

Extraordinary DSC Delivery Sub Group for CSS Consequential Change

10th June 2019 at 10:30am Xoserve Limited, Lansdowne Gate, 65 New Road, Solihull, B91 3DL

Meeting Minutes

Industry Attendees			
Jonathan Matthews	Crown Gas	JM	
Sean Cooper	Npower	CP	
Bryan Hale	Centrica	BH	
Elly Laurence	EDF	EL	
Robert Lock	SSE	RL	
Deborah Sherlock	SSE	DS	
Alison Neild	Gazprom	AN	
Andy Kelly	Scottish Power	AK	
Lindsay Biginton	Utilita	LB	
Andy Morgan	EON	AM	
Derek Clark	CNG	DC	
Megan Coventry	SSE	MC	
Martin Williams	SSE	MW	
Mairead Bailey	EON	MB	
Naomi Walker	EON	NW	
Alan Gregory	EON	AG	
Ben Palmer	SSE	BP	
Mark Jones	SSE	MJ	

Xoserve Attendees		
Emma Lyndon (Chair)	EL	
David Addison	DA	
Michael Payley	MP	
Lucy Mobberley	LM	

1. Welcome and Introductions

Emma Lyndon (EL) started the meeting and confirmed that this was our second extraordinary DSG. As mentioned previously, we are now in our detailed design phase.

EL advised that Xoserve met with Landmark (CSSP), the SI and the DCC last week. They are meeting with all existing SP's in order to meet Ofgem's published Interface Design date of 15th July.

EL informed the attendees of the following subjects for discussion.

- Detailed Design Solution Discussion
 - Stakeholder Management
 - o RGMA
 - SPA Updates
 - o Settlement Data Submission
- Future Topic Design Questions
- Data Cleansing Update
- o AOB

2. Stakeholder Management

Key message is that we are not fundamentally changing what we do with stakeholder master data. We are required to pass data onto Landmark.

Assumption – under the new REC there are new market participant statuses but these will not impact processes.

Question – What about sanctions?

Answer – They will still work as they do today and will be advised to CSS as a change to the network to shipper alliance.

There are two possible solutions:

 New Batched Interface to CSS & Offline communication to REC Code Manager

Design assumptions are Xoserve will have a direct interface to CSS.

Question – Will this be once a day (shipper/supplier)?

Answer – Yes with an adhoc interface when required.

Consideration – Is this in line with everyone's thoughts?

Question – Is the shipper/supplier governance the same?

Answer – No. Commercially sensitive data will not be shared, will sit within the system.

Question – Where will we get the data from?

Answer – There is a reliance on the shippers and suppliers to provide data.

Question – Will there be a way to update the data?

Answer – yes – it will follow the existing process via the customer lifecycle team.

Consideration – is a daily flow a reasonable activity?

Question – What are the triggers?

Answer – We need to work with the CSS Provider to determine.

Question – What about the MDD data?

Answer – This is moving to Xoserve to hold.

Assumption – There will be contractual relationships between shippers and suppliers

The group felt that there needed to be some governance around this however, Xoserve confirmed that they do not have the direct relationship with the supplier.

Question – Could CSS send an update to the supplier?

Answer – There is nothing in the CSS design.

Exceptions will be raised for any data that is not valid – this will be raised and flagged though Service Management process.

Question – When we update the CSP, will we get confirmation?

Answer – We are hoping so.

Suggestion – maybe a table online or a confirmation email would be really useful.

Action - Xoserve to look into this.

2) Offline update to CSS and REC Code Manager

Xoserve customer lifecycle team currently manage the offline communications – this process will continue with the addition of updates being issued to REC Code Managers and CSS.

Shipper Sanctions

(N.B. – This is different to REC sanctions)

This will be a real time interface between Xoserve and CSS. The way it will work is that GT will log into the portal, apply shipper sanctions within UK Link. It is a real time process today which we are pushing to continue going forward.

Question – Can we change the terminology? **Answer** – Under REC, not sanctions – change in relationship.

Action – Xoserve will update.

3. RGMA

As per high level design, there are no changes to the file structure only slight validation alignment. Currently the files are issued at D-2 but in the new world, it will be D-7 hours.

Market sector code flows – CSS will be the master of the domestic indictor and will no process the flows via RGMA therefore, it is irrelevant data set.

Question – Will there be a MAP field where the MAP ID is populated? **Answer** – Yes. There is a separate change in July which will be ahead of CSS going live. This should be a mandated field in the RGMA flow.

Question – Is Security Status always D-7

Answer – Yes but may change going forward. It would be part of a REC code change. Ofgem looking to make it later than 5pm however, Xoserve would prefer it to remain at 5pm. Rest assured, any proposed changes will go through the formal change process.

MAP ID – there are 3 parts being looked at:

Part A - July RGMA

Part B – Population

Part C - CSSC Data feed

Standstill – this prevents multiple switching within 5 days. This was considered from a UK Link-Shipper orientation. We have tried to future proof design to accommodate changes with the shipper.

