Transition arrangements for REC v3 Go Live Pre Mod discussions

September 2021

Background

- The date of CSS Implementation Date is yet to be defined.

- The day of implementation is yet to be defined. Documentation has assumed to date that the Go Live day will be a Monday – but this has not been confirmed.
    - We will need to define a term for Modification development (which will not be confirmed until January 2022, and may be subject to change) so working assumption is "CSS Implementation Date" (CSSID)

- If the CSSID is not a Monday, then due to deltas of data to CSS we would expect that we would need to take the immediately preceding Business Day(s) as Non Effective Days
    - This will be likely to impact timings within the Modification, but the principles have been established so it feels right to raise the UNC Modification and start development

Background

- From Retail Energy Code (REC) v3 Go Live the Central Switching Service (CSS) will be responsible for Registration of the vast majority of Supply Meter Points rather than the UK Link system
    - Note some Supply Meter Points are excluded from the scope of CSS – these 'Non CSS Supply Points' are (extract is **UNC TPD G – REC v3 text)**:
        - NTS Direct Connect Sites
        - Shared Supply
        - Supplier Exempt Supply Points
        - Liquified Petroleum Gas (LPG) Sites

1.2.2   All LDZ Supply Meter Points, except for LDZ Shared Supply Meter Points and Supply Meter Points in respect of which the supplier need not hold a gas suppliers licence, are CSS Supply Meter Points; and all NTS Supply Meter Points and LDZ Shared Supply Meter Points are Non-CSS Supply Meter Points.
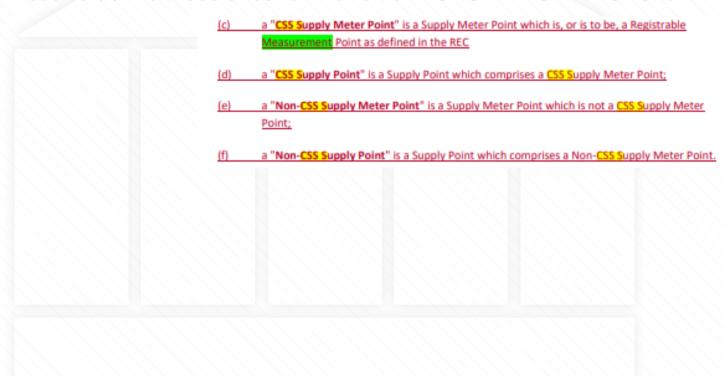
- The REC will govern the Registration processes, and these elements will be removed from the UNC
    - Registration processes for Non CSS Supply Points will remain in the UNC (Section G 6)

5   **SUPPLY POINT REGISTRATION – CSS SPs**

Not Used

6   **SUPPLY POINT REGISTRATION – NON-CSS SPs**

6.1   **Introduction**

6.1.1   A User may apply to become the Registered User in respect of a Supply Point in accordance with this paragraph 6.

Background

- **Transition Rule: As CSS / Non CSS SPs are treated differently for Transition – we will need to define these sites for Transition. UNC TPD G – REC v3 text:**

(c)   a "**CSS Supply Meter Point**" is a Supply Meter Point which is, or is to be, a Registrable Measurement Point as defined in the REC

(d)   a "**CSS Supply Point**" is a Supply Point which comprises a CSS Supply Meter Point;

(e)   a "**Non-CSS Supply Meter Point**" is a Supply Meter Point which is not a CSS Supply Meter Point;

(f)   a "**Non-CSS Supply Point**" is a Supply Point which comprises a Non-CSS Supply Meter Point.

Transition Rules for Non CSS SPs

- **Non CSS Supply Point Registration processes will continue during Transition**

- **Transition Rule: Sites will be prevented from becoming a Non CSS Supply Point where they are otherwise within the scope of CSS, and vice versa during the Transition period.**
  - In practice, this is very unlikely to happen as most are defined as Non CSS by virtue of location on the Network (NTS; LPG) but Supplier Exempt might have an element of election.
  - If any Shippers are contemplating any amendment please contact us as soon as possible to discuss this.

- Note: There may be other processes that are suspended during Transition that impact Non CSS Supply Points. The above rules relate only to Registration processes.

CSS Supply Points – Registration

- CSS Programme has a design artefact D-4.3.4 'Inflight Switches Management Approach' this sets out the approach to Registration.
  - This document has been utilised in production of this presentation. Users are recommended that this is reviewed.
  - This document is subject to change:
    - CR-D071 sought to simplify transition. CRD071 has been approved. It:
      - Removed the concept of Confirmations that commence in UK Link systems and complete in CSS
      - Removed the planned alignment of Objection Window in Gas / Elec – Gas Objection window would have been reduced to 5 days
    - CR-D100 has recently been raised to clarify the timescales for Initial Registrations / Uncontested Confirmation (i.e. where the Registered User has withdrawn) – **this presentation assumes that CR-D100 has been approved.**
- **Registrations that commence in UK Link must 'complete' in UK Link – last Effective Date for a Confirmation started in UK Link is the CSS Go Live Date (i.e. CSSID)**
- Some useful reading:
  - CR-D100
  - D-4.3.4 v2.0

Microsoft Word Document

Microsoft Edge PDF Document

CSS Supply Points – Confirmation

- CR-D100 provides the following table (note: key is from D-4.3.4). **Each of the following expected as a Transition Rule.**

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															
Gas Initial Registration									IR	CR	NC	NC	NC	NC	EX
Elec Initial Registration															

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.

