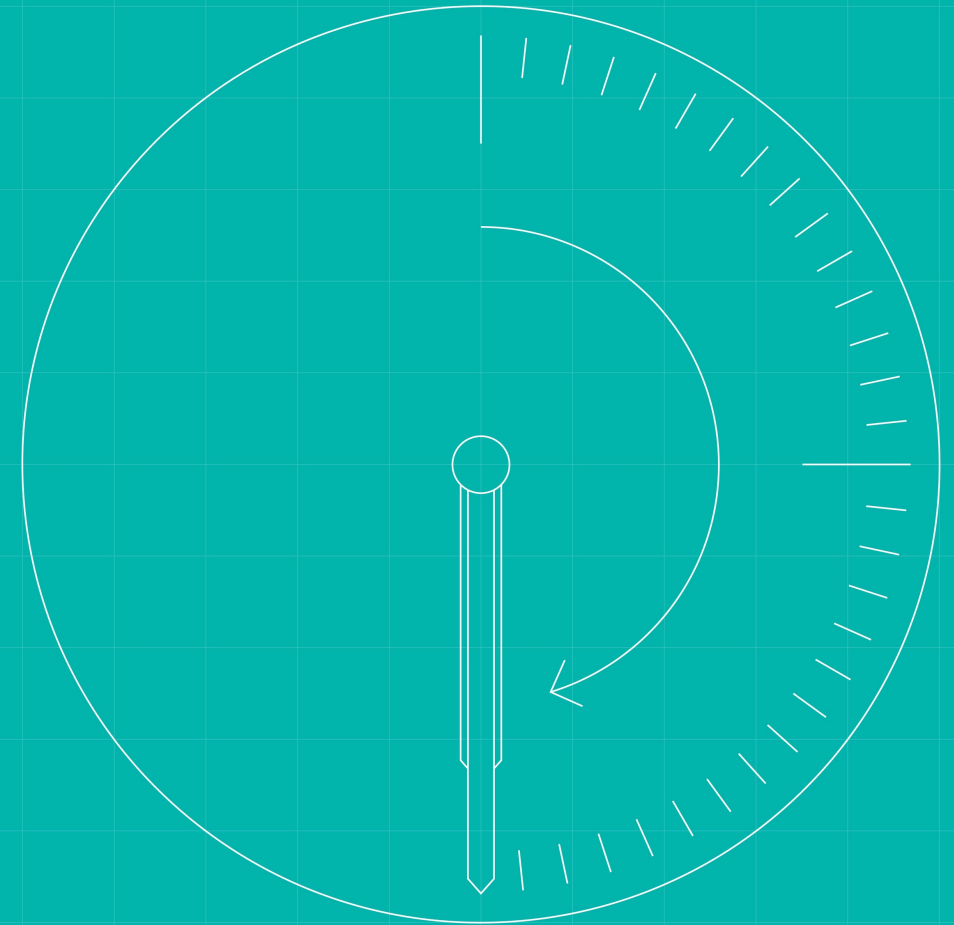


# CR023 Impact Assessment Report & Recommendations



**DECISION:** CR023: Review the outputs of Impact Assessment and make a decision on next steps

## CR023 – Impact Assessment Summary

### Objective:

DAG to review the outputs of the reissued CR023 Impact Assessments and advise SRO on their decision to approve or reject the Change Requests.

### Headlines:

- The majority of respondents to the Impact Assessment were in favour of implementing the Change Request.
- Overall: **19 respondents supported the change; 4 respondents rejected the change; and 3 respondents abstained.**
  - Suppliers, DNOs and Software Providers generally voted in favour of the Change Request, whilst Supplier and Independent Agents did not support the Change Request.
- **The supporters of the change highlighted the following items/themes to support their decision:**
  - The encouragement of competition within the SDS role through standardisation.
  - The benefits for end consumers.
  - The enablement of customer-own appointments.
- **Those who rejected the change did so stating the following themes:**
  - The risk of significant delays to M9.
  - The potential impact implementation could have on development and testing schedules.
  - Variants in benefits due to the optionality of implementing the design.
  - Uncertainties surrounding the MDR role.
- **Further feedback was provided by both supporting and rejecting respondents:**
  - The possibility of another IF-021 Variant (IF-021Vb) to allow the exchange of consumption information between Supplier (acting as their existing IS/ES) and SDS (PSS).
  - The potential impact on overall MHHS Qualification timescales.

