS to maintain alliances.

The services which hold the central record should be responsible for the issuing of the messages to the CSS:

- 1) MM: UKLink will maintain all GT to Shipper Alliances and Shipper to Supplier Alliances via a direct message to the CSS.
- 2) MM: DNOs maintain all DNO to Supplier alliances via a direct message from MPAS to the CSS
- 3) SA, ISD, APM: Require update to represent the new process and interactions between parties.

These changes harmonise the electricity and gas arrangements, ensuring that the data master (or its service provider in the case of Xoserve) has direct control of the data referenced within the CSS and removes superfluous process steps.

An additional change would be required to MPAS to support this data and messaging, although DNOs do currently have a capability under the existing arrangements to prevent Suppliers from submitting Registration Requests. MPAS changes are required to be implemented as part of Stage 1.

#### **4. Management of CSS Parameters and switching reference data**

CSS parameters are required by the CSS, Supplier services, and other Market Participants to support system functionality and business rules. The parameterisation of business rules enables future change (such as a move to even faster switching timescales) without significant impact to the core design of those services.

Switching reference data is required by all participants to understand the enumerated value domains (valid sets) of CSS data items, such as RMP Status or Registration Status.

Switching reference data also currently includes the concept of Energy Company Groups which will be associated to Energy Companies (mastered by Elexon and Xoserve) by the REC Code Manager. The REC Code Manager must master this data as the concept of Company Groups is a specific requirement of the CSS.

The CSS requires the association of a 'group' of different Supplier Market Participant Roles to support OFAF (One Fail, All Fail) functionality. This uniquely identifies that a set of individual Switch Requests are related to the same Supplier organisation (Energy Company Group) and can be grouped together for the purposes of OFAF. This association is required as only the submitting Supplier can uniquely identify an OFAF group by creating a unique identifier when sending a Switch Requests to the CSS. This identifier, 'Supplier Generated OFAF Group Identifier', may not be a unique value to the CSS as different Suppliers' could create the same identifier at the same point in time.

Managing OFAF will be complex for the CSS in terms of business rules and data processing requirements.

The REC Code Manager will master all CSS Parameters and switching reference data. This reference data will be incorporated within the Technical Specification. Amendments to the CSS Parameters and switching reference data will be governed under the REC as part of the standard change process to ensure amendments are made in a robust and transparent manner. This product will need to be in place prior to go live to support each Market Participants Design, Build and Test activities.

#### Proposed changes to support effective management of CSS Parameters and switching reference data

This reference data will be incorporated within the REC Technical Specification, and in some instances, may be defined within the REC Operational Schedules. The data must be visible to all Market Participants, for utilisation within their own systems and business processes. Amendments to the parameter data will be governed under the REC as part of the standard change process to ensure amendments are made in a controlled and transparent manner.

As data master, the REC Code Manager should have the requisite capability to maintain this data within the CSS via a message and disseminate this data to all Market Participants.

- 1) MM: Change MM to show message source as the REC Code Manager and the target service as the CSS.
- 2) MM: Change current CSS Message contents referenced in Abacus so all switching reference data within the LDM is included within at least one CSS message.

- 3) MM: Remove the current requirement for the CSS to broadcast Switching Reference Data. This should be the responsibility of the REC Code Manager who masters the data. The means for the dissemination of this data should be determined by the REC Code Manager and industry once procured.
- 4) SA, ISD, APM: Requires update to represent the new process and interactions between parties.
- 5) DMS: Requires update to represent the new process and interactions between parties.

The requirement for Energy Company Group to be mastered by the REC Code Manager and provided by that party to the CSS (for the purposes of OFAF validation) has been assessed by Ofgem and the DCC.

The proposed solution would be to change the messaging structure for an OFAF related group of Switch Requests, from a distinct number of individual Switch Request messages, to a single message containing multiple Switch Requests; all associated to the same OFAF group, sent from a single Energy Company Group to the CSS.

If a Supplier wished to make use of OFAF functionality within the CSS they would need to agree with the REC Code Manager that their Market Participant Role / Energy Companies are associated to the same Energy Company Group.

A functional constraint would be placed on the Supplier to submit a single message, utilising a single application/ service to create the message and the same network end point providing that message to the CSS.

