CR024 & CR025 Impact Assessment Report & Recommendations

**DECISION**: CR024 & CR025: Review the outputs of Impact Assessment and make a decision on next steps



# CR024 – Impact Assessment Summary

## Objective:

DAG to review the outputs of CR024 Impact Assessments and advise SRO on their decision to approve or reject the Change Requests.

## Headlines:

- Respondents to the Impact Assessment provided broad feedback. Those who supported the implementation of the Change Request were generally in favour of removing inconsistencies, whilst those who rejected the implementation of the Change Request raised the potential risk of significant rework and an impact to Programme timelines.
- Feedback relating to specific Data Items has been recorded in the attached Excel document, MHHS-DEL1388 CR024 & CR025 Supporting Evidence.
- Overall: 14 respondents supported the change; 5 respondents rejected the change; 2 respondents abstained.
  - It is important to note that, of the 14 supporters, 6 stated that their support was conditional to amendments or changes to the Change Request. These conditions can be found in the attached document.
  - This leaves 8 unconditional approvals, against 5 rejections and 2 abstentions.
- The supporters of the change highlighted the following items to support their decision:
  - The use of terms should be consistent across Participants and Code Bodies, which the change facilitates.
  - The change would prevent Participants from engaging in additional and unnecessary code drafting activities.
  - The agreement that there is currently ambiguity in the drafting of certain design artefacts.
- Alongside the recommended conditions in the attached document, those who agreed to CR024 also raised the following considerations:
  - The change introduces inconsistency in MHHS artefacts. Rework would be required to make MHHS artefacts consistent, which impacts all Participants.
  - Several responding opposed Participants changing the naming of 'Metering Services' to 'MOA'.
  - Is it not clear which delivery phase of the Programme the implementation of the change is required to occur.
- 5 respondents rejected the change:
  - Implementation of the change would take the Programme >20 working days to make updates across >50 baselined design artefacts. This will also have a knock-on effect to testing artefacts and test preparation, including updates to SIT (CIT and Functional) scenarios.
  - The MHHS TOM outlined the new roles and naming conventions to support the transition to half hourly settlement.
  - The change is not deemed necessary, and the benefits it would bring are outweighed by the additional effort required to uplift already approved Programme artefacts, and for Programme Participants to incorporate the additional design and build activities into their work plans.
  - The change adds rework to the MPRS design, potentially impacting the critical path of the Programme.
  - The change could introduce confusion at a critical point in the Programme plan, and has potentially wide implications on Participants and timelines for implementation.
  - The Programme recommends the implementation of the change should be postponed until a more appropriate time.

# **CR025 – Impact Assessment Summary**

## **Objective:**

DAG to review the outputs of CR025 Impact Assessments and advise SRO on their decision to approve or reject the Change Requests.

#### Headlines:

- Respondents to the Impact Assessment provided broad feedback. Those who supported the implementation of the Change Request were generally in favour of removing inconsistencies, whilst those who rejected the implementation of the Change Request raised the potential risk of significant rework and an impact to Programme timelines.
- Feedback relating to specific Data Items has been recorded in the attached Excel document, MHHS-DEL1388 CR024 & CR025 Supporting Evidence.
- Overall: 14 respondents supported the change; 3 respondents rejected the change; 3 respondents abstained.
  - It is important to note that, of the 14 supporters, 6 stated that their support was conditional to amendments or changes to the Change Request. These conditions can be found in the attached document.
  - This leaves 8 unconditional approvals, against 3 rejections and 3 abstentions.
- The supporters of the change highlighted the following items to support their decision:
  - Terms should be consistent across Participants and Code Bodies, which the change facilitates.
  - An agreement that there is currently ambiguity in the drafting of certain design artefacts.
  - The impact of this change is believed to be minimal and implementing it will bring alignment in terminology across Code Drafting and BAU process.
- Those who agreed also raised the following considerations:
  - There is a risk that DIP interface name changes would cause misalignment with lower-level details in Code Drafting.
  - It was expressed that the Change Request would have been welcomed earlier in the Programme. Implementing the change now has the potential to impact Programme timelines due to the potential rework required for the Programme and its participants.
- 3 respondents rejected the change:
  - Implementation of the change would take the Programme >20 working days to make updates across >50 baselined design artefacts. This will also have a knock-on effect to testing artefacts and test preparation, including updates to SIT (CIT and Functional) scenarios.
  - There is greater clarity if there is consistency between design artefacts, particularly the interface catalogue and the other artefacts, rather than between the Code documents and the Interface Catalogue.
  - Amendments to each of the impacted MHHS artefacts would be a significant undertaking so close to the commencement of SIT (CIT) and this could potentially impact successful milestone delivery.
  - The changes could introduce confusion at a critical point in the Programme plan. The changes have potentially wide implications on Participants and timelines for implementation.



