

Initial Response to Change Analysis Request

for

UNC Modification 0472 Restricting the Number of Registration Attempts by a Supplier

*This document is Xoserve's initial response to the above Analysis Request.
The response is intended to support the Proposers involvement in the development of industry changes.
**Should the request obtain approval for continuance then it should be returned to Xoserve at
Hilary.Chapman@xoserve.com or David.Addison@xoserve.com***

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PART A

Xoserve's Understanding of the Proposal

Note: this document represents initial assessment and does not constitute full analysis of the subject matter. Further analysis would be required prior to a recommendation to the industry on any solutions.

Change Drivers (the problem):

UNC Modification 0472 was raised on 11th November 2013 in response to a perceived trend of industry behaviour whereby a given Supplier may make repeated registration attempts within a short timeframe, causing the incumbent Supplier to raise repeated objections. This can be a cyclical process whereby a registration attempt is made, causing an objection to be raised, with a subsequent registration attempt being made once the initial objection has lapsed.

The Proposer of Modification 0472 considers that in the absence of reporting around this behaviour, industry parties are unable to determine whether the fault lies with the proposing or incumbent Supplier, and furthermore there is little recourse in the circumstances of spurious registration attempts or objections. The Proposer of Modification 0472 feels that the provision of a reporting mechanism would enable the incumbent Shipper to demonstrate that they have been subject to an inappropriate number of registration attempts from the same party within a set period.

Change Overview:

UNC Modification 0472 endeavours to create a framework around registration attempts, by defining a cut-off point at which the cycle may be halted in favour of engagement between the two conflicting parties. It should be noted that while registrations are a Supplier-driven activity, Modification 0472 seeks to obligate the associated relevant Shippers to act.

No significant changes to central systems are sought, however Xoserve's involvement is required in an information provision role.

Draft Business Rules as taken from the amended Modification are as follows -

- 1) *Incumbent Shipper receives a 5th registration attempt and objects using a valid Objection code.*
- 2) *The Incumbent Shipper contacts Xoserve who identify the Shipper attempting to register the site multiple times. Xoserve will release this information if it is the same Shipper responsible for multiple registration attempts.*
- 3) *The Incumbent Shipper can contact the proposing Shipper directly to resolve the issue*
- 4) *Incumbent Shipper may escalate the issue to the Authority if resolution cannot be agreed.*

The scope of the above 'information disclosure' service is understood as follows:

- Should the incumbent Shipper suspect that concurrently occurring registration attempts are being raised by the same proposing Shipper (as denoted by the Shipper Short Code), a request for information can be made to Xoserve.
- MPRN to be provided within information request.
- Requests will be managed via the Customer Data Centre and will constitute a call under the given Shipper's allowance. Limitation of one MPRN per call.
- Xoserve to utilise existing UK Link screens, identifying current live Shipper and identity of proposing Shipper, and will verbally confirm whether there have been multiple (≥5) registration attempts by the same party.
- Request can cover period of ownership, or alternatively a defined period within the period of ownership.
- If an MPRN has not been subject to five or more registration attempts by the same proposing Shipper within the specified period, then the response shall be 'invalid request'.
- Warranty to be provided by the incumbent Shipper that this request is raised in good faith.
- It is assumed that Modification 0472 will provide the relevant data permissions for the identity of the incoming Shipper to be released. The Modification would not need to create an obligation to provide this.
- Calls to the Customer Data centre would be a non-Code User Pays service.
- The above service does not include the provision of any reporting.

While a systematized solution is not currently sought, Xoserve have conducted a high level assessment of the potential system impacts should there be a requirement to include the identity of the proposing Shipper on specified file flows –

Currently, the S10 (Supply Point Withdrawal Notice Details) file does not disclose the identity of the proposing Shipper, and therefore the incumbent Shipper would be unable to recognise repeated registration attempts by the same organisation. For clarity, it is noted that the proposing Shipper is made aware of the identity of the incumbent Shipper through the S65 (Objection_Notification) file, and this information is currently utilised at a Supplier level in order to resolve objection disputes.

- Amendment to S10 file to facilitate inclusion of the identity of the proposing Shipper once a trigger (fifth registration attempt) has been reached.
- Two additional fields within the file format – Identity of proposing Shipper (SSC) and number of registration attempts (≥ 5). The latter would be optional, but could be of value should the registration attempts greatly exceed five, as it may inform a decision by the incumbent Shipper as to whether to pursue the behaviour.
- Date range could be parameterised.
- Will have consequential impacts on other industry parties' systems.
- Will require discussion and approval through UK Link Committee, with relevant notice period to be provided. Please note that this is not included in the timescale estimate provided below.
- This change is not within the scope of UK Link Programme and therefore would be developed after the UKLP release.
- This change would be a Code User Pays Service.

High Level Cost Estimate and Timescales

	Up to £20k	£20k to £100k	£100k to £300k	£300k to £500k	£500k to £1m	£1m +
Up to 3 months	Option 1					
3 to 6 months						
6 to 12 months						
> 12 months			Option 2***			

Note: High Level Cost estimate information is not based on any systems analysis and should be used with caution. Durations are subject to Xoserve resources and priorities at the time that documents are received

*** - Development Lead Time is not expected to be significant, (in the order of 3 to 6 months) however, any system based solution is not expected to receive prioritisation due to scale of impacts to Shipper and Transporter systems given the scale of prevailing industry change. This change is not within the scope of UK Link Programme. Implementation would not be expected before 2016/2017.

Benefit Case Impacts to other industry parties:

The Shipper and Supplier community will be the beneficiaries of this change. Wider industry parties are unlikely to be affected.

Assumptions:

- The identity of the associated Supplier will not be carried or disclosed, as it is felt by the Workgroup that this may divulge commercial relationships.
- Solution options seek to provide information only, and will not trigger any further system activity.
- Relevant data permissions will be made in order for identity of proposing Shipper to be communicated.
- There is currently no view of volumetrics, however the above solutions are based on an agreed load which is assumed to be low. Any increase in volumes may affect the solutions and associated estimated costs.

Xoserve view of Priority Low

Xoserve's recommended next steps:

The Proposer should define the estimated volumetrics as this may further inform the suggested solution.

The benefits case at present is un-defined, and this must be more clearly defined through the development of Modification 0472.

Additional Information:

Option 1 would require inclusion as a Non-Code User Pays Service.
Option 2 would be a Code User Pays Service.

Proposer's Response**Benefit Case****Additional Information** (that may be useful for Xoserve analysis)

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Proposer's requested next step

Close / Hold pending reassessment / Proceed to Initial Analysis

Proposer Contact Details:**Name****e-mail address****Contact Tel No.**

Edd Hunter, Npower