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Paper Reference:	**SECP_91_1604_17**
Action:	**For Decision**

Review of the MP077 implementation date

1. Purpose

Following the Panel's review of the MP077 'DCC Service Flagging' implementation date at its March meeting, we have carried out a further assessment of the impact on SEC Parties and based on the latest evidence secured, believe the implementation should not be moved. The Panel is asked to agree with this decision.

2. The current status of MP077

2.1 Change Board meeting

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, as long as there was no impact to the delivery of the Faster Switching Programme. SEC Parties, with the exception of Network Parties had also voiced support of this implementation date when asked during the Refinement Consultation and Modification Report Consultation.

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.

2.2 Requests for views from SEC Parties

We issued a request to Parties on Wednesday 3 March, asking those affected by MP077 to provide more information 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 or November 2022 SEC Release. The full responses can be found in Appendix A

(question 1). We issued follow-up requests to Parties and the responses received can also be found in Appendix A.

We have summarised below the views received from Parties via the initial Modification Report Consultation, the follow-up requests for information and from other conversations held with participants. We will provide any further updates we receive at the April Panel meeting.

3. Summary of comments received

3.1 Network Parties

Network Parties have raised concerns with including MP077 in the November 2021 Release. Their concerns mainly revolve around the Faster Switching Programme, considering that making changes to the DCC flags during this time would present risks to, and affect the testing of, the changes for this programme. Testing for the Central Switching Service (CSS) changes has already been planned and commenced based on the changes being implemented on the current baseline. Introducing a new version of the MPRS mid-way through testing will lead to large amounts of the testing needing to be repeated on the new baseline. They note this could incur significant cost and result in sizeable delay to the delivery of the Faster Switching Programme.

Network Parties have also noted the current change freeze to the MPRS system. One Network Party has noted that a similar MRA Change Proposal DTC CP 3580 was withdrawn by the Proposer with the plan to re-raise it under the REC, as there would not have been sufficient lead time to implement it during the remaining MRA lifespan. They considered that the sequential changes for MP077 should be deferred in the same way, highlighting that, to date, a corresponding proposal to deliver the MPRS changes for MP077 has not been raised.

Network Parties have noted the views of Suppliers but are unclear that a delay to MP077 will create a material issue. They consider that there are other routes for Suppliers to obtain the information, such as querying the Smart Metering Inventory (SMI).

Due to the expected go-live window for the Faster Switching changes, Network Parties have further expressed concerns about a June 2022 implementation date but would support a November 2022 implementation date. They highlight that they fully support the MP077 solution, and that their concerns are only around implementing it during the Faster Switching implementation period.

St. Clements, who provides the MPRS, stated that it could support either a June 2022 or November 2022 implementation date. This would be due to the MP077 Proposed Solution being relatively easy to develop. However, it considered that the implementation of MP077 would impact the Network Parties if made prior to the Faster Switching go-live due to changing the production code whilst working through parallel test phases for the programme. It stated that the development activity shouldn't cause issues, but the implementation times would provide difficulties. It noted that June 2022 is the earliest expected Faster Switching programme go live date and that November 2022 will be in the direct period after implementation, referred to as a "hypercare period".

3.2 Supplier Parties

We contacted Supplier Parties asking for how they would be affected by a change of implementation date for MP077 to November 2022.

One Supplier Party believed that MP077 should be implemented before the Faster Switching Programme goes live, or at the very latest at the point of the Faster Switching programme going live.

It believes that the longer it takes to implement MP077, the greater the number of switches that will be impacted by incorrect data. This impact is likely to be exacerbated if the Faster Switching programme goes live before MP077, as the changes it will introduce will greatly reduce the time available to identify and resolve any issues prior to a switch. Suppliers currently have 17 days to solve issues related to a Smart Metering System (SMS) in the event of a switch, which will be reduced to five days during the transition period. Resolving issues with an incorrect flag status in this time would present difficulty. The Supplier Party believes that MP077 should continue to be implemented in November 2021; with the only reason it shouldn't if doing so would create additional risk for the delivery of the Faster Switching programme.

The Supplier Party considered that there will likely be significant system impacting REC changes around November 2022 and was concerned this might remove space for including MP077's sequential changes. If so, this could push the potential implementation date back to 2023, which it believes would be an unacceptable length of time between the Faster Switching programme go live and the correcting of the DCC Service Flags to assist in switching.

