

Switching Programme Change Request Form

Guidance on the use of this template:

Please complete all sections within Part A prior to submission to SwitchingPMO@ofgem.gov.uk. Part B is to be completed by the Change Raiser with support from the Change Owner prior to submission.

Green italic text is provided as guidance and is to be removed before submission.

The Switching PMO Change Lead is available to support the drafting of any change requests, including guidance on completion of the template and the wider change process. Contact: SwitchingPMO@ofgem.gov.uk.

Change Request Number	CR-D025	Date CR Submitted	14/05/2020
Change Request Status	Submitted	Version Number	v0.1
Change Window	49	Version Date	14
Change Owner	Jenny Boothe	Contact Details	Jenny.Boothe@ofgem.gov.uk
PMO Lead	Abul Kashim	Contact Details	Abul.Kashim@ofgem.gov.uk

PART A – To be completed by the Change Raiser

Change Proposer's Details

Name:	Shona Fisher	Email address:	Shona.Fisher@ofgem.gov.uk
Organisation:	Ofgem	Telephone number:	NA

Please note that by default we will include the name and organisation of the Change Requestor in the Switching Programme's published Change Log. If you do not wish to be identified, please tick this box

Change Title

Please provide a short informative title.

Changes to support enhanced SoLR arrangements

Change Summary

What

A request to impact assess a set of proposed functional and non-functional changes to the Central Switching Service (CSS), Energy Supplier Services (only in a limited context/scenario), UKLink systems, Smart Metering Services, MPRS and REC code manger to support Ofgem Supplier of Last Resort (SoLR) policy.

WHY

A number of enhancements have been proposed to support the SoLR process following the introduction of the new Switching Arrangements; primarily driven by the centralisation of gas and electricity Registrations, the ability to execute faster switching and the synchronisation of Registrations from the CSS to other central services in a near real time manner.

In addition, the gas SoLR Registrations processes must be changed to support the new switching arrangements as the Shipper will no longer be responsible for the submission of registration requests (or change of supplier requests via a GEA file) to UKLink.

Ofgem also wishes to investigate changes to the approach to MPID Re-assignment¹ which would enable portfolios to be split using this method in conjunction with CSS Switching functionality.

HOW

*Provide a summary of the proposed **solution** so Programme Participants have an overview of **how** the issue is going to be addressed.*

The high-level enhancements are as follows:

- 1) The introduction of a new CSS API to support SoLR Registrations, which can be accessed by Energy Suppliers and the REC code manager.
- 2) New business processes between Ofgem, CSS, REC code manager, Elexon, Xoserve, Shippers and Energy Suppliers to support the proposed SoLR enhancements.
- 3) Non-functional requirements to support a high volume of Registrations which will become active on the same Supply Start Date.
- 4) The creation of 'SoLR supplier MPIDs' which will be held by Elexon and Xoserve and will be associated to the SoLR supplier Energy Company and used to enable portfolio splitting in the event that the SoLR supplier wishes to delay a switch to their business as usual supplier MPID (in conjunction with the proposed CSS changes).

WHEN

Expected Implementation Date of tbc

¹ MPID Re-assignment is the method currently employed in the electricity market to support SoLR.

