

Dis	cussion Request	1219		System & Pessary to de	rocess Changes liver policy
Status	Approved	Priority	High	Status Date	30/03/2022

Version	Reason for Change	Version Status
1.0	Initial Draft to facilitate Market Discussion	Final
1.1	Updated following Technical Working Group	<mark>Final</mark>
	1.0	1.0 Initial Draft to facilitate Market Discussion

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST		
Requesting Organisation(s) RMDS		
Request Originator Name Lindsay Sharpe		
Date Raised 28/02/2022		

Classification of Request			
Change Type	Schema Impacting		

Detail of Request
Reason for Request

#### Background

The NSMP phase 2 design workshops have been undertaken since early 2021. The scope covered in sessions only considered remote switch functionality for disconnection and reconnection. Throughout the workshops requests to consider design necessary to deliver a viable platform to support smart PAYG policy was raised by various Suppliers over this time. DR1216 was raised by ESBN to manage the remote switch for discon/recon. This functionality within DR1216 only provides a portion of the necessary change to CMS and other systems, processes and operations within the retail market which would be necessary to deliver a viable, consumer focussed thin PAYG solution.

At the prioritisation workshop held by RMDS on the 21.10.21, it was agreed that RMDS would determine how to progress the necessary design that had been requested since early 2021 and how this would be dealt with across industry"

RMDS issued a mail on 22.10.21 where "CRU invites Market Participants to submit any additional DRs it understands are necessary in the context of providing a SPAYG service."

The reason for this DR, is to cover all outstanding functionality not covered by DR1216, that is necessary to deliver a solution that is required by Smart PAYG policy. It is important that an understanding of how DR1216 and any other DRs will be project managed is established and where governance lies for delivering in September 2023.

The key areas that have been requested for inclusion in DR1216 and will now be dealt with in this DR are:

- Dav/Dav+1 or D+5 CoS Processing
- PAYG Flag which is available as an identifier pre switch
- Discreet Debt Flag for consumers switching, as a result of debt but no available thick or thin PAYG solution. Policy clarification required.
- CTF algorithm suitability for PAYG service provision (CTF degradation should only be impacted by genuine communications degradation and not MDMS or system issues). Evidenced by issue with mass CTF 4-3 degradation recently and the impact it would have on SPAYG.

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- Contingency process for failure in technology chain (day to day and critical/mass failure),
- SLAs and query management between Suppliers (on behalf of customer) and ESBN for D2D support. Extend to major tech outages at any point in tech chain (similar to point on contingency process)
- Transition process between SPAYG and Credit for existing customers.

The reason behind each and the proposed design and considerations are included in the next section.

It must be stated that as detailed upstream design continues, possible central market system (CMS) changes may be required. These will either form part of a re-versioned MCR or a separate DR/MCR.

## **Proposed Solution**

To deliver on SPAYG policy the following changes in addition to those in DR1216 must be implemented.

1. <u>Day, Day+1 or QH (D+5) CoS Processing – Effective date and Processing date to be the</u> same.

Why: The current Change of Supplier Process is designed for credit pay to credit pay switching. Although an effective date of "Day" can be requested, the processing of this request is only confirmed at a minimum 5 working days later. In reality the average confirmation is between 6-9 days. The CoS is effected on the original request date (or the date of the meter re-configuration – as close to request date for smart meter MCC changes during switch) meaning the date is retrospectively applied and the new Supplier gets registered from a date in the past. This works in a credit based system as billing is performed retrospectively for consumption. DUoS and consumption charges can be managed by retrospectively applying the switch date as the start date and billing forward (usually to a point up to 2 months in advance).

