**Change Request Form**

## Change Request details

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| Change Request details | | | |
| Change Request Title | **Enabling Metering Point Energy Flow to be changed more than once** | | |
| Change Request Number | CR046 | | |
| Originating Advisory / Working Group | REC Code Manager (CCAG) | | |
| Risk/issue reference | REC Change Proposal R0062 | | |
| Change Raiser | Harriet Truss, REC Code Manager | Date raised: | 08/02/2024 |

***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:**  To maintain accurate values for Settlement, DNOs make regular changes to the LLFC Indicator in ERDS. Until June 2023, the Metering Point Energy Flow, Data Item DI90033, was tied to the MS Specific LLFC Indicator, Data Item DI50370 (J0775), which has sometimes resulted in unintended changes to the energy direction. For example, going from Import to Export. Where an incorrect energy direction is held, the Distribution Network Operator needs to be able to update the Metering Point Energy Flow back to the correct value to ensure data accuracy.  The current restriction, to only one change of Metering Point Energy Flow against a Registrable Metering Point (RMP), can be overcome by terminating the existing RMP and creating a new RMP with the correct Metering Point Energy Flow value. This has a detrimental impact on the Consumer and Settlement. It is inconvenient for the Consumer to be assigned a new MPAN and Settlement relies on an accurate history that can be lost when a new MPAN is assigned.  REC Change Proposal R0062, has been raised and the solution developed to remove the existing one time restriction on energy direction updates.  The one time restriction is reflected in the MHHS Design:   * MHHSP-BPD010 - Change of Registration Data – Step 435 * MHHSP-BP010 - Change of Registration Data – Step 435 and Note on ‘one time’ changes   Therefore, removing the one time restriction will have a direct impact on the MHHS Design. Further information can be found in the attached R0062 Final Change Report, on the REC Portal [here](https://recportal.co.uk/documents/20121/0/R0062+-+Final+Change+Report+%28Post-Vote%29+v2.0+20.02.2024.pdf/aada9962-7a14-272e-e16f-040bea3a6fa4?t=1708447505930). | |
| **Description of change:**  To reflect the solution being progressed under R0062, the MHHS Design will also need to be updated to remove reference to the one time change.  The impact assessments completed for R0062 confirm that the solution is a configuration change to the Electricity Retail Data Service to increase the limit on changes to the Metering Point Energy Flow (REC Data Item DI90033). No system changes are required to implement this change as it is a user configurable setting that is set by each ERDA. | |
| **Justification for change:**  The implementation of this change will allow for more immediate resolution to inaccuracies in Metering Point Energy Flow, which will allow for Settlement errors to be rectified more promptly, improving Settlement accuracy and reducing the risk that a Trading Dispute is required to reconcile energy correctly. Please refer to the business case in the Final Change Report for R0062.  MHHS Change Freeze:  This change request is the result of a business-as-usual industry code change that was approved on 20 February 2024 and is not expected to have a material impact on the MHHS design. This change request allows the MHHS Programme to re-baseline the design artefacts and version of the code to align with the REC code change approved under R0062. | |
| **Consequences of no change:**  If R0062 is approved under REC change governance but is not taken forward in the MHHS arrangements, ERDAs will need to adjust their configuration back to the one-time restriction at the point of MHHS go live (M8/M10).  The currently allowed single change means that, should a subsequent energy flow direction issue be identified, the only available recourse is to terminate the existing MPAN, and re-instate a new separate MPAN with the correct Energy Flow. This will have the detrimental impacts as detailed above and in the R0062 change report. | |
| **Alternative options:**  N/A | |
| **Risks associated with potential change:**  No risks are expected to the MHHS Programme and its implementation as a result of this change. | |
| **Stakeholders consulted on the potential change:**  Distribution Network Operators/Electricity Retail Data Service Providers, Energy Suppliers and other industry parties were consulted on the proposed solution as part of REC Change Proposal R0062 - 22 December 2023 to 23 January 2024. All respondents supported the change. There was unilateral agreement that the change should be implemented prior to MHHS go-live and support for raising a Change Request to the MHHS Programme to retain the lifted restriction post MHHS go-live. | |
| **Target date by which a decision is required:** | Cut off for inclusion in the MHHS Design prior to go live. |

