

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 after completion of the PIA.

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-D100	Date CR Submitted	03/08/21
Change Request Status	Industry Consultation	Version Number	V0.3
Change Window	82	Version Date	25/08/21
Change Owner	Kishan Nundloll	Contact Details	Kishan.nundloll@ofgem.gov.uk
PMO Lead	Liam Evans	Contact Details	Liam.evans@ofgem.gov.uk

PART A – To be completed by the Change Raiser

Change Proposer's Details

Name:	Andrew Amato	Email address:	Andrew.amato@ofgem.gov.uk
Organisation:	Ofgem	Telephone number:	020 7901 7056
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 put an 'x' in the box to the right.			

Change Title

Further consequential changes to DB4 and related artefacts following CR-D071

Change Considerations & Viewpoint		
Priority		
Select one of the following by putting an 'x' in the box.		This change is required for go-live, it reflects changes that it necessary to avoid additional work from both Xoserve and St Clements/(i)DNOs. Furthermore, this change will also reduce the volume of switches to be held by suppliers ahead of cutover. This will enable CSS and suppliers to exit the Held Switch Management Period sooner.
Critical – Must be implemented before go-live	x	
Non-critical – Can be implemented post go-live.		
Select one of the following by putting an 'x' in the box:		The CR can follow the normal process to ensure appropriate consideration. Updates to the relevant transition artefacts are anticipated to be made for the uplift following the DMT LR test phase.
Expedited process – CR must follow the expedited processing timeline		
Normal process – CR can follow the normal processing timeline	x	
Change Type		
Select at least one of the following by putting an x in the box:		<p>This change request would uplift the following artefacts: -</p> <ul style="list-style-type: none"> • D-4.3.4 E2E Transition Plan – Inflight Switches Management Approach • D-4.2.6 CSS Data Migration Plan (TBC) • NC-0103 Transition Plan /Runbook • NCT-0135 Transition Test Plan (TBC) • End to End Cutover Approach & Plan (ECAP) • NC-0079 Overall CSS Data Migration Solution (ETL)
Programme Plan - Changes to the programme plan.		
Programme Management - Changes to baseline documents pertaining to the running of the programme.		
Design – Changes to the programme's design baseline	x	
Regulatory – Changes to the programme's regulatory baseline		
Security – Changes to the programme's security baseline		
Test environments - Changes to the programme's test environments		
Other – Please explain		

Change Summary

Please provide a summary of the change proposed using the following headings.

A key criteria of this section is that it should be understandable to a casual user. If the issue and solution are technically complex then a simplified, understandable explanation needs to be created so that non-technically minded readers can gain an understanding of the change.

BACKGROUND TO THE ISSUE DRIVING THE NEED FOR CHANGE

Following the approval of CR-D071 (Change to Management of Inflight Switches Approach) a number of points have been identified that should be addressed to ensure that additional development and test activity from a number of PUIs is not required. CR-D071 simplified the approach for inflight switch management by extending the period from T1 to go-live, removing the need for harmonised objection windows between electricity and gas switches and not allowing those switch requests that are future dated and become effective in CSS from being raised within UK Link and MPRS. This removed the concept of an in-flight switch that commenced in existing systems and completed in CSS.

It has become apparent that the movement of T1 to -15 days before go-live could mean that this could fall on non-working days (weekend) for MPRS/UK Link thereby necessitating the development and test of additional code (see Design Issue DI-1663). Furthermore, the aim of CR-D071 which seeks to allow all switches raised by T1 to complete ahead of CSS go-live can be accommodated by moving T1 to -14 days. This would result in the T1 day matching go-live day, so a Monday go-live would have T1 falling on a Monday 14 days before.

Additionally, Xoserve have raised that the removal of the potential for future dated switches (those becoming effective after CSS go-live), has impacted existing business rules for the submission of gas initial registrations which were due to cease as per DB4 at T2. Gas initial registrations can be submitted up to 4 working days before they are due to become effective. Therefore, if either of these were to be submitted at current T2, they would have an effective date after CSS go-live which following CR-D071 is no longer allowed.

A change to keep within the scope of CR-D071 would require both a regulatory and system changes within UK Link. A system change would need additional coding and testing which could introduce risk at this stage. Furthermore, one of the aims of CR-D071 was simplicity, looking to make minimal changes to existing processes ahead of go-live. Therefore, it is proposed that the cut-off date for gas initial registrations is changed to T2-1 and that two new dates are added to the in-flights approach, T2a (last date for gas initial registrations) and T2 (last date for electricity initial registrations, withdrawals, all supplier arranged appointments and queuing of other data changes as defined by NC-103 Transition Plan/Runbook).

