**Change Request Form**

## Change Request details

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| Change Request details |
| Change Request Title | Change to NFR E2E1009 for DNO & IDNO roles (LDSO, UMSO, Registrations) |
| Change Request Number | CR040 |
| Originating Advisory / Working Group | DAG |
| Risk/issue reference |  |
| Change Raiser | *David Yeoman, UKPN* | Date raised: | *17 Dec 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)*This change request is owned by UK Power Networks, but it is raised on behalf of and supported by all DNOs and iDNOs, including:* UK Power Networks
* Electricity North West
* Northern Powergrid
* Scottish Power Energy Networks
* Scottish and Southern Electricity Networks
* National Grid Electricity Distribution
* Indigo Power
* Energy Assets Networks
* Eclipse Power Networks
* Last Mile Electricity
* IDCSL
* Leep Utilities
* MUA Group
* UK Power Distribution
* BUUK

The programme has specified several Non-Functional Requirements that market participants must adhere to. Specifically, E2E1009 states: *All Services shall provide an asynchronous response (Level 4 validation) to a message within the following timeframes:**- up to average hourly volume, mean response time of 6s or less- up to average hourly volume, 90th percentile response time of 12s or less- from average hourly to peak hourly volume, mean response time of 10s or less- from average hourly to peak hourly volume, 90th percentile response time of 16s or less*DNOs and iDNO’s intend to use a ‘DIP Adaptor’ to facilitate interfacing to the DIP. The DIP adaptor provides Level 3 validation.Each ‘back office’ system that connects to the DIP Adaptor under each of the 3 DNO and iDNO roles of, Registration Services, UMSO & LDSO is expected to perform Level 4 validation.These DNO and iDNO systems cannot provide the requested Level 4 technical validation responses within 6, 10, 12 or 16 seconds as detailed in E2E1009. |
| **Description of change:***(what is the change you are proposing)*The change being proposed is that all DNO and iDNO roles and systems are not required to meet the current specified asynchronous response timeframes of E2E1009 NFR. We request the description for E2E1009 be updated to read:*All roles under DNO and iDNOs, namely Registration Services, UMSO & LDSO shall provide an asynchronous response (Level 4 validation) to a message within the following timeframes - 60 minutes or less. This should exclude IF-021 for which there is a separate NFR due to the anticipated volumes. This will ensure alignment with the Operational Choreography*As an example, DIP messages received by Registration Systems (MPRS) will be processed between the agreed hours of 05:00 to 18:00 and 21:00 to 23:00 on working days only (for Registration Services, as per CR018). Messages received outside of these hours will be held in a queue until the next processing window. No SLA will apply to messages received outside of the prescribed operating hours. These will be processed once the operating hours become effective, at that point, the revised SLA becomes effective. Automated responses to inbound messages (including Level 4 Validation) are expected to be returned within 60 minutes of receipt during the specified operating hours.Reference to operating hours (UTC ‘v’ Clock) assume CR029 is accepted and implemented.Other DIP interfacing DNO and iDNO systems in the roles of UMSO and LDSO will operate in a similar manner, subject to their individual message processing times.For clarity, CR037 relates to migration choreography. This CR does not change the principles of CR037, however, if for example a migration message is queuing for 3 or 4 hours (noting the CR037 migration processing window is 05:00 – 17:00 ) then the L4 validation response will queue and be similarly impacted as a result. |
| **Justification for change:***(please attach any evidence to support your justification)*DNO and iDNO systems under the three roles are not ‘real time’ systems.Level 3 (Synchronous) validation is performed by the DIP Adaptor. E.g., performs the MPAN validity check as far as it can (it’s 13 chars, first 2 chars match the DNO or iDNO and the last 3 are the correct check digits). It cannot however verify that the message is for an MPAN that the receiving application is aware of.Level 4 validation is ‘business validation’, performed by the receiving system. E.g., performs the MPAN validity check and verifies that the message does contain an MPAN that the receiving application recognises and can process. The suggested change aligns the NFR’s for both success and error Level 4 validation, making them consistent.DNOs and iDNOs are implementing DIP adapters to ensure a high availability (always on) interfaces are available to receive DIP messages and perform immediate Level 3 synchronous validation.Meeting the existing E2E1009 requirement for Level 4 Asynchronous validation (message rejection) as written would require significant investment and technical change to DNO and IDNO systems extending to multi-million pounds and would certainly impact the current timelines of the MHHS programme. CR034, recently raised by Helix for Elexon systems and approved by the DAG, recognises the need to relax this specific NFR. |
| **Consequences of no change:***(what is the consequence of no change)*No change to the E2E1009 Non-functional requirement will mean there will be significant development and build cost across the DNO and iDNO communities. This would include additional performance testing. Any additional infrastructure would also incur ongoing maintenance and support costs. There is no guarantee that existing systems can be changed to meet the NFR. The MHHS timelines will be adversely impacted. This unnecessary and additional cost and delay would ultimately be borne by consumers.       |
| **Alternative options:***(What alternative options or mitigations that have been considered)*This has not been explored. There is no clear business rationale as to why a 6 second response is required for L4 validation, and we recommend that the NFR is aligned to the Operational Choreography requirements instead. |
| **Risks associated with potential change:***(what risks related to implementation of the proposed change have been identified)*Relaxing the NFR may impact other parties, but we do not have any evidence that this is the case. There are no reasons stated within the Operational Choreography why a real-time L4 Validation response is required. The aim is this CR will identify if any such issues exist. |
| **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).** MHHS Design Team (Paul Pettitt & Jason Brogden)
* MHHS Non-Functional Testing team
* Chris Price – DNO Constituency MHHS Programme representative and DNO/iDNO MHHS Programme Board Chair
* Paul Band – Programme Manager – ENWL
* Daniel Tadecicco – St Clements Services
 |
| **Target date by which a decision is required:** |      ASAP |