Validation would then occur upon Switch Submission to ensure that the OFAF count equates to the number of RMPs within the Switch Request, prior to the business rule validation detailed in process 2.3 of Abacus.

This change would significantly reduce the complexity of processing within the CSS and ensure that no ambiguity would exist between the Gaining Supplier and the CSS as to the specific RMPs and Supplier Market Participant Roles which compose an OFAF group.

The business rules and processing employed by the CSS would also be reduced and potential 'queues' of Switch Requests eliminated as that ambiguity would be removed.

As the CSS design is predicated on 'near real time messaging', not batch processing, the use of a single message for Registration Requests should only be utilised for requests that share the same OFAF Group. CSS should fail to validate any messages that contain more than one RMP that do not fit these criteria.

In addition to the Abacus changes proposed above, changes are to support the proposed approaches are also required in the REC Data Management Schedule (DMS). The updated version of the DMS is available at the link below.

[https://www.ofgem.gov.uk/system/files/docs/2019/06/rec\\_data\\_management\\_schedule.pdf](https://www.ofgem.gov.uk/system/files/docs/2019/06/rec_data_management_schedule.pdf)

Change considerations & viewpoint	
Please provide your considerations and views on change using information available to you and stakeholders you have engaged.	
<b>Priority assessment for Change Request</b>  <b>An important change; its absence would be very inconvenient, although a 'work-around' is possible</b>	Without this change request, a very high degree of manual processing would be required to ensure that accurate data is shared with the CSS and appropriate market recipient.
<b>Base reason for Change</b>  <b>Design - Additional requirements/functionality being added to the programme's scope</b>	There was insufficient information to scope this functionality during previous programme phases.
<b>Rating of Change implementation</b>  LOW - Minor consequence requiring some minor redesign or rework; Minor cost impact; Minor impact to schedule	All parties will be required to develop systems and processes to manage SDD. This change primarily reduces complexity and manual interactions via the establishment of CSS interfaces transferring CSS Messages between the CSS and those parties.
<b>"Do nothing" implications</b>	A high degree of manual administration would be required between parties. Data quality issues would exist in terms of the update and accuracy of SDD data.
<b>Potential stakeholders affected by the Change</b>	Xoserve Elexon DNOs REC Code Manager DCUSA Secretariat CSS Provider
<b>Alternative sought to reduce negative impact</b>	A range of options have been considered by the Programme and shared with the Design Forum for consideration. The approaches set out in this CR are informed by the feedback received.
<b>Identify any risks to the implementation of the Change</b>	Increase scope of CSS interfaces to include an additional party – Elexon. However as Elexon already exchanges MDD with Market Participants this risk is believed to be low.
<b>Specialists and/or stakeholders consulted</b>	David Addison – Xoserve Matthew McKeon – Elexon Sandeep Shinagare – DCC Asif Nawab – DCC Andrew Wallace – Ofgem Jenny Boothe – Ofgem Andrew Amato – Ofgem Sarah Jones - SPAA

Justification for Change
Market Participant Roles <ul style="list-style-type: none"> <li>• Data Masters (Xoserve and Elexon) have direct access to CSS to maintain data.</li> <li>• Increase data quality and reduce latency of updates</li> <li>• Reduce manual hand-offs between parties, reduce REC Code Manager and CSS Operations administration costs</li> </ul> Market Participant Events <ul style="list-style-type: none"> <li>• Reduce complexity of data model and business rules within CSS to support very low frequency events.</li> </ul>

**Green** - Requestor to complete

**Orange** – Ofgem to complete

**Blue** - Impact Assessment Team to complete

- Establish single Code body (REC Code Manager) as single Data Master of business rule to enable / disable Suppliers from submitting Registration Requests.

