**Change Request Form**

## Change Request details

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| Change Request details | | | |
| Change Request Title | *Registration Service IF-40 Change* | | |
| Change Request Number | *CR039* | | |
| Originating Advisory / Working Group | *Design Resolution Group MHHS-DIN-575* | | |
| Risk/issue reference | *MHHS-DIN-575* | | |
| Change Raiser | *Daniel Tadecicco, St Clements Services* | Date raised: | *15/12/2023* |

***For further guidance on how to complete this document please see the supporting Change Request Form Guidance for Programme Participants. The guidance will support raising a change and responding to a change request via Impact Assessment. The Change Raiser should consider sharing the draft Change Request Form with impacted programme parties, prior to submission to PMO. The guidance, as well as other key documents are referenced below and can be found via the MHHS website.***

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| Change Request to be read in conjunction with: |
| MHHS Change Request Form Guidance for Programme Participants |
| MHHS Change Control Approach |
| MHHS Governance Framework |
| Ofgem’s MHHS Transition Timetable |

### Part A – Description of proposed change

**Guidance *– This section should be completed by the Change Raiser when raising the Change Request.***

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| Part A – Description of proposed change | |
| **Summary:**  **Issue:**   * **IF-040 is only sent to appointed Suppliers and Data Services on a 30 day cycle. There could be a 30 day wait until the next MDS generated IF-040.** * **Programme Design: To fill this design gap the programme has made MPRS responsible to load the IF-040 by populating Annual Consumption in the B027 Block on IF-002, IF-001 & IF-036** * **MPRS Issue: An IF-040 for every energised MPAN must be loaded adding significant overhead to processing. The 24 hr SLA could be difficult to meet without significant hardware investment.**   **Proposed Change:**   * **B027 Block removed from IF-001, IF-002 & IF-036** * **On Appointment, Data Service and Supplier will receive the latest PUB-040 with their PUB-001/PUB-036. DIP will be changed to replay the PUB-040 from the Message Archive** * **MPRS no longer processes PUB-040**   **Proposed Delivery:**   * **Early decision in February to allow for MPRS Scope Change** * **Change in IR5 SIT Scope to exclude B027 Block Loading for Supplier and Data Services. Remove testing of IF-040 Processing for MPRS** * **Change in IR8 SIT Scope to add DIP IF-040 Replay on Supplier and Data Service Appointment Confirmation** * **IR8 Change to IF-001, IF-002 & IF-036 to remove B027 Block.** | |
| **Issue statement:**  *(what is the issue that needs to be resolved by the change)*       Registration Service receives Annual Consumption only to pass the data on to Supplier and Service Appointment, as it is not used by Registration Service. Both Suppliers and Services can already obtain Annual Consumption Directly from MDR and EES. Requiring MPRS to also provide this data, particularly when it is not used by the Registration Service, is unnecessary and will cause significant performance issues, unnecessarily risking the Registration Service SLAs  The Registration Service priority is to broker appointments and store settlement and meter technical data. These transactions are time sensitive and must be processed within 60 minutes during operating hours. Annual Consumption is generated for every Energised MPAN which creates significant noise in Registration Service key processing. To avoid impacting core processing, MPRS (Registration Service) can only process the PUB-040 overnight. This is a limited processing window that only operates on Working Days. It is likely that PUB-040s will not be processed within 24 hours resulting in stale data being sent to Suppliers and Services on appointment flows. | |
| **Description of change:**  *(what is the change you are proposing)*       Change to the Annual Consumption design to improve the availability of Annual Consumption Data on Supplier and Service Appointments.  Our preferred solution is as follows:  On receipt of an IF-001 or IF-0036 (Data Service Only), the DIP will search the Message Archive and replay the latest PUB-040 for that MPAN to the receiving party. B027 block removed from REGS messages. Remove MHHS-BR-AC-006 & MHHS-BR-AC-007. | |
| **Justification for change:**  *(please attach any evidence to support your justification)*  The current design creates an unnecessary performance problem for LDSOs with large MPAN portfolios. To minimise the impact on core MPRS processing, Annual consumption is processed at low priority during downtime. This will exceed the 24 hour SLA resulting in stale data being issued on Appointments. All of the alternative options provide a solution to this issue. Option 1 is the least impactful with the maximum benefit. The impact increases and benefit decreases as you move down the options to “Do Nothing”:  The preferred solution offers the most timely and accurate distribution of Annual Consumption enabling accurate quoting and data processing. It also has the least MPRS impact & requires minimal change to Central, Supplier or Data Service systems. A DIP change is required to trigger the PUB-040 replay on appointment confirmation. | |
