
SPAA Request for Information

Priority Services Register updates for large domestic premises

SPAA

EXECUTIVE SUMMARY:

The Priority Services Register (PSR) updates due to go live from June 2018 has not sufficiently captured all issues with regards to the PSR. The issue which has been identified is that where a Customer is classed as Domestic in SPAA (classification of use at the property) but has a high amount of usage or Annual Quantity (AQ) >73,200kWh they are not classed as Domestic via the Shipper process but are deemed to be an I&C Supply.

The risk is that Suppliers will have a vulnerability recorded on their system but due to process design it will not be accepted between the Shipper and the CDSP.

The SPAA Expert Group (SEG) is seeking to understand the impact on SPAA and Parties, and if further work is required.

These issues and the proposed solutions are therefore detailed in the attached Request for Information (RFI).

Parties are invited to submit responses using the attached proforma to SPAA@electralink.co.uk no later than **Friday 25 May 2018**.

SUMMARY OF ISSUE:

As part of the ongoing work for the Priority Services Register (PSR) and with specific reference to CP 16/370A: Refining the Priority Service Codes, issues have arisen which while do not have a direct impact on the implementation of the CP but could potentially cause issues that may arise afterwards and affect Suppliers and Customers.

During Shipper developments via the UK Link change process it has been identified that where a Customer is classed as Domestic in the Supply Point Administration Agreement (SPAA) and have a high amount of usage e.g. Annual Quantity (AQ) >73,200kWh. The Customer is not classed as Domestic via the Shipper process but are deemed to be an I&C Supply.

The issue which has been identified is based on the Central Data Service Provider (CDSP) solution a rejection would occur on any I&C kWh (>73,200). The risk here is that Suppliers will have a vulnerability recorded on their system but due to process design it will not be accepted between the Shipper and the CDSP.

The SPAA Schedule is currently voluntary for I&C Suppliers, where the AQ is <73,200kWh the updates will be accepted because they will be deemed as Domestic usage; any Aqs higher than this will be rejected (the same as Domestic high users).

At this stage in UK Link/CDSP development they are unable to incorporate any additional design to increase the scope to enable acceptance of Domestic vulnerability for supplies with Aqs >73,200kWh.

The customer impact on this is they have provided vulnerability sharing consent and are under the impression the data is being shared wider, however, due to system design and flow validation constraints the information will go no further than the Supplier for gas. This could therefore cause issues in an emergency because the GT will be unaware of vulnerability at the property.

Suppliers are requested to provide to SPAA, via their Contract Manager impacts to their portfolio in a way that can also be reported to other parties and if need be the Authority.

Q 1-2

- 1** Do you agree with the proposed approach If not, please provide rationale?
- 2** Based on the detail provided, and provided this information is appropriately anonymised and encrypted, are you happy to share the percentage of your portfolio affected by this issue and are you happy for the actual number of sites within your portfolio that are affected to be included in an aggregated figure for use in discussions regarding how many customers are potentially affected?

Questions 1 and 2 seeks Supplier views on the current issue on PSR and request specific portfolio breakdown.

Q 3-5

- 3** Do you believe that there is any merit in expanding the current process to accept the >73,200 updates?
- 4** Do you believe that the creation of a manual process would be more in line with what is being proposed?
- 5** How are Domestic Customers which have been added to the Priority Services Register with an AQ of above 73,200kWh being managed currently by your business?

Questions 3 - 5 seek industry views on editing the current process or instigating a manual process.

Q 6-7

- 6** Do you believe that the Schedule and the legal text requires updating, to reflect this issue?
- 7** If parties do believe that a solution is required, it would be beneficial to understand where you believe the best place for development would be:
- a. SPAA Expert Group (SEG)
 - b. SPAA sub working group,
 - c. Change Management Committee (ChMC)
 - d. Safeguarding Customers Workgroup
 - e. Other

Questions 6 and 7 seek industry views on if the incoming Schedules needs updating and if this could be developed as part of the SPAA Expert Group or would require a new Working Group.

Q 8

- 8** Do you believe that the changes being discussed will require Authority Consent?

As the previous CP was subject to Authority Consent, it may be considered that any subsequent change being discussed could require authority consent

Questions 8 asks if the output of this potential change requires Authority Consent.

RFI Questions

Number	Questions
1	Do you agree with the proposed approach If not, please provide rationale.
2	Based on the detail provided, and provided this information is appropriately anonymised and encrypted, are you happy to share the percentage of your portfolio affected by this issue and are you happy for the actual number of sites within your portfolio that are affected to be included in an aggregated figure for use in discussions regarding how many customers are potentially affected?
3	Do you believe that there is any merit in expanding the current process to accept the >73,200kWh updates?
4	Do you believe that the creation of a manual process would be more in line with what is being proposed
5	How are Domestic Customers which have been added to the Priority Services Register with an AQ of above 73,200kWh being managed currently by your business?
6	Do you believe that the Schedule and the legal text requires updating, to reflect this issue?
7	<p>If parties do believe that a solution is required, it would be beneficial to understand where you believe the best place for development would be:</p> <ul style="list-style-type: none"> a. SPAA Expert Group (SEG) b. SPAA sub working group, c. Change Management Committee (ChMC) d. Safeguarding Customers Workgroup, other.
8	Do you believe that the changes being discussed will require Authority Consent?
9	Do you have any additional comments to make?

Respondent Requirements

Suppliers are invited to review and provide any comments on the proposed changes in the attached proforma.

Comments should be provided to SPAA@electralink.co.uk by close of business Friday 15th June 2018.

Information received through this RFI will be reviewed by the SEG at its next meeting and an SCP will be drafted post meeting if need be.

Should you have any queries or questions, please contact the SPAA Governance Services Team on 0207 432 3008, or via email at SPAA@electralink.co.uk.

ATTACHMENTS

Attachment 1_SPAA_Response Form - RFI_PSR_Large Domestic