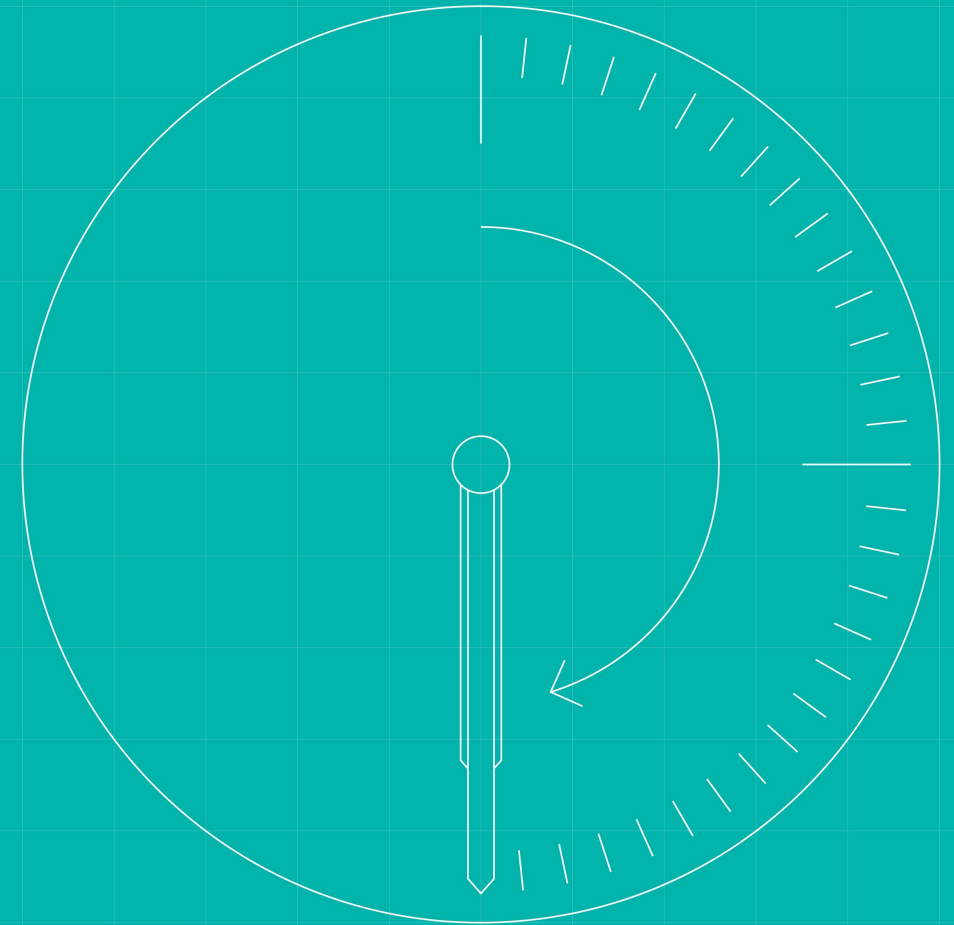# CR039 Impact Assessment Report & Recommendations

DECISION: CR039: Review the outputs of Impact Assessment and make a decision on next steps

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CR039 – Impact Assessment Summary

Objective:

DAG to review the outputs of the issued CR039 Impact Assessments and advise SRO on their decision to approve or reject the redlining in the Change Request.

Headlines:

- Overall: **20 respondents supported the change; 10 respondents rejected the change; and 2 respondents abstained.**

- Most rejections came from suppliers, whilst support came from some suppliers and the LDSOs.

- **Those who supported the implementation of the Change Request did so on the following basis:**

  - The change would ensure that SLAs are always adhered to.

  - If the change is not approved, significant costs and time impacts will apply to MPRS and subsequently LDSOs. This could bring a risk to SIT completion.

  - Reducing ongoing running costs for Registration Services will reduce enduring industry costs.

  - The change meets the requirements of the Change Freeze as it removes the risks of delays for St Clements and LDSOs in meeting M10, and aligns with the design principle to centralise processes.

- **Those who rejected the Change Request did so on the following basis:**

  - All parties should adhere to SLAs which have been documented in the baselined design for a significant period of time.

  - The change does not meet the requirements of the Change Freeze as it does not fix a defect in the design and is not critical to M10.

  - The Change Request has been raised in too close proximity to SIT. Implementing the change at this point in the process would mean additional cost and timeline risks which need to be handled by multiple organisation both across SIT and other milestones.