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. Another Supplier Party responded stating its concern that extending the date further from November 2021, would require a larger amount of work to be undertaken to clean up the Electricity Central Online Enquiry Service (ECOES) for however much longer the implementation date is postponed by.

3.3 View from Ofgem

We contacted Ofgem to seek its opinion on whether the Faster Switching Programme would be impacted if MP077 was implemented in November 2021. Ofgem has noted this is an industry matter and is not something it will input on unless the Panel issues a request to revise the implementation date. Ofgem noted the Network Parties' views around the current change freeze and clarified that changes could still be progressed if they had an urgent impact.

Ofgem considers that it is for all SEC Parties to take into consideration their wider obligations under their Licence and other Codes (including the REC Transition Schedule) when deciding on any change or implementation date. It has noted that Network Parties have suggested that implementation of MP077 could delay the Switching Programme. Ofgem has stated that any changes to the Switching Programme timeline and plan can only be approved through Switching Programme governance. The SEC Panel cannot approve a delay or change to the Switching Programme, and SEC approval of the implementation date for MP077 will not change the Switching Programme milestones.

3.4 Progression of the consequential MPRS changes

Further to the approach set out in the MP077 Modification Report, we have confirmed with the REC Code Manager that a corresponding REC Change Proposal will be raised and progressed in September 2021 following the REC go-live. Under the REC, changes to data items owned by other Codes will be able to be progressed and approved by that Code under its own modification process. The REC Code Manager considers the changes that will be made to the data flags are clearly set out

in the MP077 Modification Report, and that a consequential REC change, to reflect this in the corresponding data items, can be progressed quickly following the REC go-live.

4. Financial impacts

Since the last Panel meeting, the DCC has confirmed there will be no additional costs to move MP077 to another release. It will be able to build in a mechanism to suppress the functionality to a later release should the implementation date be deferred.

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', also targeted for a November 2021 Release date, 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 also require a delay this change.

Xoserve has also stated there is a financial benefit to be made by implementing XRN4941, but that this will benefit Gas Shippers, rather than Network Parties. Suppliers and Network Parties have not been able to provide any value for the impact of moving or not moving the implementation date.

5. 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. We note the views received, and we do not believe the implementation date needs to be changed.

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

6. Recommendations

The Panel is requested to:

- **REVIEW** the concerns around the MP077 implementation date; and
- **AGREE** not to request that the Authority directs a revised implementation date for MP077.

Harry Jones, SECAS Team, 13 March 2021

Attachments

- **Appendix A:** MP077 Implementation Approach responses

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MP077 'DCC Service Flagging' Implementation approach responses Appendix A

About this document

This document contains the full collated responses received to the MP077 Implementation approach, 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.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Northern PowerGrid	Network Party	No	We're reviewing the associated MRA CP which has an implementation of June. 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.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			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 tie as the solution requires 8 months of lead time as documented in the Impact Assessment. 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.
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 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. One to talk through when we get to these discussions.
St. Clements	Service Provider	Yes	The concern I have 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

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			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. 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		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

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			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 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).

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			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.
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 an June 2022. Points noted below:

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			• 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 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).

