RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

FINAL CHANGE REPORT

R0044 - MHHS PROGRAMME CHANGES REQUIRED TO CENTRAL SWITCHING SERVICE

CHANGE REPORT	FINAL
DOCUMENT VERSION	2.0
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DOCUMENT APPROVAL STATUS	POST-VOTE

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	AUTHORITY DETERMINED
PRIORITY STATUS	CRITICAL	URGENCY	URGENT

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	28/10/2022

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CHANGE OVERVIEW

The Market-wide Half-Hourly Settlement (MHHS) Target Operating Model (TOM) requires that the appointment data of a Smart Meter Data Retriever (SMDR) is available to the Smart Meter Data Service Provider (SMDSP), so that the SMDSP can provide SMDRs with access to the smart meters at Metering Points they are registered to.

Currently the new SMDR role and its appointment data do not exist in, nor can they be made available from, the Central Switching Service (CSS) as this is a new industry operating model.

	High Impact: MHHS Programme
	Medium Impact: Central Switching Service Provider Smart Energy Code
	Low Impact: N/A

RETAIL ENERGY CODE

RESPONSIBLE COMMITTEE DECISION

On 13 December 2022, the Change Panel voted to recommend that the Authority **APPROVE** R0044 for implementation on the date that is determined by the MHHS Programme for its Milestone: M8 'Code changes delivered'.

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BACKGROUND

1 BACKGROUND

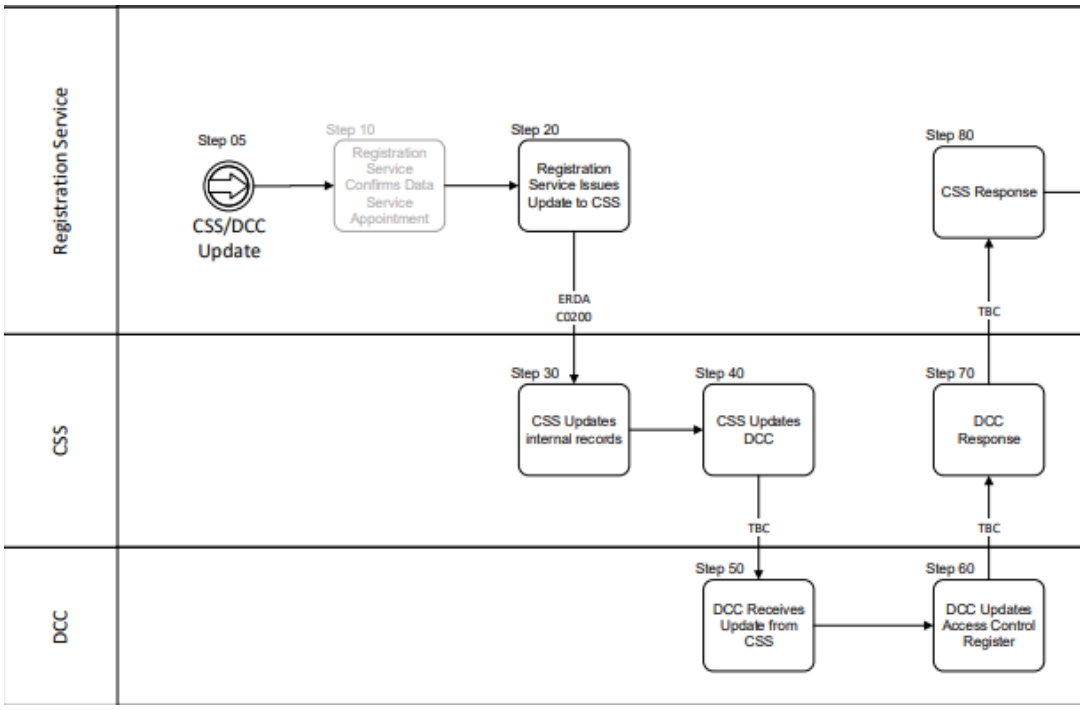
Ofgem's Electricity Settlement Reform Significant Code Review (SCR) concluded that settling all electricity Consumers on a half-hourly basis would bring net benefits of up to £4.5bn by 2045. As such, Ofgem placed responsibility on Elexon, in its role as the Senior Responsible Owner, to deliver the MHHS Programme. MHHS will be delivered in line with Ofgem's Settlement Reform Programme Plan, which includes key milestones through to 2025.

Delivering the full solution for MHHS will require a new Smart Data Service (SDS) which includes a new industry SMDR role. The SMDR will retrieve data directly from smart meters as a new Data Communications Company (DCC) User Role, as outlined in Smart Energy Code (SEC) Modification Proposal 162 (MP162) 'SEC changes required to deliver MHHS'.

SEC MP162 assumes that the appointment data for an SMDR will be sent from the CSS to the SMDSP Systems to enable the SMDSP to perform access control to smart meters for the new User Role. This will ensure that only registered SMDRs successfully collect data from smart meters to which they are registered.

