RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0080 – IMPROVEMENTS TO FAILED TO DELIVER CSS MESSAGES

On 10 May 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0080 – Improvements to Failed to Deliver CSS Messages.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	19/06/2024
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Elise Handy

DATE CONSULTATION ISSUED	10/05/2024
RESPONSE DEADLINE	03/06/2024

Question 1:	Do you agree that the proposed solution addresses the problem statement? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	Yes. The ability to resend messages following a period where a Gateway has been unavailable would be extremely useful. Obtaining missing data flows and information would aid participants, avoiding the need for time-consuming workarounds. As documented in the R0080 Change Report, the volumes of these messages can be significant.	Noted, thank you.
Scottish Power Electricity Networks (Distribution Network Operator)	We believe that solution addresses the problem statement.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE – are happy that the solution reflects the problem statement.	Noted, thank you.
EDF Energy (Energy Supplier)	Agree.	Noted, thank you.
Anonymous (Energy Supplier)	Yes, the solution addresses the problem statement.	Noted, thank you.

Question 2:	Would implementing the proposed solution incur any costs to your business? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	Yes. Implementation will require an IT solution and will need to be scoped, understood, developed and deployed. Therefore, there will be cost of staff involved with the proposed process changes, analysis and development including costs associated with implementing the new API.	Noted, thank you.
Scottish Power Electricity Networks (Distribution Network Operator)	We are not aware of any significant costs that would be incurred.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	At this stage, we believe the costs will be minimal. But once we have more technical details of the solution we would review costings to see if we would implement this change.	Noted, thank you.
EDF Energy (Energy Supplier)	Not that we are aware of	Noted, thank you.
Anonymous (Energy Supplier)	No additional costs anticipated.	Noted, thank you.

Question 3:	Do you identify any benefits to your business through the implementation of the proposed solution? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	Yes. As a CSS User we want to receive CSS messages in a timely manner following any outage of our own gateway or systems so that there is no interruption to the Switching process or the Consumers' Switching experience. Resolving issues following a break in Gateway communication will benefit from this facility. The ability to resend messages automatically and reduce levels of manual workarounds should also have associated cost savings.	Noted, thank you.
Scottish Power Electricity Networks (Distribution Network Operator)	We are not aware of having been adversely impacted by this issue, however we believe that the introduction of the ability to recall messages is a benefit in the process.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As far as we are aware we have had no issues with our system and delayed CSS messages but any improvements to this process we would support.	Noted, thank you.
EDF Energy (Energy Supplier)	Improved customer experience.	Noted, thank you.
Anonymous (Energy Supplier)	- Improved data accuracy - Reduced resource expenditure - Reduced risk of failed registrations / industry interactions - Increased utility post-MHHS implementation as more industry messages transition to CSS format.	Noted, thank you.

Question 4:	Considering MHHS and that this functionality is optional, when do you think your organisation could implement the solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	We believe that the proposed implementation date of 28/02/25 would provide sufficient lead time for us to implement the solution if we have at least 6 months lead time following approval of the final agreed solution. Lead times of at least 6 months for such changes generally, is particularly important, given the pressures on project management and IT development resources as a result of the volume of mandatory industry change, in particular MHHS.	Noted, thank you.
Scottish Power Electricity Networks (Distribution Network Operator)	We are unsure of a definite timeline, however, believe that the Feb 2025 date is achievable.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We would not look to implement until MHHS is delivered.	Noted, thank you. One of the benefits of R0080 is that users can connect to it in their own time.
EDF Energy (Energy Supplier)	Unsure.	Noted, thank you.
Anonymous (Energy Supplier)	From point of implementation - however this would be dependent upon the complexity and resource requirement for initiating the API connection.	Noted, thank you.