Programme Parties	CR023 Recommendations			
	Yes	No	Abstain	No Reply
Large Suppliers	3	-	1	2
Medium Suppliers	1	-	-	6
Small Suppliers	-	-	-	33
I&C	5	-	-	36
DNOs	4	-	-	2
iDNOs	-	-	-	13
Ind. Agents	1	3	-	44
Supplier Agents	-	-	1	5
S/W Providers	3	-	-	22
REC Code Manager	-	-	1	-
National Grid	-	-	-	1
Consumer	-	-	-	1
Elexon (Helix)	-	1	-	-
DCC	-	-	-	1
SRO / IM & LDP	1	-	-	-
IPA	-	-	-	1
Avanade	1	-	-	-
<b>Totals</b>	<b>19</b>	<b>4</b>	<b>3</b>	

**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 Supplier Agent abstained due to the Change Request having no impact on their activity or role.
- RECCo abstained as the Change Request has no impact on REC provisions, but noted the potential risk to overall MHHS Qualification timelines.
- One Large Supplier abstained, stating that although they didn't disagree with the introduction of standardised interfaces, there are still a lot of uncertainties around the MDR role, and the potential for differing MDR operating models should be handled and addressed by the Programme in a clear manner that was consistent across the various approaches Participants could employ.

## CR023 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR023)
<b>Large Suppliers</b>	<ul style="list-style-type: none"> <li>+ Three of the four responding Large Suppliers supported the Change Request.</li> <li>+ The change is seen by one Large Supplier as essential to enable non-domestic customer own appointments and supports a more flexible TOM.</li> <li>– One Large Supplier stated they believed the change would have a significant impact on timelines, cost, and resource. They believe it would delay M9 if it is agreed.</li> <li>– It was stated by a Large Supplier that they wouldn't agree if this was a mandatory process.</li> <li>▪ One Large Supplier abstained from responding to the Change Request. They don't disagree with the introduction of standardised interfaces within the MHHS operating model, but raised that there are still a lot of uncertainties around the MDR role.</li> <li>▪ One Large Supplier stated that their support was based on the assumption that the additional effort required for an analytical phase to be undertaken by the MHHS Programme does not push out the timescales for the start of SIT.</li> <li>▪ The timing of the implementation would impact the timelines for the Programme, and need to be considered and consulted on with the impacted participants to ensure the change is supported by sound design logic and a plan that can be implemented with minimal impact to the current SIT timelines.</li> </ul>
<b>Medium Suppliers</b>	<ul style="list-style-type: none"> <li>+ The one responding Medium Supplier supported the Change Request.</li> <li>+ They stated that expedited information on the new interface formats will assist participants in their scheduling.</li> <li>– They raised that they had concerns regarding the limited timeframes between the functional phases for PIT, CIT and SIT, and the potential impact this could have on development and testing schedules, especially for Participants which have already concluded their functional PIT phase.</li> </ul>
<b>Small Suppliers</b>	<i>Did not respond.</i>
<b>I&amp;C</b>	<ul style="list-style-type: none"> <li>+ Five I&amp;C Suppliers responded to the Change Request, all of which were in favour of its implementation.</li> <li>+ Having a standardised format will help enable customer own appointments, which for a non-domestic supplier is vital. It will make qualification simpler to assess and encourages competition within the SDS role.</li> <li>▪ One I&amp;C Supplier requested clarity on whether suppliers as MDRs would need to provide additional test evidence.</li> </ul>
<b>DNOs</b>	<ul style="list-style-type: none"> <li>+ Four DNOs responded to the Change Request, all of which were in favour of its implementation.</li> <li>+ Their potential delay is necessary. Having standardised interfaces will increase the range of MDR service configurations and contracting options available to MHHS parties, avoiding the need for bespoke development work and associated costs which should ultimately benefit end consumers.</li> <li>▪ One DNO's support was dependent on there being no impact on the MPRS system, as long as both the DIP Webhook subscription functionality incorporates the optionality referenced in the change and that both the IF-06 and IF-26 are classified as secondary.</li> </ul>
<b>iDNOs</b>	<i>Did not respond.</i>

