RETAIL ENERGY CODE

This document is classified as **WHITE**. Information is for public, unrestricted dissemination and publication.

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

INITIAL ASSESSMENT REPORT

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

DOCUMENT VERSION	V1.0
DATE ISSUED	11/07/2023
DOCUMENT APPROVAL STATUS	APPROVED

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

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	28/07/2023

LEAD CHANGE ANALYST



Harriet Truss

Click to send an email

020 3934 8744

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

1 BACKGROUND

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 as 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."

The CSS system is due to be updated, via operational maintenance requirements, in an available December 2023 release to align with the intended design. The 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 to the operation of the system.

The proposed solution can be found here.

2 PROBLEM STATEMENT

When the Switching Arrangements went live, a CSS business validation rule was put in place to reflect an element to 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 to 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

4 IMPACTS

REC DOCUMENTS / PRODUCTS
Data Specification: CSS Message Business Data Validation Rules

RECCO / REC CODE MANAGER
Code Manager – REC Technical Services

The business rule to be removed is detailed within the CSS Message Business Data Validation Rules, which is held in the Data Specification, here. This document will need to be updated.

The REC Technical Services function within the Code Manager are currently operating a workaround so that Switch Request processing is not impacted. The workaround will no longer be required on implementation of this change.

The implementation of the related update to the CSS system is scheduled for a maintenance release in December 2023. No further impact to CSS or the Switching Operator is expected.

Although, this change relates to management of the SOD for Energy Suppliers there is no direct impact to them as this is a central system change only.

5 CROSS CODE IMPACTS

No cross code impacts have been identified in relation to this change.

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE	RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL

This change will follow a Self-Governance Change Path, as it is in support of a simple central system change that has previously been agreed, as required under the switching programme governance.

The change seeks to amend a business rule held within the CSS Message Business Data Validation Rules, within the Data Specification. It is under the responsibility of the Technical Expert Panel; the Code Manager therefore considers that the decision on this Change Proposal should be made by them.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Retail Risk(s)	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		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)	103

Priority Status	MEDIUM

Change Proposal Type	STANDARD

The priority status for this Change Proposal is 'Medium' based on a weighted prioritisation score of 103. This is broken down as below:

Impact:

- Retail Markets Impact – a score of 1 to reflect the minimal impact the change will have on mitigating Retail Risk 9 'REC Service performance prevents a consumer from switching Suppliers effectively' by ensuring business rules are accurate and support the switching design.
- REC Operational Effectiveness – a score of 1 to reflect the minimal impact the change will have by reflecting the update to the CSS system functionality to meeting the intending switching design.

Resource:

- A score of 3 – this is a change with a fully formed solution that can progress to consultation without further solution development.

Strategic alignment:

- Objectives of the REC – a score of 1 due to the minimal impact this will have on driving efficiencies in the operation of the REC and the central systems it governs.

Urgency:

- This Change Proposal has been given an urgency score of 3 against planned activity, to reflect the need for it to be progressed immediately so that it can achieve a timetable that will provide the supporting legal text for an operational system update.

8 SUMMARY OF CHANGE PROPOSAL PLAN

The Change Proposal has been raised with a fully formed solution. Therefore, the plan for this Change Proposal starts with preliminary assessment and a standard 15 Working Day industry consultation.

	FROM	TO
PRELIMINARY CHANGE REPORT AND CONSULTATION ISSUED	28/07/2023	28/07/2023
CONSULTATION	28/07/2023	18/08/2023
FINAL CHANGE REPORT ISSUED	08/09/2023	08/09/2023
RESPONSIBLE COMMITTEE DECISION	27/09/2023	27/09/2023
APPEAL WINDOW CLOSURE	12/10/2023	12/10/2023

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.
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 (OAF)	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.