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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0044 - MHHS PROGRAMME CHANGES REQUIRED TO CENTRAL SWITCHING SERVICE

On 03 November 2022 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0044.

The purpose of this document is to consolidate the responses as well as answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	09/12/2022
RESPONSIBLE COMMITTEE	CHANGE PANEL
LEAD ANALYST	HARRIET TRUSS

DATE CONSULTATION ISSUED	03/11/2022
RESPONSE DEADLINE	25/11/2022

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
St. Clements (Provider of MPRS to ERDAs)	No • The final scope does not show the Asynchronous response from MDR to CSS and ERDS. • The solution does not acknowledge there is no existing pattern for relaying Asynchronous Responses to ERDS. A change might be required to the MM90011 for MPRS to link an Asynchronous Response to the original MM90011 request • By including changes to the MM90011 (MPRS C0200) the scope is not entirely limited to CSS and DSP as MM90011 is a message produced by ERDS • Does not acknowledge that a Supplier can nominate themselves as the MDR, therefore role code X should be a valid MDR code in addition to the agreed SMDR code.	The asynchronous message has been shared with St. Clements who have confirmed it is suitable for ERDS purposes. The finalised message design will be completed as part of the CSS Provider detailed design activities. The Code Manager continues to work with the Service Providers, and in consultation with the MHHS Programme, to ensure any concerns raised are understood and considered. This will ensure the detailed design will be fit for purpose. ERDS was always considered to be impacted, however the decision was made to progress the CSS element of the solution based on information available at the time, and to meet the critical time requirements. The MHHS Design Work-Off Plan item D-023 will address the outstanding design issue regarding the role codes that will be used for SMDRs and/or Suppliers as SMDRs.

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
Scottish and Southern Electricity Networks (Distribution Network Operator (DNO))	No SSEN refers to the response from St. Clements Services whereby there appears to be a gap in the analysis of this change omitting the impact on the ERDS.	Please see above.
Northern Powergrid (DNO)	Our comments are in line with our Service Provider, St. Clements, please see below: [A direct copy of the St. Clements Q1 response was provided. This can be viewed above.]	Please see above
DCC (CSS Provider)	Yes.	N/a
Scottish Power Energy Networks (DNO)	We are of the view that this proposal has an impact on ERDS that has not been drawn out in the documentation. While we appreciate that the ERDS elements have been removed from scope on this to allow the progression of the CSS/DSP element, we are concerned that the build may not consider the requirements of the flow that requires to be sent from MPRS, and the confirmation flow back into the MPRS system. We do not believe that the proposed solution resolves the problem, in effect we believe that this introduces a disjointed solution that may be more complex to work around following implementation and may cause further issues for MPRS build for MHHS.	Please see above. The Code Manager continues to engage with RECCo, SEC and the MHHS Programme to ensure the end-to-end solution will not be disjointed.

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
National Grid Electricity Distribution (DNO)	No. Although we agree that with the removal of the population of the SMDR role into ERDS from the scope of this CP, the proposed solution resolves the problem statement however, there is still a concern that this is not a complete E2E process. Without the associated MHHS changes to enable to population of the SMDR into the ERDS this R0044 CP will not work, it is therefore essential that the full E2E solution should be considered. Our Service Provider has also highlighted in their response the following [A direct copy of the St. Clements Q1 response was provided. This can be viewed above.]	The Code Manager recognises that R0044 does not standalone: • R0044.PCR.D001 captures the dependency on the approval of SEC MP162, which introduces the new market role. • The driver for R0044 is MHHS Target Operating Model. The end-to-end design for the SMDR role is therefore being managed under the MHHS Programme. The Code Manager response to comments from St. Clements, the provider of the MPRS, can be seen above.
Utilita Energy Limited (Energy Supplier)	It is our understanding that MDR change SECMP162 is still waiting on authority approval, therefore is surprising to see R0044 progress to consultation before SECMP162's confirmation of awaiting implementation. While R0044 may meet the problem statements for MHHS Target Operating Model it doesn't address - The impact the MHHS replan will have on this change, how many more changes the CSS is expected, and at what cost as an effect to approving this too early.	SEC MP162 has critical design dependencies on R0044, therefore R0044 had to progress to consultation, as set out in the R0044 Change Proposal Plan, to ensure the dependencies could be met. Implementation timescales could not be achieved if R0044 was to wait for SEC MP162 to be approved. R0044.PCR.D001 captures the dependency on SEC MP 162 approval. The decision to Approve has now published by the Authority. The Code Manager believes that the proposed solution and implementation

