

## **CSS Consequential Changes – Detailed Design Report to December Modification Panel**

### **Background:**

Uniform Network Code changes that were necessary as a result of the introduction of the Central Switching System and of the Retail Energy Code under the Ofgem Faster Switching Programme were considered by the UNC Review Group 0630R – Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme”. This Review Group ran in parallel with the Delivery Subgroup (DSG) which is a sub-group of the DSC Change Management Committee. This group sought to create a baseline for the High Level Design. Any matters arising in either group were able to be highlighted for ratification in the other group, in order to try to achieve consensus.

Delivered from the 0630R Workgroup was a version of the UNC Legal Text that was issued by Ofgem in their consultation “Switching Programme and Retail Code Consolidation: Proposed changes to licences and industry codes” published on 17th June 2019.

This documentation is available [here](#).

Consultation comments were invited by 9<sup>th</sup> September 2019 to Ofgem. Very few comments were received via the consultation that required change to the proposed text.

### **Purpose of this document:**

**This document contains recommendations that will result in changes to the Legal Text provided as part of the CSS Consultation.**

In parallel with this consultation the Detailed Design has been initiated, and the DSG convened to develop the technical solutions.

During development of these solutions and further elaboration of the detailed requirements it is possible that additional UNC business rules will be identified, and there is the potential that text within the revised UNC drafting will be subject to amendment.

This paper seeks to highlight to the Modification Panel on an ongoing basis any matters identified in the DSG that impact the UNC drafting so that Panel may either:

- approve or reject the suggested business rule, and
- direct whether such a business rule should be reflected in the UNC drafting or not, OR
- seek clarifications from DSG (or the CDSP) as to the merits of the proposed change, OR

- refer the proposed business rule to a workgroup for consideration, and a recommendation from that Workgroup to be considered by the panel.

Whilst every effort has been made to identify impacts to the UNC, Panel are asked to note the recommendation that parties in attendance at the DSG meeting review the UNC documentation within the consultation to obtain their own assurance that the Design and UNC align, and any matters arising are highlighted in Consultation responses.

**New Matters referred to Panel following DSG Meeting:**

Reference in (new) UNC	Where identified / and by whom	Comment	Action
G 5.5.2 - 5.5.6	DSG 26/06/2019	<p>Association Rules in UNC allowed multiple Shipper / Supplier / Supply Meter Point Base Registration Nominations to be Operative at any one point in time.</p> <p>The DSG members proposed that only a single BRN should be Operative for the above combination.</p> <p>As such the Effective Date AND CSS Reference is no longer an association criteria, and UNC will be required to accept that any subsequent valid BRN will supersede the previous BRN.</p>	<b>Outcome: Simplify references to association rules in UNC Section G.</b>
	DSG 11/07/2019	<p>Proposed to amend obtaining of Class 4 Meter Readings for a Read Date within the Incoming Shipper's ownership – i.e. for Opening Meter Readings from D onwards, rather than maintaining the window opening at D-5.</p> <p>Using this window creates additional issues regarding 'ownership' of Meter Readings – about what can / cannot be used for estimation. This would have the effect of aligning C3 and 4 Opening Meter Reading rules.</p>	<b>Outcome: Amend Meter Reading Window start date to D from D-5.</b>
M 1.5.5(a)	DSG 06/11/2019	<p>Proposing User Readings (Point of Sale (PoS)) – changes to PoS Reading, since the PoS Meter Reading is only applied to Class 4 Supply Meter Points, and is valid for Meter Readings obtained by the incoming Shipper outside of the Opening Meter Reading window i.e. prior to D-5 (where D is the Confirmation Effective Date) provided that a Meter Reading with a Read Date subsequent to the PoS Read Date has not loaded in UK Link systems).</p> <p><i>Note: Existing PoS logic would fulfil outstanding Opening Meter Readings (this would be a further variant to the Subsequent Shipper Meter Reading fulfilling previous Shipper's outstanding Opening Reads, where if we were to disregard these readings this might create perverse consumptions).</i></p>	<b>Outcome: Amend reference to end of PoS window to D-1 (rather than D-6); clarify use for Class 4 only and Smaller Supply Points only.</b>

M 5.13	DSG 06/11/2019	<p>Subsequent Shipper Meter Reading – 0630 discussions concluded that determined that the subsequent Shipper Meter Readings should not be used to fulfil an outstanding Opening Meter Reading for a previous Shipper. Since the Faster Switching Programme will reduce the timescales between Change of Shipper or Supplier events, it is possible that a Shipper may not have fulfilled it's Opening Meter Reading and that this is still outstanding when a subsequent switch occurs. Concern was raised in the 0630 group about the use of a Meter Reading from a subsequent Shipper, preferring to use Meter Reading history from UK Link systems.</p> <p>Subsequently, concern has been raised regarding the complexity / efficacy of the Supplier Agreed Reading process providing an effective remedy where issues arise. Instances where a Supply Meter Point has two outstanding Opening Meter Readings could not be identified in UK Link systems to understand volume and identify actual issues arising – but concerns regarding the potential to use Meter Readings up to two years old rather than a Meter Reading within a few days of the transfer, and the consequent exceptions and manual processes were debated, but not concluded. Currently, the UK Link system will consider any Meter Readings provided in order to estimate or prorate outstanding Meter Reading requests this logic would introduce complexity to processing in order to identify the Shipper who had provided the Meter Reading, to determine whether this could be utilised.</p>	<p><b><i>Outcome: Amend UNC to allow the use of Meter Readings from a Subsequent Shipper to estimate a previous outstanding Opening Meter Reading.</i></b></p> <p><b><i>Initiate a review of the Supplier / Shipper Agreed Meter Reading process.</i></b></p>
--------	----------------	--	---

**New Matters highlighted to Panel that require detailed assessment against the Code / Ancillary Documents:**

- Within the CSS UNC drafting, where an Opening Meter Reading was outstanding receipt of any Meter Reading or the generation of a Meter Reading in order to process a transaction (e.g. a Class Change or LDZ Change) would fulfil the Opening Meter Reading. This reflects the existing approach within UK Link systems. DSG highlighted concerns regarding foreclosure of the Opening Meter Reading window specifically around Class Change. This would present a change to the CSS approach and existing UK Link systems – therefore assessment is required.
  - ***Outcome: Undertake assessment of options and report options to DSG and Distribution WG.***

- Requirement to assess the Prime and Sub supplementary UNCC document regarding the changes agreed regarding the application of the rules to determine the relevant Shipper Meter Reading provision in relation to coterminous Meter Readings.
  - ***Outcome: Update document and present to Distribution Workgroup, and UNCC.***

-

**Previous Matters referred to Panel (Decisions / Progress):**

None

DA v1FA 20191122