This REC Change Proposal has been raised to progress the CSS system changes related to the SMDR, specifically the receipt of SMDR appointment data into CSS and the provision of that data to SMDSP. The MHHS Programme provided the high-level design, along with their design assumptions, however the full CSS solution has been developed under this Change Proposal. The MHHS design is detailed in MHHSP-BP-003A[1].

MMHSP-BP-003A



[1] MHHSP-BP003A-CSSandDCC Update - v3.0. Terminology in this business process diagram is from the MHHS Programme.

The Change Proposal assumes service and system design principles that currently exist for industry appointment data, and the SMDSP's use of this data when performing access control checks for Supplier, Distribution Network Operator (DNO) and registered Supplier Agent appointments against each Metering Point (MPAN or MPRN), will apply.

This Change Proposal is being progressed with an 'urgent' status to minimise the risk of the CSS changes impacting the critical path of the MHHS Programme. R0044 will deliver the specific CSS system changes related to sharing SMDR appointment data and is a consequential change required by the MHHS Programme. SEC MP162 is reliant upon the system interfaces that this change will deliver.

2 PROBLEM STATEMENT

The MHHS Target Operating Model requires that the appointment data of the SMDR is available to the SMDSP, so that the SMDSP can provide SMDRs with access to the Smart Meters at Metering Points they are registered to. Currently the new SMDR role and appointment data do not exist in, nor can they be made available from, CSS as this is a new industry operating model.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As the SMDSP, I want to be able to validate that an SMDR is registered so that I can provide them with access to the Metering Points to which they are registered.
M2	As an SMDR, I want to be able to access the Metering Points I am registered to so that I can collect settlement data from those meters.
M3	As the CSS Provider, I want the CSS to be able to receive notifications from the Registration Service on the appointment/de-appointment of an SMDR so that I can send the appointment data to the SMDSP.
M4	As the CSS Provider, I want the CSS to be able to provide SMDR appointment data to the SMDSP.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

The solution was not fully defined when this Change Proposal was raised. A period of solution analysis and development was therefore progressed by the Code Manager. This activity included validation of the outline solution and development of requirements for the full solution in collaboration with stakeholders from the MHHS Programme, the SEC Code Administrator, RECCo and REC Service Providers.

5 PROPOSED SOLUTION

5.1 SOLUTION OVERVIEW

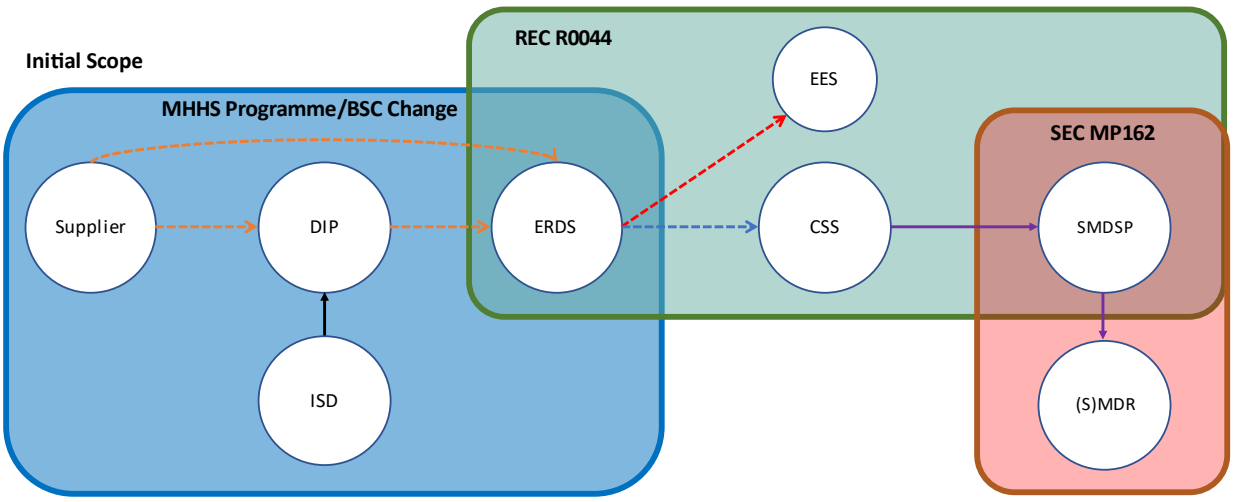
R0044 assumes that future REC changes will be required following confirmation from the MHHS Programme once the full end-to-end process has been defined. This will include the Electricity Retail Data Service (ERDS) and Electricity Enquiry Service (EES) requirements specific to the communication of SMDR appointments and they are out of scope for R0044. R0044 is being progressed to deliver the CSS requirements to facilitate required data migration activities and reduce risk of programme delays.