It should also be noted that further work undertaken by Xoserve has also identified the choreography of other data changes that are at level of detail that would not be covered within DB4 and hence are out of scope of this change request. These refer to the timing of shipper re-confirmations and confirmations where the current shipper has already withdrawn – both of these scenarios would align to T2a. It is also possible for supplier changes to be submitted to a gas registration outside of the standard confirmation process via GEA file updates, these would stop at T2. Full details of these are to be provided in the Transition Plan/Runbook and ECAP.

WHAT

This change request would update the D-4.3.4 E2E Transition Plan – Inflight Switches Management Approach as follows: -

- Update the timing only for T1 so that it falls 14 calendar days prior to CSS go-live
- Change the definition only for T2 to create the following:-
 - T2a – the last date for the submission of gas initial registrations only
 - T2 – the last date for the submission of electricity initial registrations, gas objections, withdrawals, and other data changes as defined by NC-103 Transition Plan/Runbook.

Functionality/rules within UK Link for managing initial registrations would remain the same, but the cut-off date would be a day earlier.

The detail is illustrated in the table below (assumes a Monday go-live): -

	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon
	T1								T2a	T2					GO
	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0
Gas Registration	SR	O	O	O	O			O	O	O	NC	NC	NC	NC	EX
Elec Registration	SR	O	O	O	O			O	CR	CR	NC	NC	EX		
Gas Initial Registration									IR	CR	NC	NC	NC	NC	EX
Elec Initial Registration										IR	EX	NC	NC	NC	

The above shows the progress of new gas and electricity registration requests submitted on the new T1 date taking into account CR-D071 and the removal of the harmonised objection window.

The latest submission of an initial registration for both fuels is also shown.

- T2a – the last date that a gas initial registration can be submitted
- T2 – remains the last date that a switch request can be cancelled or withdrawn prior to go live and is the last date for a gas objection or electricity initial registration.

The actual dates will be captured in the NC-103 Transition Plan/Runbook and ECAP artefacts.

JUSTIFICATION FOR CHANGE

This change seeks to make primarily a document change that will drive the setting of key programme dates and preserve existing rules functionality thereby avoiding the requirement to undertake additional development and testing activity. The change will also require energy suppliers to store a day's less switches which will also reduce the backlog of held switches to be processed, potentially reducing risk by lowering volumes and also enabling CSS to commence full BAU operations sooner after go-live.

HOW

This change request would update a number of programme artefacts including the D-4.3.4 E2E Transition Plan – Inflight Switches Management Approach, NC103 Transition Plan/Runbook and ECAP as follows: -

- Update the timing only for T1 so that it falls 14 calendar days prior to CSS go-live
- Change the definition only for T2 to create the following:-
 - T2a – the last date for the submission of gas initial registrations only
 - T2 – the last date for the submission of electricity initial registrations, gas objections, withdrawals and other data changes as defined by NC-103 Transition Plan/Runbook.

The actual dates will be captured in the NC-103 Transition Plan/Runbook and ECAP artefacts.

WHEN

This change is required for go-live and should be approved so the updated requirements can be uplifted into transition artefacts in September/October ahead of Transition Testing (Transition Stage 2) which is due to commence in January 2022.

SPECIALISTS AND/OR STAKEHOLDERS CONSULTED

Impacted parties such as Xoserve, St Clements and SI have been engaged in discussions via the SI Transition Group, Cutover Working Group (CWG) and bilateral discussions. Broader industry have also been sighted via discussions at CWG and Implementation Group.

RISKS OF IMPLEMENTING THE CHANGE

It is anticipated that this is a low risk change as only the timing of inflight activity is changing, there are no changes anticipated to existing code.

The change reduces risk more broadly by reducing the volume of switches that are to be held from T1 and also negating the need for other code changes and associated testing.

