



Modification 0734

DWG

22 October 2020

Modification 0734 Action

- Within the last WG, the CDSP highlighted concerns regarding inconsistency between SPAA and UNC processes.
- Further an action was placed on the CDSP as detailed below which will be looked to be addressed within this presentation.
- CDSP (DA) CDSP to review the process to understand whether it can deliver the solution based on the Business Rules as defined in the Modification:
 - What is already in place;
 - What is easy to implement; and
 - What is considered more a fundamental change
- The next slides detail each business rule within the Modification and highlight current processes and things which need to be considered so that potential inconsistencies between the two regimes do not compromise the intended outcomes of the Modification. Often these inconsistencies were raised in the original Review Group.
- The WG should note that CMS is being replaced, therefore it is assumed that complex system changes will NOT be delivered in advance of the replacement programme.
 - Tactical solutions will be assessed as necessary. Does the WG agree within this preliminary assumption?

Business Rules and questions for WG

BR1. The Central Data Service Provider (CDSP) will receive Supplier Confirmed Theft Data (SCTD) from the relevant administrative body (currently SPAA) on a monthly basis.

- There are additional mandatory data items required to record theft centrally. These are additional to the data items currently detailed within the Modification that Suppliers (or the TRAS) have to provide.
- - How will this shortfall be resolved?
 - Will the SPAA Schedule need to be changed to make it mandatory for these additional data items to be provided?
 - Where the Supplier cannot provide these data items, will Xoserve be expected to populate them based on the information held in UK Link?
 - It is assumed that ALL theft raised in this manner will be relevant to Shipper investigation – i.e. should be inserted in the Shipper queue and not Transporter queue.
 - It is further assumed that the type of theft will be categorised by the TRAS in line with those specified in the UK Link Communication.
- The means of recording theft via the UK Link interfaces are that this is provisioned in volume (cubic feet/meters)
 - How will this shortfall be resolved?
 - Will Suppliers (or ElectraLink/TRAS on their behalf) be converting the theft they raise in energy (kwh) back to volume before being submitted to the CDSP?
 - If not, is this a service the CDSP are expected to perform? If it is, we will need confirmation of the standard conversion used by Suppliers to derive the energy.

Business Rules and questions for WG

BR2. Subject to BR1, the CDSP will notify relevant Shipper(s) of relevant Supplier(s) Confirmed Theft Data (SCTD) on a monthly basis.

- As per current system logic, CMS does not allow duplicate thefts to be raised for the same MPRN. Based on this, if a TOG contact has been raised for a valid or alleged theft in CMS and is assigned to a Shipper or Network, if a Supplier theft on the same MPRN is provided by the TRAS, this will not be accepted within central systems. In this situation we are anticipating that:
 - The CDSP will report back to TRAS / the administrator where a Supplier raised theft cannot be added to central systems because a TOG contact is already raised and open on the same site.
 - We would expect it would be the responsibility of the TRAS / the administrator to advise the relevant Suppliers of the duplicate and Suppliers should be obligated to liaise with the Shipper to ensure the theft already open within CMS covers what was being raised by the Supplier.
 - What is the WG's view on this approach?
 - Where will this approach be documented?
 - Is there an inferred Shipper behaviour change that Shippers will no longer raise such contacts and rely on these being raised on the Supplier's behalf. Is this specifically intended?
 - It is assumed that Shippers may wish to continue to raise TOG directly. Is this assumption correct? It is assumed that such theft will follow the existing process rules?
 - It is further assumed that Transporters will wish to raise TOG directly – and these will be passed to Shippers. It is assumed that such theft will follow the existing process rules?
- It is anticipated that the Supplier raised theft submitted by TRAS to the CDSP will be loaded into CMS and created as a contact within the relevant Shippers CMS queue.
 - Do the WG believe this is sufficient notification?
 - Is there a further reporting requirement necessary?

Business Rules and questions for WG

BR3. The relevant Shipper(s) will be required to notify the CDSP of any Supplier Confirmed Theft Data (SCTD) which is invalid within 10 Days of receipt of such notification from the CDSP.

- As per current system logic, a theft logged centrally has a couple of statuses within CMS when the investigation is completed; valid – pursuing, valid – not pursuing, invalid and auto close. It is worth noting that once a theft is raised centrally, it is actively worked on by Xoserve and the DSC party.
 - With the valid – not pursuing option, the theft recorded is not progressed into settlement.
 - Do WG have a view on this status and how we manage the use of it under this Modification? Should these be treated as invalid?
 - ‘Valid – pursuing’ – will be treated as ‘Valid’ and a Consumption Adjustment is necessary.
- Currently the Modification and BR3 only deals with a Supplier raised theft being validated and progressed to settlement or being ‘rejected’ and not progressed.
 - Is there an option for a Shipper to amend a Supplier raised theft which comes to them to review? Current system logic allows a theft in central systems to be amended.
 - Is this a valid outcome expected? How should this be documented?
 - IF this is not a valid outcome, what process is expected to be followed?

Business Rules and questions for WG

BR4. On receipt of such notification under BR3, the CDSP will notify the relevant administrative body (currently SPAA) accordingly.

- What notification is expected to SPAA? Is it where a Shipper has chosen not to progress the Supplier theft into settlement?
- Is there any other additional information required to be provided?

Business Rules and questions for WG

BR5. Relevant Shipper(s) will be required to report any valid Supplier Confirmed Theft Data (SCTD) into settlement within 15 Days of receipt of such notification from the CDSP.

- As per the current process, if a theft investigation is complete and categorised by the Shipper as Valid, the Consumption Adjustment process will be progressed by the CDSP. This is the change to settlement to reflect the theft.
 - If within 10 SPSBDs, the Shipper confirms the theft as Valid, the CDSP will progress the Consumption Adjustment. The Shipper cannot control it being processed into settlement within 15 days. Based on this should this be a Business Rule on the CDSP to ensure a Consumption Adjustment is raised for thefts which are Valid by the Shipper? See next slide for suggested amendments to Business Rules.
 - For Consumption Adjustments, a specific process is followed and in some cases, the Consumption Adjustment calculation cannot be accepted and it must go through a further review with the Shipper. How would this be expected to be managed?

Business Rules and questions for WG

BR6. In the absence of any notification in accordance with BR3 and BR5, the CDSP will report any Supplier Confirmed Theft Data (SCTD) into settlement no earlier than 20 Days following submission of the notification to the relevant Shipper(s).

- As detailed in the previous slide, the CDSP undertake the Consumption Adjustment once the Shipper completes the investigation and selects it as Valid.
- Based on the current process, Shippers are unable to complete BR5. Should the Business Rules be updated to be:
 - *BR3 – The relevant Shipper(s) will be required to notify the CDSP of any Supplier Confirmed Theft Data (SCTD) which is invalid or progress the theft as Valid within 10 Days of receipt of such notification from the CDSP*
 - *BR5 - In the absence of any notification in accordance with BR3, the CDSP will progress any Supplier Confirmed Theft Data (SCTD) as Valid – pursuing and process the Consumption Adjustment to reflect the theft.*
 - *[New Business Rule – Shipper obligation to support resolution of any validation issues related to processing the Consumption Adjustment]*
 - What are WG's views on the suggested amendments to the Business Rules?

Business Rules and questions for WG

For the avoidance of doubt, the Proposer would expect the Performance Assurance Committee to have access to appropriate tools to enable them to monitor the performance of these arrangements.

- What are PAC expected to report on in terms of this Modification?
- If an additional PAC report is required, this will need to be specified within the Modification in order for it to be provided.

