RETAIL ENERGY CODE

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CHANGE PROPOSAL FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Beth Brown
COMPANY *(Optional)*	
COMPANY TYPE *(Optional)*	Code Body
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	Beth.Brown@capgemini.com

2 CHANGE PROPOSAL SUMMARY

CHANGE PROPOSAL TITLE *(Mandatory)*	Central provision of DCC Technical Contacts for requesting test certificates
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Within the test environments of the CSS, simulators are key functionality to carry out 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, certificates from the SDSPs and CSS User communities are required to interact with CSS in the testing environments. The Switching Operator was able to issue certs to the simulator provider during the Switching Programme, but the replacement process via Service Now no longer allows this – instead placing onerous activity on Parties to collaborate with the Switching Operator to give them the ability to request certificates on their behalf. Certificates are expiring in number at the moment, and new test environments (e.g., UIT-B) do not have certs

	at all. The impact is that currently it is becoming increasingly difficult to find data to test with associated to the diminished certificates in the simulators, which will quickly lead to an inability to test future changes to the CSS systems (or perform maintenance) if a solution is not implemented.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	There has been minimal impact to date other than an extension to lead times for test phases in order to source increasingly scarce data caused by the lack of certificates. With insufficient numbers/types of party certificates available, changes may not be fully tested for all scenarios as there will be no data to support them. Given that the certificates were requested in bulk at specific times within the Switching programme it is likely that big tranches will expire at the same time causing rapidly diminishing test capability. The current situation around test certificates is: • Pre-production no longer has the minimum number of required JWS certs for the test tooling to operate. The immediate impact is this prevents planned and necessary NFT post functional testing on CSS. • UIT-B only has 5 MPID certs, which is not enough to support testing for R0067 in the short term, or any other testing subsequently. • SIT-A (maintenance) and SIT-B (major change) have a diminishing number of active certs, propped up by the interim process. At least 50% of these expire in June. • UIT-A down to 11 certs, which severely limits the capability to support external testing and will ultimately prevent it.
WHAT OUTCOMES DO YOU CONSIDER ARE NEEDED TO ACHIEVE AN EFFECTIVE SOLUTION? *(Mandatory)*	Test certificates are held at all times for enough parties to enable changes to be tested with enough simulation to replicate live operational scenarios. A solution has been identified, whereby the DCC will register three (subject to review as part of the CP) named individuals within the Switching Portal as Technical Contacts for each CSS User (existing users or new users as they accede), as a bulk data amendment for test environments only. The certificates will be monitored for expiration and renewed as necessary to maintain sufficient number of

	simulators to complete testing of changes to CSS systems. This does not impact parties maintaining and registering their own Technical Contacts (multiple TCs can be nominated, for the parties or their adaptor providers), or requesting their own certificates for test environments. In many cases both the party and the simulator can hold certificates for the test environments, and there is an established process for a party to request decoupling of a simulator so they can connect directly (the processes for test environments are predicated on simulators being preferred testing options – therefore simulators should be connected unless a specific request is made and accepted). Furthermore, a party could choose to remove any Technical Contact including any registered by the DCC for the purposes described in this Change Proposal, and also could revoke certificates.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE CHANGE PROPOSAL THAT WOULD BE USEFUL? *(Optional)*	An interim process was operated by the DCC to enable rapid turnaround of certificate requests in bulk to facilitate test phases during the Faster Switching Programme. Certificates for any/all organisations were made available on request to populate the simulators. There was not a requirement for DCC to validate the use of the certificates in simulation in the test environments with the organisation who "owned" the MPID/role combination. Since the Switching programme closure, DCC has employed the interim process on a limited basis in the interests of facilitating critical testing. However, this was not desirable as it created mismatches in Switching Portal metadata, and was disabled

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS CHANGE PROPOSAL? *(Mandatory)*	☐ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit ☐ Microbusiness

	☐ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☒ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS CHANGE PROPOSAL HAVE FOR THESE CONSUMERS? *(Mandatory)*	☐ Switching experience ☐ Billing accuracy ☐ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☒ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	No direct consumer impact.