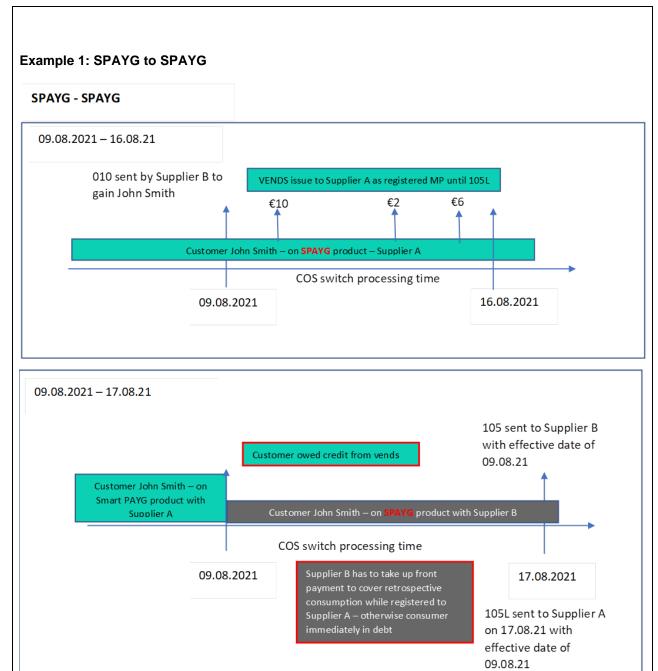
In PAYG solutions, the consumer is actively engaging with the energy bill, in many cases, daily. They are paying for their energy proactively rather than retrospectively. This means that it is critical to apply events such as CoS, CoLE or Tariff change in as close to real time as possible or to align the processing dates to the effective dates in order to allow alignment of consumer financial status. Without this, each supplier process will be refunding overpaid energy vended to consumers at all key industry processes. This would be hugely complex, administratively burdensome, costly, open to issues with consumers and repayments, poor consumer journey and experience and many more. It seems critical that the framework on which the Retail Electricity Market operates, can support all services and customers that are mandated through regulation – SPAYG being a clear example. In addition, suppliers will be unable to request re-en during this transition period and this could result in prolonged loss of power for customers even if they have topped up, pointing to a need for central market systems to be updated in the interests of consumer protection.

The best way to illustrate the issue with the current mismatch between CoS effective dates and processing dates, is through examples. Using Customer John Smith and Supplier A and Supplier B, three examples will be used to explain the issue.

- 1. SPAYG to SPAYG
- 2. SPAYG to Credit
- 3. Credit to SPAYG

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- Customer John Smith registered to Supplier A on a SPAYG product.
- Customer wishes to switch to Supplier B on **SPAYG product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21
- All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.
- While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A.
   Supplier A is responsible for DUoS and all terms of supply until such time as 105L is issued and CoS Is effected with switchover in retail systems.
- The customer has right to energy during the CoS Processing period and as on a smart PAYG product continues to vend to keep the lights on.
- Note a switch could take much longer than 6-9 days to process depending on technical/other issues.
- In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.

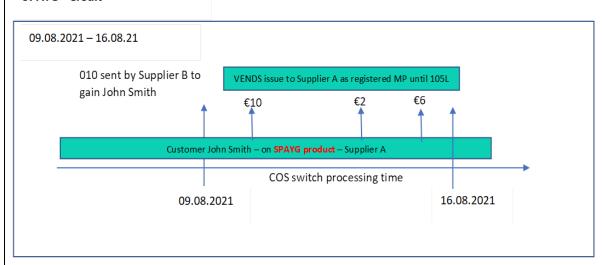
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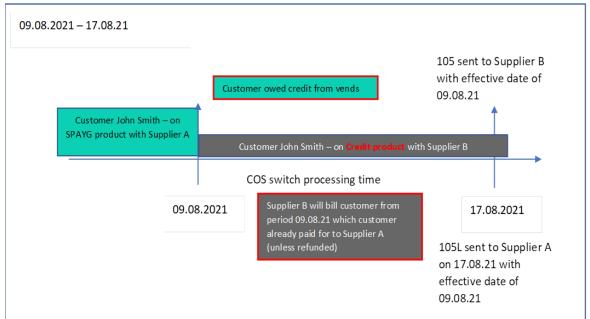


- Supplier A is now left having received vends for the service during the CoSCoS processing period and would be required to reconcile and refund the customer for the vends.
- Supplier B must ensure sufficient credit is taken up front for the CoS Processing period to ensure the customer is not immediately in debt once Switch effected (for the period 09.08 17.08)