Solution	
<p>Changes sought to programme products</p> <p><i>In the rows below, please outline the changes which are sought against which product(s). You must include the relevant product version number(s) and publication date(s) from the artefact log. Identify which section(s) of the document(s) need to be changed and where possible set out the exact change required. Refer to attachments if necessary.</i></p> <p><i>This section is “owned” by the proposer and should set out the change you, as the Change Raiser, wish to see made. This section can later be amended to incorporate issues/feedback raised by appropriate Working Groups during Industry Consultation or identified during the Impact Analysis.</i></p> <p><i>The section should be written so as to be “free standing”. By this it is meant that all the information required by someone to understand the changes being sought should either be included in the table below or referenced as attachments.</i></p> <p><i>Where possible, the section should unambiguously describe what is being changed. A statement such as “update Abacus to align with the E2E documentation” is too open to interpretation. Ideally the section needs to identify specifically what is being changed and to what it will be changed to. For instance “Section XXXX of Abacus, the text ‘XXXXXXXX’ to be changed to ‘YYYYYY’”. If necessary this section should refer to attachments. Where this is not possible as the details of the change should be described as much as possible.</i></p> <p><i>The intention of this section should be that, once a change is approved, it should be possible to trace any resulting amendments back to items identified in this section.</i></p>	
Changes sought to programme plan baseline	N/A
Changes sought to programme management baseline	N/A
Changes sought to design baseline	Changes as detailed to DB4 and associated artefacts as listed in “Change Type”.
Changes sought to regulatory baseline	N/A
Changes sought to security baseline	N/A
Changes sought to test environments	N/A
Any other changes sought that are not covered above	N/A
Any related changes to non-baseline documents that should be noted	At the time of writing the key transition artefacts (Transition Test Plan, Transition Plan/Runbook and ECAP) are yet to be formally baselined by the programme. However, it is anticipated that these changes will be reflected in those artefacts after they are baselined.

Expected Impact		
Summary Expected Impact <i>Please estimate the impacts of the change based on the provided criteria below. Please note that you are not expected to perform an exact assessment of the criteria below, but rather indicate your estimate. This is required to support further discussions of the change and trigger the right escalation mechanism. You have an option to indicate that you are not sure of the impact, however, please use your best judgement to try and estimate an approximate impact.</i>		
Please select a relevant option for the following criteria:		Rationale:
Impact on Design and/or Full Business Case.	x Full Business Case is no longer viable or is significantly impacted due to breach of design principles. Highly impactful changes to design x Change has a material impact on the Full Business Case due to some impact on design principles x Design integrity is marginally affected having a minor impact on the Full Business Case x I am not sure	Minor document change impacting baseline design, but no anticipated impact on FBC.
Cost Impact	x There is a significant cost impact due to the proposed change of more than £1m x A change will imply increasing costs by more than £50K x A change will imply a marginal increase in cost of up to £50K x I am not sure	Anticipated cost of document updates only – negating broader development and testing costs.
Impact on Participant Community	x More than 20 Parties are affected x 5-20 other Parties are affected x 0-5 other Parties are affected x I am not sure	Change would impact all parties involved in transition and cutover.
Impact on Programme Plan	x L1 milestone impacted by more than 1 week and/or Critical Path is impacted. Delay to Go Live will be likely if change is implemented x L2 milestone impacted by more than 1 week with no knock on impact on L1. x L3 or below milestone impacted by more than 1 week with no knock on impact on L2 or L1 x I am not sure	No anticipated impacts on programme plan milestones.

Other impacts	x Please specify any other potential impacts that are not provided above	None
Expected impact <i>In the rows below, please outline the expected impact of the change on the following areas of the programme activities. The intention of this section is not to repeat the changes being sought but to identify the impact of those changes on the following areas. Where possible an estimated financial impact should be provided. All impacts will be formally assessed and quantified during the Impact Assessment.</i> <i>This needs to identify the parties impacted by either party name or party classification (e.g. Suppliers, Large Suppliers, PUIs, DCC, PUIs etc.). Statements such as “all parties involved in ...” are not sufficient as they are potentially ambiguous. Reference to other documents is allowed (e.g. “all participants in UEPT as set out in the UEPT Test Plan (document reference YYYY)”) providing that the document reference is provided in full and is unambiguous.</i> <i>If no impact state “None”.</i> <i>In case you are not sure, please respond “I am not sure”.</i>		
1) Impact on DCC (including SI, CSS and other directly contracted entities)		X – Document updates (tbc)
2) Impact on PUIs (other than those included in (1))		X – Document updates (tbc)
3) Impact on programme participants (other than PUIs)		X – Document updates (tbc)
4) Impact on testing workstream (including test environments)		X – Document updates (tbc)
5) Impact on data workstream		X – document change to Data Migration Solution
6) Impact on cutover workstream		X – document changes to transition artefacts
7) Impact on regulatory workstream		N/A – none anticipated
8) Impact on security		N/A – none anticipated
9) Impact on readiness assessments and assurance		N/A – none anticipated
10) Impact on Ofgem (including PC)		X – document changes to ECAP
11) Impact on RECCo		N/A – none anticipated
12) Impact on other areas not noted above		N/A – none anticipated