Current processes based on business days rather than calendar days. Xoserve will be conducting a business process review. If we make any changes from business to calendar days, we will need to go through SPAA change.

There could be a risk on assets once we get to real quicker switching if we have customers switching frequently. Suspect that the market will react and will trigger a review.

4. SPA Updates

No major changes – there will be some re-alignment of when activities are to happen:

Capacity Referrals – Continue as-is

Emergency Contact Details – Continue as-is. There will be provision within new file format to provide details outside of switch.

Priority Service Details - Continue as-is.

MAM Updates – Continue as-is.

Question – Who is responsible for updating MAM's?

Answer – MAM's are not included in CSS. Suppliers will need to leverage their relationships with the MAM's. There have been MAMCOP sessions where the programme has presented CSS – John Wiggins has been in attendance.

Action – Dave to contact the programme and request that they are discussing the changes. There are concerns that the MAMs will not be ready – this is where the contractual agreements need to be enforced.

Design assumptions:

- Not changing file formats on CNC, CNR, EMR, MAM, MAS, CRF, SPC, SCR
- Will check the schedule

Batch processing is key – need to think about rejections.

Question – Is it worth looking at changing some of the validation rules? **Answer** – No – this would be a challenge. We should be allowing shippers to update dates retrospectively (this is feedback received). Need to ensure we're getting contact details through as soon as possible. Retrospective introduces complexity. Shippers cannot retrospectively contact customers so this is not necessarily valid.

Question to the group – Is this the right thing to do? Does quicker switching give an argument for change?

Question – What will CSS do if they receive a notification that the supplier/shipper has changed on a switch that has been accepted? Will it cancel the switch? **Answer** – Only validated on the point of receipt – if anything changes afterwards, it is not considered.

Ratchet rule – existing rules prevail.

5. Settlement Data Submission

This is the biggest topic and is essential that we get it right.

Nomination process works as it does today – few little tweaks. No postcode validation

Base Registration Nomination – this is the way that a shipper can provide full data set (equivalent of an existing confirmation). This file is not required as shipper - this is just in scope of CSS Switching. Any other files that are not in scope (e.g. NTS) need to follow existing processes. If a BRN is not submitted (it is an optional file), default values would be applied.

Question – Will there be a session to walk through the default rules? **Answer** – These are in the current version of the UNC Code. There was an industry walk through on 16th April – Ofgem will be issuing the latest version shortly.

Question – Are they open to discussion or change? **Answer** – We have tried to get them as best as we can however, the door is open to change. People need to flag any concerns.

Shipper is to send the BRN regardless of whether there is an in-flight switch in progress. We will validate and can reject if appropriate. If accepted, the latest BRN will replace any previous ones received. The BRN will remain on the shelf until the registration comes in and then an association file will be sent. If it is not possible to associate then default will be applied. There is a cut-off point of when BRN's can be received.

There are 3 new file based interfaces:

- 1. Develop new inbound interface to receive or cancel a BRN
- 2. BRR Accept or reject files sent to the shipper
- 3. ASN To send the association notification

Files will continue to go through existing IX gateway (responses are still to be received via gateway).

Question – What about the objection period?

Answer – This is managed by CSS who would issue a notification if it is objected/cancelled. The intended objection window will be 1 WD for domestic and 2 WD for non-domestic.

Question – Are the interfaces expected to be batch based?

Answer – Yes – may be more frequent batch processing – this is still to be defined.

Action on the shippers – How do they expect to submit BRN files to Xoserve? Please provide responses by the next planned meeting.

Question – When we get to in-day switching, will the cut-off be configurable? **Answer** – Yes. It is currently 3pm but this could flex. This time was implemented to allow BRN's to be received prior to the CSS registrations starting processing – we need to performance test this however, we have applied a 2 hour processing time.

Question – If a BRN is not sent and therefore default values are applied, how can they be changed to the correct values?

Answer – By following existing processes however, need to be mindful that it would be incremental. BRN allows all information to be provided in one hit.

Question – Are there regulation constraints?

Answer – Yes. Emergency contact details are mandatory.

Question – Do we have to send BRN's for all?

Answer – We would expect that shippers would want to send BRNs would want to send for all but it is optional (as we are unable to mandate).

We have anticipated that we won't get BRNs for all – we need to be clear with what riles we apply and remove any ambiguity. Where there are vulnerable customers, the code states that we should receive.

Question – So shippers could decide not to send?

Answer – Yes but this would result in apply default values.

Question – Would suppliers send vulnerable customer details to CSS? **Answer** – No. CSS are only interested in the registration details.

Consideration – can the SRN field be changed to optional?

Action – Xoserve to look at other downstream processes where the shipper reference is used by next meeting.