### 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)*     Ensures realistic response timeframes to DIP messages can be given by DNO and iDNO back office systems and no additional cost or with any delay to the MHHS programme. |

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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 |       |
| To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation |       |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) |       |
| To implement MHHS in accordance with the MHHS Implementation Timetable |      Ensures the timeline is not impacted  |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case |      Ensures additional and unnecessary costs are not incurred, ultimately by consumers  |
| To prove and provide a model for future such industry-led change programmes |       |

**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 |      All DIP interfacing parties that will exchange messages with DNO/iDNO via the DIP |
| Impacted Deliverables |       |
| Impacted Milestones |  |

**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** |
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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***There should not be an impact on other participants due to this change as the DIP adaptor already responds with technical schema validation (L3) and the receiving DNO and iDNO systems will respond with L4 albeit within 60 minutes. Not accepting the change from the required NFR could ultimately reduce the benefits of the programme.*  |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain**  |
|  |
| **Effect on consumers***There will not be an impact on other consumers due to this change as the DIP adaptor already responds with technical schema validation (L3) and the receiving DNO and iDNO systems will respond with L4 albeit within 60 minutes. Not accepting the change from the required NFR will ultimately increase costs to consumers.* |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain** |
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| **Effect on schedule***As this change involves retaining the current architecture and relaxing NFRs, it will have no impact on the schedule. Not accepting the change from the required NFR will require significant additional work that will impact the schedule.* |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain** |
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| **Effect on costs***As this change involves retaining the current architecture and relaxing NFRs, it will have no impact on the cost. Not accepting the change from the required NFR will require additional work that will significantly increase operational and DBT costs.* |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain** |
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| **Effect on resources***As this change involves retaining the current architecture and relaxing NFRs, it will have no impact on resources. Not accepting the change from the required NFR will require additional work that will significantly impact resourcing.* |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain** |
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| **Effect on contract***As this change involves retaining the current architecture and relaxing NFRs, it will have no impact on contracts. Not accepting the change from the required NFR will require additional work that may impact contractual arrangements.* |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain** |
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| **Risks***As this change involves retaining the current architecture and relaxing NFRs, it does not introduce risks. Not accepting the change from the required NFR will require significant additional work and additional infrastructure that may introduce additional programme, operational and DBT risks.*  |
| *<Delete as appropriate>:* **Agree / Disagree / Abstain** |
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### 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** |
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**Impact assessment done by:**

**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:**

### 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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