Code	Description
SR	Registration (switch) request submitted to central system.
O	Objection Window.

6.6.8 The Proposed Supply Point Registration Date shall be:

(a) not more than 30 Supply Point Systems Business Days after the Supply Point Confirmation is submitted; and

(b) not less than 14 calendar days commencing on the Day after the Supply Point Confirmation is submitted unless:

(i) at the time that the Supply Point Confirmation is submitted a Supply Point Withdrawal has been submitted by the Existing Registered User in respect of each Existing Supply Point in which case the Proposed Supply Point Registration Date shall not be less than 4 Supply Point Systems Business Days

(ii) there is no change in the identity of the Registered User in respect of the Supply Point, in which case the Proposed Supply Point Registration Date shall not be less than 4 Supply Point Systems Business Days; or

- T0 = CSSID-30SPSBDs – CDSP will need to reject any Confirmation Effective Dates greater than CSSID [Rejection Code: FYI]
- T1 – Any 'Competitive Confirmations' must be submitted by CSSID-14 calendar days
  - Note: last Effective Date for a Confirmation started in UKL is CSSID (i.e. EX = GO (see key above))
- T2a – Last submission of Non Competitive Confirmations must be submitted by CSSID-4BDs
  - Initial Registration; Re-Confirmation (same Shipper); Registered User has Withdrawn; Brownfield.

CSS Supply Points – Supplier Responsibilities – For Information only

- As part of transition the following is specified. This does not impact the UNC Mod so is for information only:
  - For any Switches where the Supply Start Date is after CSS Implementation Date the Supplier will need to queue these within their system and submit to CSS. Reasons for this could be instances such as:
    - Switch identified following T1
    - Where the consumer has a specified start date after CSSID
    - Unresolved Objections [by D-5]
  - First Supply Start Date in CSS is currently planned to be CSSID+5WDs (ref Table 2 D4.3.4 v2.0)
  - A Catch Up period is planned therefore in the period Suppliers will be subject to additional requirements and regulation (D-4.3.4 3.7) as defined in document 'NC-103 Transition Plan / Runbook'

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	NC	NC	NC	NC	EX
Elec Registration															
Gas Initial Registration									IR	CR	NC	NC	NC	NC	EX
Elec Initial Registration															

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.

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- T2a – the last date that a gas initial registration can be submitted
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CSS Supply Points – Registration

- Following CSS other Registration processes will no longer have effect for CSS Sites, therefore these need to be assessed for Transition:

  - Withdrawal

  - CDSP Authority to register each Supply Meter Point

  - Nominations

  - NB: Update of Supplier Identity via GEA is covered under 'Other Transactions'

CSS Supply Points – Withdrawal

- Withdrawals - UNC TPD G6.11 / G6.12
  - Will need to be received by CSS ID – [3]BDs in order to take effect
  - The 'effect' of a Withdrawal will depend upon:
    - whether an Isolation has been processed or not
    - *whether a Meter has never been installed and we have never received any notification of a Meter being installed*
      - *Note: post CSS we will re-use an existing record in the Withdrawal notice post CSS, but this is NOT a 'Withdrawal' under UNC*
  - The table describes the effect of Withdrawal pre / post CSS, and is expected to be refined as part of Mod development

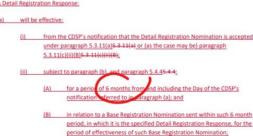| Effect of Withdrawal Scenario:		Effect of Withdrawal (WAO)	Post CSS	
			Effect of Withdrawal (WAO)	CSS Transaction
Where the Isolation has been recorded –		Confirmation would be End Dated in UKL by D+[3]BDs – where D is transaction processing date. Will be processed up to CSS ID – [3]BDs.	N/A	The Isolation being recorded in UKL will ensure that the RMP Status is a status such that the Registration can be End Dated via CSS Registration Deactivation Request.
Where the Isolation has not been recorded –		Confirmation is NOT End Dated but the Shipper foregoes the ability to submit an Objection to an incoming Shipper Confirmation. Will be processed up to CSS ID – [3]BDs (but will need to be effective prior to that to have any effect).	N/A	If the RMP Status is not at the right status, then a CSS Registration Deactivation Request will not be accepted. Isolation would need to b submitted.
Where a Meter has never been installed on UKL AND we have never been notified of installation (even if these notifications were unsuccessful) –		Confirmation is End Dated Withdrawal will also have the effect of setting the MP Status to 'EX' and the Transportation Cost refunded. Any S39 Records processed from CSS ID – [2]BDs will only affect the RMP status.	S39 Record – will initiate the process by setting the RMP such that a Registration Deactivation can be submitted. Once submitted this will prompt adjustment. UNC is silent on this	Registration Deactivation Request would need to be submitted to End Date the Registration following S39 processing.

