**Change Request Form**

## Change Request details

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| Change Request details |
| Change Request Title | LDSO Registration Service Dip messages processing times  |
| Change Request Number | CR017 |
| Originating Advisory / Working Group | DAG |
| Risk/issue reference | N/A |
|  | Catherine Duggan obo of DNOS and iDNOs (LDSOs) | Date raised: | 31January 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:****Under the REC obligation – Clause 7.3 of the Electricity Retail Data Service (ERDS) definition the i/DNOs – referred to hereon in as LDSOs - as the Electricity Retail Data Agents (ERDAs) are currently providing the ERDS to process data as follows “***Data received by the ERDA shall be included within the ERDS Total Daily Processing on the basis that all data received prior to 23:00hrs is made available to the SMRA, EES Provider or CSS Provider (as applicable) by 06:00hrs the following* ***Working Day****. Data received after 23:00hrs will be made available to the SMRA, EES Provider or CSS Provider (as applicable) by the second* ***Working Day****.****”*****In operational terms this means that an Electricity Network Operator’s Metering Point Administration System (MPRS) – this service is referred to as the ERDS within the REC - currently operates between 05:00UTC and 23:00UTC on Working Days only and processing of certain messages may be put on hold during the Key Processing Windows of:*** **Gate Closure 18:00 to 21:00 UTC**
* **End of Day 23:00 to 05:00 UTC**

**The MHHSP OPC001 Operational Choreography v1.0 dated 25 July 2022 stated that under process steps: OPC\_130, OPC\_140 and OPC\_160 the Registration Service/LDSO will be required to process various DIP mediated messages within 60 minutes of receipt. There is a lack of clarity in the document as to the operating hours to which this requirement applies i.e:**1. **is the intent for LDSOs to operate within current REC operating hours, with the addition of processing various DIP mediated messages within 60 minutes of receipt within the current processing hours of 05:00UTC and 23:00UTC, or**
2. **is the expectation that LDSOs operate 24 hours a day/7 days a week.**

**If the intent is for LDSOs to extend their current ERDS operating hours to meet the requirement in the Operational Choreography, then this is a significant service and system change from the current service LDSOs provides and which only went live in July 2022 (as an output from the Ofgem Switching Programme).** LDSOs raised their concerns with this proposed design in Autumn 2022 via an objection, during stakeholder forums and in consultations responses (refer to section ‘Stakeholders consulted on the potential change’.)Our preferred option for this Change Request is for the **Operational Choreography to clarify (and align with the REC) that LDSOs will be required to process various DIP mediated messages within 60 minutes of receipt within current ERDS operating hours.****The alternative option is for the MHHS PMO to conduct a full cost benefit impact assessment into options for exploring extending current ERDS operating hours with evidence to support the business requirements and how it would benefit customers and other parties.** |
| **Description of change:**Our preferred option is the MHHS PMO amend the **Operational Choreography to clarify and align with the REC so that LDSOs will be required to process various DIP mediated messages within 60 minutes of receipt within current ERDS operating hours.**      |
| **Justification for change:***(please attach any evidence to support your justification)*Regarding our preferred option: Clarification on the **Operational Choreography, in line with existing REC obligations and confirmation that the intention is for LDSOs to be required to process various DIP mediated messages within 60 minutes of receipt within ERDS operating hours.** Regarding an alternative option (refer to ‘alternative options’ section): if the intent is for LDOS to be required to extend their current ERDS operating hours beyond REC requirements, in accordance with the principles of the Programme change process, we would like a full cost benefit assessment to be undertaken in respect of this requirement, versus alternative solutions. This **proposed design is not in the baselined Ofgem TOM and it is not accounted for within the Ofgem MHHSP Final Impact Assessment which assessed i/DNO IT and Business Support costs at just £600k and with £0 ongoing costs.** |
| **Consequences of no change:***(what is the consequence of no change)*Lack of clarity for LDSOs of required ERDS operating hours. Confusion and potential misinterpretation from parties and Code Managers understanding their conflicting code requirements which could lead to performance issues. This could lead to delays to the overall design and risk to MHHS Programme delivery timescales. |
| **Alternative options:***(What alternative options or mitigations that have been considered)*The MHHS PMO conduct a full cost benefit impact assessment and consult with impacted parties on the business requirement for requesting LDSOs **process various DIP mediated messages within 60 minutes** outside of current ERDS operating hours. This cost benefit assessment to be undertaken in respect of this requirement, versus alternative solutions. Any extension to the current ERDS operating hours is a change to the MWHSS TOM. Extending operating hours from working days only to seven days a week (including Bank Holidays?) will have highly significant support, resource and cost impacts. An assessment is requested as to the full cost to industry in implementing the change to the TOM if the LDSOs are expected to extend their current ERDS operating hours accompanied by the rationale from the programme for the business requirement. The assessment should also include the implementation and ongoing costs to Suppliers of operating their systems on a 7 day a week basis in order to accept and process any messages generated from ERDS on non-working daysAny change to current ERDS operating hours will also require a consequential REC change. |
| **Risks associated with potential change:***(what risks related to implementation of the proposed change have been identified)*We can identify no evidence of risks associated with our preferred change.We can identify the following risks from the alternative option:* we suspect significant implementation and operational costs for LDSOs to extend their current ERDS operating hours, which can be provided to support any cost benefit assessment**. The registration architecture landscape was reformed under the Ofgem Switching programme which went live in July 2022, less than twelve months ago. The proposed design is a different registration architectural landscape to the current Switching batch processing one. The proposed design was not accounted for within the Ofgem MHHSP Final Impact Assessment which assessed i/DNO IT and Business Support costs at just £600k and with £0 ongoing costs.**
* additional and unplanned consequential code changes to align the REC with the change.
* risk to MHHSP delivery timescales.
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| **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).*On 11 October 2022, ENWL raised and submitted an objection to the LDSO registration Service DIP messages processing timesIn addition, DNOs have collectively raised their concerns with MHHS PMO via their SCS representatives as follows:* as part of a suite of design issues by Chris Price at the Programme Steering Group (PSG) on the 5 October.
* as comments (TA-COM-1713 and TA-COM-1714) by Daniel Tadecicco
* as design blockers (T4-COM-1713 and T4-COM-1714) by Daniel Tadecicco
* Daniel Tadecicco has had a meeting scheduled with Ian Smith of the MHHS PMO regarding the OpChog on the 6 October, which was cancelled by the MHHS PMO, the rescheduling of this meeting fell outside the deadline for comments on the design by the 11 October.

