**Change Request Form**

## Change Request details

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| Change Request details | | | |
| Change Request Title | *Change the format of Market Participant Role Code from Char(1) to Char(2)* | | |
| Change Request Number | *CR041* | | |
| Originating Advisory / Working Group | *CCAG* | | |
| Risk/issue reference | *BSC CP1589 ‘Change the number of characters used to specify Market Participant Role Codes in the Market Domain Data’* | | |
| Change Raiser | *Colin Berry, Elexon* | Date raised: | 15 December 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 | |
| **Issue statement:**  *(what is the issue that needs to be resolved by the change)*  BSCCo has raised BSC Change Proposal [BSC CP1589](https://www.elexon.co.uk/change-proposal/cp1559/) ‘Change the number of characters used to specify Market Participant Role Codes in the Market Domain Data’. CP1589 seeks to address the BSCCo issue that there are no Market Participant Role Codes currently available for BSCCo to allocate to new Market Participants which would be highly likely to have a significant adverse impact on new and amended industry processes and initiatives. | |
| **Description of change:**  *(what is the change you are proposing)*  The solution proposed in CP1589 is to change the format of the Market Participant Role Code (J0001) Data Item from Char(1) to Char(2) in the REC’s Energy Market Design Specification (EMDS).  CP1589 would impact:   * BSC Parties that use one or more of the Market Messages that include the J0001: * D0269 ‘MDD Full Refresh’ * D0270 ‘MDD Partial Refresh’ * D0383 ‘Notification of Commissioning Information’ * D0331 Update Green Deal Market Data * MDD Management System * BSCP509 (MDD) Appendices 1 & 2 * SVA Data Catalogue Volume 2: Data Items * REC EMDS * Data Transfer Network (DTN) users that use the Fixed File Format would need to change their systems for CP1589 implementation, as the Market Participant Role Code is used to specify the Sender and the Recipient of the data flow in the file headers. Note that other DTN users would not need to change their systems until the first two-character Role Code to be sent or received by them was introduced.   The proposed implementation date for CP1589 is 1 November 2024.  The CP1589 industry consultation closed on 15 December. We received 17 responses, two of which opted to reject CP1589, but the other 15 were in favour. Three of those in favour preferred a later implementation date. BSCCo presented a verbal update on the CP1589 responses to the Supplier Volume Allocation Group (SVG) BSC Committee on 9 January 2024 and asked them to note that both CP1589 and this CR041 would need to be approved to give full effect to the solution .  CR041 would, if approved, impact the **MHHS Programme** **ISD Method Statement** and the **Helix Programme Work Package 3**:   * Industry Standing Data (ISD) as the Market Participant Role Code is defined ISD Entity Id 21 ‘Role Code’ and is used in several other ISD Entities; * ISD Management System; * BSCP707 (ISD) Appendices 1 & 2; and * Market Participants that will load and use ISD.   This CR041 and CP1589 will be progressed in parallel, as implementing CP1589 (if approved) would be pointless without CR041 being implemented at the beginning of the Transition Period, as that would ‘back out the solution introduced for CP1589.  One alternative approach suggested in the consultation responses was to implement CR041 without implementing CP1589, which was also mentioned at DAG on 10/01/24, where a DAG member suggested not amending MDD or the the MDD Management system. However, this does not allow ISD Entity 21 ‘Role Code’ to be maintained in both MDD and ISD until the end of the Transition Period  BSCCo will seek approval of CR041 at DAG on February 14 and will present the DAG decision to the SVG at the earliest opportunity, either at an extraordinary SVG meeting, or ex-committee. | |
| **Justification for change:**  *(please attach any evidence to support your justification)*  The implementation of a solution to CP1589 that will make sufficient new Market Participant Role Codes available to BSCCo is critical to maintaining the market’s adaptability and the seamless introduction of new participants and processes.  If CP1589 is approved, it is essential that the changes to the legacy arrangements are also made to the new MHHS arrangements, to ensure the continuity of the BSC Arrangements at the start of the Transition Period. | |
| **Consequences of no change:**  *(what is the consequence of no change)*  If the new MHHS arrangements are not amended to take the solution to CP1589 into account, then the changes implemented into Production prior to the start of the Transition Period would be backed out by the implementation of the new MHHS systems at the beginning of the Transition Period. | |
| **Alternative options:**  *(What alternative options or mitigations that have been considered)*  A respondent has suggested that we could use uppercase and lowercase versions of the same alpha character (e.g. ‘A’ and ‘a') as different Market Participant Role Codes.  From discussions with REC Technical Services (RTS) and from initial responses to the CP1589 consultation, BSCCo believes that the Char(2) solution will be the preferred solution for the large majority of the industry. Our service provider has told BSCCo that approach is not ‘good practice’.  BSCCo does not regard “do nothing” as a viable option. | |
| **Risks associated with potential change:**  *(what risks related to implementation of the proposed change have been identified)*  As the new systems being delivered for MHHS by the Helix programme are scheduled for SIT Functional Cycle 1 in early 2024, this would be a late change to the design, which would need to tested in a later SIT Cycle. This would add to the risk that SIT may not complete on time, and so could result in additional work for all participants that may or may not complete in time to test in SIT.  Mitigation of this risk would be to test in a later cycle of SIT functional. | |
| **Stakeholders consulted on the potential change:**  *(Please document the stakeholders, or stats keholder 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).*  BSCCo has discussed this change with Electralink, as the Data Transfer Network Service Provider, and with the RTS.  BSCCo initially raised a REC Change Proposal that was discussed at length with RECCo, before being withdrawn on RECCo’s instruction, as the change does not impact any REC-owned Data Items or Data Flows.  CCP1589 is currently undergoing industry consultation, which will close on 15 December 2023.  BSCCo has also discussed the proposed solution in detail with Matt McKeon of the MHHS Programme, in the context of CCAG consequential change. BSCCo understands that this issue was considered during MHHS Design work-off.  The SVG agreed to raise CP1589 and issue it for consultation at its November 2023 meeting ([SVG273/07).](https://www.elexon.co.uk/meeting/svg273/) | |
| **Target date by which a decision is required:** | February 2024 |

