

**DSC Change Proposal**

**Change Reference Number: XRN 4687**

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| **Change Title** | PSR updates for large domestic sites | |
| **Date Raised** | 01/06/2018 | |
| **Sponsor Organisation** | E.ON | |
| **Sponsor Name** | Kirsty Dudley | |
| **Sponsor Contact Details** | Kirsty.Dudley@eonenergy.com | |
| **Xoserve Contact Name** | Ellie Rogers | |
| **Xoserve Contact Details** | Ellie.rogers@xoserve.com | |
| **Change Status** | Proposal / With DSG / **Out for Consultation** / Voting / Approved or Rejected | |
| **Section A1: Impacted Parties** | | |
| **Customer Class(es)** | Shipper  National Grid Transmission  Distribution Network Operator  iGT | |
| **[Section A2: Proposer Requirements / Final (redlined) Change](C:\\Users\\Rebecca.perkins\\AppData\\Local\\Microsoft\\Windows\\Temporary Internet Files\\Content.Outlook\\EXD06YFG\\Change_Proposal_Template v2.0.docx" \o "WHAT – What is the required change? WHY – Why is the change needed? WHEN – Detail when the solution should be started/implemented.  )** | | |
| Suppliers and Transporters have licence obligations to record and share domestic customer vulnerability. This is maintained through a Priority Service Register (PSR). This is fulfilled through the Supplier (via the Shipper) submitting this information to the CDSP to be recorded and issued to the relevant GT. This information is then filtered through to the electricity DNO who holds the overall central PSR registry.  Vulnerability validation has always been based on AQ rather than property classification as majority of domestic customers have an AQ<73,200. There are however customers’ who have an AQ >73,200. The current validation relating to Supply Meter Points with an AQ >73.200kWh are rejected and not recorded centrally.  The rejection of this information means the Supplier has the customer vulnerability recorded, however, the Transporter nor the electricity DNO do, which also the central register does not contain all vulnerability information.  The issue has also been raised at the SPAA Expert Group via [Issues Paper 11](https://spaa.co.uk/SitePages/SIF/SIFDetails.aspx?UID=13&Source=https://spaa.co.uk/SitePages/SIF/SIFCurrent.aspx) and a request for information has been issued to understand the impacts. To ensure that customers with an >73,200AQ are also included in the PSR which the GTs and DNOs hold a UK Link solution is required – however, at this stage the true impact is unknown because the rejection volume doesn’t account for Shippers who don’t send updates knowing they’ll be rejected,  In anticipation of the outcome and from an initial consideration, the following options have been proposed:   1. **Do nothing**   *Pros: No change required*  *Cons: PSR updates would continue to be rejected and vulnerability for these sites would not be recorded centrally.*   1. **Change the validation from AQ to Market Sector Code (D / I)**   **(*vulnerable information accepted based on the MSC not AQ)***  *Pros: Validation still in place and updates can only be provided for Domestic sites as per the licence condition*  *Cons: Dependent on the accuracy of the MSC, if recorded incorrectly, sites that are genuinely domestic maybe rejected*  *Change in validation required*   1. **Change the validation threshold from 73,200 kWh to 732,000 kWh**   *Pros: Although separate processes, this will bridge the gap between the Priority Service and Priority Consumer threshold*  *Cons: Change in validation required*   1. **Remove the validation**   ***(vulnerable information accepted