

# Please Note: This document contains multiple Solution Option Change Packs.

## Change Pack – Solution Considerations

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### Communication Detail

Comm Reference:	2768.1 – RT - PO
Comm Title:	XRN5144 - Enabling Re-assignment of Supplier Short Codes to Implement Supplier of Last Resort Directions – UK Link User assessment of requirements regarding Interface Solution Options
Comm Date:	15/02/2021

### Change Representation

Action Required:	For Representation
Close Out Date:	01/03/2021

### Change Detail

Xoserve Reference Number:	XRN5144
Change Class:	All Shipper Classes
ChMC Constituency Impacted:	All Core Customers – DNs; IGTs; Transmission; Shippers
Change Owner:	David Addison
Background and Context:	Supplier short codes are used to identify individual suppliers. This change would allow a single supplier short code to be re-assigned to an appointed Supplier of Last Resort (SoLR) rather than each individual supply meter point undergoing a registration event – for example a change of supplier event.

### Change Impact Assessment Dashboard (UK Link)

Functional:	System Impacts – fundamental impacts to UK Link systems and Business Warehouse solution to differentiate instances of Supplier MP Id use.
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	<ul style="list-style-type: none"> <li>• BW and potential for impacts to systems that rely upon release of data – e.g. DDP / API / Reporting / DES</li> <li>• Historic data is not currently made available to the new Supplier</li> <li>• UK Link Application (SAP ISU) and Identity Access Management Mechanisms</li> </ul> <p>The full detailed impact assessment has not been conducted, therefore further impacted systems and processes still need to be impact assessed.</p> <p>Changes to reporting systems / processes may be material as this would be a fundamental system change / security model to be able to assess who is entitled to site history (data security considerations for all reports / products looking to expose this). System changes would be required to identify who we release data to (e.g. the rule of ‘were you the supplier at the time therefore you can have the data’, this change will amend the security using the current short code. Current rules are all controlled by short code and effective date, however going forward the short code will remain the same so a means to identify the SOLR date / and who the supplier at that moment – this will change reporting / security but also depending on the system impact downstream systems and processes</p> <p>Process changes will be required to a number of CDSP Processes – Customer Lifecycle / Market Participant Identity Management</p>
Non-Functional:	NFR impacts not identified at this time
Application:	UK Link
User(s):	Shippers; DNS; IGTs; limited impact expected to Transmission
Documentation:	<p>Changes identified to:</p> <ul style="list-style-type: none"> <li>- UK Link Manual impacts;</li> <li>- ‘Market Domain Data Market Participant Identity Verification Approach Document’</li> </ul> <p>Further documentation changes TBC</p>
Other:	N/A

Files				
File	Parent Record	Record	Data Attribute	Hierarchy or Format Agreed
TBC	TBC	TBC	TBC	TBC

## Change Development Description

A copy of the CP can be found [here](#) for your reference.

This change would allow a single Supplier Short Code to be re-assigned to an appointed Supplier. This will negate the need for each individual Supply Meter Point undergoing a Switch Request through CSS (i.e. a Change of Supplier Registration event) at SoLR or potentially other instances where a Short Code / Organisation relationship change is required to take effect. The purpose of this change proposal is carry out an impact assessment against the CDSP's systems, process and reporting capability and identify and regulatory and contractual implications.

This change is currently being developed through the Capture process, and we are looking for views on preferable routes of solution development for 4 UK Link Users, in order to ensure we can bring reasonable solution options to Change Committee members for approval.

The purpose of this XRN is mainly the avoidance of large scale registration activities to effect SoLR events where this is a Supplier only change. This will avoid Suppliers (or CSS on their behalf) generating large scale CSS Switch Requests, CSS processing of such Registrations and propagation to other participant systems including CDSP and DSC Customer systems. Note: the counter point should be noted that User systems may currently rely upon such Registration events and the notifications that they receive as a consequence.

This change will require that the CDSP does recognise these distinct entities so that the data permissions can be effectively segregated. Something that has, to date, been achieved by the Market Participant Identity.