#### Market Participant Role Alliances

- Data Masters (Xoserve (on behalf of Shippers and GTs) and MPAS) have direct access to CSS to maintain data.
- Increase data quality and reduce latency of updates
- Reduce manual hand-offs between parties, reduce REC Code Manager and CSS Operations administration costs

#### CSS Parameters and Switching Domain Data

- Data Master (REC Code Manager) has direct access to CSS to maintain data.
- Increase data quality and reduce latency of updates
- Reduce manual hand-offs between parties, reduce REC Code Manager and CSS Operations administration costs
- Reduce complexity of CSS processing and application of business rules (OFAF)

### Programme Products affected by proposed change

#### Detailed Design Repository (Abacus)

- CSS Message Model
- E2E Process Maps
- Logical Data Model
- Solution Architecture
- Abacus Decision Services
- Interaction Sequence Diagrams
- Non-Functional Requirements
- User Requirements Specification

#### REC Data Management Schedule

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

### Part B – For Ofgem Use Only

<b>Change request No.</b>	CR-E38	<b>Date CR submitted</b>	26/03/2019
<b>Change request status:</b>	Approved	<b>Current CR version:</b>	v1.0
<b>Change Window:</b>	20	<b>Version date:</b>	11/06/2019

<b>Change Advisory Team (CAT) Lead:</b>	Name and organisation: Andrew Amato
<b>Contact details:</b>	Email address: <a href="mailto:andrew.amato@ofgem.gov.uk">andrew.amato@ofgem.gov.uk</a>
<b>PMO Lead:</b>	Name: Matthew Finlay
<b>Contact details:</b>	Email address: <a href="mailto:matthew.finlay@ofgem.gov.uk">matthew.finlay@ofgem.gov.uk</a>

Initial assessment/Triage	
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.	
<b>Design &amp; Data Impact and resource input required for IA?</b> Yes	
<b>Implementation Impact (including impacts to industry readiness, procurement timelines and the Programme Plan) and resource input required for IA?</b> No	
<b>Alignment Impact and resource input required for IA?</b> No	
<b>Commercial/Procurement Impact and resource input required for IA?</b> No	
<b>Regulatory Impact and resource input required for IA?</b> No	
<b>Security Impact and resource input required for IA?</b> No	
<b>Confirm Programme Products impacted by the change request?</b> Detailed Design Repository (Abacus) <ul style="list-style-type: none"> <li>• CSS Message Model</li> <li>• E2E Process Maps</li> <li>• Logical Data Model</li> <li>• Solution Architecture</li> <li>• Abacus Decision Services</li> <li>• Interaction Sequence Diagrams</li> <li>• Non-Functional Requirements</li> <li>• User Requirements Specification</li> </ul>	
<b>Major or Minor Change?</b>	Minor

<b>Change Process Route</b>	Standard
<b>Change Window</b>	19
<b>To be submitted to the Design Forum on:</b>	01 April 2019 for Meeting on 08 April
<b>Approval Authority:</b>	Chair - Design Authority
<b>Target Change Decision Date:</b>	19 April 2019
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matt Finlay	01/04/2019

Impact Assessment	
<p>This change request provides the necessary detail that will allow essential administrative data and operation of a number of market events (sanctions) to be effectively managed in a cost effective and robust way, ensuring that the CSS is kept up to date and allows registrations to be recorded against the right market participants.</p> <p>Without this CR, Market and Switching Domain Data will be updated through manual / service management based processes increasing operational cost and risk of manual error.</p>	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

Impact Assessment – Industry cost	
<p>Implementation costs from Xoserve are included in their previously submitted cost estimates for delivering changes to support the RP2a solution.</p> <p>Elexon will be implementing a new participant management system during 2020. Following this implementation an impact assessment of cost/complexity impact of this CR will take place. Elexon have confirmed in writing that they expect costs and complexity for implementation of the CR are low given the utilisation on the new platform to support their current mastership of MDD. Furthermore, Elexon have subsequently confirmed that a new interface would be specified once the physical design is known and that existing D flows could be adapted depending on the network/interfaces requirements. Changes would be progressed via existing BSC/MRA processes and costs recovered via existing processes for these codes.</p> <p>Detailed cost impacts for CSS Provider are not known, but expected to be included within existing estimates.</p>	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