Change Considerations & Viewpoint	
Priority Assessment for Change Request	
Critical; the final deliverable will not work without this change	<p><i>Please provide a summary and justification of the Priority Assessment you have selected.</i></p> <p>Those parties which have been identified as being within the scope of this change are required to provide impact assessments so that the cost / benefit of the proposed SoLR enhancements can be undertaken by Ofgem.</p>
Change Type	
Design - The Addition, Changes to and/or Removal of requirements/functionality to the Programme's Scope	<p><i>Please provide a summary and justification of the Change Type you have selected.</i></p> <p>Additional functional requirements impacting CSS, code managers and Energy Suppliers (only those that wish to utilise the enhanced SoLR functionality) have been identified. In addition, changes to existing non-functional requirements are also identified impacting CSS, UKLink, MPRS, Energy Suppliers (only those that wish to utilise the enhanced SoLR functionality), Shippers, DSP, EES and GES.</p>
Expected Change Impact	
MEDIUM - Significant consequences requiring redesign or rework; Significant cost impact ; Significant impact to schedule	<p><i>Please provide a summary and justification of the Expected Change Impact you have selected.</i></p> <p>The CSS will be required to develop new APIs (and supporting business rules) to support SoLR. The REC code manager will require a means of operating the API and supporting business processes.</p>
"Do Nothing" Implications	<p><i>Describe & Quantify the impact upon stakeholders and/or programme if this Change is not approved.</i></p> <p>Ofgem policy enhancement (portfolio splitting) for SoLR would not be implemented.</p>
Potential Stakeholders Affected by the Change	<p><i>Provide a list of stakeholders that could be impacted by the change.</i></p> <ol style="list-style-type: none"> 1. DSP – Non-Functional only 2. DNOs (MPRS)– Non-Functional only 3. Xoserve (UKLink systems)– Non-Functional only 4. Shippers– Non-Functional only 5. EES – Non-Functional only 6. GES– Non-Functional only 7. Energy Suppliers 8. CSS 9. REC code manager
Alternative Solution sought to reduce negative impact	<p><i>Provide details of alternative solutions which may be available.</i></p> <p>None identified in analysis to date.</p>
Identify any Risks to the Implementation of the Change	<p><i>Provide details of the risks.</i></p> <p>None Identified</p>
Specialists and/or Stakeholders Consulted	<p><i>Provide names and contact details of specialists/stakeholders consulted in development of this CR.</i></p> <p>CSS Design Team, Xoserve, Elexon, Ofgem</p>

Justification for Change

In October 2019 Ofgem issued a consultation covering ongoing Supplier of Last Resort (SoLR) requirements and existing arrangements². This identified Ofgem's plans to explore the options for splitting portfolios to enable multiple SoLRs to be appointed.

As part of this work to explore options for portfolio splitting, Ofgem has undertaken an assessment of the existing SoLR arrangements and how these could be adapted to facilitate portfolio splitting both in the short term ahead of the implementation of the new switching arrangements, and also following the implementation of the Central Switching Service (CSS).

The SoLR enhancements have two key objectives:

- ensuring that a robust process for managing SoLR incidents is in place under the existing switching arrangements and identifying any necessary changes required to deliver this, following the implementation of the CSS; and
- identifying the options that could enable a portfolio to be split in a SoLR event so customers can be transferred to multiple SoLRs following the failure of a large supplier.

Solution

The recommended SoLR policy requires the following switching programme changes to be impact assessed:

Improvements to be included in the REC (could be introduced pre-CSS go-live)

- Include end to end process in the REC Exit Schedule with a role for the Code Manager and PAB to ensure all activities are delivered.

Improvements to be implemented at CSS go-live

- Progress Switching Programme change to introduce a SoLR Registration API³, the data and business rules required to support the API would be similar to the Switch API with the following exceptions:
 - i. Objection Window parameter not applied (next day switching possible for all Registrations).
 - ii. Standstill Period parameter not applied (next day switching possible for all Registrations).

² https://www.ofgem.gov.uk/system/files/docs/2019/10/slr_policy_consultation_new_updated.pdf

³ This requirement is described as a new logical API – the AI should assess if an existing API could be utilised also (e.g. the witch API with an additional SoLR indicator).

