

DSC Change Proposal Document

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A1: General Details

Change Reference:	XRN 5319				
Change Title:	Assessing MPID Reassignment for All Party Types				
Date Raised:	28/01/2021				
	Organisation :	Organisation E.ON			
Sponsor Representative	Name:	Kirsty	Dudley		
Details:	Email:	Kirsty.	Kirsty.Dudley@eonenergy.com		
	Telephone:	07816 172 645			
	Name:	Paul Orsler			
Xoserve	Email:	Paul.O	rsler@xoserve.com		
Representative Details:	Telephone:				
	Business Owner:				
Change Status	Proposal		⊠ With DSG	□ Out for Review	
Change Status:	□ Voting			□ Rejected	

A2: Impacted Parties

	□ Shipper	Distribution Network Operator	
Customer Class(es):	□ NG Transmission	🗆 IGT	
	⊠ All	□ Other <please details="" here="" provide=""></please>	
Justification for Customer Class(es) selection	The change in approach would likely impact all customer groups, although full assessment will confirm/deny this.		

A3: Proposer Requirements / Final (redlined) Change

Problem Statement:	Currently the allocation of Market Participant Identity (MPID) short codes for all party types such as Suppliers, Shippers, are linked to the Company Number issued and associated to the Organisation the Licence granted.
	In gas, once the unique 3 digit short code is allocated to an MPID under a particular Company Number it cannot be changed between different entities which have been granted licences or another party



	type, such as Meter Asset Provider (MAP) or Meter Asset Manager
	(MAM).
	In the event of a Supplier of Last Resort (SoLR) or company acquisition the short code cannot be simply 'lifted and shifted' but instead flows to refresh the IDs have to be issued or mass movements of portfolios or data refreshes have to occur, adding cost and effort to the industry for something which could be a lot simpler and more efficient if the 'lift and shift' approach was able to be utilised.
	In contrast to this, in electricity a process can be followed to reassign the MPID in these scenarios which is far less complex and better facilitates the market. It is simpler and doesn't stop organisation innovation.
	As referenced under Change Proposal XRN5144 (which is presently looking to establish CDSP Impacts related to supporting SoLR arrangements being made under the Retail Energy Code), this approach would materially vary the treatment of organisations in UK Link systems. This approach is set out in the MDD Market Participant Identity Verification Approach Document. This currently does not allow short codes to be re-used, regardless of a parties market participant role. Therefore, a change is required to enable this in certain circumstances, such as to give effect to a SoLR direction.
	As a consequence, UK Link system design, whilst allowing a Licence and Company Number to have a one to many relationship, doesn't allow these relationships to be refreshed and moved between legal entities for the multiple Market Participant roles administered within UK Link systems.
	Whilst the current UK Link System Design adheres to the approach as set out in the MDD Market Participant Identity Verification Approach Document, however these arrangements lack the flexibility that is needed within the energy market, with parties having SoLRs, acquisitions and re-shaping their individual businesses.
	We would therefore like to explore what options are available to resolve this issue, and what the associated Impacts would be to CDSP systems.
	This XRN is being raised to explore the impacts to all CDSP systems including, but not limited to UK Link, Gemini, DES, CMS and DDP.
Change Description:	The investigation is to assess the implications and approximate costs to replicate the MPID reassignment principal in electricity (although not an exact process replica, it should be still designed to best suit gas).
	The exploratory review should consider for all party/role types:



	 An MPID moving between different party types within the same group of companies An MPID moving between different party types within different group of companies but driven by SoLR or acquisition activity (anything in addition of 5144 findings) Consider separating the validation so the same ID can be recognised as multiple party types High-level outlining of suggested amendments to the MDD process documents (or any other documents) which would be required to deliver the solution. This XRN is to outline the possible options (and associated costs) for an industry decision to be made at the ChMC. The decision should be if any options should be progressed or not. If the process is to remain as-is then suggested wording to MDD process documentation will need to be put forward to CoMC. For the avoidance of doubt, this XRN is exploratory analysis only, any changes will need to be a part B XRN or a new XRN. 				
Proposed Release:	Release: NA				
Proposed	□ 10 Working Days	□ 15 Working Days			
Consultation Period:	20 Working Days	Other [Specify Here]			

A4: Benefits and Justification

	The benefits of this change are:		
	 Understanding of change options 		
	 Understanding of change costs 		
Benefit Description:	 Understanding of 'art of the possible' 		
	Industry collaboratively determining if this is a solution which is to		
	be taken forward		
	What, if any, are the tangible benefits of introducing this change? What, if any, are the intangible benefits of introducing this change?		
Benefit Realisation:	As this is an exploratory XRN the realised benefits are based on the		
	information gathered to assist with decision making.		
	When are the benefits of the change likely to be realised?		
	There are to be no actual process changes this XRN is information		
	gathering only.		
Benefit Dependencies:	gamening only.		
	Please detail any dependencies that would be outside the scope of the change,		
	this could be reliance on another delivery, reliance on some other event that the projects has not got direct control of.		