Question 5:	Would you be supportive of the CSS Provider's proposed interim solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	Given existing workarounds available (albeit with an associated overhead) we would not be supportive of any additional costs to all participants as a consequence of the interim solution. It is unclear from the interim solution whether it's being proposed that there would be shared costs across all participants or if there is an impact on the CSS provider whilst this interim solution is applied. However, if the interim solution is optional and costs are borne solely by those participants that choose to use the interim solution (as opposed to shared costs across all participants) then we would be supportive.	The Code Manager has reviewed the feedback in full and the proposed benefits of the interim solution. On balance, the Code Manager would agree that an interim solution is not necessary and as such it will not be included as part of the Final Change Report request for approval.
Scottish Power Electricity Networks (Distribution Network Operator)	Yes, we would be supportive of the interim solution.	As above.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As SSE has had no issues to date and given the cost of the interim solution SSE would rather go straight to the Enduring solution.	As above.
EDF Energy (Energy Supplier)	Yes.	As above.
Anonymous (Energy Supplier)	In principle yes, we support the proposed interim solution – however we request more clarity around the intervals of the 24 proposed interim manual 'missed delivery' notifications, as well as any indicative response times for CSS to manually re-issue any 'missed delivery' messages upon receiving requests from CSS users.	As above.

Question 6:	Given the information and costs provided within the Preliminary Change Report, do you believe there is a business case for the progression of this Change Proposal? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	Yes. We believe that the proposed enduring solution would benefit all participants, for example, avoiding the costs and resources associated with manual workarounds. We believe that these benefits should exceed associated costs. The proposed solution would support the following REC Objectives: a) To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement; b) To ensure customers interests and data is protected in the operation of the REC; and To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructure it governs.	Noted, thank you.
Scottish Power Electricity Networks (Distribution Network Operator)	We believe that the costs quoted support a business case when compared with the impact of failed messages.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Although we are supportive of any improvements to the switching process, we feel the number of rejected switch messages annually does not warrant the costs involved in this change.	The Code Manager has taken on board your feedback and is not including the interim cost as part of our recommendation for approval which will considerably reduce the cost of the implementation of this change.

		In addition, the Code Manager understands that there is an increased risk of failed messages with the delivery of MHHS and having this capability in place before migration will help mitigate that risk.
EDF Energy (Energy Supplier)	Yes.	Noted, thank you.
Anonymous (Energy Supplier)	Yes, we believe, in principle, there is a business case for the progression of this Change Proposal: As industry communications that have historically been managed via DTF format, transition to CSS format under MHHS, there is a risk of increased volumes of 'failed delivery' messages, increasing beyond the volumes outlined in section 11.2 of the Preliminary Change Report. This is likely to reduce the 'per instance' cost of the proposed solution. However, it has been identified that an alternative solution might be to extend the current 12 hour retry window in length to 24 hours, to allow increased user resource to be applied to resolving any gateway issues before message delivery failures escalate to a point where a Switching Incident or use of the existing solution process are required. This alternative solution might be considered to reduce the overall volume of failed delivery messages and reduce by extension the number of resend requests that are raised under the current resolution methodology. It might also be considered to be considerably cheaper (both financially and resource-wise) to implement than the proposed solution which would require significant financial and resource investment.	The Code Manager has reviewed the current Retry Strategy as part of Change Proposal R0081 which was raised at a similar time as R0080, and the solutions were explored simultaneously. Ultimately through a series of workshops and analysis with the CSS Provider, The Code Manager decided to withdraw R0081 as no changes to the Retry Strategy were required. It is worth noting that the Retry Strategy is currently reviewed via the REC Technical Change Workshop on a cyclical basis to ensure it is set at the optimum level for users.

