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MP077 'DCC Service Flagging' Implementation approach responses

About this document

This document contains the full collated responses received to the MP077 implementation approach questions emailed to SEC Parties by SECAS, following the Modification Report Consultation.

Question 1: Is the current date of November 2021 to implement these changes feasible? If not, then what issues would be faced and could these be corrected with additional support?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
SSEN	Network Party	No	In the SEC Consultation responses to MP077, all DNO's rejected due to the implementation date of November 2021 impacting the Faster Switching Programme through MPRS system changes. In line with Ofgem's Significant Code Review (SCR), any changes post 28th February 2021 should only proceed where there is an exceptional or urgent need, and should be discussed with Ofgem. Likewise any changes pre 28th February 2021 where the implementation date is post 1st September 2021 (which SEC MP077 is) should be discussed with Ofgem. As stated in our consultation response we agree with the intent of the proposal, but not the implementation date. I hope this email now clarifies our position on SEC MP077 and the SCR requirement for code administrators to engage Ofgem. SSEN's position is that we of course want the change to be implemented as soon as possible, however, as stated the impacts to the Faster Switching Programme are such that if the testing window clashes with this modification and new MPRS release testing, then it has a high risk of impact. So if the Faster Switching Programme testing window falls inside the June 2022 release due to delays then we have the problem as we do now. If we can caveat for Faster Switching Programme delays that MP077 implementation date is moved to the right, then that is acceptable. Otherwise I'd be inclined for a Nov 2022 release.
Northern PowerGrid	Network Party	No	We're reviewing the associated MRA CP which has an implementation of June.

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			The difficulty for us is that the Faster Switching programme has number of test phases which requires careful planning in terms of release management and also resource for both IT technical teams and business testing resource. We need to meet all of the requirements of the programme and are therefore unable to facilitate this change. In addition, the programme have issued the attached communication setting out a change freeze for Faster Switching programme participants.
Xoserve	Industry Code	Yes	From our perspective we are in the design phase for XRN5142 – which is a change we are targeting to deliver in November 2021, in line with the proposed implementation date. Once we have concluded our design phase we will be seeking confirmation from our customers to approve going into Build, Test, Implement and Post Implementation Support phases – this is planned to take place in May, and will be via our Change Management Committee. It is at this stage where we would be asking customers to approve further draw down on their change budget – funding for our design phase has already been secured and will be recovered once this activity is concluded. I believe the design activities we are performing now will be future proof, in so far as it would reduce the size of delivering the change if the change implementation date were to be deferred. There may be some re-work or some slight changes needed if the revised implementation date were to coincide with, or be later than CSS Go-live – but that would be something we'd confirm with the relevant Release team once one was established.
DCC	DCC	Yes	If the date were to change, this would have to be changed to a later time as the solution requires 8 months of lead time as documented in the Impact Assessment.

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			The Impact Assessment had been performed based on a November 21 implementation. With the 8 month lead time there is no way they can do it sooner and if it slipped back they would need to do another impact assessment for the new release date. This would become difficult because of DSP re-procurement and ECoS implementation. [verbal communication] Even if a decision to go ahead with a November 2021 Release is reached at Panel on 12 March 2021, there is a risk that a Party may appeal Panel's decision. If this happens then the DCC would be unable to start work on the changes and not be able to complete the work in time for the November 2021 Release. For this reason, the DCC would suggest implementation in June 2022.
MRA/REC	Industry Code	Yes	June 2022 works well for us if the DCC and industry can accommodate ahead of CSS go-live. The REC change process goes live from September 2021 so that is the absolute latest we can raise the change proposal to amend the data specification. Potentially, we may not need a REC change proposal. The SEC is down as the metadata owner in the Data Specification for this item, so if the SEC are part of the new CCSG process for September we could potentially update the Data Specification as part of the SEC mod.
St. Clements	Service Provider	Yes	The concern with this change is the impact this will have on the DNOs/iDNOs to implement a change to production code whilst working through multiple parallel test phases of the faster switching programme. The difficulty of this change is not the development activity but the implementation by the DNOs/iDNOs. June 2022 marks the (current) earliest faster switching go-live date and November 2022 will likely be in the hyper care period (assuming no change to the go-live date). This could make it difficult for parties to implement the change.

