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Paper Reference:	TABASC_87_0203_09
Action:	For Discussion

MP214 Proposed Solution

1. Purpose

[MP214 'Clarification of Acceptable DCC User IDs for Import and Export Suppliers'](#) is currently undergoing the Refinement Process. The purpose of this paper is to seek the Technical Architecture and Business Architecture Sub-Committee's (TABASC) input on the proposed solution to this modification.

This paper provides the proposed solution and business requirements. More detail about the business requirements can be found in Appendix A.

2. Summary of MP214

This section summarises the key points of this Modification Proposal. More information is available in the Modification Report in Appendix B.

2.1 What is the issue?

SEC Section H 'DCC Services' states that when a Party wishes to register as a DCC User in the User Roles 'Import Supplier', 'Export Supplier' and 'Gas Supplier', it can use the same ID number for each Role. However, the wording excludes a Party from using the same ID number for the User Roles 'Import Supplier' and 'Export Supplier' unless it also intends to act in the User Role 'Gas Supplier'.

The Proposer believes that by not allowing the use of the same User ID for the Import Supplier and Export Supplier User Roles this means that Parties must request multiple ID numbers from the SEC Panel, which has minor but unnecessary operational impacts on those Parties. The Proposer also notes that the DCC frequently receive requests to use the same user ID for multiple roles. The DCC must then engage in further checks and monitoring to ensure these are assigned correctly. Managing multiple ID numbers for the same Party has a minor impact on DCC time and effort.

2.2 What is the solution?

The solution to this modification would allow the same identification number to be used when a Party is acting in any combination of some or all of the User Roles 'Import Supplier', 'Export Supplier' and/or 'Gas Supplier'.

SECAS undertook an investigation of the current situation and identified that the DCC is already able to issue the same Supplier ID to a Party that is an Import Supplier and an Export Supplier, but not a Gas Supplier. Furthermore, no issues were uncovered that show this scenario should not be allowed. The only issue is that the SEC does not allow the DCC to act in such a manner. As a result, it is proposed that there will be draft legal changes to the SEC to allow for this scenario. The legal text changes are below:

SEC Section H1.5 'User IDs'

H1.5 A Party wishing to act as a User in one or more User Roles shall propose to the DCC one or more identification numbers, issued to it by the Panel, to be used by that Party when acting in each such User Role. Each such identification number must be EUI- 64 Compliant, and the same identification number cannot be used for more than one User Role, save that a Party may use the same identification number when acting in any combination of some or all of the following combined User Roles of either,; 'Import Supplier' and 'Gas Supplier' or 'Import Supplier', 'Export Supplier' and/or 'Gas Supplier'.

The full legal text can be viewed in Appendix C.

2.3 Which User ID configurations are SEC Parties currently using?

The DCC has investigated the use of active Combined Supplier and other Supplier roles in the DCC System.

- There are 15 active SEC Parties using just the Import Supplier (IS) User Role.
- There are 16 active SEC Parties using just the Gas Supplier (GS) User Role.
 - In several cases these are the same organisation, but they have separated their electricity and gas businesses and therefore have different SEC Party IDs for different parts of the organisation.
- There are 40 active SEC Parties using the Combined Supplier User Role with a single SEC Party ID.
- There are four active SEC Parties using the Combined Supplier User Role but only for the purposes of IS and GS.

3. Business requirements

Below are the business requirements, developed with the Proposer and the DCC. The full business requirements can be found in Appendix A.

Business Requirements	
Ref.	Requirement
1	SEC Parties acting in the DCC User Roles 'Import Supplier' and 'Export Supplier' will be able to use the same DCC User ID for each User Role.

4. Discussions from the Change Sub-Committee

This modification was presented to the Change Sub-Committee in September 2022 where a member noted the original provisions were written during the development of User Entry Process Testing (UEPT) and a series of assumptions were made on Party activities and their specific roles. These assumptions were never ratified, and it has become clear that there is a more diverse set up to Party roles which needs to be reflected in the SEC.

5. Questions for the TABASC

We seek the TABASC's view on the following questions to feed into the Modification Report and business requirements:

- Does the Proposed Solution fulfil the business requirements?
- Are there any additional considerations which should be drawn out during the Refinement Consultation?

6. Next steps

Once this modification has been discussed with the TABASC and the Working Group, it will be issued for a Refinement Consultation.

Timetable	
Event/Action	Date
Discussed with Working Group	1 Mar 2023
Discussed with TABASC	2 Mar 2023
<i>Refinement Consultation</i>	<i>6 Mar 2023 – 27 Mar 2023</i>
<i>Consultation responses discussed with Working Group</i>	<i>5 Apr 2023</i>
<i>Modification Report approved by CSC</i>	<i>18 Apr 2023</i>
<i>Modification Report Consultation</i>	<i>24 Apr 2023 – 15 May 2023</i>
<i>Change Board vote</i>	<i>24 May 2023</i>

Italics denote planned events that could be subject to change

7. Recommendations

The TABASC is asked to:

- **CONFIRM** that the proposed solution fulfils the business requirements and addresses the identified issue; and
- **CONFIRM** if any additional considerations should be drawn out during the Refinement Consultation.

Ben Giblin

SECAS Team

23 February 2023

Attachments:

- **Appendix A:** MP214 business requirements
- **Appendix B:** MP214 Modification Report
- **Appendix C:** MP214 Legal Text