CONSOLIDATED CONSULTATION RESPONSES

C3-0032 - CRITERIA FOR REPORTING HIGH DEMAND

DATE ISSUED	30/09/2022
RESPONSE DEADLINE	14/10/2022

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER / RESPONSIBLE PROVIDER COMMENTS
1. Do you have any comments on the proposed changes to the 'Criteria for Reporting High Demand' Category 3 Document?	**Xoserve** GRDS and GES Provider	-	1. **Scottish Power Energy Networks** - As Switching Data Service Providers do not send Switch Requests, we do not believe they would need to carry out impact assessments. 2. **Anonymous** – Whilst the Switching Operator is aware of the contract rounds what we do not know is the scale of Switch Requests during this period. The Switching Operator would then still need to be notified in advance of these Switching
	Scottish Power Energy Networks Distribution Network Operator	We believe that the proposed changes reflect better the volume impact that in increase may have on the Service. We believe that a 100% increase across a daily average volume over a 30-day period, is more tenable than an increase of 50% of peak single day volume over the last 3 months. Where this is not clear (and not part of the tracked changes) is the method for impact assessment and communication with Switching Data Service Providers	

	Anonymous	Yes. Whist we recognise the need for the requirement refinement to accurately predict the switch request volumes, we believe that further legal text refinement is required to exclude cases where the switch request volume spikes can be predicted and scaled by CSS to include additional business as usual activities. We recommended an addition to the existing legal text which we explain in more detail in answer to question 2.	Request volume increases as per the updated guidance. **3.** **Utilita** – The Switching Operator is planning on reviewing the Criteria for Reporting High Demand guidance in 6 months' time where a tolerance could be considered.
	Drax Group (Drax Energy Solutions and Opus Energy) Energy Supplier	We do not have any comments on the proposed changes.	
	Utilita Energy Supplier	Yes, Extra detail should be considered to make this Category 3 document clearer. The documentation must specify; - When there is no need for notification to the Switching Operator as tolerance is set to a level that Switching Operators have a daily capacity for. The tolerance needs to be clear as many Energy Suppliers currently have a reduced rate of switches. Without a tolerance level, this could be a cumbersome task when switching incrementally increases again to notify the Switching Operator. - **How would Energy Suppliers be contacted when the Switching Operator notices excess switch requests from Market Participants and what are the likely consequences for Market Participants**?	

2. Do you believe the drafting clarifies	**Xoserve** GRDS and GES Provider	-	**1.** **Scottish Power Energy Networks** – As the Criteria for

when all Market Participants must notify the Switching Operator regarding increases in Switch Requests? If not, please provide details	**Scottish Power Energy Networks** Distribution Network Operator	We believe that the drafting could be better served by making the wording in the following text stronger, we would suggest that the text states: Should a Market Participant need or be aware that they will need to report higher than normal demand, the Switching Operator must/will be notified. Rather than the following Should a Market Participant need or be aware that they will need to report higher than normal demand, the Switching Operator should be notified.	Reporting High Demand is a Category 3 document (guidance document) we are unable to place an obligation on Market Participants whereby they must notify the Switching Operator. We will discuss with the Code Manager on the most appropriate way forward. 2. **Anonymous** – despite the Switching Operator having knowledge of these events we would not be aware of the magnitude or scale of these events and therefore would still ask Market Participants to notify us ahead of these periods of increased volumes of Switch Requests. This can be reviewed in 6-months' time. 3. **Drax** - despite the Switching Operator having knowledge of these events we would not be aware of the magnitude or scale of these events and therefore would still ask Market Participants to notify us ahead of these periods of increased volumes of Switch Requests.
	Anonymous	No. We believe that the currently drafting doesn't take into consideration the business-as-usual activities that suppliers undergo which could create spikes in switch request volumes (for instance the additional activities caused by the suppliers' contract rounds). We understand that as a part of the NFRs developed for CSS, these additional activities were highlighted and considered in the scope for CSS, however, they have not been transposed into the REC legal text. We believe a clarification is required in the proposed legal text to ensure that such activities are outside of the scope of the proposed requirement. We would like to propose an amendment to the legal text and addition of a footnote:	

		"Should any Market Participant expect to send an increase of 100% more Switch Requests* on a single day relative to their average over that past 30 days, the Switching Operator should be notified using a Service Request on the Switching Portal" Footnote *These notifications are not required for additional switching activity caused directly by the October and April contract rounds, as these events are recurring and predictable".	This can be reviewed in 6-months' time. 4. **Utilita** - The Switching Operator is planning on reviewing the Criteria for Reporting High Demand guidance in 6 months' time where a tolerance could be considered.
	Drax Group (Drax Energy Solutions and Opus Energy) Energy Supplier	No. This document appears to have been drafted with domestic switching in mind. The non-domestic market operates two main annual contract rounds – April and October. Consequently, the DCC should expect to see a significant increase in non-domestic Switch Requests, every April and October compared to the previous 30 days. We don't see the value of non-domestic Suppliers raising a "High Demand" Service Request ahead of every April and October round as this trend should be foreseen and expected by the DCC. We're aware of another supplier being advised informally that it would be beneficial to advise the DCC if they were switching a customer with a significant number of sites, but it shouldn't be necessary for every peak contract round. We would welcome formal guidance, set out in this document, around the expectations for non-domestic Switch Requests.	
	Utilita Energy Supplier	As mentioned in Question 1 further detail on the tolerance levels to when Market Participants need to notify the Switching Operator is still missing.	

3. Do you have any other comments?	**Xoserve** GRDS and GES Provider	As this relates to organisations generating Registration messages being required to notify [DCC] where volumes triggers are met this does not directly impact the GRDA or the GES Provider. We note that	1. **Xoserve** - The Switching Operator will communicate with

		in turn [DCC] have obligations to notify parties (including the GRDA) in the event that a party so notified the DCC of such a notification. What is the process for this notification, and where is this process defined as there is no detail defined in the Switching Service Management definition? We further believe that this process should be used by the CSS Service Provider when they are undertaking large volume updates – such as application of Address updates – and that this process should be formally documented in the 'Criteria for Reporting High Demand' documentation.	impacted Service Providers via either their Service Delivery Manager or the Service Management System. When determining whether Service Providers will need to be notified the Switching Operator will assess whether the increase of Switch Requests will breach their Non-Functional Requirements. 2. **Drax** – the current drafting requests rather than obligates Market Participants to notify the Switching Operator. Should it be considered that an obligation would be required then this would be placed in a Category 2 REC Schedule.
	Scottish Power Energy Networks Distribution Network Operator	No further comments	
	Anonymous	No	
	Drax Group (Drax Energy Solutions and Opus Energy) Energy Supplier	It's our understanding that REC Category 3 documents are non-mandatory guidance, but this document appears to place an obligation on Suppliers. Please could this be clarified.	
	Utilita Energy Supplier	No further comments	