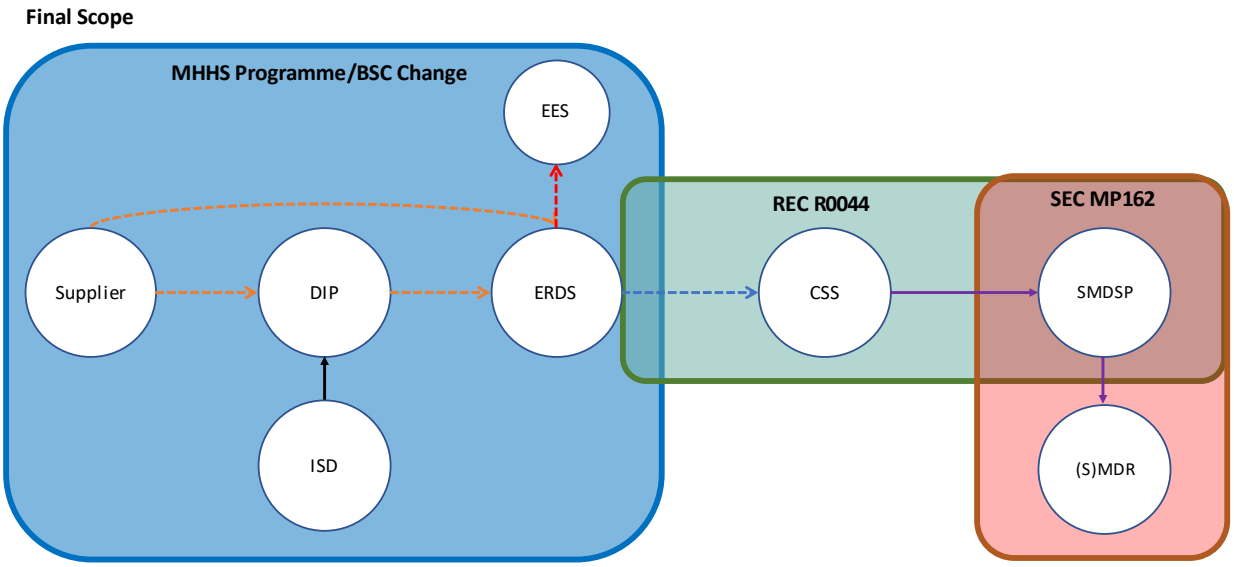
It is proposed that a Meter Data Retriever – MDR as referenced in the MHHS Programme and SEC MP162 – will be defined as a Smart Meter Data Retriever (SMDR) in the REC. This is to provide clarity that, for the purposes of MHHS, a Meter Data Retriever does not relate to all meters or market segments. Going forward, for consistency, this document will use the acronym SMDR to mean the same as MDR under the MHHS Programme and SEC.

5.2 SOLUTION SCOPE CHANGE

This Change Proposal originally included the transfer of SMDR appointment information from the ERDS to the EES. However, following the preliminary impact assessment, the decision was made to de-scope the ERDS interactions from the Change Proposal. ERDS Providers lacked sufficient information in July 2022 on the wider MHHS design to appropriately consider their end-to-end approach and costs which would enable them to complete the impact assessment.

Changes to the ERDS will be managed through the MHHS Programme, with 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.





5.3 TRANSFER OF SMDR INFORMATION FROM ERDS TO CSS

As part of the end-to-end solution, changes will need to be made to the allowable content within the registration appointments message – MM90011/RECM_SN_CSS00200 'Supplier Arranged Appointments' – that is transferred from the ERDS to CSS.

MM90011/REC_SN_CSS00200 is used to update the supplier arranged appointments for the Registration. It enables each appointment to be managed as a separate entity if required. The CSS needs to be informed of all the current active supplier arranged appointments whenever they change.

No structural change to the registration appointments message is anticipated, as such the message will retain its current structure:

Route: /registrations/{registrationId}/supplierarrangedappointments

Method: PUT

Body:

[{

"**mpid**": "string", --*

"**role**": "string", --*

"**fromDate**": "string", --*

"toDate": "string"

}]

Upon receipt of the appointment message sent from ERDS to CSS, the CSS will respond with a synchronous response confirming success, or failure.

The solution agreed, in the collaborative solution requirements workshops, was to amend the allowable values within the "role" data item, to accept a new market role that represents the

SMDR. The exact value of the enumeration value that represents the SMDR has yet to be confirmed, however, it is expected to be either “N”, “O”, “Q”, or “Y”. The Balancing and Settlement Code (BSC) will need to raise a Market Domain Data (MDD) Change Proposal to add the new Market Participant Role Code to MDD, this activity is out of scope of R0044.