Question 7:	Do you agree with the proposed implementation date of 28 February 2025? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	Yes. We believe that the proposed implementation date of 28/02/25 would provide sufficient lead time for us to implement the solution once the details have been fully confirmed and approved. Ideally, as is the case with the majority of changes, at least a 6-month lead time would be required from the date the change is approved because implementation will require an IT solution and will need to be scoped, understood, developed and deployed. With MHHS, this 6-month lead time is particularly important.	Noted, thank you. The 6-month lead time is a useful guide which the Code Manager can ensure for future changes.
Scottish Power Electricity Networks (Distribution Network Operator)	We are supportive of the implementation date.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As this is not a mandatory change, SSE has no issues with the proposed implementation date.	Noted, thank you, the Code Manager is happy to provide support to parties at the point at which they choose to implement the solution.
EDF Energy (Energy Supplier)	Agree	Noted, thank you.
Anonymous (Energy Supplier)	Yes – assuming low complexity and resource costs associated with initiating the API connection.	Noted, thank you.

Question 8:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	We have no comments at this time.	Noted, thank you.
Scottish Power Electricity Networks (Distribution Network Operator)	We have not identified any issues with text changes in the documents provided.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	Noted, thank you.
EDF Energy (Energy Supplier)	No.	Noted, thank you.
Anonymous (Energy Supplier)	No comments currently.	Noted, thank you.

Question 9:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to self-governance approval by the Technical Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy	Yes.	Noted, thank you.

(Energy Supplier)		
Scottish Power Electricity Networks (Distribution Network Operator)	Yes.	Noted, thank you.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE agree with the proposed approach.	Noted, thank you.
EDF Energy (Energy Supplier)	Yes.	Noted, thank you.
Anonymous (Energy Supplier)	Yes – the optional status of the proposed solution lends itself to a self-governance approach.	Noted, thank you.

Question 10:	Do you have any further comments?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Drax Energy Solutions/Opus Energy (Energy Supplier)	One observation regarding the interim solution - the CSS Provider is proposing to run this 24 times a year until the enduring solution is completed, at a total cost of £120,000. If, instead of running this 24 times a year, it was run only on the last weekend of each month, although the impact may potentially be slightly diminished if participants need to wait marginally longer, the solution would still be significantly better than the current position, but at a much lower cost.	Based on feedback, The Code Manager is not intending to include the interim solution within the final change report and will work with the CSS Provider to expedite the implementation of the enduring solution.
Scottish Power Electricity Networks (Distribution Network Operator)	No further comments.	Noted, thank you.

SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE do not have any further comments at this stage	Noted, thank you.
EDF Energy (Energy Supplier)	We see this as an operational improvement for the industry especially after the outage we experienced last year. EDF would support this change.	Noted, thank you.
Anonymous (Energy Supplier)	- Clarity requested around whether individual supply points identifiers (MPAN/MPRN) will be associated with failed-receipt messages as part of the notification process so that users can identify which supplies are impacted without having to wait for messages to be successfully resent and/or to allow users to potential to exclude certain supplies messages from the resend process if alternative resolutions have already been arranged. - Clarity requested on the turn-around time between the existing 12 hr retry window closing and users receiving the notifications of failed delivery messages under the proposed solution. - Clarity requested around the delivery timeframe for any requested resends to be actioned by CSS.	Individual supply point identifiers will not be provided within the notification process. The notification provides a count of each individual failed message types, of which there could be a considerable amount. To provide additional detail for each failed message could make the email notification too large and fail to deliver itself. There is no functionality available to exclude messages from the resend function, all messages will be requeued following the request. This functionality and the full list of information contained within the notification is described within Section 5.6 of the R0080 Detailed Design Document. The default configuration for notifications is to run at 6am local time, generating notifications based on the existence of messages added to the Held Message Register within the previous 24 hours. Further detail on this can be found within Section 5.6 of the R0080 Detailed Design Document Once a market participant has triggered an API request to requeue their held messages, messages will be queued for delivery

		immediately, however there will be an exclusion window in place to avoid gate closure. The proposed settings for this are: a. 70 minutes prior to the start time of gate closure b. 60 minutes after the start time of gate closure. Further information on this can be found within Section 5.2 of the R0080 Detailed Design Document.