## **Example 2: SPAYG to Credit**

#### SPAYG - Credit





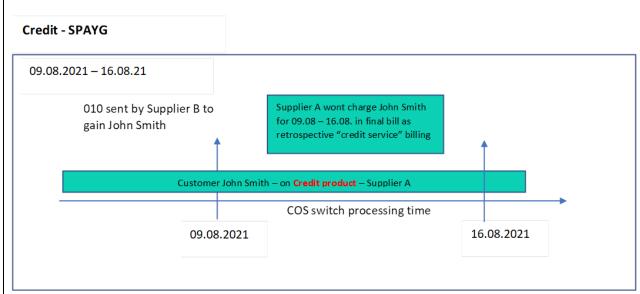
- Customer John Smith registered to Supplier A on a SPAYG product.
- Customer wishes to switch to Supplier B on a **Credit product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21
- All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.
- While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A.
   Supplier A is responsible for DUoS and all terms of supply until such time as a 105L is issued and CoS is effected with switchover in retail systems.

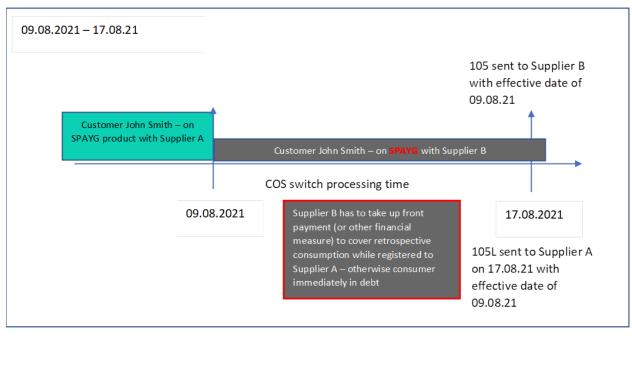
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- The customer has right to energy during the CoS Processing period and as on a Smart PAYG product continues to vend to keep the lights on.
- Note a switch could take much longer than 6-9 days to process depending on technical/other issues.
- In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.
- Supplier A is now left having received vends for the service during the CoS processing period and would be required to reconcile and refund the customer for the vends.
- Supplier B will bill customer on a credit tariff from the 09.08 which unless refunded by losing supplier A, will be paid for twice.

# **Example 3: Credit to SPAYG**







- Customer John Smith registered to Supplier A on a Credit product.
- Customer wishes to switch to Supplier B on **SPAYG product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21
- All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.
- While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A.
   Supplier A is responsible for DUoS and all terms of supply until such time as 105L is issued and CoS Is effected with switchover in retail systems.
- The customer has right to energy during the CoS Processing period but because on a credit product, is unaffected. Their final bill will cover any alignment of CoS Processing dates.
- Note a switch could take much longer than 6-9 days to process depending on technical/other issues.
- In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.
- Supplier A will now final bill customer to 09.08 and will not charge for energy consumed during 09.08 to 17.08.
- Supplier B must ensure sufficient credit is taken up front for the CoS Processing period to ensure the customer is not immediately in debt once Switch effected (for the period 09.08 17.08)

#### The requirement is to

- To align the event processing date with the CoS effective date as far as possible to reduce the need for refund and reconciliation.
- For the gaining supplier to choose whether to offer the customer a PAYG tariff
- The process would require the PAYG flag to indicate the particular CoS switch that was taking place (one of the 3 examples). The 010 would contain the current service to be in place (PAYG/Credit) and the CMS would check what the previous status via the PAYG flag to determine the existing service in situ.
- The gaining supplier would be able to see the existing PAYG flag (or absence in the webservice/extranet)
- There are 3 options which can be explored to meet the requirement of aligning effective date and processing date:

# • D+1 or D

- Where one of the following 3 scenarios existed, the switch would process and be effective D+1 or midnight of D (ESBN to determine).
- Customer able to enjoy same day switching as per same day effective date choice now.
- If D+1 is only possible, then the effective date can only be selected as D+1 in CoS for these scenarios to align effective with processing.
- No debt flagging option

#### D + 5 processing and effective date

- An alternative would be to follow QH rules whereby an effective date in these scenarios
  can only ever be D+5 and processing must align to the effective date, the key issue is the
  alignment of switch and processing.
- 010 (change of supplier request) would only allow D+5 effective date for these scenarios
- CMS processes and provides 105 (change of supplier confirmation) and 105L (loss of supply confirmation) on D+1 with effective date in 105/105L being D+5
- The impact here is a reduced opportunity for "same day" effective date contract changes (albeit current switches can opt for same day effective date, but all are processed in a minimum of 5 working days and backdated)
- This option would require disconnection and reconnection to be allowable during the period between 010 issue (with a D+5) and 105 date to allow the service to continue.
- This solution is predicated on the need for a PAYG flag to ascertain the 3 scenarios.