CSS will need to recognise the new SMDR Role Code, as it does with other Market Participant Role Codes such as “X” being “Supplier” and “M” being “Meter Operator”. However, CSS will not validate the information that is provided, other than standard validation of the message structure / valid values / data exists in the Switching Operation Data (SOD). Validation will be undertaken upstream in the ERDS prior to entry into the CSS environment, and downstream upon receipt in the SMDSP environment.

The Code Manager will provide the SMDR role and Market Participant Identifiers (MPID) that have that role as part of the SOD.

5.4 TRANSFER OF SMDR INFORMATION FROM CSS TO SMDSP

The scope of R0044 also extends to the method by which the SMDR information is transferred from CSS to the SMDSP. It has been confirmed by the CSS Provider that the existing interface between the CSS and SMDSP systems will be amended to support the transfer of SMDR information.

5.5 RESPONSES TO TRANSFER OF SMDR INFORMATION

Confirmation of success or failure of the SMDR appointment will be sent by SMDSP to the CSS, which will in turn provide an asynchronous response to ERDS confirming the same.

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0044 can be found here.

The solution will be reflected in the legal text through an update to Schedule 27 – RMP Lifecycle. This will add the SMDR to section 5 – Supplier Agent Appointment and Update of Meter Asset Provider.

Although no changes have been made to the legal text as a result of the Consultation responses, further consideration by the Code Manager and RECCo has resulted in a change to the legal text in Schedule 27. The change provides additional clarity of the variance between the process steps for SMDR and MEM updates. The changes provide more clarity for the proposed solution but do not change the requirements.

A comparison of the redlined draft legal text published for consultation against the updated final redlined proposed legal text is included in the link above.

To reflect the creation of the SMDR role into the REC, Schedule 1 – Interpretations will also be updated:

Smart Meter Data Retriever	SMDR	means the Supplier Agent responsible for retrieving data directly from Smart Meters. SMDR has the same meaning as MDR within the Smart Energy Code.

Supplier Agent		means a Data Aggregator, a Data Collector, Smart Meter Data Retriever, or a Metering Equipment Manager.

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 SERVICE PROVIDER IMPACT ASSESSMENTS

As this is an Urgent Change Proposal, all contributing parties worked to develop a plan that expedited the standard assessment period without compromising the ability to appropriately consider and assess the requirements.

A limited informal preliminary impact assessment was completed with REC Service Providers in early June, to gather costs and timescales for completion of a detailed impact assessment by:

- Service providers that form the overall CSS provision under the DCC
- Electricity Enquiry Service (EES) Provider

The preliminary impact assessment was expedited through collaborative workshops during development of the full solution requirements between May to July 2022. A 25 Working Day (WD) detailed impact assessment was then requested from the CSS Provider and a 15 WD impact assessment was requested from ERDS Providers on 11 July 2022.

Following the receipt of the detailed impact assessment response, further activity was required to refine the requirements with the CSS Provider and the MHHS Programme. The detailed impact assessment was subsequently revisited and an updated response was provided by the CSS Provider on 27 September 2022. A summary of their assessment is provided in the following table.

CSS PROVIDER	• Confirmed that the solution is viable • Confirmed that the solution for the response from the SMDSP could be provided using current messaging patterns • Provided a breakdown of effort and cost that would enable planning for testing to be appropriately planned with the MHHS Programme for the end-to-end process • Aggregated costs for design, build, test, and implementation totalled £297k

	• Confirmed the solution could be implemented in the approximated timescale of June 2024
ERDS PROVIDERS	• St. Clements, as the MPRS provider to ERDAs, confirmed that they did not have sufficient information to provide an impact assessment due to the dependency on the wider requirements from the MHHS Programme

An impact assessment was not requested from the EES Provider, as there is a dependency on receiving specific detail from the ERDS Provider impact assessments. As the ERDS Providers were unable to provide this detail due to the dependency on the end-to-end requirements to be delivered by the MHHS Programme, the EES Provider impact assessment could not be progressed.

This has not been progressed subsequently as ERDS and EES requirements have been descoped from the solution following Service Provider impact assessments.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

All activities to date have been completed within the planned timescales.

The Change Proposal Plan can be found here.

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

9.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R0044.FCR.R001	Volumes of SMDR appointments do not accurately map across to other agent appointments, such that CSS non-functional requirements and assumption A009 is impacted.		An independent workstream on CSS non-functional requirements is being progressed by the code manager and is considered out of scope for the R0044 release
R0044.FCR.R002	The MHHS Design Work-Off Plan has items that relate to the introduction of the SMDR role. Conclusions from these items could impact the R0044 proposed solution.	Work Off Plan items: D-009 D-023	Conclusions of Work-Off plan to be assessed during detailed design

No issues have been identified.