- iii. Creation of SoLR Registration API which will contain the same data items and message structure as the Switch API, with the exception of Erroneous Transfer Indicator which would not be required.
- iv. A single SoLR Registration message will be able to contain more than a one Registration.
- v. SoLR Registration API available to Energy Supplier or code manager.
- vi. All active Registrations should be capable of being switched irrespective of the RMP Status.
- vii. SoLR Registration Service Requests received prior to 5pm on a calendar day could have a Supply Start Date of the following calendar day.
- The Market Participant Role API, available to the code manager, should also be updated to support the concept of a new SoLR Market Participant Role Event.
 - i. When enabled in CSS would cancel all pending or confirmed Registrations associated to the failed supplier.
 - ii. The code manager would only use the function if the failed suppliers MPID is not re-assigned.
- Reporting would also be required from the CSS to the code manager to support the SoLR including:
 - i. Inflight switches from the SoLR supplier to be reported upon to identify cancelled switches (those that were annulled by the Gaining Supplier).
 - ii. Full portfolio data for failed supplier Energy Company related MPIDs, including ongoing monitoring of RMPs to ensure completed transfer to new Energy Company(s) and Registrations (if required).
- Creation of 'SoLR Supplier MPIDs':
 - i. Creation of a reserve of MPIDs by Xoserve and Elexon in MDD and associated to an Energy Company "RECCo".
 - ii. Association of 'SoLR Supplier MPID' to the SoLR Energy Company on the date that the SoLR award is made by Ofgem and immediate synchronisation, by Elexon and Xoserve, of the change to CSS (note: this may require a Market Participant Role Effective From Date to be added to the MarketParticipantRole API).
- Non-functional requirements:
 - i. Ability to process 250k, 0.5m, 1m, 5m SoLR Registration Events which would become effective on the same date. (impacting CSS, ERDS, SMRS, GRDS, UKLink, GES, EES, DSP). Note: SoLR Registration Events will create a new

- Registration to a new Supplier MPID and could include a new or existing Shipper).
- ii. Ability to process 250k, 0.5m, 1m, 5m change of Shipper Registration Events. (impacting CSS, GRDA, UKLink, GES).
 - iii. Security / access control changes in the CSS to enable SoLR supplier messaging / service requests to be enabled for Energy Company's Supplier MPID within 1 hour of notification from Elexon / Xoserve that the Energy Company / MPID association has changed.
2. High-level processes are included as appendices to this change covering the scenarios of:
- A gas SoLR event implemented via an MPID reassignment and coincident with a change of Shipper.
 - A gas SoLR event implemented via a SoLR Registration Event (bulk switch) and coincident with a change of Shipper.
 - An electricity SoLR event implemented via an MPID reassignment.
 - An electricity SoLR event implemented via a SoLR Registration Event (bulk switch)

Programme Products Impacted by Proposed Change

- D4.1.2/D4.1.3 Detailed Switching Design Repository
 - Whilst this change is primarily considered a physical level change rather than a logical, the Detailed Switching Design Repository (ABACUS) will be updated if Programme Participants consider this to necessary or helpful.
- CSS PhID – Update to the physical interface specification
- Testing Products – tbc subject to PIA
- Delivery Products – tbc subject to PIA
- Code manager design requirements (RECCo)
- Non-functional requirements covering CSS, DSP, RTS, UKLink, DNOs (MPRS), Energy Suppliers, Shippers
- REC Data Management Schedule
- REC Market Exit Schedule

Impact Assessment – Programme Design, Architectural and Data Principles

Please refer to the Programme Design, Architectural and Data Principles in the Appendix reviewing each and input those which are impacted by the proposed change (see example below).

Design Principle	Description	Impact of Change
Design – Simplicity	The new supply point register and arrangements should be as simple as possible.	The intent of this change is to enable SoLR Registrations to be enacted in a faster and more reliable manner.
Design – Robustness	The end-to-end solution should be technically robust and integrate efficiently with other related systems. It should be clearly documented, with effective governance. The new arrangements	The introduction of this change is intended to increase the robustness of the E2E solution by synchronising SoLR events

	should proactively identify and resolve impediments to meeting consumers' and industry requirements. These arrangements should be secure and protect the privacy of personal data.	across all central services via the standard CSS Registration Synchronisation interfaces.
Architecture - One Architecture	One single definitive architecture prevails	The CSS as the master of Registrations is responsible for the synchronisation of a SoLR event using next day switching functionality to the new supplier.
Architecture - Data is shared & accessible	Users have access to the data necessary to perform their duties; therefore, data is shared across enterprise functions and departments.	The supplier MPID responsible for a Registration is synchronised across all central services. (e.g. manual processes not required by the DSP for access control).
Architecture - Quality Characteristics	Maintain a comprehensive set of quality characteristics by which to gauge the completeness of requirements for Applications and Services.	Quality characteristics of the E2E system are embodied in those principles already outlined above – simplicity and robustness. E2E Quality characteristics on Data Accuracy and Quality that support the wider programme objectives are described in the business case and supported by this change. E.g. leveraging CSS functionality to achieve SoLR policy.
Compliance with Principles:		
Further to supporting the above-referenced principles, the change does not conflict with any others.		
Checked for Completeness By (Name/Role):		Date:

Please submit this completed form to the Ofgem Switching Programme PMO Team via SwitchingPMO@ofgem.gov.uk

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PART B – To be completed by Change Raiser with support from Ofgem, Design Forum, and any other evident stakeholders or working group.

Impact Assessment	
<p><i>Please concisely provide the overall impacts resulting from the change, for example industry/consumer costs and benefits etc. Ensure coverage of Benefits - what will be achieved by making the change, who do those benefits accrue to; Costs - what sort of cost will be imposed as a result of the change, who will those costs fall to, what impact does that have on the programme business case, is there a clear cost benefit equation?</i></p> <p><insert text here></p>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Industry Impact	
<p><i>Please concisely provide details of industry costs/benefits resulting from this change, including details of costs impacts if the change is not made. Does the change significantly divert industry resources away from established plans? Who will bear the costs of making the change? Are resources available to do the work on the required timescales?</i></p> <p><insert text here></p>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Resource Effort – To be completed with support from DCC	
<p><i>Please concisely provide the resource costs in £ or FTE required to enact the change to programme products.</i></p> <p><insert text here></p>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Programme	
<p><i>Please concisely provide details of the assessment of impacts against the Programme’s Final Business Case (FBC) taking account of any benefits to external parties.</i></p> <p><insert text here></p>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Data Cleansing / Migration – To be completed with support from Ofgem Data Lead	
<i>Please concisely provide details of the impacts in relation to planned data migration or cleansing activities.</i>	
<insert text here>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Programme Plan – To be completed with support from Ofgem PMO	
<i>Please concisely provide details of impacts against the Programme Plan (i.e. what the change does to programme timelines, parties’ implementation activities, testing or diversion of programme resources) Is the change necessary for go-live?</i>	
<insert text here>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Testing – To be completed with support from Ofgem Testing Lead	
<i>Please concisely provide details of impacts against the Programme’s Security Strategy and baselined security products.</i>	
<insert text here>	
Checked for Completeness By (Name/Role):	Date:

Impact Assessment – Security – To be completed with support from Ofgem Security Lead	
<i>Please concisely provide details of impacts against the Programme’s Security Strategy and baselined security products.</i>	
<insert text here>	
Checked for Completeness By (Name/Role):	Date:

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PART C – To be completed by Ofgem Programme Team

Initial Assessment/Triage	
<i>Please provide a summary of the initial assessment, detailing any changes made by the Change Advisory Team (CAT) which includes Ofgem PMO, Design, Implementation, Alignment, Commercial, Regulatory and Security Working Group Leads and DCC.</i>	
Design & Data Impact and resource input required for IA? Y	
Implementation Impact and resource input required for IA? N	
Commercial Impact and resource input required for IA?	
Regulatory Impact and resource input required for IA? Y	
Security Impact and resource input required for IA? N	
Testing Impact and resource input required for IA? Y	
Major or Minor Change?	Minor
Change Process Route	Expedited
Change Window	<Could be revised based on IA effort>
Design Forum Submission	Paper Day: <Paper Date> Design Forum: <Date of Design Forum>
Approval Authority	<Design Authority, Implementation Group, Delivery Group or appropriate Working Group (for Working Group Change Control Only)>
Target Change Decision Date	<Date of Approval Authority meeting>
Implementation	
What is the lead time on the work to implement the proposed changes?	Choose an item.
When do the Proposed Changes need to be implemented?	Choose an item.
Checked for Completeness By (Name/Role):	Date:

Industry Consultation – Recommendation

<i>Please provide the Programme's recommendation for decision obtained from the Industry Consultation activity.</i>	
Checked for Completeness By (Name/Role):	Date:

Programme Decision	
<i>Please provide the decision of the Approval Authority together with any conditions.</i>	
Checked for Completeness By (Name/Role):	Date:

Post Approval - Next Steps – To be completed at Decision Making Meeting	
<i>Please provide a summary, if the Change Request is approved, of next steps including which products are to be updated as a result of this CR and details of any stakeholder engagement required. Complete the table below detailing agreed timescales for product update, review & approval.</i>	
<i>If Change Request is Approved</i>	
Release Window	<Insert Approved Release Window Schedule>
Implementation Date	<Insert Implementation Date agreed by Decision Maker>
Artefact Owner/s	<Insert name/s and owning organisation>
Updates Completed	<Insert the date Updates are to be completed by>
Ofgem Quality Assurance Review	<Insert QA Dates>
Artefact Update Approval	<Insert Final Approver>

Part A – Appendix

Impact Assessment – Programme Design, Architectural and Data Principles		
Design Principle	Description	Impact of Change
Impact on Consumers		
Reliability for Customers	All switches should occur at the time agreed between the customer and their new supplier. The new arrangements should facilitate complete and accurate communication and billing with customers. Any errors in the switching process should be minimised and where they do occur, the issue should be resolved quickly and with the minimum of effort from the customer. The customer should be alerted in a timely manner if any issues arise that will impact on their switching experience.	
Speed for Customers	Customers should be able to choose when they switch. The arrangements should enable fast switching, consistent with protecting and empowering customers currently and as their expectations evolve.	
Customer Coverage	Any differences in customer access to a quick, easy and reliable switching process should be minimised and justified against the other Design Principles.	
Switching Experience	Customers should be able to have confidence in the switching process. The process should meet or exceed expectations, be simple and intuitive for customers and encourage engagement in the market. Once a customer has chosen a new supplier, the switching process should require the minimum of effort from the customer. The customer should be informed of the progress of the switch in a timely manner.	
Impact on Market Participants		
Competition	The new supply point register and switching arrangements should support and promote effective competition between market participants. Where possible, processes should be harmonised between the gas and electricity markets and the success of the switching process should not be dependent on the incumbent supplier or its agents.	
Design – Simplicity	The new supply point register and arrangements should be as simple as possible.	
Design – Robustness	The end-to-end solution should be technically robust and integrate efficiently with other related systems. It should be clearly documented, with effective governance. The new arrangements should proactively identify and resolve impediments to meeting consumers' and industry requirements. These arrangements should be secure and protect the privacy of personal data.	
Design – Flexibility	The new arrangements should be capable of efficiently adapting to future requirements and accommodating the needs of new business models.	
Impact on Delivery, Costs and Risks		
Solution Cost/Benefit	The new arrangements should be designed and implemented so as to maximise the net benefits for customers.	
Implementation	The plan for delivery should be robust, and provide a high degree of confidence, taking into account risks and issues. It should have clear and appropriate allocation of roles and responsibilities and effective governance.	
Architectural Principle	Description	
Secure by Default & Design	All risks documented & managed to within the tolerance defined by the organisation or accepted by the Senior Risk Owner	
Future Proof Design	Common design approaches will better enable designs to support future developments e.g. A mechanism for achieving non-repudiation	
Standards Adoption	Adopt appropriate standards for products, services or processes. e.g. ISO/IEC 11179 for data definition	
One Architecture	One single definitive architecture prevails	
Data is an a Asset	Data is an asset that has value to the enterprise and is managed accordingly	
Data is Shared & Accessible	Users have access to the data necessary to perform their duties; therefore, data is shared across enterprise functions and departments.	

Common Vocabulary & Data Definitions	Data is defined consistently throughout the enterprise, the definitions being understandable and available to all users.
Requirements – Based Change	Only in response to business needs are changes to applications and technology made. E.g. only industry arrangements affecting switching will be impacted.
Quality Characteristics	Maintain a comprehensive set of quality characteristics by which to gauge the completeness of requirements for Applications and Services.