

## FGO – UK Link modifications

### 1 Introduction

- 1.1 This paper outlines a suggested approach to UK Link modifications (and modifications of the UK Link Manual) under FGO, ie within the DSC. This paper addresses in particular UK Link modifications which do not flow out of Service Changes (see separate paper entitled DSC Service Changes – Process).
- 1.2 These arrangements will form part of the overall DSC Document on Change Control (together with the Service Change processes).
- 1.3 Currently TPD Section U8 has quite complex arrangements, which reflect the fact that UK Link is owned and controlled by the Transporters (through Xoserve). They are based on an assumed non-alignment between the interests as between Transporters (as owners and users) and Users (as partial users).
- 1.4 It is suggested that a more streamlined approach can be taken for DSC purposes. The arrangements need to be workable, to allow the CDSP to get on with its job, while providing customers with suitable assurances where needed.
- 1.5 The proposals in this paper envisage a role for a committee. Instead of having a separate UK Link Committee, it is suggested that the role should be fulfilled by the change management Committee (see paper on DSC Service changes). However there may be a question whether it should be the change management or the contract management committee which has this role.
- 1.6 Under 0565, UK Link will be defined as the totality of the IT systems used by the CDSP to provide services. The UK Link Manual will describe different components of UK Link to the extent the differentiation is relevant to customers.
- 1.7 A modification of UK Link would include any change in the hardware or software within UK Link, , including hardware or software which a UK Link User is required to have, and include a change (instigated by the CDSP) to services procured from a third party such as a network provider.
- 1.8 The UK Link Manual will contain some provisions which are 'legally significant' – for example in defining when Code Communications are treated as given, or contingency provisions for Code Communications. Provisionally these provisions in the UK Link Manual are referred to here as 'Level 1' provisions. We have not yet considered whether to define them generically, or by listing, or inherently in the structuring of the UK Link Manual.
- 1.9 The possible reasons why the CDSP should not be free to make modifications of UK Link are as follows::
  - (a) the change affects UK Link functionality so as to conflict with the provision of services as defined (***adverse impact on service definition***);
  - (b) the change adversely affects the level of performance of a service (including volume limits) (***adverse impact on service level***);

- (c) the change would result in other customers having increased access to confidential data (**adverse impact on confidentiality**); or
- (d) the change would alter the interface which a customer has with UK Link, in a way which would be adverse to the customer (**adverse impact on UK Link interface**) – eg requiring it to incur cost in new hardware or software, or change its processes, or change data formats.

For each of these there will be materiality thresholds which will need to be defined.

## 2 Initial proposals

- 2.1 Only the CDSP can actually modify UK Link or the UK Link Manual.
- 2.2 Only the CDSP can propose a modification to UK Link or the UK Link Manual other than a modification which flows out of a Service Change proposal (see latest paper on this) or a Code Modification.
- 2.3 The CDSP can modify UK Link on the following basis:
  - (a) if the modification is required as part of a Service Change which has been authorised under the service change rules;
  - (b) if the modification is required as a result of any other change to the DSC (including any other DSC Service Document) which has been approved under the change rules;
  - (c) If the modification:
    - (i) will not have an adverse impact on service definition or adverse confidentiality impact;
    - (ii) has or may have an adverse impact on performance level or UK Link interface, but
    - (iii) has been approved by the Committee;
  - (d) if the modification:
    - (i) will not have an adverse impact on service definition, performance level, or confidentiality;
    - (ii) has a proportionate impact (to be defined) on UK Link interface; and
    - (iii) has been notified in advance to Customers and the Committee;
  - (e) if the modification will not have an adverse impact on service definition, performance level, confidentiality or UK Link interface; or
  - (f) if the CDSP is required by law to make the modification.
- 2.4 The CDSP could be required to consult with the Committee if the CDSP has a reasonable doubt about whether the relevant conditions in 2.3 are satisfied (but otherwise would proceed as above).

2.5 Procedures for such modifications could include:

- (a) for 2.3(c), notice to all Customers and application to the Committee for approval;
- (b) for 2.3(d), notice to all Customers and the Committee, and consultation with the Committee;
- (c) for 2.3(f), notice to all Customers and the Committee, in advance where possible, and consultation with the Committee;
- (d) for all cases other than 2(e) (but without duplicating service change procedures), a programme for making the change, where appropriate prepared in consultation with the Committee, and notified to all Customers in advance;
- (e) changes except under 2.3(a) and 2.3(b) to be effective in a periodic (eg three-monthly) release / update, unless approved by the Committee or otherwise necessary.

2.6 The CDSP can modify the UK Link Manual:

- (a) if the modification is required by a Code Modification;
- (b) if the modification is required to correct an error in the Manual; or
- (c) if the modification is required to reflect:
  - (i) an approved Service Change;
  - (ii) a modification of UK Link which is permitted under the rules above
- (d) [are there other cases where the UK Link Manual may need modifying?]

provided that, in cases (b) and (c), the modification:

- (e) does not adversely affect a Level 1 provision in the UK Link Manual, or if it does, the Committee has approved the modification;
- (f) does not result in the UK Link Manual being in conflict with a provision of the UNC (or IGT Code).

2.7 As with UK Link, modifications of the UK Link Manual should be effective from a periodic version / release date unless otherwise necessary.

2.8 It will also be necessary to make provision for emergency changes, temporary changes to allow maintenance and repair, etc, which (depending on the circumstances) may not allow for prior consultation. These will fall outside the classification in 2.3.