We are currently considering the following in order to develop Solution Options. We specifically invite User views on the following points:

1. The introduction of Shipper invoice variances in order to assist the Shipper User to attribute the charges attributable either side of the Change of Supplier as a result of the SoLR within the invoice. This would mean extra lines in the invoice file, e.g. if the SoLR happens on 18<sup>th</sup> March (then the invoice would have a charge 1/3 - 17/3 for the previous Supplier; and a charge for 18/3 to 31/3 for the new Supplier) Please note we are currently NOT proposing to amend the invoicing formats in order to allow specific differentiation of the Supplier entity. In order to do so, we would need to amend invoice files to include the entity name, and also potentially the Supplier MP Id.
  1. Note: Users are reminded that any change to Shipper records would impact all Shipper Users, including parties that are unlikely to become the Shipper for a SoLR.
2. A Supply Meter Point level notification to Networks regarding the entity change of the Market Participant Identity. The existing formats do not currently provide the entity name therefore would need either amendment to existing records or creation of a new record, in an existing file or new file in order to provide such Notification. It is logical to amend the existing record K85 GENERIC ORG NOTIFICATION such that this record performs the logical purpose of such a record, but in doing so this would amend the instances in which this is received by existing Users, and would extend the use of this record to notify changes in Supplier User Type. This record is currently not received by Networks.

1. Note: We had not considered provision of an equivalent notification to Shipper Users. We had anticipated that this would be managed via reporting as an Additional Service. Views are welcomed on this point.

- Amendment of the processes defined in the 'Market Domain Data Market Participant Identity Verification Approach Document'. Currently the process is managed against a published Change Process Cycle. We would welcome User views whether the entity name would need to be updated outside of this cycle, and if so, we would welcome User views on the method of notification of such out of cycle updates.

We also welcome any further considerations for the Solution building around this change that may not have considered, and potentially a preference in what solution type would work best for customers in order to manage this considerable change.

## Associated Changes

Associated Change(s) and Title(s):	N/A
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## DSG

Target DSG discussion date:	22/03/2021
Any further information:	N/A

## Implementation

Target Release:	Not specified.
Status:	Not scheduled.

Please see the following page for representation comments template; responses to [uklink@xoserve.com](mailto:uklink@xoserve.com)

# Representation Response

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## H1: Change Representation

(To be completed by User and returned for response)

User Contact Details:	Organisation:	Northern Gas Networks
	Name:	Helen Chandler
	Email:	hchandler@northerngas.co.uk
	Telephone:	07580704123
Representation Status:	Oppose	
Representation Publication:	Publish	
Representation Comments:	NGN Opposes this change and we defer comment on this proposed solution until we receive clarity from Ofgem. We would also like to highlight the post meeting notes from the Feb Switching Programme design forum state: SoLR - Kishan Nundloll (Ofgem) provided an update on SoLR. It was noted that CR-D025 Changes to support enhanced SoLR arrangements has been withdrawn and any future SoLR developments/updates will be brought through the Design Forum.	
Confirm Target Release Date?	Yes	«h1_userDataAlternative»

## H1: Xoserve's Response

Xoserve Response to Organisations Comments:	Thank you for your comments we will take account of these within future analysis. As highlighted by a number of other respondents we understand that further SoLR proposals are proposed through the Design Forum of the CSS Programme - so we will understand these prior to further analysis.
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Please send the completed representation response to [uklink@xoserve.com](mailto:uklink@xoserve.com)

## H1: Change Representation

(To be completed by User and returned for response)

