RETAIL ENERGY CODE

This document is classified as **WHITE**.
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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0103 – CENTRAL PROVISION OF DCC TECHNICAL CONTACTS FOR REQUESTING TEST CERTIFICATES

DOCUMENT VERSION	V1.0
DATE ISSUED	26/05/2023
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	URGENT

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	11/08/2023

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CHANGE OVERVIEW

This change proposes that the Switching Operator (SO) may nominate one or more Technical Contact(s) for any CSS User or Switching Data Service Provider (SDSP), for the sole purpose of requesting test security certificates for connecting to the CSS test environments and emulating CSS Users or SDSPs during testing.

	High Impact: N/A
	Medium Impact: Switching Operator
	Low Impact: CSS Users and Switching Data Service Providers

1 BACKGROUND

Within the test environments of the CSS, simulators are key functionality to conduct testing. Simulators mimic the activity of all the SDSPs and the CSS User communities (e.g., one simulator will be able to act as any Supplier for which it holds a certificate).

In order for central systems testing (including maintenance and emergency testing) to be undertaken by the Switching Operator (SO), test security certificates from the SDSPs and CSS User communities are required to allow simulators to interact with the CSS in the testing environments.

The certificates in place during the Switching Programme are expiring and it is becoming increasingly difficult to find certificates to be used by simulators. This will quickly lead to an inability to test future changes to the CSS systems (or perform maintenance) if a solution is not implemented.

Although the Technical Contact(s) for SDSPs and CSS Users can request their own certificates through ServiceNow, the current process relies on organisations requesting their own certificates in a timely manner and this is not proving sufficient to have a broad enough set of certificates for testing.

This change proposes that the SO may nominate one or more Technical Contact(s) for any CSS User (including SDSPs), for the sole purpose of requesting test security certificates for connecting to the CSS test environments, emulating that CSS User during testing. It should be noted that this is similar to the (one-off) process used during the Switching Programme.

The SO would then be responsible for maintaining the nominated Technical Contacts registered for this purpose and for ensuring that the appropriate controls are in place to prevent any other actions being taken by the Switching Operator-nominated Technical Contacts.

This change is being taken forward as an Urgent Change Proposal, to reflect the issues that may imminently arise from the inability to robustly test CSS changes.

2 PROBLEM STATEMENT

Due to certificate expiry, there are not currently sufficient test security certificates for connecting to CSS test environments and emulating CSS Users (simulators). The current process for CSS Users to request certificates is inefficient and is reliant on the CSS Users obtaining new certificates in a timely manner. Without sufficient test certificates, the Switching Operator may not be able to fully test changes to the CSS system.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As the SO, I want sufficient simulators to be available in the test environments, so that I can test changes to CSS systems for all necessary scenarios

M2	As a CSS User, I want changes to the CSS systems to be robustly tested, so that implemented changes align to their design and deliver the planned benefits
M3	As a CSS User, I want to be able to manage my Technical Contacts, so that I am in control of my responsibilities under the REC

4 IMPACTS

CONSUMERS
N/A

REC SERVICE PROVIDERS
Switching Operator
Switching Data Service Providers

RECCO / REC CODE MANAGER
Performance Assurance

REC PARTIES AND SERVICE USERS
CSS Users

REC DOCUMENTS / PRODUCTS
Schedule 25 – Central Switching Service

The Code Manager and the SO have developed a solution, whereby the SO will be permitted to nominate a Technical Contact for each CSS User. The SO appointed Technical Contact would be able to request the Transport Layer Security (TLS) and Message Signing certificates on behalf of the CSS User.

These security certificates would be used by simulators within the test environment to emulate the CSS User, so that any change can be tested in the necessary scenarios (e.g., with a sufficient number/type of CSS Users).

CSS Users would continue to be able to nominate / remove their own Technical Contacts as now (and be able to remove the SO-nominated Technical Contact if they deemed it necessary) and would see all Technical Contacts listed on the Switching Portal.