Impact Assessment – Resource Effort
<p><b>DCC Resource Impact:</b></p> <ul style="list-style-type: none"> <li>• <b>Definition of changes required:</b> <ul style="list-style-type: none"> <li>○ 4 x days Business Analyst</li> <li>○ 4 x days Data Architect</li> <li>○ 1.5 x days Solution Architect</li> <li>○ 1.5 x days Design Lead</li> </ul> </li> <li>• <b>Product Updates:</b> <ul style="list-style-type: none"> <li>○ 4 x days Business Analyst</li> <li>○ 4 x days Data Architect</li> <li>○ 1.5 x days Solution Architect</li> <li>○ x days Design Lead</li> <li>○ 4.0 x days Quality Assurance Analyst</li> </ul> </li> <li>• <b>Assumptions:</b></li> </ul>

- 1 day per BA/DA for each sub-section of the CR (level of process, business rule updates, ISDs etc) assumes moderate level of change
- Additional changes to other artefacts (catalogues, matrices, diagrams) may be required and can be accommodated within estimates

<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	07/06/2019

Impact Assessment – Programme	
No anticipated impact on Programme Business Case.	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

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.	Accurate MDD is needed to underpin reliability in terms of suppliers being able to lodge switch requests – this change proposes mechanisms to ensure that Data Masters can effectively update the CSS with this information.
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.	No Impact
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.	No Impact
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.	No Impact
<b>Impact on Market Participants</b>		

**Green** - Requestor to complete

**Orange** – Ofgem to complete

**Blue** - Impact Assessment Team to complete

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.	No Impact
6 Design – simplicity	The new supply point register and arrangements should be as simple as possible.	This change seeks to maintain arrangements whereby current data masters continue to remain the source of data.
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 reflects the capability of existing data masters to interface with existing systems. Direct interfaces for the provision of updates will support accuracy and security by avoiding manual process intervention.
8 Design – flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	No Impact
<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.	It is anticipated that only Elexon will need to create a new dedicated interface to CSS. Therefore, additional costs should be minimised compared to additional costs / risks of manual updates.
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.	Planning to be incorporated into broader DBT development following availability of physical design

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	No anticipated adverse impact
2 Future Proof Design	Common design approaches will better enable designs to support future developments e.g. A mechanism for achieving non-repudiation	No anticipated adverse impact
3 Standards Adoption	Adopt appropriate standards for products, services or processes. e.g. ISO/IEC 11179 for data definition	No anticipated adverse impact
4 One Architecture	One single definitive architecture prevails	No anticipated adverse impact
5 Data is an asset	Data is an asset that has value to the enterprise and is managed accordingly	No anticipated adverse impact
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.	No anticipated adverse impact
7 Common vocabulary & data definitions	Data is defined consistently throughout the enterprise, the definitions being understandable and available to all users.	No anticipated adverse impact
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.	No anticipated adverse impact
9 Quality Characteristics	Maintain a comprehensive set of quality characteristics by which to gauge the completeness of requirements for Applications and Services.	No anticipated adverse impact

Green - Requestor to complete

Orange – Ofgem to complete

Blue - Impact Assessment Team to complete

<b>Summary: -</b>	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

<b>Impact Assessment – Data cleansing / migration</b>	
No Impact – MDD from Elexon / Xoserve to be migrated into CSS requires cleansing regardless of this CR.	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

<b>Impact Assessment – Programme Plan</b>	
No anticipated impact on overall plan which is currently in review. Work for data masters is to take place during ESP DBT phase.	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

<b>Impact Assessment – Security</b>	
No change to security products. REC manager to develop appropriate processes to manage low volume sanction activity.	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	08/04/2019

<b>Programme Recommendation</b>	
<b>Recommendation to approve</b> – No substantive issues raised at Design Forum on options developed for the change or the draft Change Request.	
<b>Checked for completeness (Name &amp; Role):</b>	<b>Date:</b>
Matthew Finlay	11/06/2019

Change Request Decision	
Conditionally Approved subject to the completion of an Action.	
<b>Changed Approved:</b>	<b>Yes</b>
<b>Decision Maker (Name &amp; Role):</b>	<b>Date:</b>
Arik Dondi	11/06/2019

Next Steps		
Change Request Approved		
<b>If Change Request is approved: -</b>	<b>Role</b>	<b>Date</b>
<b>Products updates to be completed by:</b>	DCC	
<b>Ofgem review dates:</b>		
<b>Product approval to be completed by:</b>	Ofgem	