regardless of the MSC or AQ)***  *Pros: All vulnerable information will be recorded centrally*  *Cons: Removal of validation completely which could result in vulnerable information being recorded against non-domestic sites*   1. **Offline solution**   *Pros: Vulnerable information submitted*  *Cons: Potentially only an interim solution and not as ‘clean’*   1. **Amend the CNF hierarchy to allow PSR information to be sent at confirmation of a LSP**   ***(this will also require a change to the CNC validation to either increase the threshold (option 3) or remove the validation (option 4).***  *Pros: Vulnerable information can be submitted on confirmation of a LSP and will be recorded centrally*  *Cons: Hierarchy change therefore would need to be a major release* | | |
| **Proposed Release** | **Feb or June 2019** | |
| **Proposed Consultation Period** | **10WD** | |
| **[Section A3: Benefits and Justification](C:\\Users\\Rebecca.perkins\\AppData\\Local\\Microsoft\\Windows\\Temporary Internet Files\\Content.Outlook\\EXD06YFG\\Change_Proposal_Template v2.0.docx" \o "Benefit Description: What, if any, are the intangible and tangible benefits of the change?Benefit Realisation:When are the benefits of the change likely to be realised? Benefit Dependencies:Detail any dependencies that are outside the scope.)** | | |
| **Benefit Description**  *What, if any, are the tangible benefits of introducing this change?*  *What, if any, are the intangible benefits of introducing this change?* | | This change will allow customer vulnerability submitted by the Suppliers via their Shipper to be recorded centrally and relayed to the relevant Distribution Network and ensuring customer safeguarding and SLC adherence |
| **Benefit Realisation**  *When are the benefits of the change likely to be realised?* | | As soon as the validation is changed. |
| **Benefit Dependencies**  *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.* | | SPAA Change 16/370A – Refining the Needs Codes Information is in scope of Release 2 due for implementation in June-18. This change in validation will support this CP. |
| **Section A4: Delivery Sub-Group (DSG) Recommendations** | | |
| DSG members recommend the approval of Option 6 -  Amend the CNF hierarchy to allow PSR information to be sent at confirmation of a LSP and a change to the CNC hierarchy to remove the validation (Option 4). | | |
| **DSG Recommendation** | Approve | |
| **DSG Recommended Release** | June 2019 | |
| **Section A5: DSC Consultation** | | |
| **Issued** | Yes | |
| **Date(s) Issued** | 17/09/18 | |
| **Comms Ref(s)** | 2076.1 – RJ - ES | |
| **Number of Responses** | 5 (3 approve, 2 reject) | |
| **Section A6: Funding** | | |
| **Funding Classes** | Shipper 100%  National Grid Transmission 0%  Distribution Network Operator and IGTs 0%  Distribution Network Operator 0%  iGT 0% | |
| **Service Line(s)** | Service Area 1: Manage Supply Point Registration | |
| **ROM or funding details** | N/A | |
| **Funding Comments** | Originally, this was under service area 16: Provision of supply point  information services and other services required to be provided under condition of the GT Licence. Upon reasonable challenge, we have now have now amended the listed service area 1. | |
| **Section A7: DSC Voting Outcome** | | |
| **Solution Voting** | ☐ Shipper Approve  ☐ National Grid Transmission NA  ☐ Distribution Network Operator Approve  ☐ iGT Approve | |
| **Meeting Date** | 13/06/2018 | |
| **Release Date** | June 2019 | |
| **Overall Outcome** | June 2019 scope has not been approved yet | |