User Contact Details:	Organisation:	EDF
	Name:	Eleanor Laurence
	Email:	eleanor.laurence@edfenergy.com
	Telephone:	07875117771
Representation Status:	Approved for assessment only	
Representation Publication:	Publish	
Representation Comments:	<p>For a SoLR – suppliers can currently determine how the process works for gas, however in electricity the supplier ID is currently novated across to the new supplier.</p> <p>The electricity process - whilst it resolves the settlements part of SoLR - does not address the customer facing aspect i.e. the ability to bill/manage the account unless the supplier decides to take systems of the failing supplier. SPAA, MRA &amp; REC currently do not differentiate between an original supplier assigned to an MPID or any supplier taking over an MPID as part of SoLR in terms of their obligations under these codes and thereby any resolution to issues such as meter mix ups, disputed reads and Erroneous Transfers, is made extremely difficult, risky &amp; expensive as well as with the potential to have a detrimental impact to customers due to the new supplier not having access to all of the history of the reassigned supplier ID/customer accounts.</p> <p>If we are reassigned the supplier ID, to manage it fully we would also need to take on the relevant supplier IX nodes as well as the systems of that supplier as well (as per the points made above) which could be expensive and unrealistic and we would also need to ensure the suitable commercial arrangements are in place with shippers. In previous SoLR events we have found that this is not a financially viable option and therefore we would see it as more cost effective &amp; customer beneficial to move customers onto our own MPIDs and into our own systems.</p> <p>Whilst we understand that may be an option that some suppliers prefer, it is not the approach that we feel is best suited to manage</p>	

	<p>these customers on a long term basis for gas. We wish to ensure that we are not forced into using this method and that if it is progressed – that it is optional only.</p> <p>Therefore in order to be able to successfully migrate customers to our systems, we would still need to undertake a mass change of shipper/supply event post Supplier ID reassignment. Therefore we would prefer to retain the existing SoLR process or be able to suggest that is the process that we would prefer to use as part of any SoLR bid and not to be reassigned the supplier ID, otherwise on the gas side this could be seen to give an advantage to those Suppliers on SoLR event who use same Shipper or use the same software as the failing company.</p> <p>Critically - the primary issues faced during a SoLR or trade sale event for gas are with the change of shipper (relating to and energy &amp; transportation) and in this change, the issues would not be addressed and would still remain and a mass change of shipper event would still be necessary.</p> <p>With the implementation of a more innovative and flexible CSS, it is our expectation that as an industry we should be able to do much higher volume of SoLR CoS events in much shorter 2 timelines and therefore believe that the proposal for reassignment is not necessary. As an industry, we need to ensure that any SoLR events can be managed by flexing DCC/CSS central systems accordingly.</p>	
Confirm Target Release Date?	Yes	«h1_userDataAlternative»

## H1: Xoserve's Response

Xoserve Response to Organisations Comments:	<p>Thank you for your comments we will take account of these within future analysis. As highlighted by a number of other respondents we understand that further SoLR proposals are proposed through the Design Forum of the CSS Programme - so we will understand these prior to further analysis.</p>
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Please send the completed representation response to [uklink@xoserve.com](mailto:uklink@xoserve.com)

## H1: Change Representation

(To be completed by User and returned for response)

User Contact Details:	Organisation:	SSE Energy Supply Limited
	Name:	Megan Coventry
	Email:	megan.coventry@sse.com
	Telephone:	02392277738
Representation Status:	Reject	
Representation Publication:	Publish	
Representation Comments:	<p>This would likely be a very large and complex change to implement for a number of shipper and supplier parties. It is unlikely to be possible to take a supplier ID and simply apply it to established systems and expect that all shipper processes and flows would work normally for that new supplier ID without IT development work. Depending on the system, it may require a significant amount of time to set up new shipper/supplier relationships, and this is especially likely to be the case in systems where there are 1:1 shipper to supplier relationships. It is also likely that a number of shipper and supplier systems need the normal registration flows to instigate the COS process. The solution, as proposed, also does not consider that when a shipper takes on a SOLR, they may split the portfolio over a number of shipper IDs rather than just using one shipper ID. Also, the Faster Switching arrangements will allow sites to be taken on quickly by the new supplier using normal industry processes. Therefore, it seems unreasonable to request that shippers build this potentially very difficult functionality into their systems and processes at significant cost when it is intended only to be used for SOLRs, i.e., infrequently or not at all.</p>	
Confirm Target Release Date?	No	There is no target implementation given in the change pack document.