9.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0044.FCR.A001	R0044 provides a solution for sharing SMDR appointment data for CSS changes only		Validated through solution refinement and impact assessment
R0044.FCR.A002	ERDS and EES requirements for sharing SMDR appointment data will be delivered under the MHHS Programme		Validated through solution development and impact assessment
R0044.FCR.A003	MHHS Design will be baselined on 31 October, with no changes expected to MHHSP-BP-003A	The Design Baseline is subject to completion of the MHHS Design Work-Off Plan to be completed in January 2023. See associated risk, R002 above.	To be validated during detailed design following programme conclusion of Work-Off items
R0044.FCR.A004	Transfer of SMDR appointment information from CSS to SMDSP is to be made through the existing interface		Validated through impact assessment
R0044.FCR.A005	Validation to take place upstream in SMRS during SMDR appointment process and downstream upon receipt in SMDSP, as such standard error handling without additional validation is sufficient within CSS	Upstream validation relates to DIP interface IF-031 which has been defined in the MHHS Design Baseline on 31 October. Downstream validation in SMDSP is in the scope of SEC MP162.	Validation dependent on MHHS Programme design, build, test (DBT)
R0044.FCR.A006	The allowable values for Data Item 'Market Participant Role Code' (DI50001[2]/J0001) will		Validated – the BSC MDD Change will follow the existing process

[2] Data Item reference in EMAR

	be updated outside of change proposal R0044, as a BSC owned data item, through a MDD change request		
R0044.FCR.A007	The SMDR role and associated MPIDs with that role will be provided to the RTS so that it can be passed on to CSS via the existing SOD interfaces.		To be validated during design phase
R0044.FCR.A008	No Service Requests will be required as business as usual within ServiceNow, however error handling may require incidents to be raised by exception.		N/A
R0044.FCR.A009	No SMDR Appointment Information, or combination of SMDR IDs and Role Codes, is expected to be hosted in ServiceNow.		N/A
R0044.FCR.A010	Volumes of SMDR appointment messages that are to be transferred between ERDS and CSS, and CSS to SMDSP are expected to be equivalent to that of other agent appointments (such as MEMs or Data Collectors etc.).		Validated through Impact Assessment responses
R0044.FCR.A011	There is no direct requirement for the ECoS (Enduring Change of Supplier) Service Provider to know of SMDR appointment as the switching process does		Validated through Impact Assessment responses

	not need this information		
R0044.FCR.A012	End-to-end testing for the SMDR appointment process will be delivered under the MHHS Programme	The Code Manager will continue to work with stakeholders to define the details for test planning	Validated through solution development and impact assessment
R0044.FCR.A013	No changes are being made to the communication of MEM appointments.		Validated through solution development and impact assessment

No.	DEPENDENCY	NOTES	STATUS
R0044.FCR.D001	R0044 is subject to Authority approval of SEC MP162	R0044 is only required if SEC MP162 is approved	Closed – the Authority decision to Approve SEC MP162 was published on 28 November 2022
R0044.FCR.D002	SEC MP162 design is dependent on completion of the detailed design for R0044		Closed
R0044.FCR.D003	SEC MP162 has identified a dependency on SMDSP-CSS integration testing prior to end-to-end testing as part of MHHS SIT		Closed

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	MHHS Programme Milestone M8 'Code changes delivered'

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The Code Manager proposes an implementation date that is directly linked to the MHHS Programme Milestone M8 'Code changes delivered'. By targeting this milestone, R0044 will be implemented alongside the REC consequential changes for MHHS therefore ensuring alignment across the REC legal text and the system changes across all the MHHS changes to REC Services (ERDS, EES and CSS).

Dependencies and assumptions between the MHHS Programme, SEC MP162 and this change are captured in section 9 above and engagement will continue across the three into planning, delivery, and release. Activity is underway to determine the specific details on dependencies and hand-offs between them.

The release plan will be developed to enable completion of design, build and test milestones that support the SEC MP 162 dependency and ensure availability of the solution for MHHS Programme System Integration Testing (SIT).

The Code Manager will perform test assurance for all R0044 test phases. Any MHHS testing will be undertaken and overseen by the programme and is outside the scope of this Change Proposal.

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 03 November 2022 to obtain views on the Preliminary Change Report (Link). In total nine responses were received from DNOs, Energy Suppliers and Service Providers.

The key themes from these responses have been summarised and set out below.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

Two respondents agreed that the proposed solution resolves the problem statement; seven respondents did not agree. Even though there was support for the proposed solution in resolving the problem statement for the reduced scope of the change, there was concern regarding the lack of an end-to-end solution for SMDR appointments and the exclusion of the other impacted REC systems.

Two respondents agreed with the proposed legal text; five respondents did not comment; and another respondent called out that the legal text includes the response message from CSS to ERDA but that it is not detailed in the solution. One respondent did not agree with the legal text based on the impact on ERDAs to receive a message from CSS by the inclusion on process step 5.2.6. The also raised further points for clarification.