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
	- That the cost is relatively high, which has following a similar pattern to MP162. Cost seems high for something that appears to involve a small change to RMP lifecycle processes. We question how much cost can be challenged after R0044 is approved. - MDRSP should pay for these costs directly as it is unlikely Energy Suppliers will use this service but instead has been left to those paying for central system changes as part of MHHS.	approach for R0044 will not be impacted by the MHHS Replan as it will not affect the design and requirements. R0044 has purposefully tied implementation to a MHHS Programme milestone and not a specific date so that the Replan, or any subsequent shift in dates do not affect the stability of the CP's approval. As part of the impact assessment activity the REC Technical Design Authority (TDA) work with Service Providers to ensure costs are understood and challenged. The TDA challenges, and solution refinement activity, resulted in approximately 50% reduction on initial quoted costs. The CSS Provider continues to seek cost efficiencies during the Design, Build, Test activities. As such, the quoted costs should not be exceeded and it is likely (with a medium level of confidence) that the final cost will come in below those quoted in the Final Change Report.

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
		The impacts of the introduction of the new SMDR role on the charging methodology are out of scope of R0044.
British Gas (Energy Supplier)	Yes – we agree that the Proposed Solution is what is needed to enable the introduction of the MDR role in SEC MP162.	N/a
OVO (Energy Supplier)	No. Yes, the change proposal makes available MDR ID so that DCC can enable MDR access to read data for use in MHHS. However, as the design is continuing to progress subsequent to the M5 milestone via the MHHS Design Work Off List, further changes that come out of MHHSP could render R0044 development nugatory in the short term. It makes sense that the MHHS design should complete prior to R0044 progressing further. This is called out by the Change Report "R0044 assumes that future REC consequential changes will be required following confirmation from the MHHS Programme once the full end-to-end process has been defined". Note on nomenclature: calling the MDR the SMDR not needed here. Nor is calling the DCC the SMDSP. Its just going to confuse people, and goes against the principle that REC should be easily understandable by all. There's no Dumb MDR so, it follows theres no need for a Smart MDR. Same with DCC.	At the time of publication of the Preliminary Change Report, the MHHS Design Work-Off Plan was not available. The risk of the MHHS Design Work-Off Plan outcomes impacting R0044 development will be addressed in the Final Change Report. To meet the required change and implementation timescales, R0044 was progressed based on the MHHS Design assumptions provided and the accepted risk that additional changes may be identified. However, the introduction of the SMDR itself and the need for the appointment data to be transferred was considered part of the core MHHS Target Operating Model. The use of the term SMDR was made following a recommendation from the MHHS Programme, to make clear that SMDR is specific to Smart Meters. The Code Manager considers that this provides additional clarity

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
		and also takes into consideration the pre-existing BSC acronym MDR. SMDSP is the existing REC terminology.

Question 2:	Do you agree with the proposed legal text? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
St. Clements (Provider of MPRS to ERDAs)	N/A	N/a
Scottish and Southern Electricity Networks (DNO)	No comment at this time	N/a
Northern Powergrid (DNO)	N/A	N/a
DCC (CSS Provider)	Yes.	N/a

Question 2:	Do you agree with the proposed legal text? If not, please provide rationale.	
Scottish Power Energy Networks (DNO)	We note that the legal text references the response being sent back to the CSS and ERDA, however this is not referenced in the change documentation.	Section 5 Proposed Solution of the change report has been to include this element. The impact assessment by the CSS Provider included provision for the solution requirement for CSS to send the message to ERDA.
National Grid Electricity Distribution (DNO)	No, we would query the following **Schedule 1 - Interpretations** Should the definition for Supplier agent also include the qualification for the SMDR "SMDR has the same meaning as MDR within the Smart Energy Code" **Schedule 27** 5.2.6 Where validation has failed CSS sends Asychronouse response to ERDA Currently the ERDA has been out-scoped from this REC CP, therefore, as per the CP "Changes to the ERDS will be managed through the MHHS Programme, with consequential EES changes also delivered within the wider EES MHHS requirements. The proposed solution assumes that the notification message for an SMDR appointment is successfully sent from the ERDS and includes requirements covering successful receipt of messages in CSS"	Schedule 1 – The aim of the REC is to only define terms once. Therefore the qualification will only be captured under the SMDR specific definition. The response message being sent from CSS to ERDA (step 5.2.6) is included to reflect the R0044 solution requirement on the CSS Provider to send the message. The detailed design is being developed but it is based on the existing MM90011 (CSS0200) message. The draft asynchronous response message has been shared with St. Clements who have confirmed it is suitable for ERDS purposes. The finalised message design will be completed as part of the CSS Provider detailed design activities. The requirement on ERDAs for receipt of the message and any subsequent activity will be