If D+5 is viable, PAYG remote de/re energisation MUST be allowed once 010 issued but before 105/105L issues.

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Following feedback from Market Participants a consensus to proceed with a D+5 processing and effective date was agreed.

- D + 5 (Working Days) processing and effective date for a PAYG customer o The proposal is to populate a required date of D+5 (working days) where the new Supplier is offering a PAYG tariff whereby the effective date in these scenarios will be D+5 (working days) and processing will align to the effective date. The key issue is the alignment of switch and processing.
- o MM010 (change of supplier request) should be populated with a required date of D+5 (working days) where the new Supplier is offering a SPAYG tariff to the Customer. The CoS will complete to an effective date of D+5 (working days) and the CoS completion messages will be sent once D+6 is reached.
- This option would also require disconnection code D05 and reconnection code EO5 to be allowable during the period between 010 issue and 105 date to allow any existing PAYG services to continue (subject to Customer Protection implications that would require CRU approval).
- Change of Smart Data Services as part of a CoS to facilitate SPAYG o The proposal is to populate a required date of D+5 (working days) and also request a change to Interval Data services. The effective date in these scenarios will be D+5 (working days) and processing will align to the effective date. The key issue is the alignment of switch and processing.
- ESBN would reconfigure the Meter from Non-Interval data services to Interval data services on D+5 (working days) and the CoS completion messages will be sent once D+6 is reached
- o The customer would be registered to the gaining Supplier as an Interval customer.

#### 2. PAYG Flag

CRU has considered the proposals included in DR1219 as well as the feedback received from Market Participants in relation to the ask for a PAYG flag as part of the Smart PAYG solution. Consumer choice is key to an open competitive retail market. The CRU is cognisant of potential unintended consequences for the customer in having this identifying characteristic available to suppliers. The CRU has therefore decided to reject the inclusion of a permanent PAYG flag in DR1219.

- Temporary PAYG Identifier o The gaining supplier sends in the MM010 to initiate the CoS
- A new code is being created for inclusion MM012 which the losing supplier will populate to indicate the customer is PAYG
- The gaining supplier will be issued a MM112 with the code to indicate the customer is currently on a PAYG tariff.

The proposal is to create a mechanism to inform the gaining supplier that the customer is a PAYG customer upon initiation of a CoS

#### 2. PAYG Flag

The above provides one substantiation as to why a PAYG flag is needed – to facilitate an effective CoS process. This can be further expanded to include the following:

To manage the transition between fundamentally different services (PAYG — paying for energy upfront) vs credit (paying for energy at the end of a billing period after use), the gaining supplier needs to be aware of the service that the customer is operating on. This will enable management of the process where a credit by previous supplier is due, supporting the consumer who is used to either credit or SPAYG and what the move to the new product will mean for them.

It must be stressed that the PAYG flag is in no means a representation of tariff management, recording of supplier tariffs or management of supplier vends by ESBN. It is rather a provision of a service in place in much the same way that a Supplier knows if there is a MEC (microgen), MCC12, HH data, VC (vulnerable attribute), DG (urban or rural). The industry design is composed of a vast number of data values which allow different service delivery and customised options for different customers. The PAYG flag is to ensure that the pay before you use your energy service is distinguished from the pay after you use your energy — fundamentally different services and operations.