Since the consultation responses have been received, the Code Manager has shared the asynchronous message with St. Clements who have confirmed it is suitable for ERDS purposes. This has addressed the primary concern that was raised by St. Clements and reiterated by the DNOs. The finalised message design will be completed as part of the CSS Provider detailed design activities.

11.1.2 IMPLEMENTATION APPROACH AND DATE

Four respondents agreed with the implementation date and approach; two respondents did not provide a response; two respondents did not agree or disagree due to the full end-to-end solution not being available; one respondent disagreed suggesting that the change should be updated to include the ERDS requirements.

11.1.3 IMPACTS TO PARTIES

Three respondents agreed that there is no impact to REC Parties; five respondents disagreed; and, one had no comments. Those that did not agree were concerned that the impacts to the ERDS and the MHHS Programme should be considered. One was concerned that the Supplier impacts in the scenario where a Supplier acts as the SMDR is not considered.

11.1.4 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Four respondents supported the case for change and Code Manager's recommendation. One of these respondents called out that this was directly related to the approval of SEC MP162 but that they do not support the introduction of the SMDR role under the SEC change.

Two respondents were not able to agree or disagree due to dependencies on the MHHS Programme.

Three others did not provide a response.

11.1.5 MHHS PROGRAMME RESPONSE

The MHHS Programme also provided the Code Manager with a response after the formal consultation had closed. They agreed with the proposed solution, legal text and implementation approach and are strongly supportive of the Change Proposal as a key enabler of the MHHS Programme delivery. The MHHS Programme will continue to work with RECCo and the Code Manager to ensure that the proposed solution continues to align with the overall design for delivery of the MHHS solution.

11.1.6 CONSOLIDATED RESPONSES

The responses have been consolidated and, following review and consideration, the Code Manager has provided comments. The consolidated response document can be found here.

The Code Manager considers that through post consultation engagement with key respondents that all the consultation responses have been appropriately addressed.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Final Change Report	Background	Added 'CSS' to '...however the full solution has been developed under this…'	Ensure clarity of the scope of the solution
Final Change Report	5 Proposed Solution, 5.1	Removed 'consequential'	The REC changes that will be required to ERDS and EES for SMDR appointment data are a direct result of

			the MHHS design and not consequential
Final Change Report	5 Proposed Solution, 5.5	Existing SMDSP to CSS content moved into new section, 5.5, on Responses. New content added on CSS sending response to ERDA.	The change report did not previously include the CSS to ERDA response. This was only captured in the RMP Lifecyle draft legal text.
Legal text	Schedule 27 - RMP Lifecycle	Additional clarification added to Schedule 27 - RMP Lifecycle	Mitigate any risk of misinterpretation of the legal text.
Final Change Report	6 Draft Legal Text	Explanation of legal text changes included.	To provide transparency and reasoning for changes made to the draft legal text.
Final Change Report	9.1 Risks and Issues	New risk, FCR-R002, added	Design baseline will not be fully complete until work off plan has concluded in January 2023. There are two work-off items that could impact the R0044 proposed solution.
Final Change Report	9.2 Assumptions and Dependencies	One new Assumption; Notes added to A003 and A005; Closed D001	Assumptions and Dependencies updated to reflect required clarifications identified in Consultation responses.
Final Change Report	10 Proposed Implementation Date and Approach	Additional wording added	To clarify the REC Code Manager's test assurance role.
Final Change Report	13 Business Case Assessment	Updates made to enhance the business case assessment	For greater transparency of business case.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

	TOTAL COSTS
CSS PROVIDER	£297,000

The costs quoted include the total design, build and test activities, including integration testing with the SMDSP. Integration testing between the SMDSP and CSS prior to the end-to-end MHHS testing has been identified by SMDSP Provider as a critical dependency for the SMDSP solution. SMDSP–CSS integration testing will ensure that the solution is robust, greatly reducing the risk of rework and regression testing effort during MHHS programme implementation. MHHS end-to-end solution testing is not included in this Change Proposal.

The Code Manager has identified that this approach to CSS-SMDSP integration testing could represent a duplication of effort and costs, when coupled with the MHHS end-to-end testing. The approach has been challenged with the SMDSP Provider and whilst the above stated benefits of the approach have been outlined, there is a concern that the testing approach is required to meet the governance needs of the SMDSP Provider rather than being considered as a part of the overall solution.

The Code Manager considers that although the integration testing approach does potentially duplicate costs this does not negate the overall business case for the change. We do not believe this approach to testing should be considered the 'default' for future SMDSP-CSS Change Proposals.

The costs are significantly reduced from the first detailed impact assessment provided (by approximately 50%), following solution refinement and thorough review between the Code Manager and the CSS Provider.

There are no direct implementation costs for Parties as this is a central system change only.

There are no costs expected from the Code Manager or RECCo.