| **Consequences of no change:**  *(what is the consequence of no change)*       High numbers of transactions to be processed in the Overnight Batch will result in MPRS not being able to meet a 24 hour SLA for PUB-040 messages, resulting in stale Annual Consumption data being displayed on the B027, likely pushing Services & Suppliers to obtain Annual Consumption from other sources (which are already available within the programme design). | |
| **Alternative options:**  *(What alternative options or mitigations that have been considered)*  Three option themes were explored:   1. On receipt of an IF-001 or IF-0036 (Data Service Only), the DIP will search the Message Archive and replay the latest PUB-040 for that MPAN to the receiving party. B027 block removed from REGS messages. Remove MHHS-BR-AC-006 & MHHS-BR-AC-007    1. Alternative, receiving party manually replays PUB-040 using the Replay API 2. Appointed Party uses the EES API to obtain the Annual Consumption. B027 block removed from REGS messages. Remove MHHS-BR-AC-006 & MHHS-BR-AC-007    1. REGS uses the EES API “on-demand” to populate B027 before sending IF-002/1/36. B027 Retained 3. IF-040 structure changed to support multiple MPANs in one transaction to improve MPRS performance. B027 Retained    1. If the message size exceeds 1MB this could be multiple 1MB PUB-040 messages    2. Alternative for a REP-040 with Compressed Payload containing the full REGS portfolio update in one transaction.   **Detailed Optional Analysis:**  Option 1a requires parties to manually request the PUB-040 if required. Some DIP change might be required to grant access to this replay if it is outside the participant’s appointment period. Services and Suppliers will have to develop code to call the DIP Replay API. Option 1 & 1a have the same MPRS impact of low.  Option 2, as EES Receives Annual Consumption from MDS and makes it available on the API, parties could develop to obtain an accurate Annual Consumption value through this method. EES is designed to reflect industry data quickly and will most likely display a more accurate value than REGS. There is an increased impact on Data Services who do not use the API currently. Suppliers already use the API so the impact is reduced. This approach has a low impact on MPRS.  Option 2a allows for MPRS (REGS/ERDA) to obtain the Annual Consumption value via the EES API “on-demand” for inclusion in B027, PUB-040s will be ignored/unsubscribed. The impact on MPRS is medium as existing code can be used to develop EES API calls and no storage of Annual Consumption is required. It is anticipated that the performance of MPRS will not be impacted by this change. EES might be impacted during Gate Closure where multiple MPRS systems would be calling the EES API to populate the IF-037 B027. Medium change is required to MPRS which could impact SIT milestones.  Option 3 & 3a have a high impact on MPRS although each option improves PUB-040 load performance by reducing the number of transactions. MPRS currently has to validate the Common Block and store Transactional data for millions of Annual Consumption transactions in a large LDSO. If the total portfolio or significant chunks of it can be contained in one to a handful of PUB-040 messages then most of the transactional overhead is reduced. This will increase the likelihood of the 24 Hour SLA being met. This option impacts MDS and MPRS which could impact SIT milestones.  Option 3b has a very high impact on MPRS but guarantees that large LDSO portfolios can be delivered in one transaction. The high MPRS impact is due to developing code for compressed payloads. Option 3b will meet the 24 hour SLA but it is highly likely that high development impact could impact SIT milestones. This also impacts MDS potentially impacting SIT milestones.  **Costs:**  Do Nothing – Very High hardware & support costs on LDSO to meet 24 hour SLA.  Option 1 & 1a - Low MPRS, DIP, SDS ADS and SUPP impacted  Option 2 - Low MPRS, EES SDS & ADS Impacted  Option 2a - Medium MPRS, EES Impacted  Option 3 & 3a - High MPRS, MDS Impacted  Option 3b - Very High MPRS, MDS Impacted | |
| **Risks associated with potential change:**  *(what risks related to implementation of the proposed change have been identified)*  **Delays to SIT completion due to Central System changes** | |
| **Stakeholders consulted on the potential change:**  *(Please document the stakeholders, or stakeholder groups that have been consulted to date on this change. The Change Raiser should consult with relevant programme parties in the drafting of the request, prior to submission to PMO).*  **Presented at DRG & consulted with MHHS Programme Design Team** | |
| **Target date by which a decision is required:** | Before SIT Functional Start |