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- Currently Suppliers rely on the RM code used for Secure meters (ESBN Legacy Hardship PAYG) to understand what is in-situ at point of take on. Suppliers are able to use the RM code to ensure the correct processes and services are provided to the consumer. Importantly it also ensures that those suppliers who have a derogation, do not take on customers with such a meter as they are unable to service them. The RM codes which denote an ESBN H/S PAYG meter are RM280, RM281, RM282, RM283, RM284, RM285.
- The process involved in Lifestyle PAYG switch to or from a credit meter, was often difficult and resulted in issues for the consumer, often temporary loss of supply.
- To ensure the gaining and losing supplier can manage the journey between the fundamentally different (or similar) service types, they must be advised of the service in situ at switch.
- It has been acknowledged that a thin PAYG solution supported through a chain of different technologies, is susceptible to inevitable technical issues from time to time (with one or more components in the chain running into technical problems). This has already been seen since the go live in Smart metering from March 2021. A significant concern raised in a number of consultation responses to the CRU is in relation to continuity of service provision and the risk of issues arising as a result of the thin PAYG solution compared to those within a thick PAYG solution. The PAYG flag would facilitate a measure of risk to consumers who are being serviced by this technology. This would be critical in cases of managing technical problems with the thin PAYG technical framework.
- In recent years, extreme climate conditions and other events have required ESBN to provide information to the CRU in relation to the number of ESBN H/S PAYG consumers in the estate. This was particularly relevant in cases of top up access and the threat of being without power during extreme winters. It seems prudent that in the same way that ESBN manages the central Vulnerable customer DB against which reconciliation occurs annually, that as a minimum, they are required to retain the updated register of SPAYG customers.
- The Supplier of Last Resort Process could also benefit from a PAYG flag. The current process
  prioritises PAYG customers and a PAYG identifier flag would allow these customers to be placed
  on a PAYG service straight away.
- The introduction of the PAYG flag will also fulfil the CRU mandate that 'the capability to differentiate between customers on a credit or prepay tariff will need to be introduced in the V14 market release' as called out in the Smart Pay-as-you-go policy decision paper.

For a PAYG flag to exist at take on, it needs to be maintained throughout all processes. This would mean that the PAYG flag must be updated at 010, 016, 017 and 013 tariff change. It is suggested that the logic employed in vulnerable customer management is used for the SPAYG flag.

- CoS no CoLE For new customers, the flag must be added in the 010 (1 for SPAYG, 2 for Credit)
- CoS with a CoLE For new customers, the flag must be added in the 010 (1 for SPAYG, 2 for Credit)
- CoLE For new customers who are registering at a MPRN currently registered to the same Supplier, the flag must be included (1 for SPAYG, 2 for Credit)
- CoCD (MCC change) where a new MCC is being applied for SM the SPAYG flag must be added in the 013 (1 for SPAYG, 2 for Credit) – see section 6
- CoCD (Credit to SPAYG service change) where an existing customer is not undertaking a MCC change, but is changing from credit to SPAYG or SPAYG to credit, an 013 must issue (1 for SPAYG and 2 for credit) \* note, this is the only time/scenario a discreet MM will be issued rather than the flag being added to existing processes. see section 6
- Re-eng with CoLE for new customers undertaking a re-eng and CoLE with or without tariff change, the flag will be issued (1 for SPAYG and 2 for credit)
- Re-eng for existing customers undertaking a re-eng, the flag will be included (1 for SPAGY, 2 for Credit)

Transition between SPAYG and credit and Credit and SPAYG for existing customers.

Suppliers will manage the transition between credit/SPAYG and SPAYG/credit individually and differently. It may be that the transition is automatic off the back of internal debt management, terms and conditions.

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In order to manage the service within CMS, an 013 must issue for service change between credit and SPAYG and SPAYG and credit. This may or may not involve a parallel MCC change.

It is suggested that the PAYG flag is set as 1 for PAYG and 2 for credit (any values) and is set depending on the service offered by the supplier.

The 114 will confirm the update in CMS with a new code.

## 3. Debt Flag for switches away from Suppliers with no PAYG facility

CRU has confirmed its position that there will not be a debt flag or identifier for Smart PAYG.

A number of policy clarifications have been sent to the CRU, one of which covers the debt flag. This requirement has been added on the basis that a clarification would lead to a re-introduction of the debt flag for those switching due to no available PAYG facility.

