RETAIL ENERGY CODE

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

CHANGE REPORT

R0128 - REMOVAL OF CSS BUSINESS RULE 1177 TO REFLECT OFAF OPTIONALITY

CHANGE REPORT	FINAL
DOCUMENT VERSION	2.0
ISSUED DATE	18/09/2023
DOCUMENT APPROVAL STATUS	POST-VOTE

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

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	28/07/2023

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CHANGE OVERVIEW

This change looks to remove business rule 1177, from the Central Switching Service (CSS) Message Business Data Validation Rules, which mandates that all Suppliers have a 'One Fail All Fail' (OFAF) reference included in their Switching Operational Data record in CSS. This was not the intended design. CSS system functionality will be updated as part of an operational change, as agreed at Switching go-live. This change is required to align the Data Specification with the operation of the system.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: REC Code Manager

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RESPONSIBLE COMMITTEE DECISION

On 15 September 2023, the Technical Expert Panel voted to **APPROVE** R0128 for implementation on 06 December 2023.

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BACKGROUND

1 SUMMARY

As part of the Switching design, a 'One Fail All Fail' (OFAF) reference was intended to be an optional Data Item for the Energy Supplier Switching Operational Data (SOD) records. When the Switching Arrangements went live, the Central Switching Service (CSS) was built with the OFAF references set as mandatory for all Energy Supplier SOD records. The Switching Programme Design Authority recognised that the OFAF reference was incorrectly flagged as mandatory in the CSS. This was recorded as defect 'DEF-1294 - Test Case SIT-F-MDD-08-01'. It was agreed that, as a low priority defect, the necessary change, to set the OFAF reference to optional, would be arranged post go-live.

Until that time, a workaround was put in place with the Code Manager providing dummy OFAF references for all Energy Suppliers that are not currently OFAF qualified. This ensures that Energy Supplier records can be accepted into CSS and Switch Requests will be processed as required.

Within the CSS Message Business Data Validation Rules, business rule 1177 currently states:

> "It is mandatory that roles of Supplier must have an OFAF Company Group supplied. N.B., A workaround (agreed with Landmark, DCC and RECCo) is in effect until the first scheduled release post-go-live, when this attribute will become optional in this scenario."

It is intended that the CSS system will be updated to align with the intended design, under operational maintenance requirements, in an extraordinary release in December 2023. The current workaround will no longer be necessary from that point. This change proposes an update to the CSS Message Business Data Validation Rules, at the same time as the maintenance release, to remove business rule 1177. This update will align the Data Specification with the operation of the system.

2 PROBLEM STATEMENT

When the Switching Arrangements went live, a CSS business validation rule was put in place to reflect an element of the CSS design that was not intended. To support the functionality that is in place, the Code Manager is operating a workaround. This adds a small overhead but also creates SOD that incorrectly reflects the accurate status of OFAF qualification for Energy Suppliers.

The Switching Operator has scheduled an update to the functionality to meet the original design. On implementation of the system update, the REC Data Specification needs to reflect the updated functionality.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want the operational switching processes to run efficiently so that my switching experience is not impacted
MARKET PARTICIPANT USER STORIES	
M1	As the Code Manager, I want the REC to reflect the intended design and align with the CSS functionality so that I do not need to operate a workaround
M2	As the Switching Operator, I want the REC Data Specification to reflect the functionality as designed so that my obligations are clear
M3	As an Energy Supplier, I want the SOD, relating to my Market Participant Identifier(s) (MPIDs), to accurately record my OFAF reference so that my OFAF qualification status is clearly understood

PROPOSAL

4 PROPOSED SOLUTION

The proposed solution is to remove business validation rule 1177 from the CSS Message Business Data Validation Rules.

Further details on the proposed solution can be found here. No changes have been made since the document was shared at initial assessment.

5 DRAFT LEGAL TEXT

The legal text makes the required deletions within the CSS Message Business Data Validation Rules.