### Part B – Initial Impact of proposed change

**Guidance *– This section should be completed by the Change Raiser before being submitted to the MHHS PMO.***

***Please document the benefits of the change and to delivery of the programme objectives***

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| What benefits does the change bring |
| *(list the benefits of the change and how this improves the business case)*   1. Accurate Annual Consumption Data at Appointment 2. Reduced MPRS performance requirements resulting in reduced cost for LDSOs (option 1, 2 &1a only) |

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| Programme Objective | Benefit to delivery of the programme objective |
| To deliver the Design Working Group’s Target Operating Model (TOM) covering the ‘Meter to Bank’ process for all Supplier Volume Allocation Settlement meters | None identified |
| To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation | Accurate and timely Annual Consumption Data provided |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) | None identified |
| To implement MHHS in accordance with the MHHS Implementation Timetable | None identified |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case | To provide accurate Annual Consumption Data at Appointment and reduces the operational costs for LDSOs |
| To prove and provide a model for future such industry-led change programmes | None identified |

**Guidance *– Please document the known programme parties and programme deliverables that may be impacted by the proposed change***

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| Impacted areas | Impacted items |
| Impacted Parties | EES MDS SDS ADS SUPP REGS |
| Impacted Deliverables |  |
| Impacted Milestones | *<Ofgem’s MHHS Transition Timetable is linked above>* |

**Note *– Please refer to MHHS DEL174 Change Request Guidance for Programme Participants for information on how to score the initial assessment.***

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| Initial assessment | | | |
| Necessity of change |  | Expected lead time |  |
| Rationale of change |  | Expected implementation window |  |
| Expected change impact | Option Dependent |  |  |

**Guidance *– Please include a reference and link to any additional documentation which the change relates to.***

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| Change Request to be read in conjunction with: | |
| **Title** | **Reference** |
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### Part C.1 – Summary of Impact Assessment

### Note – *This section will be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

### *All Impact Assessment responses will be considered public and non-confidential unless otherwise marked. If there are any specific elements of the response (e.g. costs) that are confidential, please mark the specific sections as confidential rather than the response as a whole. The MHHS Programme will publish all Impact Assessment responses and redact any confidential information as noted.*

**Guidance – Programme Participants are required to:**

**Respond with ‘Agree’, ‘Disagree’ or ‘Abstain’, deleting as appropriate. If the respondent agrees, they can provide additional evidence to further support the assessment. If the respondent disagrees or abstains, they should provide a detailed rationale as to why.**

**Add any additional effects that have not already been identified. In doing so, they should provide as much detail as possible to allow a robust assessment to be made.**