The CRU Consultation proposed a threshold under which a supplier does not have to offer either smart or H/S PAYG. The concession is that if the consumer wishes to switch away to a supplier who offers this service in order to better manage their debt, they must be allowed, following engagement to do so. The CRU has made this allowable on condition that no debt flag is passed.

The request to the CRU is that an alternative flag code operates to distinguish this type of switch away as distinct from the std credit debt flag. It would follow all existing debt flag logic besides being a different code. This will allow gaining suppliers to:

- i. Verify if a customer is switching to them due to their previous supplier not being able to offer a SPAYG product or H/S PAYG product.
  - a. This is necessary to determine an appropriate customer journey for the customer moving due to debt and needing a PAYG solution
  - b. Allow the Supplier who offer SPAYG to provide an appropriate solution
  - c. Allow the Supplier who does not offer H/S PAYG and has a customer with CTF less than 4 to move to a supplier who does offer a H/S PAYG Solution or L/S PAYG solution
  - d. Allow the Supplier who does not offer any PAYG solution to advise the consumer they are unable to supply them with an appropriate product.
- ii. As change proposed will follow the existing debt flagging process, cancellation/objection MM will be used to prevent switching to a Supplier where appropriate PAYG cannot be supported. It is suggested that a discreet objection/cancellation reason is included to manage this.

The CRU proposal AS IS, requires supplier side change, the proposal above, would also require change but would allow continuation of debt policy to operate.

## 4. CTF algorithm suitability for SPAYG service provision

RMDS will create a new DR specifically looking at the CTF algorithm suitability for SPAYG service provision.

The CTF is an eligibility criterium for SPAYG service offering. The design in DR1216 mandates CTF 4 for remote disconnection and reconnection for PAYG. This means that the service is only fully and consistently available to consumers with a CTF of 4.

A SPAYG service must be reliable and consistent if it is to meet basic consumer expectations. Although estimate data can continue to be sent in 343MM for those on CTF 3 or below, remote disconnection/reconnection cannot take place. This means that to consistently manage the product offering, Suppliers are more than likely going to have to move a consumer from a SPAYG service offering if the CTF degrades below 4. This will mean a new contract and terms and conditions and obviously a poor customer experience.

In September 2021, the downloadable meter point files were assessed and revealed that +/- 72,000 customers who had been on CTF 4, were degraded to CTF 3. ESBN has explained that the reason for the degradation was due to a remote meter reading issue encountered for a week in August 2021. The CTF is

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defined in the CTF briefing document as measuring the "reliability of communications from the smart meter to the head end system". It also states that "ESB Networks expects coverage to fluctuate for a small number of meter locations due to a variety of reasons including but not limited to: local propagation issues, atmospheric conditions, tree coverage, radio access network failure, changes in network topology, communications interference sources, customer actions etc".

It is important from the above, that ESBN expects only a small number of fluctuations in CTF. In September 2021, 16% of all smart meters with a proven CTF degraded from 4 to 3. This value is usually around 0.1%-0.2% of the smart meter population with proven CTF. ESBN advised that the CTF reverted to CTF 4 in the month of October (yet to run analysis to confirm).

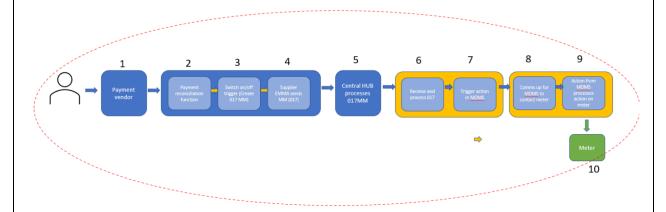
CTF degradation from 4 to 3 must be minimised wherever possible to prevent poor customer experience through moving a customer from a SPAYG to a credit product. It will also be an administrative burdensome process for Suppliers to manage. If there is a genuine degradation due to a change in regular connectivity, it is warranted but anomalies such as those experienced during September would lead to a significant consumer and supplier disruption in process and experience. Future anomalies also need to be assessed as sending estimations and replacements for PAYG customers is likely to have more of an impact as account balancing will be done daily.