13.2 BENEFITS

The benefits for this change are linked to the delivery of the MHHS Target Operating Model. Ofgem have estimated that the MHHS Programme will bring "net consumer benefits of between £1.6bn and £4.5bn over the period 2021-2045".[3]

The Code Manager has not identified any benefits that are quantifiable that will be specifically delivered through R0044, but the change would bring about the following intangible benefits:

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
MHHS PROGRAMME	Creation of the new SMDR role is a key component of the MHHS Target Operating Model that is being delivered primarily by SEC MP162. R0044 will deliver a critical element of how the role is governed by facilitating the sharing of SMDR appointment data via CSS.

13.3 COST BENEFIT ANALYSIS SUMMARY

R0044 will deliver the CSS requirements for sharing SMDR appointment data. These are needed before the majority of MHHS consequential code changes. There is a dependency of the SEC MP162 design on the R0044 detailed design which will provide the interface specification for sharing the appointment data. The delivery lead time that is required by SEC MP162 could not be accommodated within wider MHHS Programme plan and has been progressed to approval to ensure that modification can be delivered in time for MHHS SIT.

[3] Decision to approve Retail Energy Code modification R0003: Market-Wide Half-Hourly Settlement Implementation and Governance Arrangements | Ofgem

The Code Manager considers the costs are at the upper limit of what is acceptable to implement the proposed solution. However, it is recognised that the proposed cost may reduce for the Design, Build and PIT Testing (DBT) phases once the CSS Provider finalises internal arrangements.

Following publication of the Preliminary Change Report (PCR) the Code Manager has been working closely with the SMDSP Provider to refine the DBT activities. The Code Manager had previously assumed that integration testing would be undertaken by the MHHS Programme but recognised this was subject to further clarification.

SMDSP Provider has identified integration testing between the SMDSP and CSS prior to the end-to-end MHHS testing as a critical dependency. SMDSP-CSS integration will greatly reduce the risk of failures ahead of MHHS integration testing and reduce the potential for rework and regression testing effort. These integration testing activities are covered by the above quoted cost for the overall Change Proposal and increase the potential for efficiencies in the MHHS end-to-end testing.

As outlined above (see Section 13.1), there is a concern that the integration testing approach will result in duplication of effort when coupled with the MHHS end-to-end testing. However, in our opinion this approach does not negate the overall business case of the Change Proposal.

The Code Manager believes that the Change Proposal should be progressed. It is a critical component of the MHHS Design, and without its implementation neither SEC MP162 nor the MHHS Target Operating Model can be successfully delivered.

14 CASE FOR CHANGE

14.1 AUTHORITY DETERMINATION

The Code Manager believes that R0044 better facilitates the following REC Objectives:

OBJECTIVE	IMPACT TYPE	DESCRIPTION AND JUSTIFICATION
To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement[4]	Positive	The implementation of R0044 will provide a key component of the MHHS Target Operating Model which is being delivered as a positive and significant change to settlement in the Retail Energy Market
To ensure customers interests and data is protected in the operation of the REC	Neutral	Consumer interests and data protection are delivered through the governance of the SMDR role provided under SEC MP162

[4] REC Mission Statement

To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs	Positive	The solution for R0044 has been developed to use existing interfaces used between REC Service Providers and other central systems in the Retail Energy Market

14.2 CODE MANAGER CONSIDERATIONS

The Code Manager has reviewed the Change Proposal, considering the consultation responses received, and concluded the following:

- Concerns raised regarding design detail would not normally be considered in the proposed solution and the detail that has been shared has closed out the concerns. Although the Code Manager recognises and agrees that having an end-to-end solution for SMDR appointments under the MHHS Programme would be the preference, it has not been possible for this to be achieved in a way that provides the CSS system changes in the timescale that is required
- Since the consultation, no changes have been made to the proposed solution, implementation approach and date, or the case for change to address the concerns raised, therefore, no further industry consultation was required
- The Code Manager comments appropriately address the consultation responses received
- Although concerns have been raised, in the responses there were no direct disagreement with the case for change and Code Manager's recommendation

The Code Manager, the MHHS Programme and Service Providers are committed to working together to ensure a joined-up solution is implemented, for the success of the MHHS TOM going forward.

15 CODE MANAGER'S RECOMMENDATION

Based on the assessment in section 13 and 14 of this report, the Code Manager considers the REC Objectives would be better facilitated by this Change Proposal being implemented than would otherwise be the case.

The Code Manager's minded to position is that the Change Panel recommends that the Authority:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date which will be that determined by the MHHS Programme for Milestone M8 'Code changes delivered'.

16 RESPONSIBLE COMMITTEE DECISION

This report was discussed at an extraordinary REC Change Panel meeting on 13 December 2022.

The REC Change Panel voted to recommend that the Authority:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date which will be that determined by the MHHS Programme for Milestone M8 'Code changes delivered'.

This report has been updated to reflect the Change Panel's decision and to provide greater clarity on how concerns raised in consultation responses have been addressed and considered by the Code Manager in its recommendation.

