Switching Programme Change Request Form

Part A – For the requestor to fill in

Change Requestor's Details
Name: Andy Boojers Organisation: Smart DCC Email address: andy.boojers@smartdcc.co.uk Telephone number: 07855 277 841 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
Integration of the Smart Metering Enduring Change of Supplier (ECoS) solution with the Switching Architecture.

Change Summary
A Government consultation on a proposal to direct DCC to provide Enduring Change of Supplier (ECoS) arrangements for smart meters commenced on 30th May 2019[1]. The proposed solution[2] (See Appendix) will impact on the Switching design through the introduction of a new 'CoS Party' to the Switching ecosystem, which will require registration data from the Central Registrations Service (CRS) in order to undertake its responsibilities.

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[1] Consultation on directing the DCC to plan for the design, development and implementation of smart meter enduring Change of Supplier arrangements - https://smartenergycodecompany.co.uk/latest-news/beis-smip-consultation-on-directing-the-dcc-to-plan-for-the-design-development-and-implementation-of-smart-meter-enduring-change-of-supplier-arrangements/

[2] See Annex B in the afore-mentioned consultation

Change considerations & viewpoint

In Scope:

This Change Request covers:

- Changes to Switching processes and systems that would be needed to introduce the ECoS CoS Party into the Switching ecosystem.
- Impacts on delivery and transitional activities required to realise the revised switching design.
- Any impacts to the regulatory framework underpinning the new switching arrangements.
- Impacts on the programme plan and the switching business case.
- An estimate of the rough order of magnitude of the costs that would be incurred, including both DCC and end-to-end costs.
- An assessment and description of any relevant RAID (Risks, Assumptions, Issues, Dependencies).

Out of Scope

- Operational, technical, commercial and contractual Impacts of incorporating the COS Party into the DCC Total/Live Systems (it is assumed that these impacts will be addressed directly by the ECoS programme).
- Changes to DSP architecture and consequential impacts (it is assumed that these impacts will be addressed directly by the ECoS programme).

Priority assessment for Change Request A Must; the final deliverable will not work without this change	The changes to the Smart Metering architecture will be mandated through updated license conditions.
Base reason for Change Design - Additional requirements/functionality being addedd to the programme's scope	The changes to the programme scope are a consequence of changes being mandated by Government, for DCC to deliver ECoS.
Rating of Change implementation MEDIUM - Significant consequences requiring redesign or rework; Significant cost impact ; Significant impact to schedule	This rating is indicative and subject to change following a more thorough impact assessment across all programme workstreams.
"Do nothing" implications	'Do nothing' will result in a CRS solution that doesn't support the ECoS change, resulting in an inability of smart-metering COS processes to operate, preventing gaining suppliers from gaining control of their customers' smart meters.
Potential stakeholders affected by the Change	Market Participants OFGEM BEIS SECAS DCC
Alternative sought to reduce negative impact	Solution options to be determine during impact assessment.
Identify any risks to the implementation of the Change	To be confirmed upon completion of impact assessment.
Specialists and/or stakeholders consulted	To be confirmed upon completion of impact assessment.

Justification for Change

A key component of the Smart Metering architecture, the Change of Supplier credentials (CoS) process allows the supplier certificates associated with a losing energy supplier to be replaced with those of a gaining energy supplier whenever a consumer changes supplier. DCC Systems were originally developed to operate using a Transitional CoS (TCoS) process during the roll-out of Smart meters to minimise the impact on suppliers during this critical period, although it was recognised at the time that this was only a temporary solution.

Currently the Transitional Change of Supplier (TCOS) is managed by an application that the DSP runs on behalf of SMETS2 to support the COS process for swapping the energy supplier's organisation certificates on the meters. This application currently uses the DSP's copy of the Registration data in the Smart Meter Inventory (SMI) to validate the registration before generating a service request to change the device certificates. This certificate then enables the new owner to interact with the device. The SMI is an internal DSP datastore currently populated by the RDP data.

Under the current TCoS solution the DSP fulfils the role of a centralised CoS Party but does not meet all the requirements of an enduring solution. The CoS Party and ACB do not maintain individual reference data, and some aspects of the CoS Party systems are integrated into other elements of the DSP systems, including the shared use of a time-source.

Once the Smart Meter rollout is complete, forecasted for 2020, then the barriers to replacing the TCoS process with the more resilient and secure Enduring CoS (ECoS) solution are removed.

A Consultation on directing the DCC to plan for the design, development and implementation of smart meter enduring change of supplier arrangements[3] sought views on the proposal to:

a) Align the implementation "such that TCoS arrangements do not need to be re-procured by the DCC under the Data Services Provider (DSP) contract."[4]
b) "Ensure that, in the [Switching] detailed design, the CSS can support the ECoS2 arrangements."

The proximity of the Switching Go Live Range (Jun – Aug 2021) to the DSP contract end date (September 2021) should be noted, as this will drive the impacts to the Switching Programme.

The preferred option for the ECoS Solution is for CoS events to be validated, processed and executed by a centralised CoS Party service provider (See Appendix).

In order to undertake its responsibilities, the centralised CoS Party will require registration data from the Central Registration Service (CRS). This data is provided to the DSP from the CRS in the current design baseline.