Question 2:	Do you agree with the proposed legal text? If not, please provide rationale.	
	By the inclusion of 5.2.6 within the proposed legal text, it puts a requirement on the ERDA to receive a message from the CSS for which it has no E2E design requirement for. Additionally, the CP states that "CSS will not validate role – validation to be undertaken upstream in ERDS prior to entry into CSS and downstream upon receipt in the SMDSP environment." We would therefore seek clarity on what validation checks will be made under 5.2.4?	defined and managed under the MHHS Programme. The implementation approach for R0044, to align with the MHHS Programme code drafting changes, has been proposed to ensure there are no gaps in obligations being in effect. Both R0044 and the MHHS Programme will have a requirement that is met by 5.2.6 which covers both the sender and recipient. Upstream validation in ERDS is part of the MHHS requirements, relating to the new DIP interface IF-0031. Validation by SMDSP under 5.2.4 is in the scope of SEC MP162. No changes are being made to the communication of MEM appointments. Therefore, any existing validation by the ECoS Service Provider is not impacted by R0044.
Utilita Energy Limited (Energy Supplier)	No further comments	N/a

Question 2:	Do you agree with the proposed legal text? If not, please provide rationale.	
British Gas (Energy Supplier)	NA	N/a
OVO (Energy Supplier)	The legal text is fine, bar the comments made above on timing and nomenclature.	N/a

Question 3:	Do you agree with the proposed implementation date and implementation techniques? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
St. Clements (Provider of MPRS to ERDAs)	N/A	N/a
Scottish and Southern Electricity Networks (DNO)	SSEN suggest a revised change proposal is published to include the impact on ERDS	R0044 has been progressed with the reduced scope to de-risk implementation of SEC MP162 and MHHS as a whole. At the time of solution development, the information was

		not available from MHHS Programme to provide full ERDS requirements. The Code Manager and RECCo continue to be engaged with the MHHS Programme to enable an end-to-end solution that is fit for purpose.
Northern Powergrid (DNO)	N/A	N/a
DCC (CSS Provider)	Yes.	N/a
Scottish Power Energy Networks (DNO)	We have no issue with the proposed implementation date and technique, however, would reference at this point that this needs to tie into the delivery of the ERDA solution in the MHHS Programme timescale and would suggest that the end-to-end solution be implemented at the same time, as without the submission to CSS and the response back this proposal on its own does not deliver a workable solution.	The Code Manager believes that by tying the implementation date to M8, it will ensure the end-to-end solution is implemented at the same time.
National Grid Electricity Distribution (DNO)	Without a clear E2E design for this process and the associated changes being raised within MHHS and MDD, we are unable to provide an opinion on the proposed implementation date and implementation techniques. However, we are aware of the MHHS Programme Milestones that need to be met.	The Code Manager and RECCo continue to be engaged with the MHHS Programme to enable an end-to-end solution that is fit for purpose.
Utilita Energy Limited (Energy Supplier)	The implementation techniques approach and the final cost are unclear while it's being determined by the MHHS Programme for Milestone M8 'Code changes delivered'.	The R0044 solution will be progressed to ensure that it is ready to enter MHHS SIT at the appropriate time. The exact dates will be determined by the MHHS Programme

		Replan. Implementation will then be aligned with all other central system and code changes ahead of the start of migration. The costs provided should be considered the upper limit for the delivery of R0044.
British Gas (Energy Supplier)	Yes	N/a
OVO (Energy Supplier)	Yes	N/a

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Authority Determination following a recommendation by the REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
St. Clements (Provider of MPRS to ERDAs)	N/A	N/a

Scottish and Southern Electricity Networks (DNO)	N/A	N/a
Northern Powergrid (DNO)	N/A	N/a
DCC (CSS Provider)	Yes.	N/a
Scottish Power Energy Networks (DNO)	Yes.	N/a
National Grid Electricity Distribution (DNO)	Yes we agree	N/a
Utilita Energy Limited (Energy Supplier)	Yes	N/a
British Gas (Energy Supplier)	Yes this should be subject to Authority Determination, as it is a supporting change to support the MHHS TOM and more specifically the SEC MP162 change (which is also Authority Determined).	N/a
OVO (Energy Supplier)	No, but it should be approved by MHHP	The MHHS Programme, as the Proposer and a key stakeholder, have been engaged throughout the development of R0044. The implementation timescales for the introduction of the SMDR role in the SEC

		meant that SEC MP162 and R0044 had to be progressed outside the MHHS Programme governance. They have therefore followed the change governance under their respective codes. REC governance sets out that due to the impacts on the Significant Code Review, being delivered by the MHHS Programme, the changes should be determined by the Authority.

