RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0203 – CSS RETRY STRATEGY

On 18 September 2024 the Code Manager issued a consultation to industry to seek feedback on the Change Report (Consultation) for R0203.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	18/09/2024
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	James Hardy

DATE CONSULTATION ISSUED	18/09/2024
RESPONSE DEADLINE	02/10/2024

Question 1:	Do you agree with the proposed solution? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Retail Ltd (Energy Supplier)	We agree it is imperative that the practical operation of the CSS matches the legal provisions of the Code. It is right to address this apparent discrepancy in relation to the CSS retry strategy. At the same time, it remains incumbent on the CSS Provider to operate the service with regard to the Code. We are heartened that the CSS Provider has, according to the Change Report, committed not to deviate from the Code concerning the CSS retry strategy in future. We trust that the CSS Provider will take the same approach in respect of every applicable provision of the Code concerning the CSS.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the proposed solution. However, we would also add that although we understand the DCC's desire to expedite a change to their systems to improve the retry sequencing, had market participants had an opportunity to impact assess their proposed changes, a more rounded solution could have been achieved. In particular we would highlight that whilst we welcome a retry strategy, abandoning the message entirely after 12 hours, if the outage lasts more than 12 hours, makes the retry pointless. We would welcome that after 12 hours of retry that an incident is then raised, but we believe a better process would be to place the failed messages in a Dead Letter Queue, rather than abandoning them. This would mean that, say following a 24 hour outage, once the systems were back up, the DLQ can be reprocessed and no messages are lost.	Thank you for your response. The Code Manager can engage with the CSS Provider on the point highlighted. There is the ability to raise a REC Change Proposal or Issue, if the respondent, or the CSS Provider, believes the CSS retry strategy should be updated further to reflect the highlighted proposal.

Question 2:	Do you agree that the proposed legal text accurately reflects the current CSS retry strategy?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Retail Ltd (Energy Supplier)	While we support this proposal in principle, we believe that further amendments to the draft legal text, set out in the table below, should be made to the definition of the CSS retry strategy. **The Code Manager is unable to paste the table provided by Scottish Power without corrupting the document, but it has been received and reviewed.** We agree that the first, short-interval part of the CSS retry strategy as set out in the original proposal is sufficient. However, we believe that the second, long-interval part of the retry strategy should be revised to match the structure of the short-interval part. We also propose that the conditionality of the statements be revised so that the sequence from failure/non-receipt to the short-interval element of the retry strategy, to the long-interval element of the retry strategy, to abandonment flows well. In our view, this approach would ensure that the CSS retry strategy in the Code is as clear as possible.	Thank you for your response and suggested amendments. The CSS retry strategy contained in the draft legal text (that is not impacting on Energy Suppliers) has been developed through engagement with the CSS Provider to ensure it is an accurate reflection of the current procedure, and has been reviewed by legal advisors to ensure clarity on the approach and wording. The Code Manager notes that despite the suggested amendment, the respondent has expressed their support in principle for the proposed solution and implementation date in question 1, 2 and 3 of this Consultation. Based on these points, the Code Manager rejects the further amendments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree that the proposed legal text reflects the current CSS retry strategy.	Noted. Thank you for your response.

Question 3:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for Implementation on 08 November 2024? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Retail Ltd (Energy Supplier)	We have no objection to the proposed implementation date of 8 November 2024 for this proposal.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the Code Manager's recommendation for implementation on 8/11/2024	Noted. Thank you for your response.

Question 4:	Do you expect this Change Proposal to result in any financial or operational impacts to your organisation? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Retail Ltd (Energy Supplier)	We see no notable operational or financial implications of this proposal to raise at this stage.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	We do not anticipate any financial or operational impacts to our organisation.	Noted. Thank you for your response.

Question 5:	Do you have any other comments on this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Retail Ltd (Energy Supplier)	We have no further comments to make on this proposal at this stage.	Noted. Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	We understand the DCC's desire to expedite a change to their systems to improve the retry sequencing, however, had market participants had an opportunity to impact assess their proposed changes, a more rounded solution could have been achieved. In particular we would highlight that whilst we welcome a retry strategy, abandoning the message entirely after 12 hours, if the outage lasts more than 12 hours, makes the retry pointless. We would welcome that after 12 hours of retry that an incident is then raised, but we believe a better process would be to place the failed messages in a Dead Letter Queue, rather than abandoning them. This would mean that, say following a 24 hour outage, once the systems were back up, the DLQ can be reprocessed and no messages are lost.	Thank you for your response. Please refer to the Code Manager comments to the response to question 1.