### 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)*  If CP1589 is approved, this CR would be required to ensure that the MHHSP solution does not undo approved changes that were implemented prior to the Transition Period. Expanding the Market Participant Role Code to a two-character Char(2) format offers significant benefits, including a substantial increase in the number of available unique identifiers, ensuring future-proofing for market growth. This change enhances flexibility in assigning codes to new market roles and provides a long-term, sustainable solution. Char (2) also does not pose a risk to the existing data set, having lower and upper case of the same letter can could cause confusion. |

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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 | None identified |
| 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 | Yes, as the implementation of this CR will allow the MHHS programme to be delivered without adversely affecting the production baseline. |
| 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 | MHHSP – Code Drafting & Design  All participants that use MDD / ISD |
| Impacted Deliverables | BSC Change Proposal (CP) 1589.  MHHSP\_EDI021\_ISD\_Entities  ISD Management System; and  BSCP707 (ISDD) Appendices 1 & 2. |
| Impacted Milestones | *This CR will be progressed in parallel with CP1589. Both the CR and the CP must be approved – if either is rejected then the other would be withdrawn.*  *It is likely that the CP1589 would be presented to SVG at its meeting on February 13 and this CR would be presented to the DAG at its meeting on February 14.* |

**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 |  |  |  |

**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** |
| CP1589 ‘Create Additional Market Participant Role Codes’ | [***CP1589 Consultation 2.0***](https://www.elexon.co.uk/documents/change/cps/cp1551-cp1600/cp1589-cp-consultation-2-0/) |
| [***CP1589 Progression Paper***](https://www.elexon.co.uk/documents/change/cps/cp1551-cp1600/cp1589-progression-paper/) |

### 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**  *Implementing this CR – and, by implication, agreeing that CP1589 should be implemented, if SVG so directs - will ensure that the MHHS programme systems will be able to process Char(2) Market Participant Role Codes, and so will ensure that the CP implementation to the MHHSP will not adversely impact the implemented CP1589 solution* |
| *<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**  *The effect of implementing this CR would be to allow continuity of the BSC Trading Arrangements when the Transition Period begins.*  *The effect of not implementing this CR – and, by implication, not implementing CP1589, would be that there would be no new Market Participant Role Codes available to assign to new Market Participant Roles, which could delay the introduction of new opportunities in the industry.* |
| *<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**  *Subject to confirmation from Helix WP3, BSCCo’s expectation is that this change could be made to the ISD Entities and ISD Management System without a significant adverse impact on major Helix Programme milestones. This is because CP1589 is a ‘facilitating’ CP – i.e. it will introduce changes to systems and processes that would allow a Char(2) Role Code to be assigned in the future – but it does not actually introduce any new Char(2) Market Roles.* |
| *<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**  *The cost impact on ISD and Helix will need to be assessed as part of this CR.* |
| *<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**  *The impact on ISD and Helix will need to be assessed as part of this CR.* |
| *<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**  *None* |
| *<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**  Risk to Programme timelines due to late addition to the scope – however, this risk is not expected to impact major 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**  *Change Raiser to provide initial recommendation.*  **It is recommended by the Change Raiser the change is approved.** |
| *<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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