Alternative solutions
Alternative Solution sought to reduce negative impact
<i>An alternative solution would be to change gas initial registration timelines and modify UNC drafting accordingly. It is anticipated that a ROM cost for this change could be of the order of £94,500 (+/- 50%). fa</i>

Adherence to 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).		
Programme Principles not met	Description of Principles that are not met	Impact this change has on the Principles that are not met
N/A	N/A	N/A
Compliance with Principles:		
Please provide a summary of the impacts to the Programme's Design, Architectural and Data Principles. Include a statement outlining that the CR meets all non-impacted principles.		
Checked for Completeness By (Name/Role):		Date:
Liam Evans		04/08/21

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.

Overall Impact to FBC

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. in terms of changes to overall costs and benefits. what impact does that have on the programme business case, is there a clear cost benefit equation?

Total ROM Cost

- £0 +/- 50%
- This is a total of the DCC Managed supplier and PUI costs called out in 1) and 2)

Total Resource Effort

- 9 days
- This is a total of the DCC Managed supplier and PUI resource effort called out in 1) and 2)

Benefits called out in PUI PIAs

- BUUK, SPEN, St Clements and UKPN have called out that they are supportive of the CR:
 - We view this as a positive change as this means that there is no code changes required to MPRS. (SPEN)
 - There is a positive impact on MPRS as it removes the need for further code changes. (St Clements)
 - UK Power Networks are supportive of this CR, as there is a positive impact on MPRS (UKPN)

Risks of implementing the change

This section should clearly set-out any potential risks around the implementation of the change that should be noted on the programme's risk log. If risks relating to the implementation of this change have already been placed on the risks and issues log then the risk numbers should be referred to here along with a summary of the risk.

For risks that are not already captured on the log the wording should articulate the risk, its impact, probability and likelihood using the same scorings and notations set out for the risks and issues process so that, if the change is approved, the risks can be uploaded to the risk and issues log.

None reported.

Checked for Completeness By (Name/Role):

Date:

Liam Evans

25/08/21

1) Impact on DCC (including SI, CSS and other directly contracted entities)

Please concisely provide details of the DCCs and their direct su-contractor's costs/benefits resulting from this change, including details of cost impacts if the change is not made.

Summary

- SI have confirmed they are impacted by the change.
- CGI, Capgemini and Landmark have confirmed no impact.

Cost

- ROM cost - **£0**
 - Fixed cost: £0
 - Recurring cost: £0

Resource Effort

- Effort impact – 9 days

Dependencies, Risks, Assumptions, and Constraints

Checked for Completeness By (Name/Role):

Date:

Liam Evans

25/08/21

2) Impact on PUIs (other than those included in (1))

Please concisely provide details of PUI's (other than those included in (1)) costs/benefits resulting from this change, including details of cost impacts if the change is not made.

Summary

- 7 PUI responses received.
- BUUK, C&C, Gemserv, Xoserve, Scottish Power Energy Networks, St Clements and UKPN have confirmed they are not impacted by the change.
- BUUK, SPEN, St Clements and UKPN have also called out that they are supportive of the CR and the positive impact the change will have on MPRS.

Cost

- ROM cost - **£0**
 - Fixed cost: £0
 - Recurring cost: £0

Resource Effort

- Effort impact – 0 days

Dependencies, Risks, Assumptions, and Comments

Assumptions

- This CR reduces the volume of switches to be held by one day. The assumption is that the held switch volume data analysis will be done again to reflect the new total volume of held switches ahead of cutover, which consequently will enable the programme to estimate how quickly the held switch backlog can be digested once CSS is operational. (BUUK)

Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

3) Impact on programme participants (other than PUIs)

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? Are resources available to do the work on the required timescales?

None reported.

Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

4) Impact on testing workstream (including test environments) – To be completed with support from Ofgem Testing Lead

Please concisely provide details of impacts in relation to activities in the testing workstream.

There is no impact.

Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

5) Impact on data workstream – To be completed with support from Ofgem Data Lead

Please concisely provide details of the impacts in relation to activities in the data workstream including planned data migration or cleansing activities.