**Please send the completed forms to:** [**mailto:box.xoserve.portfoliooffice@xoserve.com**](mailto:box.xoserve.portfoliooffice@xoserve.com)

**Document Version History**

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| **Version** | **Status** | **Date** | **Author(s)** | **Summary of Changes** |
| 2.0 | Draft | 10/08/18 | Xoserve | Minutes from DSG meeting on 6th August added to Section C. |
| 3.0 | Issued in an extraordinary Change Pack | 17/09/18 | Xoserve | Issued in an extraordinary change pack on solution optons following DSG meeting on 17/09/18. |
| 4.0 | Reps | 19/09/18 | Xoserve | Reps added |
| 5.0 | Rep Matrix created | 02/10/18 | Xoserve | Rep Matrix created and sent to the industry |
| 6.0 | Section A6 (Funding) Updated | 05/10/18 | Xoserve | Service Area Changed from 16 to 1. |

**Template Version History**

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| **Version** | **Status** | **Date** | **Author(s)** | **Summary of Changes** |
| 2.0 | Approved | 01/05/18 | Emma Smith | Layout and cosmetic changes made following internal review |

**Section C: DSC Change Proposal: DSG Discussion**

**(To be removed if no DSG Discussion is required; Xoserve to collate where DSG discussions occur)**

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| **Section C1: Delivery Sub-Group (DSG) Recommendations** | |
| **DSG Date** | 17/09/2018 |
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| DSG members recommend the approval of Option 6 -  Amend the CNF hierarchy to allow PSR information to be sent at confirmation of a LSP and a change to the CNC hierarchy to remove the validation (Option 4).  This recommendation was put forward at the DSG meeting on 17th September. | |
| **Capture Document / Requirements** | N/A |
| **DSG Recommendation** | Recommended solution option |

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| **DSG Recommended Release** | June 2019 |

**Section D: DSC Change Proposal High Level Solution Options**

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| **Section D1: Solution Options** | |
| **High Level summary options** | |
| The High Level Solution Option Impact Assessments (HLSOIA) have been provided for Options 3, 4 and 6 and are detailed within the attached presentation for the industry to review. | |
| **Implementation date for this solution option** | June 2019 Release |
| **Xoserve preferred option; including rationale** | Xoserve are comfortable with the DSG preferred solution option (6) as this is a long-term solution which also encompasses the changes to the CNC validation. |
| **DSG preferred solution option; including rationale** | DSG preferred solution Option 6 - Amend the CNF hierarchy to allow PSR information to be sent at confirmation of a LSP and a change to the CNC hierarchy to remove the validation (Option 4).  The rationale was the preference for all elements of the change to be implemented at once therefore the CNF hierarchy change plus the amendement to the CNC validation. This was deemed the most logical and effective way of implementing the change rather than splitting it between a minor change to the validation followed by a major change to the CNF. |
| **Consultation close out date** | 1st October 2018 |

**Section E: DSC Change Proposal: Industry Response Solution Options Review**

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| **User Name** | Cher Harris | |
| **User Contact Details** | [**Cher.Harris@SSE.com**](mailto:Cher.Harris@SSE.com) | |
| **Section E1: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| OPTION 2.  This option best fits the Licence obligation to provide PSR information for domestic properties only. The cons state that PSR updates may be rejected if the Market Sector Code (MSC) is incorrectly set to ‘I’, however, we see that as a positive in so far as it would act as a prompt to the Shipper/Supplier to correct the MSC, which is an important data item that drives several other processes, including RPC billing. We feel that industry should be grabbing every opportunity to improve data quality, rather than switching off validation as a way of skirting around data inaccuracies.  Furthermore, we already see widespread misuse of the PSR process, whereby Shippers send high volumes of name changes where there is no PSR condition (i.e. the update is triggered on every change of occupier), or they send codition code ’99 – Check PSR info’ with no explanation, rendering the update meaningless. By removing MSC/AQ validation and opening up the file to non-domestic sites, this problem will be exacerbated and make it difficult for the Transporter to handle the volumes of files and to identify the genuine PSR updates. | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Reject |
| **DSG preferred solution option** | | Reject |
| **Publication of consultation response** | | Publish |
| **Section E1: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments. To provide some context, all 6 options were discussed within the DSG meetings whereby members believed that only options 3, 4 and 6 should be impact assessed.  Option 2 was discussed, however DSG members did not believe that utilising the MSC validation was suitable at this stage as there were concerns that this could still cause the rejection of genuinely vulnerable sites.  DSG recommended the approval of Option 6 as this sees the full solution implemented in a single release and reduces the risk of valid domestic sites receiving rejections.  Your comments and option preference will be published and considered by the ChMC ahead of the meeting in October. The ultimate decision will be down to the Change Managers on 10th October 2018. |