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Interpretations and Definitions Schedule ☐ Transition Schedule ☐ Accession Agreement ☐ Company Governance Schedule ☐ Change Management Schedule ☐ Performance Assurance Schedule ☐ Qualification and Maintenance Schedule ☐ Market Exit Schedule ☐ Charging Methodology Schedule ☐ Prepayment Arrangements Schedule ☒ Central Switching Service Schedule ☐ Data Access Schedule ☐ Energy Theft Reduction Schedule ☐ Transfer of Consumer Data Schedule ☐ Metering Operations Schedule ☐ Metering Accreditation Schedule ☐ Smart Meter Installation Schedule ☐ Secure Data Exchange Schedule ☐ Green Deal Arrangements Schedule

	☐ Registration Services Schedule ☐ Related Metering Points Schedule ☐ Address Management Schedule ☐ Switching Data Management Schedule ☐ RMP Lifecycle Schedule ☐ Switching Service Management Schedule ☐ Resolution of Consumer Facing Switching and Billing Issues Schedule ☐ SPAA Transition Schedule ☐ MRA Transition Schedule ☐ Unbilled Energy Code of Practice ☐ Gas Metering Code of Practice ☐ MOCoPA ☐ ASPCoP ☐ Change Panel Terms of Reference ☐ Performance Assurance Board Terms of Reference
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION? *(Optional)*	☐ Data Item Catalogue ☐ Market Message Catalogue ☐ Data Access Matrix ☐ Standards Definition
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Electricity Enquiry Service ☐ Central Data Service Provider Further Services ☐ Secure Data Exchange Service ☐ Green Deal Central Charging Database ☒ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Switching Operator ☐ Gas Retail Data Service ☐ Electricity Retail Data Service

	☐ Gas Enquiry Service ☐ Energy Theft Tip Off Service (ETTOS)
ADDITIONAL INFORMATION *(Optional)*	New process to be followed to manage certificates and request new ones as they expire or for new CSS Users

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ Energy Suppliers ☐ Distribution Network Operators ☐ Gas Transporters ☐ Metering Equipment Managers ☐ DCC ☐ Shippers ☐ Data Collectors ☐ Data Aggregators ☐ Green Deal Providers ☐ Green Deal Finance Parties ☐ Meter Asset Providers ☐ AMR Service Providers ☐ EES Users ☐ GES Users ☐ GDCC Users ☒ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	CSS Users

OTHER INDUSTRY CODES? *(Optional)*	☐ BSC ☐ DCUSA ☐ SEC ☐ UNC ☐ IGT UNC

ADDITIONAL INFORMATION *(Optional)*	

DOES THIS CHANGE PROPOSAL IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	

5 CHANGE PROGRESSION

DO YOU BELIEVE THIS CHANGE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	Yes, due to the limited number of certificates remaining: • Pre-production no longer has the minimum number of required JWS certs for the test tooling to operate. The immediate impact is this prevents planned and necessary NFT post functional testing on CSS. • UIT-B only has 5 MPID certs, which is not enough to support testing for R0067 in the short term, or any other testing subsequently. • SIT-A (maintenance) and SIT-B (major change) have a diminishing number of active certs, propped up by the interim process. At least 50% of these expire in June. • UIT-A down to 11 certs, which severely limits the capability to support external testing and will ultimately prevent it.
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OR IMPLEMENTATION OF THIS CHANGE PROPOSAL? *(Optional)*	Before the next significant test event is due
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THE CHANGE PROPOSAL WHICH MAY IMPACT ITS	No

PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	
DOES THIS CHANGE PROPOSAL RELATE TO AN EXISTING OR PREVIOUS CHANGE PROPOSAL? *(Optional)*	Yes – could be a connection to R0070 which is setting out the provisions for test environments / test data. But this issue/solution can be standalone and progress separately.

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	