The SO would be responsible for ensuring the appointed Technical Contacts only had access to the test environment and their actions were controlled. The SO will develop and set out the governance and controls ahead of an impact assessment being issued to CSS Users.

The Code Manager has developed draft legal text for this change, which can be found here.

5 CROSS CODE IMPACTS

No cross-code impacts have been identified.

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF GOVERNANCE

RESPONSIBLE COMMITTEE	CHANGE PANEL

The REC document impacted by this Change Proposal fall under the responsibility the REC Change Panel.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Retail Risk(s)	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	3	10	30
				Overall Priority Score (rounded)	153

Priority Status	HIGH
Change Proposal Type	STANDARD

This Change Proposal has a high priority status based on a priority score of 153.

Consumer Impact – a score of 1 as this will have a minor indirect impact to Consumers. It will ensure the appropriate testing is completed ahead of the implementation of CSS changes – this will reduce risk of issues with changes that could impact Consumers.

Retail Risk – a score of 2 to reflect the need for robust testing and its importance in relation to system reliability and performance. This links to the Retail Risk Register, Reference 9 [1].

Operational Effectiveness and Efficiencies – a score of 2 as this will improve the efficiency and effectiveness of the process for requesting and using security certificates.

Legal Regulatory and Compliance – a score of 1 as this change will support the SO in meeting its obligations associated with testing and implementation of changes to CSS.

Contribution to/ Alignment with the objectives of the REC – a score of 1 as this change supports continuous improvement and drives efficiencies in the operation of central systems.

Urgency – a score of 3 to reflect that the change should progress imminently, to ensure that sufficient test certificates are in place for use during the first testing of CSS impacting changes since REC V3.0 go-live, expected in September or October 2023.

8 SUMMARY OF CHANGE PROPOSAL PLAN

The solution for this Change Proposal has already been identified and a 15 Working Day (WD) Service Provider impact assessment period has been initiated with the SO. During this period the SO will complete the analysis needed to enable it to set out the process and controls that will be introduced as part of the solution.

A further impact Assessment period has been included to give impacted Parties and SDSPs sufficient time to assess the proposed solution and respond to the impact assessment.

[1] Retail Risk Register

Following publication of the Preliminary Change Report, a 15 Working Day consultation period is proposed.

	FROM	TO
IMPACT ASSESSMENT PERIOD	19/05/2023	28/07/2023
PRELIMINARY CHANGE REPORT AND CONSULTATION ISSUED	11/08/2023	11/08/2023
CONSULTATION	11/08/2023	04/09/2023
FINAL CHANGE REPORT ISSUED	15/09/2023	15/09/2023
RESPONSIBLE COMMITTEE DECISION (EX-COMMITTEE)	22/09/2023	22/09/2023
APPEAL WINDOW	22/09/2023	06/10/2023

9 GLOSSARY

TERM	DEFINITION
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.
CSS Certificate Authority	means the CSS Provider in its role as security certificate authority for the Central Switching Service.
CSS User	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
Message Signing Certificate	means a security certificate required in accordance with the CSS Schedule used to authenticate individual messages sent across the communication channel through the application of a digital signature.
Retail Risk	means a risk that retail energy consumer outcomes and the effectiveness of the retail market are measurably and significantly degraded by a failure by a REC Service User or REC Service Provider to meet the objectives, standards and core processes under this Code
Test Environments	means the testing environments as described in the E2E Testing Plan.
Switching Data Service Providers (SDSPs)	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.
Switching Operator (SO)	means the DCC in performing the role of managing the co-ordination of the CSS Provider and the other Switching Data Service Providers, including the mechanisms for Users to report incidents and access service management support, from the CSS Go-Live Date.
TLS Certificate	means a security certificate required in accordance with the CSS Schedule to secure either end of the network connection to ensure the transfer of Market Messages across the communication channel is via a secure encrypted channel.