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			From a St Clements development perspective, it would be reasonable to assume we will be in the DBT phase of MHHS but MP077 is relatively easy to develop and therefore it should not matter whether June or November 2022 is chosen as go-live for this change.
Waters Wye Associates Limited	Other Respondent	Yes	It is ultimately up to SEC parties, but I would note that November 2021 is at the tail end of UEPT testing and June 2022 is in the go live window.
Western Power Distribution	Network Party	No	As you are aware Western Power Distribution have been involved in this change since the beginning. As discussed we feel that we cannot commit to an implementation date for this change in November 2021 or June 2022 and provide assurance that the Faster Switching Programme will not be put at risk. There is a consequential change required to our MPRS system, which currently has a change freeze implemented to ensure stability of the switching work involved. We were advised that only urgent changes would be approved by Ofgem to continue through this period. As yet we have not seen this change raised, nor have we seen any evidence that this is an urgent change. We have also not been advised that there will be a DTC release in November 2021. Whilst we understand that Ofgem, MRA, SEC and REC colleagues have discussed this and agreed to allow a change to go through, we feel that this is more a paperwork exercise and doesn't actually consider the impact on DNOs who have to implement the consequential change during this time. There is a lot of time and resource required to implement the consequential change, including full regression testing, at a time when resources are being utilised for the Faster Switching Programme. We have also not seen any real evidence of the urgency regarding this modification, and why it has to be implemented at a time that clashes with such a major project. Details around DCC enrolled smart meters is currently available by other means, such as the DCC

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			Smart Meter Inventory, which we believe would still need to be referred to by Suppliers as the flag will not identify what type of smart meter is present. The flag only identifies if the device is a DCC communicating device, it doesn't provide information on whether it is a SMETS1, or SMETS2, or what model, firmware etc. it is, all of which mean that there is different functionality available that we believe a Supplier would need to consider in order to know what to offer a consumer. In conclusion, due to the fact that we cannot see an argument for the urgency, and we don't feel we can implement in November 2021 or June 2022 without the potential of a significant impact to the Faster Switching Programme, we feel that November 2022 is the best implementation date for the consequential change. We also hope that there will be lessons learnt going forward with regards to cross code changes as we don't feel that this has been handled in an appropriate way.
Electricity North West Ltd.	Network Party	No	We reject the proposed implementation dates of June 2021 and November 2021. We would prefer an implementation date of November 2022 (subject to no further slippage to the Switching go-live date). The risk being that the implementation of this modification prior to Switching go live in summer 2021 would require another release of MPRS which would cut across several Switching test phases. DNO's have already made a strong recommendation that the implementation date is deferred until after Switching go-live. Energy Suppliers and Network Operators are obliged to co-operate with the delivery of this Significant Code Review under their licence which would take precedence over any SEC obligations inappropriately implemented via MCP077. We refer the DCC to the notice from Ofgem directing that no additional changes can be brought into the scope of the programme until June 2022. As the SEC modification would require a new version of MPRS the proposed implementation timescales of June 2021 and November 2021 are incompatible with the Ofgem notice.

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OVO	Large Supplier	Yes	This Mod was raised for a very specific reason where the information provided by DCC into the Registration systems is incorrect. This is having a real world current impact to how we operate. As such, being able to establish the correct metering on site is critical and not being able to do so because DCC is not providing the 'correct' flag status, is needed sooner rather than later. It is hard to understand how such a far reaching programme such as the Faster Switching Programme cannot accommodate a change to a singular set of data items... The longer this is delayed, the more inaccurate the data will become and the greater the issue will be. So the earlier date would be appreciated. Nov 21.
SP Energy Networks	Network Party	No	As per the previous response provided from SPEN in relation to this change we have concerns around the proposed implementation dates of both November 2021 and June 2022. Points noted below: • This falls in the middle of key Faster Switching Industry testing which we are mandated to participate in and support. The Programme is a significant change and requires a high level of resource to manage. • The change being suggested would require a new release of the MPRS product. This would involve internal testing of the both existing and new functionality prior to implementation. This places additional burden on the DNO's and our service provider at a time when resource is already stretched to meet Switching Programme timescales. • We believe that to introduce a new version in the middle of a large scale Industry change would constitute a significant risk to the Programme deliverables. • I am not aware of the appropriate MRA change having been raised to make the changes to the D0350 flow. • I believe that the changes to the D0350 flow would require a change proposal to be raised as part of the Switching Programme, as an impact assessment would be

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			required to assess the impact of this change on the information that will need to flow through to the CSS from MPRS. This would require further Programme testing. • The Switching Programme has announced a change freeze on the design effective from the 19/02/21 to ensure stability of delivery. • There is also an additional risk in the 03/06/22 implementation date as this falls in the 'Transition phase'. There is a Code freeze change prior to this date. While the change has been discussed at a high level, we do not believe that the practicalities of the change have been considered. This change would require consequential changes to be made to the MPRS System, and the potentially to the CSS system (to accommodate the changes). We are not aware of a formal change having been raised, nor any evidence that this should be treated as an urgent Industry change. Both of the dates above have, we believe the potential to result in major issues, as the DNO's (and system provider) resource will be in heavily invested in supporting the Switching Programme at these times. We would suggest that the Nov 2022 is a more feasible date, however cognisance needs to be taken of any slippage in the Switching Programme deliveries that may affect this change, in addition to any Change proposals (currently there is a proposal to alter the current routing for the RDP/D0350 files) which if implemented would result in an alternative solution being required.