

PARTY IMPACT ASSESSMENT RESPONSE

R0096 – CSS MESSAGE REGENERATION FUNCTIONALITY

DATE ISSUED	06/11/2025
RESPONSE DEADLINE	28/11/2025

LINKS

- [Change Proposal](#)
- [Change Report \(For Implementation\)](#)
- [Detailed Design Document](#)

The completed response document should be uploaded to the REC Portal. On the Impact Assessment Page click 'Add Response' to upload the completed document.

Responses can be submitted as:

- **Non-confidential** – the full response plus the submitting organisations name and category will be published; or
- **Confidential** – responses will only be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders. Details of the response will not be referenced in any Change Report; or
- **Anonymous** – the full response will be published, but will omit the name of the submitting organisation (organisation category will be published). Details of the response will be referenced in the Change Report, and the organisation name will be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant).

Organisations can submit the whole response as non-confidential, confidential or anonymous, or flag each question separately as they wish.

All responses will be treated as non-confidential unless indicated otherwise.

The Code Manager recommends that only financials or other commercially sensitive information is submitted confidentially, and that anonymous is used for all other cases where the submitting organisation does not wish to be identified, as this allows the details of the response to be seen in the Change Report and for the Code Manager's comments to the response to be published.

RESPONDENT'S NAME	David Addison
RESPONDENT'S ORGANISATION	Xoserve
RESPONDENT'S ORGANISATION CATEGORY	Other - GRDA
RESPONDENT'S EMAIL ADDRESS	David.addison@xoserve.com
RESPONDENT'S TELEPHONE NUMBER	
RESPONSE CONFIDENTIALITY	Non-Confidential

QUESTIONS

1. Did you attend the Change Issues Group on 06 November 2025?	
Yes	
RESPONSE CONFIDENTIALITY	Non-Confidential

2. Do you have any comments on the proposed solution?	
<p>The document scope states that this is intended only as a Proof of Concept (Section 1.7.1). Is this correct?</p> <p>One assumes that assessment of value for money is being conducted outside of this PIA.</p> <p>We assume that there are no requirements on CSS Users, and that ALL functionality is 'self heal' in the CSS solution. If I have misunderstood this point, then we will need to revisit the PIA response. There is a significant level of detail within the document related to the CSS system (as you would expect with a document of this nature), but would advocate that there should be an explicit section related to messages / impacts to CSS Users (even where this is 'No impact'.</p>	
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3. Do you agree the proposed solution addresses the problem statement? If not, please provide details	
<p>Our reading is that the CSS solution will be able to self identify instances where messages have not completed and reinitiate these. For example paragraph 3.4.3.9 references 'internal only' integration /</p>	

ticketing. As such there is no User requirement to prompt resolution (either via new messages or via tickets) – if so, we agree with the principle.

We do note that in Fig 5 there is no integration with the Service Desk to RECEIVE notifications should Users detect issues, should this be included even only as a logical flow?

I note that para 4.2.5 references functional issue stalls – quoting the instance of duplicate MPxN in an OFAF transaction. What will be done in these instances as it is assumed that these result in processing stalls? What will be the resolution path that these instances follow – will these be functionally resolved as a result of this change?

Is this intended to provide the solution for the change raised as scenario 1 in R0178 – i.e. Deactivation of an active reg. whilst in-flight switch in progress? IF not, will this not cause external ticketing prompting User action – is this considered Out of Scope? Should this be referenced as part of some of the design e2e design? NB: I acknowledge that OS-04 / 06 references Mis-use and Malicious User intent – but should these components be updated in the event that instances are identified – for example the multiple MPxN in OFAF?

Note: I cannot see any specific SLAs that the solution will adhere to. These should be explicit – else there is the potential impact to Users – i.e. they will notice that the application has stalled. We note references to 35 mins in 2.2.2, but also 4.8.4.1 references 5 minutes. What should the User expectation be?

Other document observations:

4.7.1 – The RPO should be nil? It references a single operation (which I assume is a single transaction being processed), but this self heal should ensure that this is processed?

4.7.5 – No scale in Fig 7 / 8. Not sure what this shows?

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Non-Confidential

4. Are there any alternate solutions that would better meet the needs of the problem statement?

We don't offer any alternatives as our understanding is that there are no User impacts of this solution.

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5. Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?

I am not aware that this instances where messages can be stalled have been published, but assume that CSS will provide this assurance based on identified instances.

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Non-Confidential

6. Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements whilst the industry manages both MHHS and non-MHHS Metering Points?

We cannot comment on MHHS.

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Other – We offer no response, suggest remove from any published feedback.

7. What lead time would be required for your business to implement the proposed solution? Please provide justification.

We do not believe that there are any requirements on the GRDA as part of this solution. We note that there are also no external User trials phases.

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8. Are you aware of any constraints on when this change can be delivered?

As we understand that there are no User impacts we don't offer any constraints. Note: AS-03 – Out of date. EoGC is no longer proceeding, but assume this reflects the point in time the document was produced?

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Non-Confidential

9. Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?

We cannot comment on MHHS.	
RESPONSE CONFIDENTIALITY	Other – We offer no response, suggest remove from any published feedback.

<p>10. Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall:</p> <p>A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.</p>	
As we understand that there are no User impacts, nor any testing requirement. I would expect that we might have administrative costs of reviewing documents, but do not see any functional impacts as a result of this change.	
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<p>11. Do you identify any benefits to your business through the implementation of the proposed solution?</p>	
<p>In principle, yes. There are no reasons to objecting to self heal functionality in CSS. However, the extent of the impacts to consumer activities is unknown to us – e.g. if a Registration event stalls prior to GRDA receiving the messages, requiring a Supplier to resubmit and the original Switch Date being missed.</p> <p>I would also qualify this as I suspect that the R0096 functionality will not actively seek to resolve functional stalls – such as those defined in R00178. I suspect that this change might simply better classify these functional issues, but assume that these will require changes to CSS which will be charged and not considered issues within CSS. It is for the Code Managers to make representation whether this is the correct course of action.</p>	
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12. Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?

We cannot provide any effective assessment of the business case. It is not possible to say based on the information that we are aware of.

The costs of this change are unclear – as this design document ONLY appears to be planned delivery of a PoC and design artefacts, but I may have misunderstood the purpose of the document.

We have no visibility of the number of transactions that could be at a stalled status. Nor the nature of these transactions.

We can perform reconciliation activities only on instances where a pending is received, and then the Secured Active (or cancellation) is not.

If the instances and types of stalled transactions is not yet published then this information should be published so this assessment can be made.

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13. Do you have any other comments relating to this Change Proposal?

We have made a few detailed observations regarding the document within the above responses.

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