## H1: Xoserve's Response

Xoserve Response to Organisations Comments:	Thank you for your comments we will take account of these within future analysis. As highlighted by a number of other respondents we understand that further SoLR proposals are proposed through the Design Forum of the CSS Programme - so we will understand these prior to further analysis.
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Please send the completed representation response to [uklink@xoserve.com](mailto:uklink@xoserve.com)

## H1: Change Representation

(To be completed by User and returned for response)

User Contact Details:	Organisation:	Scotland and Southern Gas Networks
	Name:	Sally Hardman
	Email:	sally.hardman@sgn.co.uk
	Telephone:	07970019027
Representation Status:	Oppose	
Representation Publication:	Publish	
Representation Comments:	SGN have previously indicated that we believe the proposal to re-use the Supplier Short Code in the event of a SoLR as a material risk to our business. We are mindful that CR-D025 has been withdrawn and Ofgem have indicated future developments will be brought through the Design Forum. This would indicate that the current solution options should await further direction before being progressed.	
Confirm Target Release Date?	Yes	«h1_userDataAlternative»

## H1: Xoserve's Response

Xoserve Response to Organisations Comments:	Thank you for your comments we will take account of these within future analysis. As highlighted by a number of other respondents we understand that further SoLR proposals are proposed through the Design Forum of the CSS Programme - so we will understand these prior to further analysis.
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Please send the completed representation response to [uklink@xoserve.com](mailto:uklink@xoserve.com)

## H1: Change Representation

(To be completed by User and returned for response)

User Contact Details:	Organisation:	Wales & West Utilities
	Name:	Richard Pomroy
	Email:	richard.pomroy@wwutilities.co.uk
	Telephone:	07812973337
Representation Status:	Publish	
Representation Publication:	Publish	
Representation Comments:	<p>We understood that Change DR25 from the Faster Switching programme that was the cause of this XRN had been withdrawn. Notwithstanding the status of DR25, we strongly oppose this change.</p> <p>The principle that a Market Participant id relates to one legal entity is a fundamental feature of the design of the UK Link system. If this principle was changed then additional fields would be required to provide start and end dates for the relationship between the MPid and the legal entity. This would impact any system or report that showed data over a period of time by Supplier id as we could not assume that the same legal entity was behind the Supplier id through the whole period and hence comparisons over time may be invalid. We note that meter reading performance is a particular interest to the UNC Performance Assurance Committee. PAC's interest is in settlement accuracy which is a challenge as Shippers are the key party but they rely on Suppliers to provide meter reads. Potentially complicating this relationship by changing the legal entity</p>	

	<p>behind Supplier ids in a non-transparent way will hamper this work. We acknowledge that carrying out a change of Supplier process when a Supplier of Last Resort is appointed is laborious and the superficial attraction of being able to solve the problem related to Supplier of Last Resort transfers by changing the legal entity behind a Supplier MPid. A notification to Transporters of a change in the legal entity behind a Supplier MPid would not be an adequate solution because it would not make the information available to person who was looking at time series of any data related to a Supplier MPid.</p> <p>We suggest that other solutions are explored such as making a wholesale Supplier MPid change to a new unused Supplier MPid, rather than imposing a solution that would require, what we expect would be significant costs to be incurred by Transporters and Shippers, to make the consequential changes required to central systems to rectify the degradation to parties' ability to use data. An alternative would be to create a legal entity id and present data with the legal entity id and the legal entity industry role in place of Transporter Mpid, Shipper MPid, Supplier Mpid. We expect that this solution would be expensive and far reaching.</p> <p>We expect that detailed analysis by parties would reveal additional costs for making changes to their own systems. We would expect that Shippers that ship for more than one Supplier may be particularly impacted by this change.</p>	
Confirm Target Release Date?	Yes	«h1_userDataAlternative»