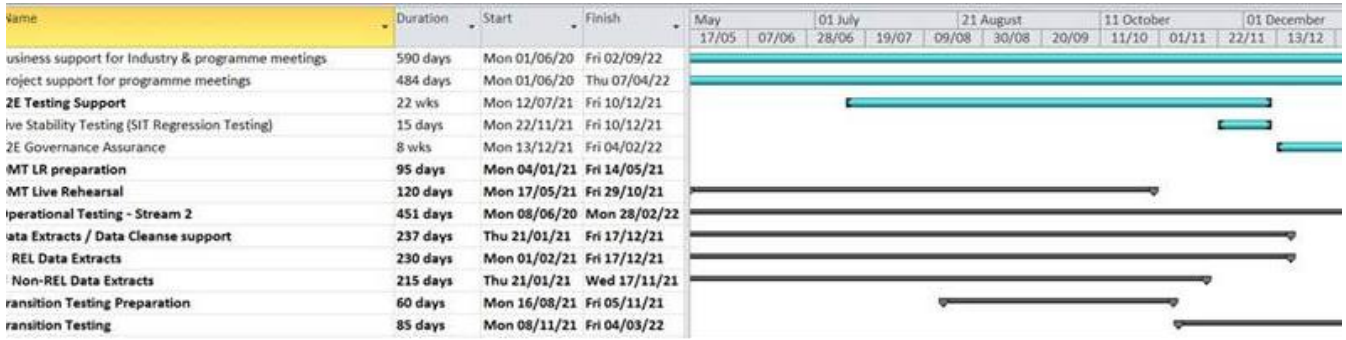
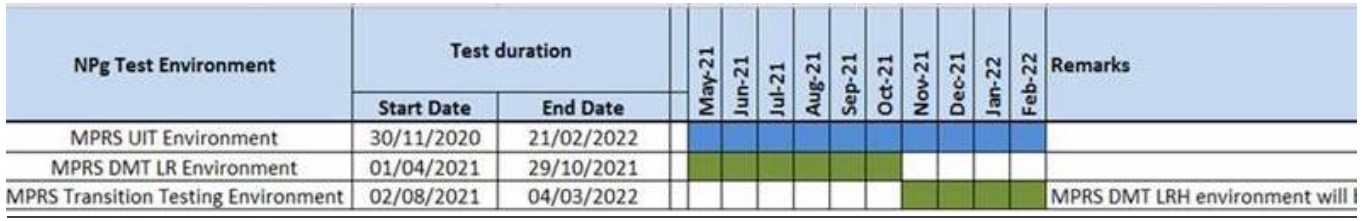
Question 1			
Respondent	**Category**	**Response**	**Rationale**
			We are not aware of a formal change having been raised, nor any evidence that this should be treated as an urgent Industry change. Both of the dates above have, we believe the potential to result in major issues, as the DNO's (and system 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 alteernative solution being required.

Question 2: Can you provide any testing approaches or internal plans related to the Faster Switching Programme or any other information that can demonstrate the individual difficulties that Network Parties would incur if the implementation date is not rescheduled?

Question 2		
Respondent	**Category**	**Rationale**
Electricity North West Ltd.	Network Party	MP077 implementation date of November 2021 – the Ofgem plan (which is available on the Ofgem Switching portal) requires us to support multiple programme test phases (User Entry Process Testing/End to End Testing and Data Migration Live Rehearsal /Transition Testing) around November 2021. We only have limited resources and test capability which are already stretched. Implementing any changes to MPRS would have a knock-on effect on what is already a very complex and challenging Ofgem programme. If this modification is approved with an implementation date of November 2021 we may be forced to seek a SEC Panel derogation and discuss the impact with Ofgem.
Western Power Distribution	Network Party	We believe that due to the ongoing SCR, Ofgem are assessing any proposed changes to understand any potential impacts on both the SCR and the Faster Switching Programme. We are of the understanding that Ofgem are only happy to support any change as long as they had assurance that the Faster Switching Programme would not be put at risk. We have advised SECAS numerous times that we do not feel that we can provide this assurance. In support of our views, the Faster Switching Programme has a change freeze to the MPRS system. This is due to the fact that this system is vital to the Faster Switching Programme and there is data that is locked into the environments for the testing we are having to undertake. Articulating the cost and impact of implementing changes to MPRS during the Faster Switching Programme is not straight forward. The issue is that the systems and resource are tied up in a national programme and having to conduct testing as well as full regression testing for any change to the systems, would have to use this resource.

Question 2		
Respondent	**Category**	**Rationale**
		Also there is no guarantee that there would not be any problems encountered, and this adds further risk to the Faster Switching Programme. We still don't understand what the urgency is for this to be implemented in November 2021, given that the information that it will provide is already available elsewhere. We have not seen any detail on the costs and impacts of a later implementation date. We are concerned that, despite it being raised regularly from before this modification was formally raised, that there has not been any consequential change raised to enable a change to the DTC. At Change Board 24 March 2021 – WPD won't accept MPRS changes if it goes through in Nov 21, and stated it requires the MRA/REC Change.