While there was a general agreement in principle with the change. Three broad themes emerged in the qualitative feedback that need to be addressed in order to proceed with the Change Request:

## Theme

# **Further information**

Introducing inconsistency	<ul> <li>The intention of the Change Requests is to ensure the use of terms is consistent across industry.</li> <li>However, implementing the changes will cause misalignment with the MHHS Target Operating Model (TOM).</li> <li>Further, the existing terms have been used within industry for the past two years.</li> <li>Clarity and consistency between design artefacts is more important than aligning Code documents with the Interface Catalogue.</li> <li>Changing the widely used term 'Metering Services' to 'MOA' was frequently called out as a concern.</li> </ul>
Lack of clarity on implementation timelines	<ul> <li>Responding Participants noted the lack of clarity on when the proposed changes are required to be delivered.</li> <li>It was noted by respondents that implementing the changes now would create a risk to the SIT timelines.</li> <li>There is concern that this change would cause confusion among PPs at a critical time in the Programme.</li> <li>Interim Release 3 (the next interim release scheduled for this month and the SIT baseline) cannot incorporate these changes.</li> </ul>
Required effort and impact to timelines	<ul> <li>The change would require updates to &gt;50 design artefacts as well as some testing documents such as test scenarios. This is estimated to required c.20 working days' effort for the Programme.</li> <li>Changes to baselined design artefacts will require additional design and build effort for Programme Participants.</li> <li>Respondents questioned whether the benefits of the changes are of enough value to justify the additional effort.</li> <li>The change may have an impact on the existing MPRS design, which is required for SIT.</li> </ul>



# CR024 & CR025 – Submitted Impact Assessments

PROGRAMME

Industry-led, Elexon facilitated

Programme Parties	CR024 Recommendations				CR025 Recommendations				
	Yes	No	Abstain	No Reply		Yes	No	Abstain	No
Large Suppliers	2	-	-	4		2	-	-	
Medium Suppliers	-	-	-	7		-	-	-	
Small Suppliers	-	-	-	33		-	-	-	
l&C	2	-	-	39		2	-	-	
NOs	2	2	-	2		3	1	-	
DNOs	1	1	-	11		1	-	-	
nd. Agents	2	-	1	45		1	1	1	
Supplier Agents	1	-	-	5		1	-	-	
S/W Providers	2	1	-	22		2	-	1	
REC Code Manager	1	-	-	-		1	-	-	
National Grid	-	-	-	1		-	-	-	
Consumer	-	-	-	1		-	-	-	
Elexon (Helix)	-	-	1	-		-	-	1	
DCC	1	-	-	-		1	-	-	
RO / IM & LDP	-	1	-	-		-	1	-	
PA	-	-	1	-		-	-	1	
Totals	14	5	3	171		14	3	4	

#### Notes:

The classification of Independent and Supplier Agents is maintained by the Programme Party Coordinator and is subject to change.

Rationale for being marked down as abstained:

- One Independent Agent stated that insufficient material was provided on the impact of the change to make a data based assessment on the cost vs value implications of the change.
- Helix did not identify any impact on their workstreams.
- One Software provider abstained due to CR025 having no software impact on MPRS.
- The IPA is comfortable that the change requests are not expected to have an impact on their activities and has no specific objections to the Change Requests.

