RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

R0055 – SWITCHING OPERATOR OUTAGE NOTIFICATION LEAD TIME

CHANGE REPORT	FINAL
DOCUMENT VERSION	1.0
ISSUED DATE	18/11/2022
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	MEDIUM	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	14/10/2022

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CHANGE OVERVIEW

Within the Switching Operator Service Definition, the Central Switching Service (CSS) Provider is required to provide 10 Working Days' (WDs) notice of planned system outages. However, within the CSS Provider's processes and the Switching Operator Change Management Process Category 3 document, an 8 WD lead time is set out. This change seeks to address this discrepancy.

	High Impact: N/A
	Medium Impact: CSS Provider, Switching Data Service Provider
	Low Impact: CSS Users

RESPONSIBLE COMMITTEE DECISION

On 30 November 2022 the REC Technical Expert Panel voted to **APPROVE** R0055 for implementation on 24 February 2023.

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BACKGROUND

1 SUMMARY

Within the REC Switching Operator Service Definition document, Paragraph 4.5, there is the provision for the CSS Provider to give a minimum of 10 WDs notice of planned outages. However, within the CSS Provider's internal operational procedure and the Switching Operational Change Management Procedures Category 3 document, the lead time is defined as 8 WDs.

2 PROBLEM STATEMENT

Across REC products there is an inconsistency in the defined lead time for the CSS Provider to give notification of scheduled maintenance and system outages. This inconsistency may result in uncertainty for Switching Data Service Providers (SDSPs) when submitting their Operational Switching Service Change requests to the CSS Provider, to ensure they can be included within a planned maintenance release. This may also affect CSS Users and their ability to plan their operational activity around CSS availability.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As the CSS Provider, I want the service levels to be consistently defined across relevant REC Products. This will ensure that I am clear on the lead time I need to provide for planned outages and can meet the defined service level.
M2	As a CSS User, I want to understand how much notice I will get for planned outages of the CSS, so I am able to appropriately plan my activity reliant on this service.
M3	As a Switching Data Service Provider, I want to understand how much notice I will get for planned outages of the CSS. This will ensure I am able to appropriately plan my Operational Switching Service Changes and associated activities.

PROPOSAL

4 PROPOSED SOLUTION

This change has been raised by the Data Communications Company (DCC), as the CSS Provider, and seeks to change the Switching Operator Service Definition Document to reflect 8 WDs as the lead time for planned outage notifications. Two solutions were considered as part of this Change Proposal:

- **Option 1** – Change the notice period for planned outages from 10 WDs to 8 WDs in the Switching Operator Service Definition.
- **Option 2** – Keep the Switching Operator Service Definition as 10 WD and raise a Category 3 Change Proposal to update the lead time to 10 WD within the Switching Operational Change Management Procedures. DCC Procedures would also require updating to accommodate a 10 WD notice period.

Following the Service Provider impact assessments, the Code Manager has determined that the most pragmatic solution to take forward is option 1.

Although one SDSP did state a preference for option 2, no concerns were raised by REC Service Providers or REC Parties that present any blockers to the implementation of solution 1. Another SDSP indicated there would be minimal costs to implement solution option 1, therefore the cost to implement solution option 2 outweigh the cost to implement solution option 1 (as set out by the CSS Provider and outlined in section 6.1).

Solution option 1, as the preferred solution, is considered simple by the Code Manager and will only require a legal text change, this can be seen in section 5 of this document.

5 DRAFT LEGAL TEXT

The proposed amendments of the legal text to the Switching Operator Service Definition section are set out below.

4.5. Scheduled Maintenance shall not occur between 16:00 and 01:00 hours. In the event of Scheduled Maintenance, the Switching Operator shall provide notice to Market Participants and Switching Data Service Providers at least ~~10~~8 Working Days before the outage, and the Switching Operator shall report on unplanned outages as soon as reasonably practicable, after becoming aware of an unplanned outage.

The legal text changes to deliver the proposed solution to R0055 can be found here.

6 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

6.1 SERVICE PROVIDER IMPACT ASSESSMENTS

Service Provider Impact Assessments were triggered on 19 August 2022, requesting the assessment of costs and impacts for the two solutions set out in section 4. The table below summarises the responses received:

Central Switching Service (CSS) Provider	• This Change Proposal was raised by the CSS Provider with the intention of aligning the Switching Service Definition with their internal processes for the provision of notice for planned outages. Consequently, they are supportive of implementation of an 8 WD notification lead time.
	
	Solution Option 1
	• This option will not require any changes by the CSS Provider.
	• No cost will be incurred from the CSS Provider.
	• This can be implemented without any lead time.
	
	Solution Option 2
	• This will require development by the CSS Provider to implement;
	  ○ There will be a one off cost of £5000.
	  ○ There is a medium level of confidence in this being an accurate estimation of cost.
	• The Switching Service Provider requested further time to undertake a more detailed impact assessment should this option be chosen for progression.
	• This solution option would take approximately 2 months to implement.