The legal text changes to deliver the proposed solution to R0128 can be found here.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

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

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks or issues have been identified that could impact this plan.

7.1 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0128.CR.A001	The CSS system change will be implemented via operational maintenance requirements on the same release date	Requirement for system change identified under Switching programme testing: DEF-1294 - Test Case SIT-F-MDD-08-01	Closed – inclusion in December 2023 release confirmed

No.	DEPENDENCY	NOTES	STATUS
R0128.CR.D001	R0128 is directly linked to the implementation of the CSS functionality update	Reference: DEF-1294 - Test Case SIT-F-MDD-08-01	Closed
R0128.CR.D002	The Switching Operator has a dependency on the document change being implemented, to support the Maintenance Release happening on 06 December 2023.	If R0128 is not implemented - the defect could not be implemented through the Maintenance Release; or, - if it is implemented, REC documentation would not reflect the update.	Closed

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

	06/12/2023	PROPOSED IMPLEMENTATION APPROACH	BIG BANG

An extraordinary REC release has been scheduled for 06 December 2023 for the implementation of R0067 - Introduction of CSS refresh functionality. The same release is targeted for R0128, as it is a low impacting addition to the release and will benefit from the additional time for the change process to complete. The Switching Operator has confirmed that

the associated operational requirements are appropriate to be included in the extraordinary release. Implementation of R0128 is not dependent on the implementation of R0067.

10 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 28 July 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 and set out below.

10.1 SUMMARY OF RESPONSES

10.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

The respondents agreed that the proposed solution resolves the problem statement and agreed with the proposed legal text.

10.1.2 IMPLEMENTATION APPROACH AND DATE

The respondents agreed with the implementation date and approach. One response identified, however, that should the R0067 implementation be postponed for any reason, that R0128, as a low priority change, should be included within the next appropriate scheduled release.

10.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondents supported the case for change and Code Manager's recommendation.

11 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made to the report following consultation.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

No costs have been identified to deliver the Data Specification update required for this Change Proposal.

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REC CODE MANAGER	The REC Technical Services function within the Code Manager will no longer be required to operate a workaround that ensures Switch Request processing is not impacted.
SWITCHING OPERATIONS	Switch Request processing will no longer be reliant on an operational workaround by the Code Manager. SOD in CSS will be cleaner without the inclusion of dummy references for Supplier OFAF qualification.
DATA SPECIFICATION	The Data Specification will be aligned with the CSS design, following delivery of the defect fix.

12.3 COST BENEFIT ANALYIS SUMMARY

There are no costs associated with implementation of this Change Proposal and the benefits from implementation of this change are clear.

13 CASE FOR CHANGE

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

- the proposed solution is fully formed and appropriately resolves the problem statement;
- without implementation of this change the delivery of the intended design for the industry's Consumer-centric Switching arrangements will not be reflected in the Data Specification; and,
- a positive business case can be made, as set out in section 9 of this report.

14 CODE MANAGER'S RECOMMENDATION

Based on the assessment in section 12 and 13 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 06 December 2023.

15 RESPONSIBLE COMMITTEE DECISION

On 15 September 2023, the Technical Expert Panel voted unanimously to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 06 December 2023.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
PROPOSED SOLUTION	Link
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link
RELATED CHANGE	R0067 - Introduction of CSS refresh functionality

17 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.
Data Specification	means the document of that name forming part of the Technical Specification.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Market Participant Identifier (MPID)	means the unique identifier by which a Market Participant is identified.
One Fail All Fail (OFAF)	means that a Switch Request has been identified as dependent upon the successful progress of other Switch Requests in the same OFAF Group (or, following Validation of one or more of those Switch Requests, all the resulting Registrations while they are either Pending or Confirmed).
Switching Operational Data (SOD)	means the data described in Paragraph 4 of the Switching Data Management Schedule.
Switching Operator	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.
Switching Request	means a request from a Gaining Supplier to initiate a Switch.