- **Further comments:**

  - Although the Change Request did not offer solution optionality, the Change Raiser shared other options that they had previously explored. There was some support amongst respondents for alternative option 2a, which 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 Programme and other respondents suggested that the B027 block should remain, as it is an option block and therefore does not need to be populated.

  - RECCo suggested that if the change is determined to be required, it should be implemented after M10.

- **Implementation:**

  - If approved, the Programme proposes that the change would be published in IR8 (April 2024). SIT Functional cycle 3 would prioritise regression testing of IF-001 and IF-036 ahead of testing non-SIT LDSO Qualification Testing.

CR039 – Submitted Impact Assessments

Programme Parties	CR039 Recommendations				Market Share			
	Yes	No	Abstain	No Reply	Yes	No	Abstain	No Reply
Large Suppliers	1	3	-	1	24%	64%	-	12%
Medium Suppliers	1	-	-	6	10%	-	-	90%
Small Suppliers	-	1	-	32	-	35%	-	65%
I&C	4	3	-	34	13%	6%	-	81%
DNOs	6	-	-	-				
iDNOs	1	-	-	12				
Ind. Agents	3	-	-	44				
Supplier Agents	-	-	-	7				
S/W Providers	2	1	-	22				
REC Code Manager	-	1	-	-				
National Grid ESO	-	-	-	1				
Consumer	-	-	-	1				
Elexon (Helix)	-	1	-	-				
DCC	-	-	1	-				
SRO / IM & LDP	1	-	-	-				
IPA	-	-	1	-				
Avanade	1	-	-	-				
Totals	**20**	**10**	**2**	**160**				

Market Share information is according to the latest Meter Point Administration Number (MPAN) data held by the Programme as of August 2023. Market Share has not been provided for constituencies where MPAN data is not currently available.

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:
- The DCC and the IPA abstained from providing a recommendation as the change will not impact them.

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CR039 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR039)
Large Suppliers	+ One of the four responding Large Suppliers supported the implementation of Change Request. – Three of the four responding Large Suppliers rejected the implementation of the Change Request. – The Change Request is based on an assumption that the 24-hour SLA will be breached. The current design has set the 24-hour target. It is the responsibility of Registration Services to develop their systems to manage the SLA. The Change Request has been raised to mitigate costs for the MRS and adds no value to the wider Programme. – The Change Request has been raised in too close proximity to SIT and future CIT and Qualification preparation. Implementing the change at this point in the process would mean additional cost and timeline risks which need to be handled by multiple organisation both across SIT and other milestones. – One respondent does not believe that the Change Request meets the requirement of the Change Freeze. – The change is one of a number of changes which, instead of making changes to MPRS, put in place workarounds or have relaxed proposed SLAs. Avoiding investment in DNO/MPRS systems, combined with the implementation of these workarounds, could have unintended consequences and could impact the outcomes that MHHS is trying to achieve. • One Large Supplier was supportive of Option 2 in the Change Request form, another was supportive of Option 2a.

Medium Suppliers	+ The one responding Medium Supplier supported Change Request.
	• They raised the following three questions:
	   • If REGS retrieves the latest PUB-040 from the archive and sends it on appointment confirmation, what is the event code that will be populated?
	   • Is it better to add a separate event code or add an indicator to the PUB-040 that is sent on appointment confirmation?
	   • How can the normally received PUB-040 flows be identified against the one retrieved from archive? Could a new code be added to signify the difference between the normally received monthly message and the one received as part of COA/COS?

Small Suppliers	– The one responding Small Supplier rejected the implementation of the Change Request. – The design has been baselined for a significant amount of time. Implementation would cause SLA breaches and would lead to dated information being processed. – Making the proposed change during SIT would significantly increase the risk of Programme delay.
I&C	+ Four of the six responding I&C Suppliers supported the implementation of the Change Request. + The change should be made to ensure SLAs are adhered to. + The solution strikes a balance between a need to quickly assess and view the annual consumption value, and the increased costs, effort and ongoing maintenance of processing the messages within operating hours. – Two of the four responding Large Suppliers rejected the implementation of the Change Request. – The responsibilities of the Registration Service have been documented in the design for a significant period of time. – The knock-on implications to supplier systems is not acceptable in close proximity to SIT and during the Change Freeze. • One respondent noted that, from an IT design perspective, they would opt for Option 2a. Another supplier also stated they would consider Option 2a. • One respondent believes that Option 2 would bring the greatest benefits. They, and other suppliers, already receive and use the API, so the impact would be reduced.