Question 5:	Based on the proposed solution, which is impacting only CSS and the CSS Provider, the Code Manager has not identified any impacts to REC Parties. Do you agree with this assessment? If no, please provide your rationale and describe any expected impacts.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
St. Clements (Provider of MPRS to ERDAs)	No As the producer of the MM90011 (MPRS C0200) message ERDS is impacted by this change. Further, there is currently no pattern for CSS Asynchronous responses to ERDS. SCS have raised the Asynchronous Issue with RTS and the REC Change Manger. Two options are proposed: 1. Change MM90011 (MPRS C0200) to include an erdaGeneratedReference, to be reflected on the Asynchronous response. This would be a similar pattern to the	For the purposes of the REC Change Process, the DNOs in the role of ERDA, are considered a REC Service Provider. The proposed solution excludes ERDA and EES requirements and makes the assumption that any impacts from those requirements need to be included in MHHS delivery.

	supplierGeneratedReference used on MM90012 - RECM_SN_CSS01800 a. This is the superior solution as it would uniquely link the response to the original request where there might be more than one request. 2. No change to MM90011 (MPRS C0200), the Asynchronous Response would include registrationId to allow MPRS to determine which registration the response related too. a. This would only work where there is one attempt at an MDR appointment. More than one attempt on the same registration would result in two or more asynchronous responses with the same registrationId, MPRS would not be able to determine which response is for which request. The REC Change Manger & RTS agreed to share details of the Asynchronous Response Message design with SCS The MHHS Programme is also an impacted party (although not members of the REC). MHHS M5 Work Off Plan Items D-009 & D-023 should be raised as Dependencies.	The Code Manager is working with St.Clements and the CSS Provider to manage the design dependencies called out in this response. These will be resolved as part of the detailed design. At the time of writing the Preliminary Change Report, the MHHS Design Work-Off Plan was not available. D-009 and D-023 have been added to the Final Change Report as suggested.
Scottish and Southern Electricity Networks (DNO)	No Impacts on ERDS have not been included or defined.	Please see above
Northern Powergrid (DNO)	Our comments are in line with our Service Provider, St. Clements, please see below:	Please see above

	[A direct copy of the St. Clements Q5 response was provided. This can be viewed above.]	
DCC (CSS Provider)	Yes.	N/a
Scottish Power Energy Networks (DNO)	We agree that this element of the change has no impact on other REC parties, however we are concerned that there are dependencies on information coming from other rec parties (the appointment flow) and that cognisance needs to be given of any impact should the solution require a change to upstream processes because of 'stand-alone' build.	
National Grid Electricity Distribution (DNO)	No, the ERDA is required to receive an Asychronous message as detailed in Schedule 27 Section 5.2.6, as detailed in the Legal Text changes for Schedule 27, therefore the proposed solution is not just impacting only CSS and the CSS Provider. Our Service provider has also highlighted the following: [A direct copy of the St. Clements Q5 response was provided. This can be viewed above.]	The response message being sent from CSS to ERDA (step 5.2.6) is included to reflect the R0044 solution requirement on the CSS Provider to send the message. The detailed design is being developed but it is based on the existing MM90011 (CSS0200) message. The draft asynchronous response message has been shared with St. Clements who have confirmed it is suitable for ERDS purposes. The finalised message design will be completed as part of the CSS Provider detailed design activities. The requirement on ERDAs for receipt of the message and any subsequent activity will be defined and managed under the MHHS Programme.

Utilita Energy Limited (Energy Supplier)	No comments.	N/a
British Gas (Energy Supplier)	We support this yes	N/a
OVO (Energy Supplier)	No, if we are a supplier are we automatically an MDR? If so, what is our MDR ID? How is that managed? What if a supplier notices issues with the MDR ID? How are they fixed?	It is outside the scope of R0044 to determine how Suppliers as SMDRs should be reflected in the appointment messaging. R0044 focusses on the central system updates for sharing the appointment data. MHHS Design Work-Off Plan item D-023 is being progressed to address these questions.