**Proceed to Part C.2 for Impact Assessment Recommendation response once completed.**

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| Part C.1 – Summary of Impact Assessment (complete as appropriate) |
| **Effect on benefits**  *Increase accuracy of Annual Consumption Data at Appointment of Supplier and Data Services. Do Nothing results in 24 hour SLA being breached and old/NULL Annual Consumption data being included in B027* |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on when a benefit will be realised; who will realise the benefit; the extent to which the benefit will be realised.*  *Where possible, contextual information should be included e.g. the benefit will be delayed by X weeks; the change means Y population will also realise the benefit.* |
| **Effect on consumers**  *N/A* |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on service delivery to consumers; will there be a cost impact to consumers; will there be a choice impact to consumers?*  *Where possible, contextual information should be included e.g. what is the scale of the effect? Will the effect be permanent?* |
| **Effect on schedule**  *All options might impact SIT schedule as change is required to core central systems and SIT volunteers.* |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the schedule/milestones be directly impacted; will the schedule/milestones be indirectly impacted.*  *Where possible, contextual information should be included e.g. the change will delay the project by X days; the change will require additional resource to complete (though detail resource in resource section); the delay can/cannot be recovered by condensing Y activity.* |
| **Effect on costs**  Low MPRS, DIP, SDS ADS and SUPP impacted |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the change cause a loss of income; will the change cause additional cost; will the change cause a reprofiling of cost?*  *Where possible, contextual information should be included e.g. whether it is capital or operating expenditure that will be affected; what period costs will be affected in; what the rough order of magnitude of the cost impact will be and if organisation will be able to absorb it?* |
| **Effect on resources**  *N/A* |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will there be an impact on tools or equipment; will there be an impact on staff capacity; will there be an impact on staff skills or capability?*  *Where possible, contextual information should be included e.g. the change will require X additional staff for Y period of time; the change requires Z training or support.* |
| **Effect on contract**  *Change Raiser to provide initial impact assessment.*  *N/A* |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on contracts with sub-contractors; whether there will be an impact on contracts with vendors; whether there will be an impact on contracts with regulators/ESO.*  *Where possible, contextual information should be included e.g. the changes will require new contracts to be created; the changes will variations to existing contracts; the changes will affect ability to meet contract requirements.* |
| **Risks**  *Do Nothing: Inaccurate Data*  *All Options: Impacts to SIT milestones* |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.*  *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will existing risks be affected; will new risks be created?*  *Where possible, contextual information should be included e.g. the change will affect the likelihood of a risk occurring, the change will affect the impact the risk would have, the change will require additional controls and mitigation.* |

### Part C.2 – Impact Assessment Recommendation

### Note – *This section must be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

**Guidance – The primary reporting metric of the Impact Assessment is the recommendation response. The consolidated response will be presented to the relevant governance group(s) and decision maker(s) with the totals for ‘Agree’, ‘Disagree’ or ‘Abstain’. As such, please ensure this section is completed before the form is returned to MHHS PMO. Provide detailed rationale and evidence in the commentary field.**

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| Part C.2 – Impact Assessment Recommendation (mandatory) |
| **Recommendation**  **It is recommended by the Change Raiser that the preferred solution: DIP replays PUB-040 to the appointed Data Service or Supplier and the B027 block is removed from REGS Messages is approved and implemented.** |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
| *Impact Assessment respondents to add supporting commentary to support their selection.* |

**Impact assessment done by:** <Name>

**Guidance*: If you are a third party responding on behalf of another Programme Participant, please state this in your response.***

**Impact assessment completed on behalf of:** <Name>

### Part D – Change approval and decision

**Guidance*: The approvals section will be completed by the MHHS PMO once the Impact Assessment has been reviewed.***

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| Part D - Approvals |
| **Decision authority level**  <Based on the impact assessment, state who is required to make a decision concerning this change> |

**Guidance** - ***This section will be completed by the MHHS PMO and Change Owner following the review of the impact assessment and decision reached by the SRO.***

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| Part D – Change decision | | | | |
| Decision: |  | Date | |  |
| Approvers: |  |  | |  |
| Change Owner: |  | | | |
| Action: |  | | | |
| **Changed Items** | **Pre-change version** | | **Revised version** | |
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### Part E – Implementation completion

**Guidance *- This section will be completed by the MHHS PMO at the end of the post-implementation process.***

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| Part E – Implementation completion | | | |
| Comment |  | Date |  |

**Guidance *– The Closure Checklist in MHHS DEL175 Change Log must also be completed by MHHS PMO at this stage.***

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| Checklist Completed | Completed by |
| Yes/No |  |

**Guidance – *This section will be completed by the MHHS PMO at the end of the post-implementation process and should be* used to add any appropriate references of the change once it has been completed.**

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| References | | |
| **Ref** | **Document number** | **Description** |
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