The requirement is to request ESBN, ensure that ad hoc anomalies in systems do not temporarily impact the CTF value. The algorithm must be amended in such a way as to exclude certain anomaly events to prevent unnecessary degradation from 4—3 and then back to 4. Apart from anything else, the mass degradation experienced would have immediately prevented the disconnection/reconnection of any of the 72,000 customers who may have been operating on a SPAYG product.

# 5. Contingency process for failure in SPAYG Technology Chain

RMDS will create a new DR specifically looking at contingency process for failure in the SPAYG technology chain.

CRU has acknowledged the complexity of the new thin SPAYG technical framework and the need to consider contingency process and procedure. As detailed in the diagram below (extract from OHC submission to CRU in call for evidence), up to 10 technical interfaces exist in the operation of the proposed thin SPAYG solution. This is in comparison to 3 to 4 in the current lifestyle PAYG and or hardship ESBN PAYG solution.



A variety of issues could arise, examples include:

-	Process	System	Party	Outage and disconnections process
1	<del>Payment</del> <del>Vendor</del>	External	External	Pause account threshold monitoring/ Disconnections

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2	Payment Files	Automatic/Supplier system	Supplier	Pause account threshold monitoring/ Disconnections
3	Payment reconciliation function	Supplier system	Supplier	Pause account threshold monitoring/ Disconnections
4	Switch on/off trigger 017	Supplier system	Supplier	Use webforms to send 017
5	SAP PO	Supplier system	Supplier	Use webforms to send 017
6	Supplier resend 017	EMMA	Supplier	Phone Networks
7	Central Messaging HUB	EMMA	ESBN	Phone Networks
8	Receive and Process 017	Supplier system	ESBN	TBC
9	Trigger MDMS action		ESBN	TBC
<del>10</del>	Comms to MDMS	MDM	ESBN	TBC
11	Action MDMS process on meter	MDM	ESBN	TBC
<del>12</del>	Meter	MDM	ESBN	TBC

Although the volume of issues cannot be foreseen, it is accepted that issues will inevitably arise due to the number of technical interfaces and different stakeholders (payment vendors, customers, suppliers, DSO). It is necessary to model a process for failure at:

- each interface and how service must be managed at each failure point
- how resolution and "back fixing" the issue in relevant systems must be undertaken.

The outcome is likely to be a working practice for the industry with guidelines, but it may also involve technical requirements which are yet to be identified (especially with CMS).

## Issue can fall into two different categories

- day to day individual MPRN issues and
- mass technical failures at an interface.

For example, if a HUB outage prevents issue of 017 reconnection or disconnection messages how must

- 1. the issue be resolved immediately for the consumer
- the issue be corrected throughout all systems to ensure no knock on impacts up/down chain of systems.

# This requirement must include details such as

- 1. SLAs for each interface resolution event (mass resolution)
- 2. SLA for individual resolution of issues with consumers (individual)
- 3. Query process between stakeholders to support issues in end-to-end SPAYG service
- 4. Query process for day-to-day issues with individual events.

A process where ESB Networks is available on call 24/7 may be needed to adequately support the smart PAYG service.

As per the Smart Pay-as-you-go decision paper, ESBN have been tasked with presenting their contingency plan for Thin PAYG to CRU by the end of the year. We believe giving suppliers early sight of what this proposed plan may be and seeking input is vital.

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Design Documentation	Business Process	DSO Backend System Change	MP Backend System Change	Tibco		Supplier EMMA	Schema	Webforms	Webservice	Extranet Market Website
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Message	No.	Messa	ige Name						RO	)I
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# Market Process Diagrams – MPDs

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Market Process Number	Market Procedure	Affected	
MPD 1	Change of Supplier Non Interval	Yes	
MPD 2	Change of Supplier Interva	Yes	
MPD 9	De-Energisation	Yes	
MPD10	Re-Energisation	Yes	

Guidance Documentation		
Document	Version	Affected
No impact		No Impact

Briefing Document				
Briefing Document		Affected		
No Impact		Yes		

User and Technical Documents				
Reference	Name	Version	Affected	
No impact			No Impact	
INO Impact			No impac	

Comments

Part 2 - Performance and Data Changes	
Market Messages volume, processing etc.	
Data	
Details of Data changes e.g. cleansing	

Approved by	CRU