Reg date & CSS ref number – these can be used to pin to a particular CSS registration. These have been added more for when we get into same day switching. If we are asking for a different date, new BRN needs to be submitted to ensure alignment.

Question - Is there time limit?

Answer - Will last for 60 calendar days - would not associate after that date.

Question - Why 60 days?

Answer - We originally set it at 30 days but asked to increase to 60 days. This is to allow debt to be cleared.

Topic - If we receive multiple BRN's, how would we manage them?

Because we have included CSS reg identifier and eff date, we need to consider receiving multiple BRN's. Do we think that having CSS ref and eff date is applicable (bearing in mind, these are to be future-proof when there will be more frequent switching to allow shippers to associate activity easily).

The association file that Xoserve will send will explicitly detail which BRN we will be using.

The driver was "how can we associate the BRN to the registration?" and it could be that the mandatory items are enough. Ofgems view is that a scenario of gaining on a Monday, lose on Tuesday, gain again on a Wednesday with different settlement details (next day, every day).

Ofgem – current view that there will only be 1 single pending registration (does not apply to change of shipper rule). If we were to rely on that, shippers would need to ensure that they are on top if issuing all relevant flows.

What are the scenarios where we need multiple BRN's. Need to take away to large

Action on Shippers – what are the instances where there are multiple inflight switches. Is there a circumstance where you would expect us to have multiple BRN's sitting on the shelf or would you expect Xoserve to utilise the latest BRN. Do we only need to consider the 3 mandatory items or whether we need to include other data items?

BRN linking with CSS Reg

With an RRN and without an RRN – if it needs an RRN, will need to be handled differently.

Action on Xoserve – Check if there is any duplication of data across the RRN and BRN files.

What triggers the association – first trigger is the CSS registration. Any BRN's received after then, we will issue another association. A shipper can send a BRN up to 3pm on D-1.

Q – For class 1 or 2 and we do not send BRN, use default?

A – For class 1- if AQ above AQ threshold or other class 1 criteria met, remain class 1. If not, drop to class 4. Not going by previous class type. If class 2 but has defaulted to class 4, shipper need to revert to standard process for changing class if required.

BRN Cancellation:

Use in scenarios where we wouldn't want the BRN to be applied. In BRN response, there will be a reference to be used within the cancellation.

If the registration does not go ahead, CSS would be responsible for sending notifications to all parties.

RRN & BRN response validity:

If RRN is submitted and the BRN is submitted after the validity period has expired, it will not be accepted.

BRN file format:

Proposal to create 2 new record formats - T90 where there is an RRN and the T91 where there isn't a RRN.

Is there going to be an effective date from? – all info in the BRN is expected to become effective from the registration date. This gives an opportunity to provide MAM (not currently). Is there any Performance Assurance reporting around this? Need to look at schedule 22 (Dave to pick up).

Difference between two options is how the MAM data is provided – group to have a think about preferred option.

Discussion around when the MAM information can be sent.

Do not want to send a MAM ID before it's appointment has been accepted by the MAM. Best way to manage would be to supersede with a subsequent BRN.

Action on Shippers - Do you want to provide the MAM ID within the BRN – are there scenarios where this would be required/available. MAM ID is proposed as an optional data item.

6. Remaining agenda items

Due to previous topics over-running, we were not able to discuss Future Topic Design Questions or provide the Data Cleansing Update.

Action - The group agreed to review the rest of the slides before the next meeting on 26th June – happy to receive questions

EL provided a quick update of the following:

Market Trials – meeting with DCC to start thinking of it from an industry perspective but then look at consequential. Jo Galloway who some of you will remember from Nexus will come to the next meeting to provide her thoughts.

Question - Will the consequential trials be separate to the CSS market trials? **Answer** - No they need to be linked. Jo will present her thoughts on expected period.

RRN (NOM) file submission rules – Shippers need to think about when these need to be submitted – mandatory of all Class 1 & 2 sites and optional for other LSP sites or Class 1 & 2 only.

Gemini – Currently in discussions with NG Control Room regarding impacts to the current process..

Action - We will be amending the agenda for the next meeting and move the Gemini topic to the 25th July.

Data - Plot to postal needs to be reviewed by all. Reports are issued every month – if not sure who receives this within organisation, contact EL. IGT Data not yet issued – Emma working with IGT's to pull together. We are hoping that in July/Aug the plot to postal will include IGTs. Landmark are keen to get going on the address data and perform cleansing activity to ensure 1 REL. They want good quality REL for gas and electricity. There is a Data Working Group that takes place every month; intention is for a Technical Data Working Group to sit under to look at test data.

Next Meetings

26th June	Xoserve Office	10:30am – 3:00pm
11th July	Xoserve Office	10:30am – 3:00pm
25th July	Xoserve Office	10:30am – 3:00pm
16th August	Xoserve Office	10:30am - 3:00pm
4th Sept	Xoserve Office	10:30am – 3:00pm
17th Sept	Xoserve Office	10:30am – 3:00pm