RETAIL ENERGY CODE

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

CHANGE REPORT

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

CHANGE REPORT	FINAL
DOCUMENT VERSION	1.1
ISSUED DATE	19/09/2023
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) (TC) 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

RESPONSIBLE COMMITTEE'S DECISION

On 19 September 2023, the Change Panel voted to Approve R0103 for implementation on 23 FEBRUARY 2024.

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BACKGROUND

1 SUMMARY

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).

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 (varying dates per organisation) 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 TC(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 TC(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 TCs 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 TCs.

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 TCs, so that I am in control of my responsibilities under the REC

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

The SO submitted a fully formed solution which included the processes it will follow and the controls that will be in place. SDSPs were invited to provide their assessment of the changes, and a summary of responses are included in the table below in section seven.

CSS Users were also asked to provide an impact assessment on the proposed solution, however, only DNOs/IDNOs responded, and their comments are also provided in section seven.

5 PROPOSED SOLUTION

The Code Manager and the SO have developed a solution, whereby the SO will be permitted to nominate a TC for each CSS User. The SO appointed TC 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 TCs as now (and be able to remove the SO nominated TC if they deemed it necessary) and would see all TCs listed on the Switching Portal.

The SO would be responsible for ensuring the appointed TCs only had access to the test environment and their actions were controlled. Actions undertaken by the SO will be auditable and a report can be made available to give visibility of all Parties nominated via this process.

The Role Based Access Control (RBAC) within ServiceNow would restrict these TCs from requesting Production Environment PKI Certificates, thereby limiting the actions of the TCs to just the Test Environment, as only Test Environment PKI Certificates can be requested. Furthermore, CSS Users will still be able to manage their own TCs as now, including removing the SO appointed TCs should they wish to.

6 DRAFT LEGAL TEXT

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

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 SERVICE PROVIDER IMPACT ASSESSMENTS

Service Provider Impact Assessment responses were received from three service providers, summarised in the table below.

CSS Provider	• For the SO, the solution goes beyond a document change, configuration is needed to ServiceNow systems to support the change. • The costs for implementing and testing the solution have been provided. • The SO suggested a 5-week delivery timeframe following approval of the change proposal. • The requests to add TCs and certificates are auditable, and a report can be requested, giving full visibility of all affected CSS Users • Recommends that a Knowledge Article be written to support CSS Users on how to follow the process.
ERDA	• Raised no concerns with the proposed solution or legal text. • They were happy that the solution addressed the problem. • While noting the absence of the specific controls on the SO; they were satisfied that the responsibility to ensure those controls are appropriate and lay with the SO.
GRDA	• indicated that they didn't believe they were impacted by this change, and therefore were not providing a detailed response.

7.2 REC PARTY IMPACT ASSESSMENTS

REC Parties were invited to provide their comments on the proposed solution during the Impact Assessment. We received only two non-confidential responses that are summarised below.

ENERGY SUPPLIERS	• No responses were received from any Supplier Parties.
DISTRIBUTION NETWORK OPERATORS	• Two responses were received from DNOs/IDNOs. • One of those responses indicated support for the proposed approach. • The second response indicated that while no impacts have been identified with the proposed solution, they had concerns for the Parties for whom the Switching Operator would be acting, and they recommended that details of controls should be included in the legal text to prevent inappropriate action being taken by the Switching Operator, such that they cannot perform any other tasks.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

The Change Proposal Plan can be found here and all activity has been completed within the planned timescales.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	23/02/2024

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

10 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 11 August 2023 to obtain views on the Preliminary Change report Link. In total two responses were received from an Energy Supplier and a DNO. The responses have been consolidated and comments provided by the Code Manager. This can be found here.

The key themes from these responses have been summarised below.

10.1 SUMMARY OF RESPONSES

Both responses received were supportive of the proposal and agreed with the Code Manager's implementation approach.

11 BUSINESS CASE ASSESSMENT

11.1 COST BENEFIT ANALYSIS

The estimated ServiceNow Design, Pre–Integration Testing (PIT) and Systems Integration Testing (SIT) costs are estimated to be approximately £9300, however the final costs incurred may be lower, and only that amount incurred will be charged.

	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
SWITCHING OPERATOR	£3000	£0.00	£0.00 PER ANNUM

CODE MANAGER	£6300 +/- 10%	£0.00	£0.00 PER ANNUM
REC BUDGET APPROVAL SECURED FOR CENTRAL SYSTEM COSTS			21/06/2023

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
Testing by the Switching Operator	The certificates put 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. This change will allow the SO to nominate TCs on behalf of CSS users to enable them to emulate Party testing before CSS changes go-live, and thereby assuring the industry that solutions have been tested thoroughly in terms of solution and capacity.

11.2 COST BENEFIT ANALYIS SUMMARY

The only known costs provided to implement this change are central system change costs as detailed above. Although during impact assessment, a respondent indicated there may be unspecified staff costs for any monitoring activity they may need to perform, to assure themselves that no other activities have been undertaken by the CSS Provider in using the permissions this change provides. Those costs are relatively minor and outweigh the intangible benefits that robust testing provides for the CSS Users.

Without this change, the CSS Provider would be reliant on CSS Users renewing their certificates and providing them to the CSS Provider to enable the testing to take place. To date, insufficient Users have renewed their Test Certificates to ensure reliable levels of testing can take place.

12 CASE FOR CHANGE (SELF GOVERNANCE)

The proposed changes,

- appropriately resolves the original Problem Statement.
- the cost and effort of implementing and operating the proposed solution is low and outweighs the risk that insufficient testing could present.
- the proposed solution doesn't, remove or override the rights of the CSS users to submit their own TCs or to remove the SO TCs should they wish to do so. The CSS Users will have visibility of who the current TC is on the Switching Portal. If the solution is not

implemented, it could cause detriment to market participants and/or Consumers by delaying deployment of changes until sufficient test certificates were available or result in the necessary release of inadequately tested solutions due to the lack of useable test certificates.

- the proposed solution delivers positive outcomes for Consumers and efficiencies in the operation of the retail energy market, since it will enable the SO to ensure that where solutions require testing, the SO is able to step in and emulate environments/ Market Participant Identifier (MPIDs)/ and or roles where there are insufficient current test certificates submitted which will ensure a level of confidence in the changes being delivered.

Based on the above summary, the Code Manager believes there exists a positive case for change.

13 RESPONSIBLE COMMITTEE DECISION

This report was discussed at the REC Change Panel meeting on 19 September 2023

The REC Change Panel voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of **23 February 2023**

14 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link

15 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.
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.
Technical Contact (TC)	relates to the management of CSS security certificates, and has the meaning given in the Central Switching Service Schedule.
Test Environments	means the testing environments as described in the E2E Testing Plan.
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.