Rough Order of Magnitude (ROM) Request and Response

1. Purpose of a ROM

The DSC CDSP Service Document – Change Management Procedure sets out the expectations of the ROM process.

> 4.6.2 Subject to paragraph 4.6.3, within 10 Business Days after receiving a ROM Request, the CDSP shall send to the Customer and the Committee a report (Rough Order of Magnitude Report or ROM Report) setting out (so far as the CDSP is able to assess at the time):
>
> (a) a high level indicative assessment of the impact of the Potential Service Change on the CDSP Service Description and on UK Link;
>
> (b) the CDSP's opinion as to whether the Potential Service Change would be a Restricted Class Change, would have an Adverse Impact on any Customer Class(es)) or would be a Priority Service Change, where applicable;
>
> (c) the CDSP's approximate estimate of:
>
> > (i) the Costs (or range of Costs, where options under paragraph (e) are identified) of Implementing the Potential Service Change;
> >
> > (ii) the impact of the Potential Service Change on Service Charges; and
> >
> > (iii) the period of time required for Implementation;
>
> (d) any material dependencies of Implementation on other Proposed Service Changes or other likely Priority Questions; and
>
> (e) if it is apparent to the CDSP that there are likely to be materially different options as to how to Implement the Potential Service Change, a high level description of such options.

2. ROM Request – To be completed by the customer

Please populate the details below and send to box.xoserve.portfoliooffice@xoserve.com, to enable the CDSP to undertake the impact assessment to provide the ROM Response (section below).

Please note, the ROM requestor may be asked for further details if it is believed that request is not clear and additional information is required in order to provide a ROM Response.

2a. ROM Request Details

ROM Request Details	
Change Title	Update of UNC Code Communication Methods (removal of facsimile)
Regulatory Impact	☒ Yes ☐ No
Regulatory Reference (if applicable)	UNC Modification 0864 - Update of UNC Code Communication Methods
Change Overview	Obligated communication between parties (e.g. Transporters and Shippers) is clearly stated within UNC documents. Currently within the UNC General, TPD, OAD and IGTAD documents, such communication should include telephone or facsimile. PSTN and ISDN lines, which fax employ, will be switched off nationally in 2025 by telecoms companies, led by Ofcom. The Government advises preparing for this pending switch-off including the replacement of IP unsupported devices, including fax machines. To ensure compliance when fax hardware is removed, a UNC modification is needed to remove references to facsimile as a form of approved communication. The modification proposes to remove reference to 'facsimile' 'fax', and 'facsimile number' from within the UNC General, TPD, OAD and IGTAD documents, in preparation for the 2025 switch off. Dependant on the impacted part of Code facsimile and facsimile number will be updated via one of the following options outlined within the Mod. • Delete facsimile and fax (no further communication mechanism added) • Delete facsimile and add email where appropriate (i.e. where it is not currently listed) • Alternative approved UNC Code Communication added by exception. • Facsimile/fax references within TD IIC that have expired are to be left. There are numerous references to facsimile, fax or facsimile number within the UNC. This includes but it not limited to the following processes: • User Admissions • EBCC arrangements

- Invoicing
- Receiving and storing contract information (for emergencies or interruptible processes etc.).

Not all of the references being addressed have an impact on the CDSP and central processes. The analysis undertaken by NGT and the WG to set out each of the instances which will be updated in Code and how the update will be made can be found **here** (e.g. just remove fax reference or remove and add email as an additional communication).

Our view is that areas related to User Admission, EBCC arrangements, Invoicing, receiving, and storing contact information and any process where we can communicate via fax are those that need to be assessed to understand the proposed approach and related high-level impact.
Please note, this is our assessment, but if Correla believe there are other clauses within the analysis that impacts our central processes, these should be included.

Existing UNC Text	Solution
Facsimile/fax is referenced with/without alternative listed methods of communication excluding email	Replace facsimile/fax with email, or alternative method of communication by exception
Facsimile/fax is referenced with email as an alternative listed method of communication	Delete facsimile/fax
Additional text pertaining to facsimile, such as 'facsimile number' and facsimile deemed receipt	Delete additional text

Please note when considering the approach, we are anticipating a big bang implementation.

When undertaking the assessment, please can you consider two approaches to the solution:

Option 1 - Remove fax references from documentation and file formats.
- Update all file formats to eliminate any mention of fax with the insertion of a phone number in TBD section Q 2.3.1 as an exception.
- Remove Fax as an allowable value, add Email (EML) as a new allowable value. Ensure email address can be provided in place of fax within relevant file formats.
- Update all documentation to reflect fax removal with the replacement of email and alternative form of communication by exception where applicable.