### 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 |
| Following confirmation from REC Parties that they believe there to be continued value in the proposed solution under the MHHS arrangements, the Code Manager also consulted with Elexon and Helix Programme stakeholders on the potential impacts and risks to Settlement or the central settlement systems. The following was confirmed:   * Enabling additional energy direction corrections is considered a benefit to minimise the risk to settlement through the loss of the MPAN history. This relates to the potential to reduce the settlement error associated with ‘BSC Risk 2: SVA Metering System Attributes are incorrect’, by improving opportunities to correct energy direction data back to the creation date within the fluid settlement period * There would be no impact to Helix systems, as they have been built to deal with data changes, as long as the changes are in the fluid period * Any retrospective settlement change required, as a result of an energy direction correction completed outside the new 4-month Settlement Calendar period, would need to go through Trading Dispute   The benefits as set out in the R0062 change report are provided below:   |  |  | | --- | --- | | **BENEFITS** | **BENEFITS DESCRIPTION** | | **CUSTOMER EXPERIENCE** | R0062 improves customer experience by removing the requirement to create a new RMP due to a system data error and not because of any change the customer has made to their supply contract. There would be no loss of history for a customer and they would not be required to agree a new supply contract.  The risk that a new supply contract could mean a change in their energy charges is also removed.  Any impact of the current restriction on customers’ ability to Switch when incorrect data is held in CSS or the Electricity Enquiry Service, will be removed. | | **THEFT IN CONVEYANCE** | R0062 mitigates the risk of theft in conveyance which is increased when a new RMP is created whilst a customer does not agree a new supply contract. | | **BUSINESS PROCESSES** | R0062 removes the effort required by DNOs/ERDAs and Suppliers for the:   * Creation a new RMP * Supplier/DNO operational process for the Supplier registration to the RMP * Termination of the existing RMP/Disconnection of the existing MPAN | | **SETTLEMENT RISK** | Without the ability to correct the energy direction any consumption history will be lost on termination of the RMP creating a risk to settlement data where consumption has not been submitted. The gap created means nothing can be settled whilst a new RMP is being created and registered. | | **DUoS BILLING ACCURACY** | Where a new RMP has to be created this can impact the ability to accurately bill DUoS charges for the period when the energy direction has been recorded incorrectly. | |

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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 | Introducing this change will allow for Settlement errors to be more efficiently resolved, where possible, within the revised Settlement Timetable. |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) | - |
| To implement MHHS in accordance with the MHHS Implementation Timetable | - |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case | - |
| To prove and provide a model for future such industry-led change programmes | Supports implementation of change for wider industry benefits as identified through industry code change external to the MHHS Programme, in this instance enabling positive Consumer outcomes in the retail market. |

**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 | LDSOs, Energy Suppliers, MPRS Provider |
| Impacted Deliverables | MHHSP-BP010-Change of Registration Data – updated to note in grey box only, no MHHS or Helix system changes called out in R0062 impact assessments  MHHSP-BPD010 - Change of Registration Data |
| Impacted Milestones | No impacts to milestones have been identified |

**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 | 2 – Important | Expected lead time |  |
| Rationale of change | Solution | Expected implementation window | 2- Short |
| 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** |
| R0062 Final Change Report v2.0 (Post-Vote) 20.02.2024 | [R0062 - Removal of ERDA meteringPointEnergyFlow change restriction](https://recportal.co.uk/group/guest/-/removal-of-erda-meteringpointenergyflow-change-restriction) |

### 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**  This change will retain the benefits brought by R0062, subject to approval, in the enduring MHHS arrangements:   * Consumer experience * Mitigating risk of theft in conveyance * Supplier/Registration Service business operations * Settlement * DUoS billing accuracy |
| *<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**  Improved consumer experience by removing the requirement to create a new RMP due to data accuracy and not because of any change they have made to their supply contract. There would be no loss of history for a consumer and they would not be required to agree a new supply contract.  The risk that a new supply contract could mean a change in their energy charges is also removed.  Any impact of the current restriction on customers’ ability to Switch when incorrect data is held in CSS or the Electricity Enquiry Service, will be removed. |
| *<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**  This change is expected to be an MHHS Design documentation change only, with an associated drafting update to REC Schedule – RMP Lifecycle. Programme participants will not be required to deliver any changes to support the update to the MHHS Design, as this will already have occurred for R0062. If this MHHS CR is not progressed, the relevant data item is configurable and easily switched back to a one time restriction at M8/M10. |
| *<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**  Very limited costs are associated with this change, as detailed in the R0062 change report. |
| *<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**  Very limited impacts are associated with this change (ERDAs only), as detailed in the R0062 change report. |
| *<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**  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**  No risks expected to the MHHS Programme. |
| *<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 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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