Question 6:	Based on the Business Case Assessment and Case for Change, do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on the date that will be determined by the MHHS Programme for M8 – 'Code Changes delivered'? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**

St. Clements (Provider of MPRS to ERDAs)	N/A	N/a
Scottish and Southern Electricity Networks (DNO)	N/A	N/a
Northern Powergrid (DNO)	N/A	N/a
DCC (CSS Provider)	Yes.	N/a
Scottish Power Energy Networks (DNO)	Yes.	N/a
National Grid Electricity Distribution (DNO)	Without a clear E2E design for this process and the associated changes being raised within MHHS and MDD, we are unable to provide an opinion. However, we are aware of the MHHS Programme Milestones that need to be met.	N/a
Utilita Energy Limited (Energy Supplier)	This change proposal shouldn't be voted on before the MHHS replan.	The proposed solution and implementation approach for R0044 will not be impacted by the MHHS Replan as it will not affect the design and requirements. R0044 has purposefully tied implementation to a milestone and not a specific date so that the Replan, or any subsequent shift in dates do not affect the stability of the CP's approval.

British Gas (Energy Supplier)	We did not support the introduction of SEC MP162, but if that is going ahead, then we agree that R0044 is also needed, on the dates proposed by the MHHS Programme.	The decision to Approve SEC MP162 was published by the Authority on 28 November 2022.
OVO (Energy Supplier)	Yes	N/a

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
St. Clements (Provider of MPRS to ERDAs)	N/A	N/a
Scottish and Southern Electricity Networks (DNO)	Nothing further currently.	N/a
Northern Powergrid (DNO)	N/A	N/a

DCC (CSS Provider)	SEC modification MP162 introduces critical path changes required for the MHHS programme implementation timeline. R0044 is needed to provide clarity for MP162 in the registration data design elements that relate to introducing the new Meter Data Retriever service, as defined by the Ofgem Target Operating Model. R0044 therefore is equally critical to this major programme. The Preliminary Report states *"The Code Manager will perform test assurance for REC specific Programmer Integration Testing (PIT) and will work alongside the MHHS Programme to maintain oversight of the end-to-end test assurance"*. There was an expectation by DCC that this change will be governed E2E by RECCo and the Code Manager and any governance requirements from the MHHS programme will be managed by RECCo. This statement above relates to DCC level testing of the Code across the DSP Interface. R0044 scope does not include MHHS programme level testing for which DCC is expected to be engaged separately (as confirmed in the DCC DIA response).	DCC have previously agreed with RECCo that they will manage their own MHHS engagement. The Final Change Report will be updated to clarify the Code Manager's test assurance role. Testing from SIT onwards, identified in the detailed impact assessment (DIA), was considered subject to change by the MHHS Programme. This was highlighted and discussed during the DIA refinement with the CSS Provider.
Scottish Power Energy Networks (DNO)	None.	N/a
National Grid Electricity Distribution (DNO)	We note that the scope of CP R0044 has been significantly reduced so that it now covers the receipt of the SMDR role into CSS and the transfer of that data to the SMDSP environment. Whilst we understand that this has been done to enable progression of the new Market Role for MHHS, we still regard that the lack of a clear design on how the ERDS will be populated with the SMDR role and the validation requirements is a significant risk. Also, there is no clear design path on how ERDS will be populated and how ERDS will populate CSS with the SMDR role. Although the REC CP has stated that this will be progressed under the MHHS Programme, we are concerned that there is no clear E2E design for this process. This has been called out in REC	The Code Manager acknowledges that R0044 does not provide the end-to-end design and supports that this is something the ERDA and other parties need. However, R0044 could not enable progress of the CSS requirements if it waited for key components for the end-to-end to be defined. The Code Manager will continue to work with the MHHS Programme and REC

	CP R0044 as an assumption under PCR.A0002, however without this E2E process on the population of the SMDR Role into ERDS, R0044 cannot work and therefore should be called out as a risk. Additionally, PCR A006 should also be raised as a risk as R0044 is dependent upon this being completed in time and if it is not R0044 again cannot work. PCR.A012 - The population of the SMDR role into ERDS needs to be fully designed to ensure that true E2E testing is undertaken and not each component individually. Therefore, this should also be recorded as a risk.	stakeholders to ensure the end-to-end is fit for purpose, transparent and understood. The SMDR appointment will be communicated to ERDS via the DIP Interface IF-0031.
Utilita Energy Limited (Energy Supplier)	No Further Comments.	N/a
British Gas (Energy Supplier)	No	N/a
OVO (Energy Supplier)	No	N/a