17 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link to EMAR
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link
RELATED CHANGE	Smart Energy Code (SEC) Modification Proposal 162 (MP162) 'SEC changes required to deliver MHHS'
OTHER DOCUMENTS / LINKS	MHHSP-BP003A-CSSandDCC Update - v3.0 MHHS Programme Planning MHHS Design Work-Off Plan

18 GLOSSARY

This glossary details two different sets of terms.

- The first table includes terms and definitions from the REC
- The second table includes terms and definitions from the MHHS Programme which are taken from the MHHS Glossary on the Programme Collaboration Base

REC TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Data Communications Company (DCC)	means the person holding the DCC Licence.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Enduring Change of Supplier Service Provider (ECoS) Service Provider	means the DCC in its role as CoS Party, defined in the Smart Energy Code.
Electricity Retail Data Service (ERDS)	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Electricity Supplier	means a person holding an Electricity Supply Licence.

REC TERM	DEFINITION
Electricity Enquiry Service (EES)	means the service described as such in the EES Service Definition.
Market Domain Data (MDD)	means, the central repository of reference data maintained in both gas and electricity for use by respective Market Participants.
Market Participant Identifiers (MPID)	means the unique identifier by which a Market Participant is identified.
Metering Point	has the meaning given to it in the Electricity Distribution Licence, which for the time being means: "the point, determined according to the principles and guidance given in the MRA Transition Schedule to the Retail Energy Code, at which a supply of electricity taken into or conveyed from the licensee's Distribution System: a) is or is intended to be measured; or b) where Metering Equipment has been removed, was or was intended to be measured; or c) in the case of an Unmetered Supply, is treated as measured."
Metering Point Administration Service (MPAS)	means the service of that name which each DNO is required to provide under its Electricity Distribution Licence.
Registrable Measurement Point (RMP)	means a Supply Meter Point or Metering Point identified in the Central Switching Service.
Registration Data	means the data recorded in relation to a Registration.
Registration Service	means the component of the Central Switching Service which records Switching Operation Data and manages Switches, as further described in the Switching Data Management Schedule and the Registration Services Schedule.
ServiceNow	ServiceNow is the service desk provision for CSS
Significant Code Review (SCR)	means a review of one or more matters by the Authority which the Authority considers is: a) related to this Code (whether on its own or together with other Energy Code(s); and b) likely to be of significance in relation to the Authority's principal objective and/or general duties (as set out in section 3A of the Electricity Act and section 4AA of the Gas Act), statutory functions and/or relevant obligations arising under Law,

REC TERM	DEFINITION
	and concerning which the Authority has issued a notice that the review will constitute a significant code review.
Smart Energy Code (SEC)	means the code of that name maintained pursuant to the DCC Licence.
Smart Meter	means a meter which conforms (or is intended to conform) with the SMETS.
Smart Meter Data Retriever	means the new industry role that is being introduced into the REC through R0044 The role is known in the Smart Energy Code and MHHS Programme as Meter Data Retriever
Smart Meter Data Service Provider (SMDSP)	means the DCC in its role as provider of the Smart Meter Data Service.
Switching Operation Data (SOD)	Switching Operation Data comprises of data required to support the validation of CSS Market Messages as defined in Paragraph 4.5 of Schedule 24 - Switching Data Management

MHHS TERM	DEFINITION
DCC	Where DCC is used in MHHS documentation, this is interpreted by the REC Code Manager to mean the Smart Meter Data Service Provider.
Data Service Provider (DSP)	DCC System managing communications with Smart Meters.
MHHS Milestone M8 ‘Code changes delivered’	This is the milestone at which the consequential changes, required to the industry codes to enact the MHHS Design, will be implemented. The date will be determined and governed by the MHHS Programme.
Market-wide Half Hourly Settlement (MHHS)	Market Wide Half-Hourly Settlement will utilise the ability of smart meters to record a customer’s usage during each half hour period to move domestic and small non-domestic customers to half-hourly settlement. Medium and larger non-domestic consumers have been settled half-hourly since BSC modification P272.
Meter Data Retriever (MDR)	This is a sub-service of the Smart Data Service. It is the entity responsible for connecting to the DCC, and retrieving smart metering data for MHHS purposes. Registered Suppliers may choose to perform this role themselves or appoint a third party MDR service provider.

MHHS TERM	DEFINITION
MHHS Target Operating Model (TOM)	The Target Operating Model is the settlement arrangements designed by the Design Working Group (DWG), and further developed by the Code Change and Development Group (CCDG) and the Architecture Working Group (AWG) that will facilitate Market-wide Half Hourly Settlement.
Smart Data Service (SDS)	The Smart Data Services in the MHHS TOM comprise the Meter Data Retrieval Service, Processing Service (Smart) and Meter Reading Service, which together enable settlement of the Smart and Non-smart Market Segments.