Option 2 – Reuse Fax for email
- Keep Fax as an allowable value, but to be used to accept Email submissions.
- Insertion of a phone number in TBD section Q 2.3.1 as an exception
- Update all documentation to reflect fax removal with the replacement of email and alternative form of communication by exception where applicable.

Date Raised	12/04/2024	
Required Response Date	26/04/2024	
Requestor Contact Details	Name:	Gavin Williams
	Organisation:	National Gas
	Email:	gavin.williams@nationalgas.com
	Number:	07935353142
Xoserve Lead Contact (to be provided by the CDSP)	Contact Name:	Ellie Rogers / Josie Lewis
	Contact Email:	Ellie.rogers@xoserve.com Josie.Lewis@xoserve.com

3. ROM Response – To be completed by the CDSP

The ROM response provided is based on a high-level indicative assessment of the impact of the change.

Please note, all the sections within this template should be populated by the CDSP when providing a ROM response.

To find the high-level costs and timescales please go to section 3c which can be found here.

3a. Impacted Constituency

Customer Class(es) Impacted by Change:	☐ Shipper	☐ Distribution Network Operator
	☐ NG Transmission	☐ IGT
	☒ All	☐ Other <Please provide details here>
Justification for Customer Class(es) selection	UK Link stores the FAX data received as part of registration request from Shippers. This can be later amended by the Shippers. This information is then passed to other stakeholders in various reports. Based on this, we believe all Customer Classes are impacted as a result of this change.	

3b. Overview of impacts

Overview of impacts	This ROM response considers high-level impacts of Modification 0864, ultimately no longer receiving or storing fax details, and where appropriate, holding an alternative contact detail.

Systems:

UK Link
FAX details are received into the UK Link system as part of registration requests and contact updates. The values can be later amended by the Shippers to a new value if a change is required.

The following processes/files will require a change (remove FAX and replace with EMAIL (under options 1)) as they contain FAX as an allowable value under the contact Electronic Communication.

- Non-CSS registration files: CNF, CFR, TRF

- CSS registration files: BRN, BRR, TMC

- Portfolio files: IDL, IQL, EDL, EQL

- Unique site templates/files: SNO, SNR, CRS, CSS, TRS, RCI, TNI

- Contact amendment files: EMC, CTR

UKLink change overview (under options 1):

- Changes are required in the validation program which processes the above interface files.
- New validations within the above processes to accept EMAIL as an allowable value under Contact Electronic Communication type and store in UKLink
- If FAX is received in the inbound request, the request will be rejected. Existing rejection codes will be reused where possible. EMAIL details received as part of the registration request will be stored in UK Link and will be provided in the response files. (This will not be sent to the DN's/IGT's in the daily portfolio files (IDL/EDL) as per BAU processes with fax details currently). This will be sent to the DNs/IGTs within the quarterly portfolio files (IQL/EQL) as per BAU processes.
- File format changes are required on the allowable values to remove the reference of FAX and include EMAIL form in the electronic communication type. To confirm it is the S67 record which has fax as an allowable value within. The file formats listed above are where the S67 or B39/B46 are present and therefore need to be changed.
- An End date will be set for the existing FAX entries, in UK Link, to mark them inactive and to stop them feeding into reports/files. Circa 30k entries are currently being maintained in UK Link. These will be end dated, but the data will continue to be stored for a period of time (at least to Line in the Sand date). Details of cut-off for fax entries and any data cleanse activities will be worked up as the change progresses, this will include any proposed communication / notification.

BW Reports:

- The following BW reports will require a change to remove FAX and include EMAIL contact data after this change is implemented. Presently FAX appears in these reports:
- Rpt_Id_406_IP_Contacts_IDN
- IP_Contacts_TGT
- Rpt_id_1047_Individual_Stakeholder_Details
- Rpt_id_1048_Stakeholder_Details_by_role
- Rpt_id_1049_Stakeholder_Emergency_Contacts
- Rpt_id_1057_Unique Sites DN Emergency Contacts Report
- Rpt_id_1108_IP_Contacts_iGT
- Rpt_id_1058_Unique Sites NTS Emergency Contacts Report

Apart from the above-mentioned changes required in UKLink below options were considered to explore the various solution options:

Option 1a: Replace Fax with Email (File format changes)

- File format changes for IQL/IDL (B46 record - COMMUNICATION IDENTITY) and EQL/EDL (B39 record - ELA IDENTITY) will be required to change the length to 241 as currently these have a field length of 25 characters. Inbound S67 segment allows up to 241 characters for CONTACT ELECTRONIC ADDRESS.
- This change will allow these files to present the whole email information up to 241 characters.