There is no impact.	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

6) Impact on cutover workstream – To be completed with support from Ofgem Cutover Lead	
<p><i>Please concisely provide details of the impacts in relation to activities in the cutover workstream.</i></p> <p>Updates to Transition artefacts including NCT-0135 Transition Test Plan, NCT-0052 Transition Test Requirements, NCT-0178 Transition Test Traceability and NC-0103 Transition Plan/Runbook.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

7) Impact on regulatory workstream – To be completed with support from Ofgem Regulatory Lead	
<p><i>Please concisely provide details of the impacts in relation to activities in the regulatory workstream.</i></p> <p>There is no impact.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

8) Impact on security – To be completed with support from Ofgem Security Lead	
<p><i>Please concisely provide details of impacts against the Programme's Security Strategy and baselined security products.</i></p> <p>There is no impact.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

9) Impact on readiness assessments and assurance – To be completed with support from Programme Coordinator	
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<p><i>Please concisely provide details of impacts against the Programme's readiness assessment framework, approach and assurance.</i></p> <p>There is no impact.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

10) Impact on Ofgem (including PC) – To be completed with support from Ofgem and Programme Coordinator	
<p><i>Please concisely provide details of impacts on Ofgem and the Programme Coordinator</i></p> <p>There is no impact.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

11) Impact on RECCo – To be completed with support from Ofgem	
<p><i>Please concisely provide details of impacts on RECCo</i></p> <p>There is no impact.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

12) Impact on Other areas not noted above	
<p><i>Please concisely provide details of any other impacts not covered above</i></p> <p>There is no impact.</p>	
Checked for Completeness By (Name/Role):	Date:
Liam Evans	25/08/21

PART C – To be completed by Ofgem Programme Team

Initial Assessment/Triage	
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.	
Design & Data Impact and resource input required for IA? Y	
Implementation Impact and resource input required for IA? Y	
Alignment Impact and resource input required for IA? N	
Commercial Impact and resource input required for IA? N	
Regulatory Impact and resource input required for IA? N	
Security Impact and resource input required for IA? N	
Testing Impact and resource input required for IA? N	
Major or Minor Change?	Minor
Change Process Route	Standard
Change Window	82
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?	20+ Working Days

When do the Proposed Changes need to be implemented?	Prior to Go-Live
Checked for Completeness By (Name/Role):	Date:
Liam Evans	04/08/21

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>	
If Change Request is Approved	
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, Data Management and Testing Management Principles

Design Principle	Description
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.
Data Management Design Principles	
Unambiguous requirements, constraints and business rules related to data management should be clearly defined and accessible to all Market Participants within controlled documentation, which may take the form of Documented Technical Specifications such as XML Schemas (XSD), data catalogues or descriptive business rules.	
Open Standards for the definition, management and messaging of data should be utilised where practically possible.	
Switching related data (data defined within a CSS interface documented in the REC Technical Specification Schedule), which has a direct mapping to existing industry data, as defined within the UKLink Manual, electricity Data Transfer Catalogue or SPAA Data Flow Catalogues, should be described with identical attributes (such as name (or reference to a synonym if alternate names or definitions are utilised), data type and field length) within the CSS physical Messaging Model.	
All data in existing systems at the point of the commencement of Transition Stage 1* will be in accordance with industry agreed standards and procedures, such as those defined within the MRA, SEC, SPAA and UNC; and therefore assumed to be fit for the purpose of CSS as defined in Design Baseline 4 (DB4).	
Data cleanse activity is being undertaken by industry during Transition Stage 0* to ensure that existing data conforms to the required current industry standards. It is expected that all data being migrated into the CSS has been cleansed by Data Masters to quality standards as required by (d) in advance of Transition Stage 1.	
Only those Registrable Measurement Points (RMPs) that are related to physical network connections and/or Energy Locations that exist or are planned should be set to a state that allows those RMPs to migrate to the CSS; thus preventing any erroneous migration of obsolete RMPs and the potential creation of invalid Retail Energy Locations by the CSS.	