CSS Supply Points – Withdrawal

- Withdrawals - UNC TPD G6.11 / G6.12
    - We will need to cancel Withdrawals that have been submitted prior to the Isolation having been submitted, and where such Withdrawals will not take effect prior to CSS Implementation Date, we will do so following completion of Withdrawal activity on CSS ID – 3BDs. **This is likely to require a Transition Rule.**
    - For information (UKLM variation): there will not be a UK Link Communication to Shippers of these Supply Meter Points – this will be conducted [by email]

    - Users will then need to submit these as Registration Deactivation Requests in CSS

    - For Information: RGMA Transaction processing is unaffected by Transition (subject to confirmation of Implementation Date requiring Non Effective Days) therefore would expect Isolations to be processed in accordance to G7.2.3:

> 7.2.3   Subject to paragraph 7.2.4, within one Day of receipt of a notice complying with paragraph 7.2.2 the CDSP will amend the Supply Point Register to set the status of the Supply Meter Point to **"Isolated"**.

CSS Supply Points – CDSP Authority to register

- Within the UNC the CDSP is granted authority to register Supply Meter Points (UNC TPD G4.4.4; G4.6.11; G8.2.4; G8.4.3; G8.5.4)

  - We will be suspending the above batch processes during Transition. Last processing date will be CSSID – [4]BDs.

  - These will be re-started on CSS ID +[0]BDs via CSS as a Transporter Initiated Registration

  - For the above references these are not timebound – therefore not expected to require legal text for Transition.

CSS Supply Points – Nominations / Offers

- Within the UNC Offers are valid for 6 months (subject to other conditions – such as DM Capacity breaching Offered Capacity) following Offer Creation Date – it is proposed that Offers made pre CSS will remain Valid post CSS (subject to the conditions in the UNC):

6.5.4   Subject to paragraphs, 6.5.5 and 6.8.3, and unless and until a Supply Point Confirmation is made which becomes effective, a Supply Point Offer will remain valid for a period of six (6) months after it was made.

- – UNC TPD G6 - Pre CSS (and Non CSS SPs) terminology is Nomination and Offer
- – UNC TPD G5 (introduced at REC v3.0 Go Live – i.e. Post CSS for CSS SPs) is Detail Registration Nomination and Detail Registration Response (see below extract)

- – **It is likely that we will need to cater for this different terminology as part of the Transition Rules.**

5.3.13   A Detail Registration Response:

(a)   will be effective:

(i)   from the CDSP's notification that the Detail Registration Nomination is accepted under paragraph 5.3.11(a)5.3.11(a) or (as the case may be) paragraph 5.3.11(c)(ii)(B)5.3.11(c)(ii)(B);

(ii)   subject to paragraph (b) and paragraph 5.4.45.4.4:

(A)   for a period of 6 months from and including the Day of the CDSP's notification referred to in paragraph (a); and

(B)   in relation to a Base Registration Nomination sent within such 6 month period, in which it is the specified Detail Registration Response, for the period of effectiveness of such Base Registration Nomination;

Impact on Other Processes

- The following processes have been assessed:

  - Meter Reading – it is expected that there is a hard Cutover from old to new Meter Reading rules – this primarily affects Opening Readings not being valid prior to D
  - Market Sector Code Update – this will be mastered in CSS post REC v3. Last update in UKL will be CSS ID – [3]BDRGMA Transactions – these are no expected impacts for Transition – the jobs will run as normal
    - Note: Market Sector Code update will no longer be used from RGMA transactions post CSS Go Live – but this is not a Code matter

  - Subject to SoLR Option Discussions – the GEA Supplier Transactions will:
    - not be accepted from CSS ID – [3]BDs
    - Not be accepted with an Effective Date greater than CSS ID [from T0]

Impact on Other Processes

- No change to the legal text – but for information, we will need to assess the following times from the UK Link Manual.
    - Greater pressure on these times with a non Monday CSS Implementation Date

A Batch Transfer Communication may be made at any time, subject to the availability of the UK Link Network. There are no technical restrictions concerning the timing of Batch Transfer Communications. However, in order to guarantee that a Batch Transfer Communication is processed for that Supply Point System Business Day they need to be received by the CDSP by the following times on that Business Day:

CNF - Confirmations	23.00 hours
NOM – Nominations	23.00 hours
SPC - Supply Point Changes	23.00 hours
WAO - Withdrawals & Objections	23.00 hours
IAR - Isolations & Reconnections	23.00 hours
CNC - Customer Amendments	16.00 hours
EMC - Emergency Contacts	16.00 hours
RFA - Reference Amendment	16.00 hours
Meter Readings	21.00 hours]