Option 1b: Replace Fax with Email (No File format changes)

- No File format changes for IQL/IDL (COMMUNICATION IDENTIFY) and EQL/EDL (ELA IDENTITY). These fields will continue as is with the field length of 25 characters.
- This would mean that when the email information received is more than 25 characters, these files will present the same up to 25 characters (truncated). This is the existing BAU design.

Option 2: Reuse Fax with Email (No File format changes)

- Allowable value for Fax will be retained to submit Email information in the inbound file formats.
- No File format changes for IQL/IDL (COMMUNICATION IDENTIFY) and EQL/EDL (ELA IDENTITY). These fields will continue as is with the field length of 25 characters.
- This would mean that when the email information received is more than 25 characters, these files will present the same up to 25 characters (truncated). This is the existing BAU design.
- New validations within the above processes to accept EMAIL as an acceptable value under Contact Electronic Communication type and store in UKLink as EMAIL follows different data format compared to FAX.

Gemini
There are no system impacts to Gemini, however there are numerous references to FAX within the Gemini Code Contingency documentation which would need to be updated if this change was implemented. The review of Gemini Code Contingency documentation and Business Continuity Management (BCM) procedures is currently within scope of the Gemini Sustain Plus programme which is expected to include relevant documentation amendments.

The ROM specially requested consideration on Gemini Sustain Plus compared to legacy Gemini system. As Gemini Sustain Plus indicative timeline is implementation in September 2024, we are expecting this change to be implemented post Gemini Sustain Plus delivery. Additional to this, we do not anticipate system changes to Gemini.
Based on this, a cost does not need to be provided for legacy Gemini and post Gemini Sustain Plus.

Documentation / Process changes:
If this change was implemented, there would be administrative changes required to certain documentation and processes to remove fax as a form of communication. Based on the initial assessment, the high-level processes we've considered would need to have changes are below. These and any others which may be impacted will be considered in detailed design.

Customer Lifecycle
Administrative changes/updates will be required to the following forms contact lists and processes to remove need to request fax details:
- Shipper/Trader application forms
- Transportation contacts
- Emergency contacts.
- Service Now and reporting back to Transporters.

Energy Balancing arrangements
Administrative changes would be required to update the Energy Balancing Credit Rules following the implementation of the Modification to remove fax as a form of communication.

UK Link Manual
Administrative changes would be required to the UK Link Manual, as a minimum to the UKLCD1 – Code Communications Reference and UKLBD4 – Active Notification System Supplementary Document to remove fax as a form of communication.

Assumptions:

- Existing FAX data will be maintained in UK Link as it is, but the end date will be populated to mark them as inactive.
- Initial data population of email data is not considered in scope instead this will have to be provided by the Shippers as part of registration flows or contact amendment via BAU process.
- For internal testing, any confidential data in the test environments will be anonymised/masked. If unanonymised/masked data is required to facilitate any external testing, then additional costs would be incurred.
- No Performance Testing is included currently due to minimal changes to the impacted processes and BW reports.
- No Market testing is considered in scope of this change.
- CDSP Service and Operate costs would need to be evaluated during detailed analysis and design but unlikely to change.
- AMT involvement will be required for the changes to daily Portfolio files (IDL, EDL) if required (Only applicable for option 1a)
- The costings provided are based on a stand-alone release. If bundled into a major release, for example, there may be efficiencies identified.
- The existing 3-character field for electronic communication type will be used to include EMAIL as a allowable value (e.g. EML)
- Where possible, existing report fields will be reused to display email rather than fax.
- Consequential changes to DDP have not been identified therefore have not been included in this response.
- Presently FAX is not mandatory in any of the flows to UK Link system, hence removal of FAX will not cause any mandatory validation failures.
- If FAX data is received as part of comment or any other free text from external stakeholders (E.g. via Portal) this data will be accepted into UK Link. E.g. If DN/IGT users enter 'FAX' in referral comment field within UK Link Portal then it will be stored in the system and will be passed to shippers in NRF file S64 segment (Field - REFERRAL_COMMENTS). Another example is meter instructions where 'FAX' can be provided either from shippers or from DNs/IGTs via portal, same will be stored in system if provided.
- There are no changes to the existing contact validations which mandates TEL data along with FAX/PAG. If EMAIL or any other alternate form of communication is added, a TEL will still be required in the inbound requests. This is required as per the approved file format hierarchy/validations defined for S67 record.