Electricity Retail Data Service (ERDS)	• No ERDS Providers indicated any cost would be incurred for the implementation of either solution option. • Most ERDS Providers are currently working to a 10 WDs notice period; however, some are already using 8 WDs. • A range of implementation lead times are required for solution 1, the longest being one month. No concerns or impacts were raised for either solution option.
Gas Retail Data Service (GRDS)	• The GRDS Provider indicated a preference for solution option 2. • They indicated that no cost would be incurred for the implementation of either solution. • They stated the importance of this lead time being clear. • They raised a risk relating to the availability of data in GES during an outage, which has been added to the RAID Log as an assumption until confirmed.

6.2 REC PARTY IMPACT ASSESSMENTS

Whilst an impact assessment was issued to REC Parties on 26 August 2022, no responses were received.

The Code Manager assumes this is because this Change Proposal will not have any material impact on REC Parties.

7 DELIVERY AGAINST CHANGE PROPOSAL PLAN

All activities associated with R0055 have been completed in the timeframes set out in the Change Proposal Plan.

The Change Proposal Plan can be found here.

8 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

8.1 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	There is no REC Party impact that affects the solution to be taken forward by the Code Manager	No Party impact assessment responses were received, the Code Manager assumes this is due to no or limited impact on Parties, however the consultation will give an additional opportunity for Parties to provide feedback.	Closed – No issues were raised during the consultation of this Change Proposal.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	24/02/2023

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The Code Manager proposes implementation in the next standard release, on 24 February 2023.

Service Providers have indicated that one month is the appropriate lead time to implement this Change Proposal, following the Responsible Committee decision due on 30 November 2022. There is also no dependency driving a specific date for implementation, the Code Manager considers implementation in the February 2023 release to be appropriate.

10 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 14 October 2022 to obtain views on the Preliminary Change report. In total 3 responses were received from SDSPs.

No objections or notable comments were made against the solution, legal text or implementation approach of this Change Proposal. All 3 respondents agreed that the solution addressed the problem statement, they agreed with the case for change and the proposed implementation approach.

The consolidated consultation responses can be found here.

11 BUSINESS CASE ASSESSMENT

11.1 COST BENEFIT ANALYSIS

No costs have been identified for the implementation of the solution.

Cost avoidance is the key tangible benefit that will be seen from the implementation of the preferred solution, when compared to implementation costs of the alternative solution.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
Consistency across the REC	This Change Proposal addresses a discrepancy between REC Documentation and Service Provider Process. It is important that we address issues with congruence between REC documents when they are discovered. This change will ensure that the REC is consistent and clear, so all REC Parties and Service Providers can meet their obligations under the REC.

11.2 COST BENEFIT ANALYIS SUMMARY

The Code Manager has determined that there is a positive business case for the implementation of this Change Proposal.

This is on the basis that implementing the proposed solution, to amend the Service Definition for the notice period of planned outages, will result in a cost avoidance of £5000, compared to retaining the current definition of 10 WD notice lead time, which would require the CSS Provider to make changes to their procedures.

The Code Manager's assessment is based on the assumption that there is no material impact to CSS Users, as validated through the impact assessment and consultation.

12 CASE FOR CHANGE

12.1 SELF-GOVERNANCE

The Code Manager considers that there is a positive case for change to implement this Change Proposal, on the basis that the proposed solution:

- resolves the problem statement, by aligning Service Provider process and REC documentation, ensuring consistency across the REC;
- offers the best value for money resolution to the problem statement and has a positive benefits case; and
- provides efficiencies to Service Providers by aligning process and documentation to ensure all have a consistent understanding of what the lead time for notice should be.

13 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 11 and 12 of this report, the Code Manager considers a positive business case can be made for implementing this solution

The Code Manager recommends that the Technical Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 24 February 2023.

14 RESPONSIBLE COMMITTEE DECISION

On 26 October 2022 the REC Technical Expert Panel voted to **APPROVE** R0055 for implementation on 04 November 2022.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link to EMAR
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Consolidated Consultation Responses
OTHER DOCUMENTS	PDF Legal Text Preliminary Change Report Switching Operator Service Definition Switching Operational Change Management Procedures Change Proposal Plan

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16 GLOSSARY

TERM	DEFINITION
Category 3 document	refers to the operational documents which are required to support, but do not place obligations upon, market participants and as such will be maintained by the Responsible Provider.
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.
Central Switching Service Provider (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.
CSS Users	means each organisation which is Qualified to use the CSS, together with each Switching Data Service Provider (other than the CSS Provider) the categories of which are set out in the Central Switching Service Schedule
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.
Gas Retail Data Service (GRDS)	means the gas registration services provided under this Code to support the provision of gas retail data to the CSS and other services.
Operational Switching Service Change	means a change to the Switching Arrangements (e.g. planned downtime and software updates) which can be progressed without a change to this Code, as further described in Paragraph 8 of the Switching Service Management Schedule.
Switching Data Service Providers	means the CSS Provider, the SMDSP (in respect of the services provided under the Smart Energy Code), the Enduring Change of Supplier Service Provider (in respect of the services provided under the Smart Energy Code), the Gas Retail Data Agent, the Electricity Retail Data Agents, and the Enquiry Service Providers

TERM	DEFINITION
Working Day (WD)	means any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day that is a bank holiday in either or both England and Wales within the meaning of the Banking and Financial Dealings Act 1971