In response, the MHHS PMO have tabled this issue at the following forum:* 7 November – ‘LDSO and MHHS Programme discussion on whether there is/is not a need for MPRS to operate 24/7’
* 25 November 2022 – working group meeting
* 12 December 2022 – working group meeting
* 27 January 2023 – assurance forum

To date LDSOs have not received confirmation from the Programme whether there is/is not a need for LDSOs to operate within current ERDS operating hours or we are required to extend to operate at 24/7. Consequently, this issue was escalated to the DAG on the 14 December 20122 and at which it was decided that D-013 (Registration Service Operating Hours) could be removed from the M5 Work-Off Plan subject to the submission of a Programme Change Request. This is the Change Request.In addition. individual LDSOs have raised their concerns in consultation responses to the re plan and in programme assessments. |
| **Target date by which a decision is required:** | Preferred option: February 2023Alternative option: cost benefits impact assessment on option: February 2023 with a view to the results of the IA forming part of decision-making process for the PSG in March 2023 |

### 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)*Preferred option: clarity for all parties that LDSOs can continue to operate their ERDS within current operating hours which align with the REC.Alternative option: evidence and clarity on the rationale and business requirements for options for extending the ERDS operating hours. Clear and transparent change process to enable the PSG to make an informed decision.  |

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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 | Removal of the impact that the current version of Operational Choreography artefact is not aligned with the TOM. |
| To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation | Removal of an unnecessary delivery service in absence of a full cost benefit impact assessment into options for exploring extending current ERDS operating hours with evidence to support the business requirements and how it would benefit customers and other parties. |
| To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR) | Mitigate the impact of the current version of Operational Choreography artefact nonalignment with current REC ERDS operating hours. Mitigate the need for an urgent consequential change to the REC to align with the MHHS Programme. |
| To implement MHHS in accordance with the MHHS Implementation Timetable | Removal of the risk to MHHS delivery timescales because of an extension to the current REC ERDS operating hours requiring a change to the TOM. |
| To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case | Removal of the risk that the current Operational Choreography artefact is not aligned with the TOM. Nor was this design accounted for within the Ofgem MHHSP Final Impact Assessment which assessed i/DNO IT and Business Support costs at just £600k and with £0 ongoing costs.An impact assessment should have been undertaken as a part of the design/work-off plan within DAG i.e without requiring a CR – however, an industry wide impact assessment of the options including requiring LDSOs to support DIP messaging processing 24/7 and Suppliers ability to accept and process such messages would confirm if this change would trigger Ofgem thresholds and as per the MHHS Programme Governance Framework would require escalating to Ofgem. |
| To prove and provide a model for future such industry-led change programmes | Lessons learnt exercise for future MHHS Programme change control and Significant Code Review programme design and delivery to avoid introducing risk and uncertainty to programme objectives (as set out above for this example). |