Northern Powergrid	Network Party	• Project technical and Business resources will be fully engaged on the various CSS programme testing phases running in parallel between May and December this year as indicated below:
		  ○ UEPT & E2E Testing (May – Dec 2021), DMT Live Rehearsal (May – Oct 2021);
		  ○ Transition Testing (Nov 2021 – Mar 2022);
		  ○ Preparation activities for each test phase;
		• In addition, the project team will also be required to support the production REL and Non-REL data extract cycles to support data cleanse validations;
		• We do not have a test environment or the resources to support additional MPRS release testing;

Question 2		
Respondent	**Category**	**Rationale**
		• Also, the MP077 change may not be applicable after the proposed plan to decommission D0350 data flow post CSS go-live is implemented. <u>NPg Project plan for CSS</u>  Name / Duration / Start / Finish usiness support for Industry & programme meetings — 590 days — Mon 01/06/20 — Fri 02/09/22 roject support for programme meetings — 484 days — Mon 01/06/20 — Thu 07/04/22 **2E Testing Support** — 22 wks — Mon 12/07/21 — Fri 10/12/21 ive Stability Testing (SIT Regression Testing) — 15 days — Mon 22/11/21 — Fri 10/12/21 2E Governance Assurance — 8 wks — Mon 13/12/21 — Fri 04/02/22 **MT LR preparation** — 95 days — Mon 04/01/21 — Fri 14/05/21 **MT Live Rehearsal** — 120 days — Mon 17/05/21 — Fri 29/10/21 **perational Testing - Stream 2** — 451 days — Mon 08/06/20 — Mon 28/02/22 **ata Extracts / Data Cleanse support** — 237 days — Thu 21/01/21 — Fri 17/12/21 **REL Data Extracts** — 230 days — Mon 01/02/21 — Fri 17/12/21 **Non-REL Data Extracts** — 215 days — Thu 21/01/21 — Wed 17/11/21 **ransition Testing Preparation** — 60 days — Mon 16/08/21 — Fri 05/11/21 **ransition Testing** — 85 days — Mon 08/11/21 — Fri 04/03/22 May 17/05 07/06; 01 July 28/06 19/07; 21 August 09/08 30/08 20/09; 11 October 11/10 01/11; 01 December 22/11 13/12 <u>NPg Test Environment plan for CSS</u>  NPg Test Environment / Test duration (Start Date, End Date) / May-21 Jun-21 Jul-21 Aug-21 Sep-21 Oct-21 Nov-21 Dec-21 Jan-22 Feb-22 / Remarks MPRS UIT Environment — 30/11/2020 — 21/02/2022 MPRS DMT LR Environment — 01/04/2021 — 29/10/2021 MPRS Transition Testing Environment — 02/08/2021 — 04/03/2022 — MPRS DMT LRH environment will
SSEN	Network Party	Following a change in the design, the bulk of Switching Programme activities has now fallen on to the DNO's\iDNO's. The ED1 expectation was that the burden of activity would be incumbent upon the Supply organisations. All DNO Programme activities surround the Meter Point Registration System (MPRS). We currently have 4x MPRS environments. Each time a change is released for MPRS, the team as to go through a regime of backups,

Question 2		
Respondent	**Category**	**Rationale**
		deployment, and regression tests on each for these environments. This can take 4-5 weeks of effort (4 x resources). This situation is unlikely to change until the Programme goes live (currently scheduled for June 2022). The current Switching Programme activities due to take place across the dates being suggested for MP077 are: - • November 2021 – User Integration Testing (End to End Testing), Live Stability Testing & Transition Testing • June 2022 – Transition Stage 3 and Go Live cutover There is no currently planned activity for November 2022. However, if the Programme was to hit problems with 'go live' and require a reversion and re-implementation or problems encountered during the many testing phases pushed back the go live date, November 2022 might be required as contingency. Our suggestion would be to defer this change post completion of Switching, possibly to June 2023.

Question 3: Can you provide any evidence or supporting figures that would highlight the advantages or problems faced by you as a Supplier Party if the MP077 Proposed Solution would not be implemented in the November 2021 SEC Release and was instead rescheduled to a later date?

Question 2		
Respondent	**Category**	**Rationale**
Utilita	Large Supplier	I am presuming you will use the minutes from February's change board meeting for further evidence? Our concern in extending the dates to far from November 2021 is that this may mean an extensive clean-up of Ecoes/Xoserve might be needed the longer this modification prolongs.