A5: Final Delivery Sub-Group (DSG) Recommendations – Removed

(see Section C for DSG recommendations)

A6: Service Lines and Funding

Service Line(s) Impacted - New or existing	N/A analysis only			
Level of Impact	Major/ Minor/ Unclear/ None			
If None please give justification				
Impacts on UK Link Manual/ Data Permissions Matrix				
Level of Impact	Major/ Minor/ Unclear/ None			
If None please give justification				
	Customer Classes/ Funding	Delivery of Change	On-going Budget Amendment	
	🗆 Shipper	XX %	XX %	
Funding Classes	National Grid Transmission	XX %	XX %	
	Distribution Network Operator	XX %	XX %	
	🗆 IGT	XX %	XX %	
	□ Other <please specify=""></please>	XX %	XX %	
ROM or funding details:		•	·	
Funding Comments:				

A7: ChMC Recommendation – Initial Review

Change Status:	⊠ Approve □ Reject		Defer	
DSC Consultation Issue:	□ Yes		🛛 No	
Meeting Date:	10/02/2021			

A7: ChMC Recommendation

Change Status:	□ Approve	□ Reject		□ Defer
Industry	10 Working Days		15 Working Days	
Consultation:	20 Working Days		🗆 Other [S	Specify Here]
Expected date of receipt for	XX/XX/XXXX			



DSC Consultation Issue:	□ Yes	🗆 No
Date Issued:	Click here to enter a date.	
Comms Ref(s):		
Number of Responses:		

A8: DSC Voting Outcome

	□ Shipper			Please select.		
Solution Voting:	National Grid Transmission			Please select.		
Solution Voting:	Distribution Network Operator		Please select.			
	🗆 IGT	□ IGT				Please select.
Meeting Date:	Click here to enter a date.					
Release Date:	Release: Feb / Jun / Nov XX or Adhoc DD/MM/YYYY or NA					
Overall Outcome:	□ No	□ Yes	If [Yes] please specify <release></release>			

Please send the completed forms to: <u>box.xoserve.portfoliooffice@xoserve.com</u>



Section C: DSG Discussion

C1: Delivery Sub-Group (DSG) Recommendations

DSG Date:	22/02/2021		
DSG Summary:	PO presented this agenda item. PO advised that this Change was raised by E.ON and is a non-regulatory change with a medium priority score. This XRN is being raised to explore the impacts to all CDSP systems including, but not limited to, UK Link, Gemini, DES, CMS and DDP. The investigation is to assess the implications and approximate costs to replicate the MPID reassignment principal in electricity (although not an exact process replica, it should be still designed to best suit gas). EL if this cp is referring to the reassigning of every MPID apart from supplier ID or the potential impacts of assigning apart from supplier ID. PO stated that the suggestion with this Change is that everything in relation to Supplier ID will be included. DW asked that this Change is analysis only at this current moment, will there be a further change raised if there needs to be some form of implementation. PO advised that is correct and has been suggested by ChMC and the proposer of the Change.		
Capture Document / Requirements:	<insert appropriate="" where=""></insert>		
DSG Recommendation:	Approve	Reject	Defer
DSG Recommended Release:	Release: Feb / Jun / Nov XX or Adhoc DD/MM/YYYY		

Section C: DSG Discussion

C1: Delivery Sub-Group (DSG) Recommendations

DSG Date:	26/07/2021
DSG Summary:	 JB presented this agenda item. JB introduced the proposals with their aims XRN5318 is to consider the movement of Supplier MPIDs within the same company group or to another company group XRN5319 is to consider the reassignment of MPIDs of any party type i.e. Shipper, Supplier, MAM, to be used by other party types within the same or different company groups JB advised that to support CSS XRN5144 is currently in capture and seeks to allow reassignment of a Supplier short code under a SoLR event. Due to impacts identified within UK Link and DSC



parties' systems of re-assigning Market Participant identities within XRN5144 the CDSP are looking at alternative options with Ofgem. XRN5318 – High Level Costs JB advised there are two solution options returned as part of the analysis into XRN5318. Both solution delivered the requirements differentiated by the data management within CDSP central systems.
 There is an overall high level cost range for the solutions equating to approx. £250K- £350K, including but not limited to the following reasons, would require a delivery within a major release: Impacts to SAP-ISU Invoice process testing Data assurance Points to note: All reporting would require further analysis to confirm impacts AMT support will be required for file format changes (these costs are NOT included) DDP, IX and Marketflow changes are NOT considered in the cost Any file format changes required to invoicing files have NOT been considered. The next available major release will be post CSS(C) Delivery. This would, therefore, bring the full cost to deliver to be likely circa £1million.
XRN5319 – High Level Costs
 JB detailed that as this change look to reassignment of an MPID that previously belonged to a party that has now left the market, this is likely to be a more complex scenario to manage than SoLR or acquisition events. Wider industry processes would need to be considered in this scenario (B2B activity) JB advised as a high level estimate, it would require an approx. 50% uplift of the XRN5318 base costs. This is on the proviso that additional development, and in particular, testing and integration would need to be considered. Therefore, based on the above, the additional cost to deliver XRN5319 with the same conditions as XRN5318 would be circa £375k-£525K.
DSG Discussion
 Findings have been presented to the proposer and it has been requested for them to be presented to DSG and ChMC. The changes were raised as analysis only and, as such, Xoserve proposes that these are now closed as complete and any further requirements are raised under new change proposals.
JB asked DSG members if they foresee a requirement to progress either of the proposals and support the Xoserve recommendation. Members were in agreement that the change proposals be closed as complete and that if the functional changes are wanted to be progressed in the future, new change proposals are raised.
Change proposals to be closed.



Capture Document / Requirements:	<insert appropriate="" where=""></insert>		
DSG Recommendation:	Approve (Recommendation to close)	□ Reject	□ Defer
DSG Recommended Release:	Release: Feb / Jun / Nov XX or Adhoc DD/MM/YYYY		

Version Control

Document

Version	Status	Date	Author(s)	Remarks
1.0	DSG	10/02/2021	Rachel Taggart	Updated with the outcome from ChMC on 10 th February 2021
2.0	DSG	02/03/2021	Chan Singh	Updated CP with discussions from DSG 22 nd February 2021
3.0	Change to be closed	26/08/2021	Megan Troth	Updated with DSG discussions from 26 th July 2021