Programme Products affected by proposed change

To be confirmed upon completion of the Impact Assessment

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.

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[3] https://smartenergycodecompany.co.uk/latest-news/beis-smip-consultation-on-directing-the-dcc-to-plan-for-the-design-development-and-implementation-of-smart-meter-enduring-change-of-supplier-arrangements/

[4] The end date for the current DSP contract is September 2021

Green - Requestor to complete   **Orange –** Ofgem to complete   **Blue -** Impact Assessment Team to complete

Part B – For Ofgem Use Only

Change request No.	CR-E46	Date CR submitted	28/07/2019
Change request status:	In Triage	Current CR version:	v0.1
Change Window:	27	Version date:	02/07/2019

Change Advisory Team (CAT) Lead:	Name and organisation: Jenny Boothe
Contact details:	Email address: Jenny.Boothe@ofgem.gov.uk
PMO Lead:	Name: Matthew Finlay
Contact details:	Email address: Matthew.Finlay@ofgem.gov.uk

Inital 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.
Design & Data 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?	[Assessment of effort to complete IA, FTE impact for implementation of change or assessment of consequential impacts]

Change Process Route	<Urgent or Standard>
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 (Name & Role):	Date:

Impact Assessment

To be confirmed upon completion of the Impact Assessment

Checked for completeness (Name & Role):	Date:

Impact Assessment – Industry cost

<Insert/embed the details of industry costs/benefits resulting from this change, including details of costs impacts if the change is not made. Does the change significantly divert industry resource away from established plans.>

Checked for completeness (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 away from established plans.>

Checked for completeness (Name & Role):	Date:

Impact Assessment – Programme

Green - Requestor to complete   **Orange –** Ofgem to complete   **Blue -** Impact Assessment Team to complete

<Insert/embed the assessment of impacts against the Programme's Outline Business Case (OBC), especially taking account of any benefits to external parties.>

Checked for completeness (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.	Green With the Introduction of the ECoS solution, the proposed changes will ensure that the full switching experience, including the transfer of ownership of smart meters will continue to achieve a positive customer 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.	Green Provision of registration information to the CoS Party will ensure processes can be completed without unnecessary delays
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 change
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.	Green With the Introduction of the ECoS solution, the proposed changes will ensure that the full switching experience, including the transfer of ownership of smart meters will continue to achieve a positive customer experience
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.	No change
6 Design – simplicity	The new supply point register and arrangements should be as simple as possible.	No change

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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.	No change The additional integration will be documented and managed with effective governance in line with those already defined.
8 Design – flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	No change
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.	TBC upon completion of Impact Assessment
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.	TBC upon completion of Impact Assessment

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

Summary: -

Checked for completeness (Name & Role):	Date:

Impact Assessment – Data cleansing / migration

To be confirmed upon completion of the impact assessment.

Checked for completeness (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, testing or diversion of programme resources? Is the change necessary for go-live?>

Checked for completeness (Name & Role):	Date:

Impact Assessment – Security

The impact assessment will elaborate on the following security considerations:

- *Certificates used to secure connections between the CoS Party and CRS.*
- *Certificates used to sign CRS messages destined for the CoS Party*

Checked for completeness (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>

Checked for completeness (Name & Role):	Date:

Change Request Decision

<Insert the decision of the Approval Authority together with any conditions of the approval>

Changed Approved:	Yes / No
Decision Maker (Name & Role):	Date:

Green - Requestor to complete   **Orange** – Ofgem to complete   **Blue** - Impact Assessment Team to complete

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

Green - Requestor to complete   **Orange** – Ofgem to complete   **Blue -** Impact Assessment Team to complete

Appendix – EcoS Preferred Solution Option

NB for a full description of the preferred (and alternative) option, refer to Annex B of the Consultation on directing the DCC to plan for the design, development and implementation of smart meter enduring Change of Supplier arrangements:

https://smartenergycodecompany.co.uk/latest-news/beis-smip-consultation-on-directing-the-dcc-to-plan-for-the-design-development-and-implementation-of-smart-meter-enduring-change-of-supplier-arrangements/

Overview:

- No significant changes to energy suppliers' systems are expected as ECoS 2 is functionally similar to the existing TCoS model.
- CoS events are validated, processed and executed by a central CoS Party service provider.
- The implementation and management of the new central CoS Party will be undertaken by DCC.
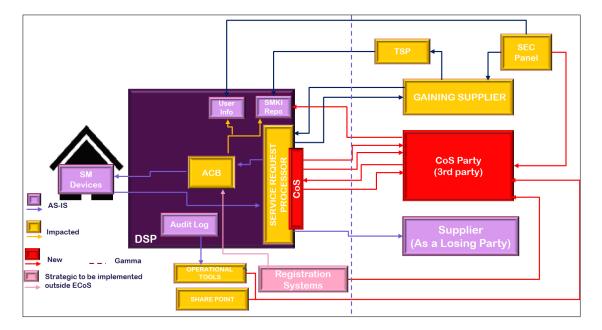- DCC will be responsible for developing the interfaces with the CoS Party system required to obtain reference data.

Figure 1 - ECoS2 Architecture

Green - Requestor to complete   Orange – Ofgem to complete   Blue - Impact Assessment Team to complete