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Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR024)
Large Suppliers	<ul> <li>+ Two large suppliers responded to the Impact Assessment, both of which supported the Change Request.</li> <li>+ They noted that the change should simplify Code Drafting and agreed that use of terms should be consistent across participants and code bodies.</li> <li>- It was called out that the change will introduce inconsistency in MHHS artefacts. Re-work will be required to make MHHS artefacts consistent.</li> <li>- One large supplier noted that this change means a move away from the Programme and Code Drafting being design-led, and sets a precedent for Code Drafting changes being drafted outside of the design-led principle.</li> </ul>
Medium Suppliers	Did not respond.
Small Suppliers	Did not respond.
I&C	+ Both responding I&C Suppliers supported the Change Request.
DNOs	<ul> <li>Two of the four responding DNOs supported the Change Request.</li> <li>It was agreed that there is currently ambiguity in the drafting of certain design artefacts.</li> <li>One DNO believes the Change Request will avoid unnecessary Code Drafting activities.</li> <li>Two of the four responding DNOs rejected the Change Request.</li> <li>One rejecting DNO stated that they had assumed that the MHHS terminology would be picked up and progressed in any code and process changes as part of the Programme, and felt that the request did not seem to be in the in spirit of the MHHS Programme.</li> <li>A risk was raised by an MPRS service provider that this change would have an impact on the MPRS design changes and would impact updates to the Validation Rules to reflect the Data Item Name.</li> <li>One DNO estimated that the effort would take approximately 18 working days to complete, and without planning it has the potential to impact upcoming critical path milestones. It was also highlighted that the change would have a detrimental impact on the design and implementation milestones for their Service Provider as MPRS design changes would be required to update the Validation Rules to reflect the Data Item Names.</li> <li>The other rejecting DNO called out that the change would have a detrimental impact on the design and implementation milestones for their Service Provider as MPRS design changes would be required to update the Validation Rules to reflect the Data Item Names. This would involve rework to the MPRS design, which would potentially impact Programme milestones.</li> </ul>



Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR024)
iDNOs	<ul> <li>+ One of the two responding iDNOs supported the Change Request.</li> <li>- One of the two responding iDNOs rejected the Change Request.</li> <li>- The rejecting iDNO argued that changing the description of Data Items DI50488 - DI50496 to be free form would drive inconsistency instead of aligning data across the industry.</li> </ul>
Agents	<ul> <li>+ Two of the three responding Agents supported the Change Request.</li> <li>+ It was stated that a change to the naming conventions (and other elements described within the Change Request, such as data formats) is better undertaken as early as possible.</li> <li>- One Agent abstained from supporting or rejecting the Change Request.</li> <li>- The abstaining Agent stated that there was insufficient material provided on the impact of this change to make a data-based assessment on the cost vs value implications of implementing the changes.</li> <li>- One of the supporting Agents argued that whilst a change to the naming conventions is better undertaken as early as possible, there is a risk with this Change Request regarding the impact that it may have on SIT activity.</li> </ul>
S/W Providers	<ul> <li>Five of the three responding Software Providers supported the Change Request.</li> <li>The more quickly the change is implemented, the more minimal the impact will be, and the lower the risk is that it will affect the rework of code.</li> <li>The changes were described as "minor cosmetic changes".</li> <li>One Software Provider rejected the Change Request.</li> <li>They raised a number of risks associated with the change, including the risk of misalignment to the MHHS TOM, the risk of late MPRS entry into CIT and SIT, and the risk of delayed SIT completion.</li> <li>They argued that the MHHS TOM clearly outlined the new roles and naming conventions to support the transition to half hourly settlement, and that this is an unnecessary late change which results in rework and creates misalignment between Physical and Logical Data item names.</li> <li>One Software Provider questioned the statement "For the avoidance of doubt, the changes are limited to data item names and description and do not impact the YAML name or the data item definition." and requested clarification. They expect the YAML to be impacted.</li> </ul>
REC Code Manager	+ As Change Raiser, RECCo supports the implementation of the Change Request.
National Grid	Did not respond.



<b>Programme Parties</b>	Range of respondents' views on benefits and concerns (related to the approach in CR024)
Consumer	Did not respond.
Elexon (Helix)	<ul> <li>Helix abstained from supporting or rejecting the Change Request, stating that it had no impact on their activities.</li> </ul>
DCC	<ul> <li>+ The DCC support the Change Request.</li> <li>+ They stated that the Change Request added clarity, and that using established terms where possible will promote comprehension across industry parties.</li> </ul>
SRO / IM & LDP	<ul> <li>The Programme rejected the Change Request.</li> <li>The Change Request implies that changing references to descriptions does not have a material impact, however the changing of Data Item names does.</li> <li>Significant work would be required to update all the identified artefacts (&gt; 20 w/d effort from design). This would not be a priority when compared to more significant updates to the design.</li> <li>The request to update the term Metering Service to MOA will affect 54 design artefacts, whilst Service Provider will affect 40 design artefacts.</li> <li>The proposed changes have potentially much wider implications on participants and timelines for implementation.</li> </ul>
IPA	+ The IPA is comfortable that the Change Request is not expected to have an impact on their activities and has no specific objections to its implementation.



Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR025)
Large Suppliers	<ul> <li>+ Two large suppliers responded to the Impact Assessment, both of which supported the Change Request.</li> <li>+ One large supplier acknowledged that a detriment would be incurred by the change, but agrees that use of terms should be consistent across Participants and Code Bodies.</li> <li>+ The other believes that the change will enable alignment in the existing code terminology and avoid delays in the code drafting schedule.</li> </ul>
Medium Suppliers	Did not respond.
Small Suppliers	Did not respond.
I&C	+ Both responding I&C Suppliers supported the Change Request.
DNOs	<ul> <li>Three of the four responding DNOs supported the Change Request.</li> <li>It was agreed that there is currently ambiguity in the drafting of certain design artefacts.</li> <li>One DNO rejected the Change Request.</li> <li>Concerns were raised regarding the impact changing DIP interface naming would have on alignment between the names of DIP files and the event codes and scenarios, which could cause confusion in a lower-level of detail in Code Drafting.</li> <li>The rejecting DNO recognised the desire to align existing code terminology, but stated their reason for rejection as the potential detrimental impact the change could have upon the design and implementation milestones.</li> </ul>



Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR025)
iDNOs	+ The one responding iDNO supported the Change Request.
Agents	<ul> <li>+ Two of the three responding Agents supported the Change Request.</li> <li>+ It was suggested that aligning the definitions with Code Terminology would be beneficial to schedules.</li> <li>+ Clarity is beneficial and would reduce effort by all parties.</li> <li>- One Agent abstained from supporting or rejecting the Change Request.</li> <li>- They argued that insufficient material was provided on the impact of this change to make a data-based assessment on the cost vs value implications of the change.</li> <li>- One of the supporting suppliers expressed their desire to of see the proposed changes to enable corrections or changes in advance of the Change Request being raised.</li> <li>- A risk was raised regarding the disruptive effect the change could have on CIT and subsequent testing phases.</li> <li>- There is a greater risk of confusion if there is not alignment on terms with the set design artefacts.</li> </ul>
S/W Providers	<ul> <li>Two of the three responding Software Providers supported the Change Request.</li> <li>One Software Provider abstained from supporting or rejecting the Change Request.</li> <li>Their reason for abstaining was that the change proposed no software impact on MPRS, however they stated that they disagreed with the principles of the change.</li> <li>The proposed change from Metering Service to MOA raised concerns.</li> <li>One Software Provider noted that moving away from the term 'Metering Service' would cause a misalignment with the TOM.</li> </ul>
REC Code Manager	+ As Change Raiser, RECCo supports the implementation of the Change Request.
National Grid	Did not respond.



Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR025)
Consumer	Did not respond.
Elexon (Helix)	<ul> <li>Helix abstained from supporting or rejecting the Change Request.</li> <li>Following a review of the Change Request and the MHHS-DEL1327-CR25 DIP Interface Name Change attachment, they stated that there is no impact to Helix, as they do not currently store the interface names.</li> </ul>
DCC	<ul> <li>+ The DCC support the Change Request.</li> <li>+ They stated that the Change Request added clarity, and that using established terms where possible will promote comprehension across industry parties.</li> </ul>
SRO / IM & LDP	<ul> <li>+ The Programme recognise that the Change Request makes sense in principle.</li> <li>- The Programme rejected the Change Request.</li> <li>- The Programme referenced the potential the change has potential to introduce confusion within industry. They suggest that alternate options should be considered e.g., synonyms within the Code Drafting.</li> <li>- Significant work would be required to update all the identified artefacts (&gt; 20 w/d effort from design to make updates to c.50 artefacts). This would not be a priority when compared to more significant updates to the design.</li> <li>- Implementing a change to a large number of design artefacts at this time within the Programme would add additional confusion and uncertainty to Participants, and have wider implications to other Programme artefacts, such as testing, migration and transition.</li> </ul>
IPA	+ The IPA is comfortable that the Change Request is not expected to have an impact on their activities and has no specific objections to its implementation.