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR039)
DNOs	+ All six DNOs responded to the Impact Assessment, all of whom were in favour of implementing the Change Request. + The impact to MPRS and subsequently LDSOs is significant. If the Change Request is not approved, significant costs and time impacts will apply.
iDNOs	+ The one responding iDNO supported the implementation of the Change Request. + If the Change Request is not approved, the additional processing times for significant numbers of IF-040s could cause performance issues for LDSOs with significant MPAN portfolios. This could bring a risk to SIT completion as changes are needed to MPRS.
Agents	+ All three responding Agents supported the implementation of Change Request. + They recognise the constraints that will be imposed upon the Registration Services and believe that the suggested change is a workable solution. + Reducing ongoing running costs for Registration Services, without significant increase for other parties, will reduce the enduring costs for the industry. ▪ One respondent suggested that the given B027 block should remain, as it is an option block and therefore does not need to be populated. This minimises changes to the Interface Spec at this stage. ▪ The change will require adjustments to several areas of systems which have already been developed and have completed PIT testing. This will therefore require additional development and testing time to be incorporated before IR8 SIT testing, but should not impact readiness for each cycle of SIT Functional testing.
S/W Providers	+ Two of the three responding Software Providers supported the implementation of the Change Request. + The IF-040 is a high-volume message, which as an adaptor provider to MPRS, is an overhead to process if there are more pragmatic solutions. – One responding Software Provider rejected the implementation of the Change Request. – It should not be accepted by industry that inaccurate data will not be provided if the Change Request is not implemented. The SLAs are outlined in the design baseline. The responsibilities of the Registration Service have been documented have been documented for a significant period of time in the design artefacts. The knock-on impacts to software systems and therefore supplier systems is not acceptable this close to SIT and during the Programme Change Freeze. – Changes or missing functionality at this stage will likely cause defects and slow down SIT and PIT for Qualification. ▪ The rejecting respondent noted that they would consider Option 2a as an alternative solution.
REC Code Manager	– RECCo rejected the implementation of the Change Request. – They expect all parties to meet SLAs included in the baselined design and industry code. – The proposed change is a material change to the MHHS design, impacting multiple parties' processes and systems. Implementing this during the Change Freeze would put Programme milestones at risk and increase delivery costs. All options considered mean technical changes to parties outside of MPRS which could impact the Programme timeline. – The change could significantly impact SIT participant end to end testing, as they will not be in a position to receive Annual Consumption through another route. This will therefore increase the level of testing required by SIT Participants in later cycles or through Qualification Testing. ▪ RECCo suggests that if the Change Request is approved, it should be implemented after M10.

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CR039 Impacts – Views on the proposed approach (Page 3)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR039)
National Grid ESO	*Did not respond.*
Consumer	*Did not respond.*
Elexon (Helix)	– Helix rejected the implementation of the Change Request. – They expect all involved parties to adhere to the SLAs outlined in the baselined design and industry code. – The proposed alteration constitutes a significant modification to the current MHHS design, affecting the processes and systems of multiple participants. Implementing this change during the Change Freeze period could jeopardise Programme milestones and escalate delivery costs. – The change could significantly impact SIT participant end to end testing, as they will not be in a position to receive Annual Consumption through another route. This will therefore increase the level of testing required by SIT Participants in later cycles or through Qualification Testing. – The change, which has an impact on multiple Participants, systems, and processes, does not meet the threshold to be considered during the Change Freeze, as it is not critical for achieving go-live. Detailed consideration of the change should be postponed until after go-live.
SRO / IM & LDP	+ The Programme supports the implementation of the Change Request. + The change meets the requirements of the Change Freeze as it removes the risks of delays for St Clements and LDSOs in meeting M10, and aligns with the design principle to centralise processes. ▪ If approved, the change would be published in IR8 (April 2024). SIT Functional cycle 3 would prioritise regression testing of IF-001 and IF-036 ahead of testing non-SIT LDSO Qualification Testing. ▪ The Programme notes that their support is dependent on Avanade's ability to meet M10 on time. ▪ The Programme recommends retaining block B027 in order to minimise the impact on other Participants.
IPA	▪ The IPA is comfortable that the change request is not expected to have an impact on their activities.
Avanade	+ Avanade support the implementation of the Change Request. ▪ The Change Request should reflect that a change will be required to the DIP delivery schedule to accommodate the DIP design, build and test of the final specification. ▪ There is a risk that the change will lead to reprioritisation of existing work which may impact committed timelines from the DIP SP for in flight changes, and that additional message volumes within the DIP may incur additional Azure consumption costs for Elexon.

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