## CR023 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR023)
<b>Agents</b>	<ul style="list-style-type: none"> <li>+ One of the five responding Agents supported the Change Request. They stated that although they would generally disagree with standardisation in MHHS which doesn't already exist, they see a standard interface removes an item for consideration, which is particularly important where the relationship with the customer is direct rather than with the Supplier.</li> <li>– Three of the five responding Agents rejected the Change Request.</li> <li>– One rejecting Agent stated that well-designed bi-lateral interfacing arrangements do not present a significant barrier to a Supplier switching SDS agents. This is not a material enough problem to warrant approving this Change Request and the extra work it will create. The argument that this improves testing and qualification falls down as there are no plans to test non-standard interactions between SDS sub-roles, the proposed solution is optional, and Suppliers and their preferred SDS are tested independently.</li> <li>– The proposed solution introduces additional complexity that is not necessary to facilitate an optional interface for consumption data exchange. The impact of this additional complexity and cost/resource implications are a risk to delivering SIT. <ul style="list-style-type: none"> <li>▪ One Agent abstained, stating that the Change Request has no impact on their activity or role.</li> </ul> </li> </ul>
<b>S/W Providers</b>	<ul style="list-style-type: none"> <li>+ Three Software Providers responded to the Change Request, all of which were in favour of its implementation.</li> <li>– One Software Provider stated in their response that there is no proven benefit to SIT, and that as part of the Change Request implementation decision it would be beneficial to have the release date confirmed. They noted that it would only benefit those in qualification who choose to use the optional design. If the Change Request was mandated then the benefits would be realised in full. <ul style="list-style-type: none"> <li>▪ One Software Provider identified an additional simplification and saving that could be achieved through the Change Request, by considering another IF-021 Variant (IF-021Vb) to allow the exchange of consumption information between Supplier (acting as their existing IS/ES) and SDS (PSS). This could be used to remove duplicate SRV4* requests needing to be issued by the DCC (with the current TOM these will be sent to Supplier IS/ES for billing and MDR for settlement).</li> </ul> </li> </ul>
<b>REC Code Manager</b>	<ul style="list-style-type: none"> <li>▪ RECCo abstained from voting on the Change Request as it does not impact REC provisions. However, they noted that the inclusion of MDRs as DIP Users may result in additional BSC qualification activities, which would impact the joint qualification documents that RECCo is developing with BSC colleagues and may also impact overall MHHS Qualification timescales.</li> </ul>
<b>National Grid</b>	<i>Did not respond.</i>
<b>Consumer</b>	<i>Did not respond.</i>

## CR023 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR023)
<b>Elexon (Helix)</b>	<ul style="list-style-type: none"> <li>- Elexon are not in favour of implementing the Change Request.</li> <li>- They stated that any change to the current approach could increase rather than streamline the BSC Qualification process for MHHS. They would need to re-assess the requirements, approach and timescales based on any MDR requirements which may fall under BSC governance.</li> </ul>
<b>SRO / IM &amp; LDP</b>	<ul style="list-style-type: none"> <li>+ The Programme voted in favour of implementing the Change Request, on the basis that they support the principle of what the Change Request is seeking to achieve.</li> <li>- However, they noted that the current design does work, and it not broken.</li> <li>- The optionality provided in the Change Request negates the benefits for SIT testing and is unlikely to form part of SIT testing, as these interfaces are downstream of the SDS role.               <ul style="list-style-type: none"> <li>▪ With regards implementation, the Change Request would need to be scheduled until after testing. but no later than M10 (March 2025).</li> </ul> </li> </ul>
<b>DCC</b>	<i>Did not respond.</i>
<b>IPA</b>	<i>Did not respond.</i>
<b>Avanade</b>	<ul style="list-style-type: none"> <li>+ Avanade support the implementation of the Change Request.               <ul style="list-style-type: none"> <li>▪ The following risks were raised: schedule, the DIP SP assesses that this change cannot be delivered for M9; complexity, message specific routing, configuration or logic may be required within the DIP that is not immediately obvious – risk to effort and cost associated with the change.</li> </ul> </li> </ul>