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Paper Reference:	**SECP_90_1203_21**
Action:	**For Decision**

Review of the MP077 implementation date

1. Purpose

The Change Board is requesting that the implementation date for MP077 'DCC Service Flagging' be reviewed by the Panel and amended, if necessary. The Panel is asked to agree whether to request that the Authority directs a revised implementation date for MP077.

2. The current status of MP077

At the Change Board meeting on 24 February 2021, the Change Board voted to approve MP077 under Self Governance. As it stands, the implementation date, set by the Panel in the MP077 Modification Report, is 4 November 2021 (November 2021 SEC Release). This was so that the other impacted industry Codes (the Master Registration Agreement (MRA)/Retail Energy Code (REC) and Xoserve) could coordinate sequential changes before the go live of Ofgem's Faster Switching Programme. The Smart Energy Code Administrator and Secretariat (SECAS) held several meetings with these Codes and Ofgem representatives from the Faster Switching Programme and all agreed this date was acceptable, with Ofgem reiterating that there should be no impact to the Faster Switching Programme.

However, while MP077 was approved by the Change Board, members requested that SECAS undertake a review of the implementation date and the benefits and impacts of moving this into 2022. Members noted concerns from Network Parties that key testing milestones for the Faster Switching Programme may be jeopardised if the implementation date remained as is. Members who voted to approve MP077 did so with the caveat SECAS would ask the Panel whether to request the Authority agrees a change to the implementation date.

3. Summary of comments received

We issued a request to Parties on Wednesday 3 March, asking for those affected by MP077 for more information and rationale around why the current date is or is not suitable.

As part of this, we asked Parties whether they agreed with the current implementation date, or if they would prefer to have it moved to either the June 2022 SEC Release or the November 2022 SEC Release.

We have asked for any responses to our request for information to be sent by Tuesday 9 March. The full responses will be provided as a late attachment once the responses deadline closes. We have summarised below the views we have received from Parties via the Modification Report Consultation and from other impacted participants we have liaised with. We will provide any further updates we receive at the meeting.

Views on the implementation date

SEC Network Parties were the only Parties who believed that the agreed implementation date was not suitable and would have impacts on their testing for the Faster Switching Programme changes. All other Parties were confident they could implement MP077 in November 2021 but were sympathetic to the Network Parties concerns.

The Proposer has expressed concerns that MP077 should be implemented before the Faster Switching Programme goes live but also commented that any delays to the Faster Switching programme itself were costing significant amounts and the implementation of MP077 should not impact the implementation of the Programme. The Proposer added that the longer it takes to implement MP077, the greater the number of switches that will be impacted. This impact is likely to be exacerbated if the Faster Switching Programme goes live before MP077, where the opportunity to identify and resolve any issues prior to a switch will be greatly reduced, even in the transition period where five day switching will be the standard. The Proposer believes that MP077 should be implemented in November 2021; the only reason it shouldn't is if doing so would create additional risk for the delivery of the Faster Switching Programme.

This view has been supported by other Supplier Parties. One Supplier has stated that being able to establish the correct metering on site is critical, and it is currently not able to do so because the DCC is not providing the 'correct' flag status. It considers this change is needed sooner rather than later. This Supplier Party believed that the November 2021 date should be kept to implement the solution as soon as possible, believing the longer this is delayed, the more inaccurate the data will become and the greater the issue will be.

However, Network Parties have stated concerns with including MP077 in the November 2021 Release. Their concerns mainly revolved around the Faster Switching Programme, suggesting that making changes to the DCC flags now would present risks and affect testing. They cited that this would lead to another release of the Metering Point Registration System (MPRS), and requested that the implementation date be put back until after the Central Switching Service (CSS) go live date in Summer 2022. There were also concerns raised over a change freeze that had been put in place from 19 February 2021 to prevent all but urgent changes going through between then and the go live time of the Faster Switching Programme.

All Parties, other than the Network Parties, have indicated that they could also implement MP077 in either of the two proposed 2022 Releases. Network Parties have further expressed concerns about a June 2022 implementation, but support a November 2022 implementation.

St. Clements, who provides the MPRS, stated that from its perspective, it would be fine with either a June 2022 or November 2022 implementation. This would be due to the MP077 Proposed Solution being relatively easy to develop. However, it expressed concerns that the implementation of MP077 would impact the Network Parties if the date was changed to either June 2022 or November 2022. It believed this impact would be due to changing the production code whilst working through parallel test phases for the Faster Switching Programme. It stated that the development activity shouldn't cause issues, but the implementation times would provide difficulties. This is due to June 2022 being the

earliest Faster Switching Programme go live time and November 2022 is in the direct period after implementation, referred to as a "hypercare period".

Financial impacts

SECAS has received information from the DCC that the current Impact Assessment for MP077 was written based on MP077 being included in the November 2021 SEC Release. It has stated that it would need to undertake a new assessment accounting for the new release date. The DCC has added that a new Impact Assessment would be difficult given changes to the Data Service Provider (DSP) re-procurement and the Enduring Change of Supplier (ECoS) implementation which has changed from the last assessment. The cost of moving the implementation to another Release will add around £47k-£52k to the current costs.

Xoserve has contacted SECAS about the sequential change it is progressing to mirror MP077, XRN5142 'New Allowable Values for DCC Service Flag in DXI File From DCC'. This modification to the Uniform Network Code (UNC) has already been approved. With MP077 potentially being moved to a later implementation date, this will require XRN5142 to be moved to the same date so both changes are implemented simultaneously.

Another Xoserve change, XRN4941 'Auto updates to meter read frequency which uses the 'active' DCC Service Flag', was also targeted for a November 2021 Release date, which requires MP077 to be implemented first. This is because the updates to the DCC Service Flags under MP077 need to be made prior to the implementation of XRN4941. Therefore, any delay to MP077 will require delay to both of these UNC changes facilitated by Xoserve.

Xoserve has also stated there is a financial benefit to be made by implementing XRN4941, but that this will benefit Gas Suppliers (Shippers), rather than Network Parties.

4. Next steps

SEC Section D10.5 allows the Panel to request that the Authority directs a change to the implementation date for an approved Modification Proposal.

If, after considering Parties' views, the Panel agrees that the implementation date for MP077 should be changed, it will need to request that the Authority issues such a direction for MP077. The Authority will then either approve or reject this request.

We will provide our recommendation on which release MP077 should be included in at the Panel meeting, once we have reviewed all the responses received.

5. Recommendations

The Panel is requested to:

- **REVIEW** the concerns around the MP077 implementation date; and
- **AGREE** to request that the Authority directs a revised implementation date for MP077 of the corresponding 2022 SEC Release.

Harry Jones

SECAS Team

5 March 2021

Attachments

- **Appendix A:** MP077 Implementation Approach responses (late attachment)