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| **User Name** | Eleanor Laurence | |
| **User Contact Details** | [Eleanor.laurence@edfenergy.com](mailto:Eleanor.laurence@edfenergy.com) / 07875 117771 | |
| **Section E2: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| Preferred Option 6 (incorporating option 4)  We see little point in having to implementations close to 3 months apart for the same topic.  We are happy to save cost for al parties and see full solution implemented in a single release.  We believe removing all validation is the best solution which reduces complexity of the process, reduces costs and reduces the likelihood of incorrect rejections. Having validation in this process seems unnecessary and may result in valid domestic sites receiving rejections ‘incorrectly’ | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Approve |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E2: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments.  Your comments and option preference will be published and considered by the ChMC ahead of the meeting in October. The ultimate decision will be down to the Change Managers on 10th October 2018. |

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| **User Name** | Npower | |
| **User Contact Details** | Gas.codes@npower.com | |
| **Section E3: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| We support Option 6 | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Approve |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E3: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments.  Your comments and option preference will be published and considered by the ChMC ahead of the meeting in October. The ultimate decision will be down to the Change Managers on 10th October 2018. |

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| **User Name** | Wales & West Utiltities | |
| **User Contact Details** | Richard Pomroy – Commercial Manager | |
| **Section E4: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| We oppose the proposed solution of Option 6 and Option 4.  We do not support Option 6 - to amend the confirmation file hierarchy to allow Priority Service Register  information to be sent at confirmation of a large supply point as recommended with either  Option 3 - change the validation threshold from 73,200 kWh to 732,000 kWhor Option 4 - remove the  validation (vulnerable information accepted regardless of the Market Sector Code or AQ)  Either of these options would mean PSR data for large non-domestic sites being sent and the PSR and its  needs categories are not intended for non-domestic sites.  It is worth noting that with Xoserve’s current validation of sending information if the AQ is less than or equal  to 73,200kWh then we may already be getting information on non-domestic sites (there being more non-domestic sites with AQ < 73200kWh than non-domestic sites with AQ > 73,200kWh) – an issue we can  address with our preferred solution below.  WWU uses Market Sector Code not AQ information. On this basis our preferred solution would be  Option 6 - to amend the confirmation file hierarchy to allow Priority Service Register information to be sent  at confirmation of a large supply point with  Option 2 - change the validation from AQ to Market Sector Code (Domestic / Industrial Commercial)  (vulnerable information accepted based on the Market Sector Code not AQ) in June 2019  If this cannot be done, we propose Option 6 - to amend the confirmation file hierarchy to allow Priority Service Register information to be sent at confirmation of a large supply point with  Option 4 - remove the validation (vulnerable information accepted regardless of the MSC or AQ)  in June 2019 and Option 2 - change the validation from AQ to Market Sector Code (Domestic / Industrial Commercial) (vulnerable information accepted based on the MSC not AQ) to follow later but all in one change | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Reject |
| **DSG preferred solution option** | | Reject |
| **Publication of consultation response** | | Publish |
| **Section E4: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments. To provide some context, all 6 options were discussed within the DSG meetings whereby members believed that only options 3, 4 and 6 should be impact assessed.  Option 2 was discussed, however DSG members did not believe that utilising the MSC validation was suitable at this stage as there were concerns that this could still cause the rejection of genuinely vulnerable sites. This is not to say that the MSC may not be considered as the validation mechanism at a future date.  DSG recommended the approval of Option 6 as this sees the full solution implemented in a single release and reduces the risk of valid domestic sites receiving rejections.  Your comments and option preference will be published and considered by the ChMC ahead of the meeting in October. The ultimate decision will be down to the Change Managers on 10th October 2018. |

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| **User Name** | SSE Energy Supply | |
| **User Contact Details** | Mark Jones | |
| **Section E5: Organisation’s preferred solution option, including rationale taking into account costs, risks, resource etc.** | | |
| SSE agrees with the solution recommended by the DSG (Option 6). | | |
| **Implementation date for this option** | | Approve |
| **Xoserve preferred solution option** | | Approve |
| **DSG preferred solution option** | | Approve |
| **Publication of consultation response** | | Publish |
| **Section E5: Xoserve’ s Response to Organisations Comments** | | Thank you for your comments.  Your comments and option preference will be published and considered by the ChMC ahead of the meeting in October. The ultimate decision will be down to the Change Managers on 10th October 2018. |