**H1: Xoserve's Response**

Xoserve Response to Organisations Comments:	Thank you for your comments we will take account of these within future analysis. As highlighted by a number of other respondents we understand that further SoLR proposals are proposed through the Design Forum of the CSS Programme - so we will understand these prior to further analysis.
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Please send the completed representation response to [uklink@xoserve.com](mailto:uklink@xoserve.com)

**H1: Change Representation**

(To be completed by User and returned for response)

User Contact Details:	Organisation:	Centrica	
	Name:	Oorlagh Chapman	
	Email:	Oorlagh.Chapman@centrica.com	
	Telephone:	07557 614769	
Representation Status:	Defer		
Representation Publication:	Publish		
Representation Comments:	<p>It is our opinion that the option to reassign the MPID should be available for any supplier that wishes to use it, but the solution should not disallow a 'bulk CoS' for the impacted MPRNs if that is what the supplier wishes to do. The solution should focus on the customer and meeting our needs.</p> <p>We also still need to address the issue of MPIDs that are shared between Supplier and Shippers, the fact that they are 2 different parties should mean 2 different parties can have the same MPID as is the case for electricity.</p>		
Confirm Target Release Date?	N/A	«h1_userDataAlternative»	

## H1: Xoserve's Response

Xoserve Response to Organisations Comments:	<p>Thank you for your comments we will take account of these within future analysis. As highlighted by a number of other respondents we understand that further SoLR proposals are proposed through the Design Forum of the CSS Programme - so we will understand these prior to further analysis.</p>
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Please send the completed representation response to [uklink@xoserve.com](mailto:uklink@xoserve.com)

# Change Pack – Solution Considerations

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## Communication Detail

Comm Reference:	2898.4
Comm Title:	XRN5144 - Enabling Re-assignment of Supplier Short Codes to Implement Supplier of Last Resort Directions – For Representation
Comm Date:	13/09/2021

## Change Representation

Action Required:	For Representation
Close Out Date:	Comments to be submitted to Ofgem directly (Representation window closes 20th September 2021 at 16:00hrs)

## Change Detail

Xoserve Reference Number:	N/A
Change Class:	N/A
ChMC Constituency Impacted:	All Users
Change Owner:	David Addison <a href="mailto:David.addison@xoserve.com">David.addison@xoserve.com</a> +44121 229 2138

## Change Design Description

Dear colleague,

Further to the Change Pack issued in March 2021 ( [link](#) ), additional work has been undertaken with Ofgem to consider alternative solution options in relation to the treatment of the Supplier Market Participant Identity following the appointment of a Supplier of Last Resort (SoLR). This matter was discussed at the DSC Change Management Committee in September 2021, where we agreed to issue the presentation and explanatory paper that describes the further options in a Change Pack for DSC parties information.

The matter has been raised in the Switching Programme Design Forum, and they have requested feedback on the solution options contained in the presentation. Feedback should be provided to the Switching PMO at [SwitchingPMO@ofgem.gov.uk](mailto:SwitchingPMO@ofgem.gov.uk) by Monday 20<sup>th</sup> September 2021 at 16:00hrs. We have recommended Option 2 (Submission and processing of switch requests by the SoLR over a number of days, but below the CSS NFR daily Peak of Peaks, to give effect to the SoLR) as the preferred option.

If it is agreed that the Market Participant Identity re-assignment option (Option 1) is not the preferred approach a formal change will be raised within the Programme, as it is this option that is described in the DB4 documentation in the Faster Switching Programme.

- [Xoserve SoLR Options Paper](#)

- [XRN5144 Options Overview](#)

We would ask that you provide any views in writing via your representatives at this forum or directly as set out above. Should you have any questions or comments, please come back to me directly at [david.addison@xoserve.com](mailto:david.addison@xoserve.com).

## Associated Changes

Associated Change(s) :	N/A
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## DSG

Target DSG discussion:	N/A
Any further information:	N/A

## Implementation

Target Release:	TBC
Status:	For Representation