UK Link Component Systems	Level of Impact (L/M/H)	File Format (Y/N)	Screens (Y/N)	Reporting (Y/N)	Batch Jobs (Y/N)	Validation (Y/N)	Processes (Y/N)	Other
UK Link Gemini	N/A	N	N	N	N	N	N	*If 'Other' is ticked, please provide justification*
UK Link System Application (e.g. SAP ISU, BW, PO)	H	Y	N	Y	N	Y	Y	UKLink/BW reports are covered under reporting. Impact is high due to validations needed for the impacted interfaces
UK Link Portal	N/A	N	N	N	N	N	N	*As above*
UK Link Online Services	N/A	N	N	N	N	N	N	*As above*
Contact Management Service (CMS)	N/A	N	N	N	N	N	N	*As above*
SwitchStream	N/A	N	N	N	N	N	N	*As above*
UK Link Network (Inclusive of IX, EFT and AMT)	L	Y	N	N	N	Y	N	*As above*
Additional Systems	**Level of Impact (L/M/H)**	**File Format (Y/N)**	**Screens (Y/N)**	**Reporting (Y/N)**	**Batch Jobs (Y/N)**	**Validation (Y/N)**	**Processes (Y/N)**	**Other**
Data Discovery Platform (DDP) Core	N/A	N	N	N	N	N	N	*If 'Other' is ticked, please provide justification*
Discovery API	N/A	N	N	N	N	N	N	*As above*
Reporting	N/A	N	N	N	N	N	N	*As above*
Gas Enquiry Service (GES)	N/A	N	N	N	N	N	N	*As above*

3c. High level costs and timescales

Costs provided within the ROM response are indicative and high level based on high level analysis.

Below details the high-level implementation cost range and provides an indication of any ongoing costs identified from the high-level analysis.

Implementation costs
Please provide below a high-level indicative cost range for this request.
An enduring solution will cost at least £150k, but probably not more than £230k.

Ongoing costs
Please provide a view on whether any ongoing costs are anticipated as a result of this change being implemented.

No ongoing costs anticipated but this will be confirmed at detailed design.

Timescales:
The high-level estimate to develop and deliver this change is approximately 15 weeks, plus 4 weeks of Post Implementation Support

Validity of ROM:
Please note, the information provided in the ROM response is an 'at a point in time' assessment which is valid for 6 months from the date of issue.

3d. Release type

Please provide a view on the anticipated release type this change would need to be delivered under.

Release Type	☒ Ad-hoc / Stand-alone	☐ Minor
	☒ Major	

Next available Release (based on the Release Type)	ChMC approval to Release scope	ChMC approval of Detailed Design
Major Release – June 2025* Ad-hoc - TBC	Dec 2024	Dec 2024

*Dependant on production and approval of Solution Design Change Pack, Detailed Design Change Pack and Scope Approval.

3e. Impact on Service Line(s)

Impact on Service Line(s)	Impacts to the DSC Service Table are expected. This is to reflect changes to no longer utilise facsimile as a Code Communication which is still referenced in certain Service Lines as the mechanism is to deliver the service. The assessment and confirmation of changes to the Service Table will be confirmed at detailed design.

Based on the areas this change impacts, this will span a range of Service Areas:

- Service Area 3 – Manage updates to customer portfolio – 90% Shippers, 10% DNOs
- Service Area 7 – Customer Joiners / Leavers – 50% NGT, 50% DNOs
- Service Area 8 – Energy Balancing – 100% NGT
- Service Area 9 – Customer Reporting – 63% Shippers, 9% NGT, 28% DNOs / IGTs
- Service Area 12 – Customer Contacts – 50% Shippers, 6% NGT, 44% DNOs / IGTsService Area 13 – Managing Change (52% Shippers, 7% NGT, 40% DNOs, 1% IGTs

Based on this, the appropriate funding area must be considered and agreed.

3f. Assumptions

- Any changes in the requirements or approach to the solution may affect the overall schedule and costs for the change.
- Costs are high level, based on high level analysis. Detailed analysis will be needed to determine the final solution which will impact both cost and schedule.
- Any costs associated to Market Trials are not included.
- The high-level analysis is based on changes to central systems and does not account for changes to customer systems as a result of any potential work.
- The high-level analysis and costs are based on current production system.