**Appendix 1**

**Change Prioritisation Variables**

Xoserve uses the following variables set for each and every change within the Xoserve Change Register, to derive the indicative benefit prioritisation score, which will be used in conjunction with the perceived delivery effort to aid conversations at the DSC ChMC and DSC Delivery Sub Groups to prioritise changes into all future minor and major releases.

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| **Change Driver Type** | CMA Order  MOD / Ofgem  EU Legislation  License Condition  BEIS  ChMC endorsed Change Proposal  SPAA Change Proposal  Additional or 3rd Party Service Request  Other*(please provide details below)* |
| **Please select the customer group(s) who would be impacted if the change is not delivered** | Shipper Impact iGT Impact Network Impact Xoserve Impact National Grid Transmission Impact |
| **Associated Change reference Number(s)** |  |
| **Associated MOD Number(s)** |  |
| **Perceived delivery effort** | 0 – 30  30 – 60  60 – 100  100+ days |
| **Does the project involve the processing of personal data?**  *‘Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’ – includes MPRNS.* | Yes *(If yes please answer the next question)*  No |
| **A Data Protection Impact Assessment (DPIA) will be required if the delivery of the change involves the processing of personal data in any of the following scenarios:** | New technology  Vulnerable customer data  Theft of Gas  Mass data  Xoserve employee data  Fundamental changes to Xoserve business  Other*(please provide details below)*  *(If any of the above boxes have been selected then please contact The Data Protection Officer (Sally Hall) to complete the DPIA.* |
| **Change Beneficiary**  *How many market participant or segments stand to benefit from the introduction of the change?* | Multiple Market Participants  Multiple Market Group  All industry UK Gas Market participants  Xoserve Only  One Market Group  One Market Participant |
| **Primary Impacted DSC Service Area** | Service Area 1: Manage Supply Point Registrations |
| **Number of Service Areas Impacted** | All  Five to Twenty  Two to Five  One |
| **Change Improvement Scale?**  *How much work would be reduced for the customer if the change is implemented?* | High  Medium  Low |
| **Are any of the following at risk if the change is not delivered?** | |
| Safety of Supply at risk Customer(s) incurring financial loss  Customer Switching at risk | |
| **Are any of the following required if the change is delivered?** | |
| Customer System Changes Required  Customer Testing Likely Required  Customer Training Required | |
| **Known Impact to Systems / Processes** | |
| **Primary Application impacted** | BW  ISU  CMS  AMT  EFT  IX  Gemini  Birst  Other *(please provide details below)* |
| **Business Process Impact** | AQ SPA RGMA  Reads Portal Invoicing  ☐ Other *(please provide details below)* |
| **Are there any known impacts to external services and/or systems as a result of delivery of this change?** | Yes *(please provide details below)*  No |
| **Please select customer group(s) who would be impacted if the change is not delivered.** | Shipper impact  Network impact  iGT impact  Xoserve impact  National Grid Transmission Impact |
| **Workaround currently in operation?** | |
| **Is there a Workaround in operation?** | Yes  No |
| **If yes who is accountable for the workaround?** | Xoserve  External Customer  Both Xoserve and External Customer |
| **What is the Frequency of the workaround?** |  |
| **What is the lifespan for the workaround?** |  |
| **What is the number of resource effort hours required to service workaround?** |  |
| **What is the Complexity of the workaround?** | Low *(easy, repetitive, quick task, very little risk of human error)*  Medium *(moderate difficult, requires some form of offline calculation, possible risk of human error in determining outcome)*  High *(complicate task, time consuming, requires specialist resources, high risk of human error in determining outcome)* |
| **Change Prioritisation Score** | 35% |