The gas and electricity Switching Data Services (UKLink and MPAS), shall continue to master existing data (e.g. Metering Points, Agent Appointments) and shall not be required to change the Data Type Format of the data at rest within their services.
Equally, for data which is changing Data Mastership from existing Switching Data Services to the CSS (e.g. Registrations) and which is still required to be provided to those services for existing end to end operations out of scope of switching (e.g. settlements); the CSS should present the data in a Data Type Format, via a CSS message, which is equal to the existing data industry standards as defined with the UK Link Manual and Data Transfer Catalogue.
The design of applications, such as the Central Switching Service, should not be constrained by existing industry data for CSS Day-1 live operations. Where opportunities are identified pertaining to wider industry future proofing, efficiencies and market innovation, these should be considered for future CSS releases and evaluated through the Change Control process for adding to the CSS future roadmap of releases.
However, to ensure that the delivery of the new switching arrangements scope (for Day-1 Live Operation) is focused to the realisation of Ofgem's related published policies, the scope of the future proofed design shall be limited to the CSS; this shall be accomplished by adhering to the constraints of existing industry Data Type Format standards via CSS messages which shall conform to new Data Exchange Formats and Data Exchange Semantics.
A Roadmap of future switching and wider industry improvements which require switching data (as defined within the REC Technical Specification Schedule) should be developed so that these opportunities are visible and can be evaluated in a timely manner. This Roadmap should be controlled by the Switching Programme Coordinator until such point that the REC Code Manager is operational.
Data provided over switching Interfaces should be constrained in scope so that only services which have a requirement to process specific data receive that data. In addition, certain data which is commercially confidential or is classified as personal sensitive should be controlled in a manner that is compliant with the security requirements of the new arrangements.
Each data item will be assigned a Meta Data Owner, a Data Master and certain data items will be assigned one or more Data Responsible Users.
Testing Principles
Unambiguous testing requirements should be clearly defined and accessible to all Programme Participants.
Objectives, scope, approach as well as entry and exit criteria will be developed for each test phase in a Testing Phase Test Plan.
Assurance will be conducted as per the Milestone Assurance Framework over the relevant testing milestones, the purpose of which is for Ofgem to gain confidence in the progress of Programme Participants.
Participants are encouraged to use all reasonable endeavours to cooperate (in a reasonable manner and in good faith) to resolve problems and issues relating to testing activities on a "fix first, dispute later" basis.
Licensed Parties are responsible for developing and executing their own testing plans in alignment with the Switching Programme Plan, Milestones and the Testing Plan documentation. Licensed Parties must also adhere to any testing requirements set by the Systems Integrator (SI), and approved by the TWG, in relation to the CSS.
Parties must ensure availability of skilled resources for executing the testing activities as relevant to their organisation (e.g. taking into account the manner of the organisation's technical solution).
The SI must coordinate the testing ways of working with the core system providers in line with the Programme Cooperation Agreement already agreed by these parties.
The SI will be responsible for preparing, maintaining and conducting the Environment Plan, and will produce the scripts for each test phase, with the exception of PIT, which will be the accountability of the Service Providers or the Licenced Party, as indicated in the End-to-End Plan. The SI will be responsible for managing and maintaining the availability of all test environments and tools they develop, as well as resolving any defects and issues relating to these environments.
All test data will be based on production data that will be anonymised where required.

As per the requirement in the Retail Energy Code, End-to-End Testing is mandatory for Licensed Parties with 250,000+ Registerable Measurement Points (RMPs). Parties with fewer RMPs can voluntarily participate in the End-to-End Testing, subject to successful completion of User Entry Process Testing (UEPT).
The TWG will review and approve the SI's proposed process for prioritising defects as part of their Defect Management Approach.
Parties must be open and supportive in relationships with the Assurance Providers, the Programme Coordinator and the Systems Integrator.
Parties must proactively communicate any risks or issues to Ofgem and must follow the Switching Programme Risk and Issue Management process. The SI will be responsible for resolving issues arising under the testing activities they are responsible for, minimising escalation to Ofgem as a last resort.
Ofgem will promptly communicate any testing related matter that might affect parties' testing plan activities.
Testing rationalisation – Testing activities will be rationalised and automated where appropriate so as to minimise duplicate testing effort. This includes Licensed Parties being able to rely on the testing completed by their third party software provider(s) as a means to rationalise their own testing activities.
Where participants have similar or shared solutions, such as those provided by third party software providers, they should consider sharing testing activities and data between organisations. This will require collaboration between these participants and should be reflected in Licensed Parties test plans.
Early integration will be considered as a means to minimise the risk that a number of defects will arise during the User Entry Process Testing and End to End Testing phases.
Where a new entrant joins the market during the DBT phase, they will be required to undertake and complete all relevant test phases prior to Go Live, even if these phases are already complete from a programme perspective.