RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0093 - UPLIFT TO CSS MAXIMUM DEMAND VOLUMES DURING MHHS MIGRATION PERIOD

On 01 December 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0093.

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

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	11/01/2024
RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL
LEAD ANALYST	HARRIET TRUSS

DATE CONSULTATION ISSUED	01/12/2023
RESPONSE DEADLINE	15/12/2023

Question 1:	Do you agree the proposed solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, Utilita agree with the proposed solution given that the MHHS programme have been unable to specify an exact number for message volumes. The solution is explicitly clear on the CSS Providers sole responsibilities on engaging with the programme and managing the message volumes.	Noted – thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Noted – thank you.
Data Communications Company (DCC)	No. DCC is currently uncertain of the maximum Market wide Half-Hourly Settlement (MHHS) migration volumes, however it is working to the assumption that this will be approximately 1.5m that will be actioned within a one-hour timeframe. This is a substantial increase on current targets set out in Central Switching Service (CSS) Service Definition Section 7.3, which states that a peak hourly volume is 25,300. DCC is of the opinion that it will be unable to meet current SLAs, which are currently under review under REC Change Proposal R0092 'DCC Service Level Agreements for the Switching Incentive Regime'.	The Code Manager notes the response. As has been discussed with the CSS Provider during an extended impact assessment and solution development period, the intention of the proposed solution is not to define the MHHS migration volumes within the REC itself but to ensure that the CSS Provider engages with the MHHS Programme to ensure it can stand up the required service to maintain service levels during the MHHS Migration Period. Any volumes associated with MHHS migration are

		considered additional to the baseline stated in the CSS Service Definition. Any changes made to the baseline under R0092 will not affect the requirement for the additional volumes for MHHS migration to be managed.
SSE Energy Supplier Limited (Energy Supplier)	Yes.	Noted – thank you.

Question 2:	Do you agree with the proposed legal text? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, Utilita agree with the proposed legal text. The new obligation in section 7 'Maximum Demand Volumes' and the accompanying definitions added to schedule 1 are clear, concise, and unambiguous. The drafting makes it explicitly clear of the CSS Providers responsibilities within the migration period.	Noted – thank you.
National Grid Electricity Distribution (DNO)	Yes we agree	Noted – thank you.
Data Communications Company (DCC)	No.	As R0093 does not look to make changes to the baseline volumes it is not appropriate to

	The volumes should reflect changes made to the agreed volumetrics under R0092. Furthermore, as per the response to question 1, the MHHS migration volumes are yet to be published.	include any changes within the R0093 legal text. When the R0092 solution and legal text is approved and implemented it will be reflected alongside the R0093 text.
SSE Energy Supplier Limited (Energy Supplier)	Yes.	Noted – thank you.

Question 3:	Do you agree with the proposed implementation date and implementation techniques? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, agreed.	Noted – thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes – this will fall in line with ratification of the Migration Thresholds within MHHS and be in place ahead of Migration in April 2024	Noted – thank you. (Migration is planned to start in April 2025)
Data Communications Company (DCC)	No. With the current assumed volumes, DCC advises that a system redesign may be required to facilitate this change and meet the relevant Service Level Agreement (SLA). Or as a minimum, exceptions should be agreed up-front if the CSS system experiences large increases in messages-per-second such that any measurement period (currently an	As detailed in the proposed solution and change report, any steps that the CSS Provider needs to take to be able to continue to provide the expected service during the migration period should be managed via operational planning and budget submissions directly with RECCo.

	hour) is disproportionately impacted by the need to scale-up resources to meet those increases in demand.	The Code Manager notes that any exceptions to meeting agreed service levels will relate to when volumes go over those stated in the CSS Service Definition plus those that are communicated by the MHHS Programme via the Migration Thresholds Document and related material which manages live migration management.
SSE Energy Supplier Limited (Energy Supplier)	Yes.	Noted – thank you.

Question 4:	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 REC Technical Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, agreed.	Noted – thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. But would ask that those in attendance are versed in MHHS expectations.	Noted – thank you.
Data Communications Company (DCC)	No.	The Code Manager notes the response but also that no evidence has been provided to support that the approval should be

	DCC is of the opinion that this Change Proposal should be Authority led.	determined by the Authority. To help understanding, the details below set out the reasoning of the Code Manager on why R0093 does not meet the criteria set out in the Schedule 5 - Change Management: 1. It will not have a material impact on existing or future energy consumers. 2. It will not have a material impact on competition in the supply market. However, it is vital to supporting competition in the market that CSS is able to manage demand from the market, so it continues to support fast and reliable switching. 3. While R0093 acknowledges the requirement for the CSS Provider to make changes to its systems and processes, this is not considered to be discriminatory in its effects. 4. R0093 was not raised by the Authority.
SSE Energy Supplier Limited (Energy Supplier)	Yes.	Noted – thank you.

Question 5:	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 23 February 2024.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, agreed.	Noted – thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes – this will fall in line with ratification of the Migration Thresholds within MHHS and be in place ahead of Migration in April 2024	Noted – thank you. (Migration is planned to start in April 2025)
Data Communications Company (DCC)	No. DCC believes that this Change Proposal should at the very least, be placed on hold, to allow further discussions take place, and refine the Proposed Solution. Furthermore, DCC would prefer there to be an outcome on R0092 before a decision is made on this Change Proposal.	The Code Manager has engaged with the CSS Provider throughout solution development and the impact assessment period, making itself available to work through questions and ensure mutual understanding on the expectations regarding the proposed solution. Following confirmation of understanding during discussions the CSS Provider did not take the opportunity provided during the impact assessment period to appropriately consider the changes required and impact to SLAs. The proposed solution was adjusted at each stage of the impact assessment to support and mitigate concerns raised by the CSS Provider. Estimated

		volumes were also provided from the beginning to help this assessment. The Code Managers notes that assumption A008, was included in the Preliminary Change Report to make clear that any changes made to the baseline under R0092 will not affect the requirement for the additional volumes for MHHS migration to be managed and therefore does not consider there to be a dependency on R0092 to clearly define the requirement for R0093 which concerns additional volumes for migration only.
SSE Energy Supplier Limited (Energy Supplier)	Yes.	Noted – thank you.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Nothing to add.	-
National Grid Electricity Distribution	No	-

(Distribution Network Operator)		
Data Communications Company (DCC)	None.	-
SSE Energy Supplier Limited (Energy Supplier)	No.	-