**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 parties in understanding the operating hours of the ERDS. |
| Impacted Deliverables | Operational Choreography artefact.      |
| Impacted Milestones | *M9* |

**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 | Preferred option: 4 weeksAlternative option: 2 months |
| Rationale of change |  | Expected implementation window | As above |
| Expected change impact | Significant |  |  |

**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** |
| MHHS Final Impact Assessment | [MHHS Final Impact Assessment (ofgem.gov.uk) [ofgem.gov.uk]](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.ofgem.gov.uk_sites_default_files_docs_2021_04_mhss-5Ffinal-5Fimpact-5Fassessment-5Ffinal-5Fversion-5Ffor-5Fpublication-5F20.04.21-5F1-5F0.pdf&d=DwMGaQ&c=dtNsJijI3wFkob4AZmdtKuktkI3weK_Sz_u9gR40gzs&r=kh6zkkeKuHl4RgFZOkU_LYU8r4vus4DNHgE9RSFH-QoX_wsB0bH3mjoLgBSsAwhG&m=_j3dCGFYb6_8avRbokVc_nJF2Ik6-mf6tAfDF_NjV9eqdH6l19BDMPGlapMWV0yh&s=fT0PYXszLb2ZKmkRJs1EnpjPhb4SSkDaqCVpXPE692o&e=) |

### 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**Preferred option: provide clarity to all parties on the ERDS operating hours post MHHS go live and confidence in programme readiness and successful programme delivery.Alternative option - Unknown – no cost benefit impact assessment has been completed to date on any of the options.  |
| *<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**Preferred option – no impact or disruption. The alignment of the Operational Choreography artefact with the current ERDS REC operating hours change will have avoided unnecessary implementation and operational costs being borne by LDSO which are passed onto customers through their bills.Alternative option - Unknown – no cost benefit impact assessment has been completed to date on any of the options.  |
| *<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**Preferred option: no detrimental impact to Programme timescales or determinant to any customer benefits.Alternative option: Lack of clarity for LDSOs if they can continue to operate within current ERDS operating hours. Confusion from parties and Code Managers understanding their conflicting code requirements which could lead to performance issues. This could lead to delays to the overall design and MHHS Programme delivery. |
| *<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**Preferred option – The alignment of the Operational Choreography artefact with the current ERDS REC operating hours change will have avoided unnecessary implementation and operational costs being borne by LDSO which are passed onto customers thorough their bills.Alternative option- unknown – no CBA has been completed to date on any of the options. We suspect significant implementation and operational costs for LDSOs to extend their current ERDS operating hours**. The registration architecture landscape was reformed under the Ofgem Switching programme which went live in July 2022. The proposed design is a different registration architectural landscape to the current Switching batch processing one. The proposed design was not accounted for within the Ofgem MHHSP Final Impact Assessment which assessed i/DNO IT and Business Support costs at just £600k and with £0 ongoing costs.** |
| *<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**Preferred option – The alignment of the Operational Choreography artefact with the current ERDS REC operating hours change will have avoided unnecessary resources being borne by LDSO to extend ERDS operating hours.Alternative option- unknown – no CBA has been completed to date on any of the options. We suspect significant implementation and operational costs and resources for LDSOs to extend their current ERDS operating hours**. The registration architecture landscape was reformed under the Ofgem Switching programme which went live in July 2022. The proposed design is a different registration architectural landscape to the current Switching batch processing one. The proposed design was not accounted for within the Ofgem MHHSP Final Impact Assessment which assessed i/DNO IT and Business Support costs at just £600k and with £0 ongoing costs.** |
| *<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**Preferred option – no impactAlternative options – LDSOs will have to extend their contract with their current ERDS service providers to be able to design, build, implement and deliver the extended ERDS operating hours. |
| *<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**preferred option: - no evidence of risks associated with this changealternative option: we can identify the following risks from the alternative option:* we suspect significant implementation and operational costs for LDSOs to extend their current ERDS operating hours**. The registration architecture landscape was reformed under the Ofgem Switching programme which went live in July 2022. The proposed design is a different registration architectural landscape to the current Switching batch processing one. The proposed design was not accounted for within the Ofgem MHHSP Final Impact Assessment which assessed i/DNO IT and Business Support costs at just £600k and with £0 ongoing costs.**
* additional and unplanned consequential code changes to align the REC with the change
 |
| *<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.**It is felt that the materiality of the issue outlined is sufficiently material as to warrant treatment.  |
| *<Delete as appropriate>:* **Agree Disagree Abstain** |
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**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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