

Retail Electricity Market

New Entrant and Market Participant Assurance Strategy and Approach

This document does not include any confidential, personal or sensitive information.



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Reference Documents

Title	Description
Irish Retail Electricity Market – Market Change Assurance Strategy	Document outlining the Assurance strategy and process that will apply when changes are being introduced to the Retail Electricity Market.
Retail Electricity Market Balance Scorecard – Guidance Document	Guidance document to outline the framework for the application of the Balance Scorecard.



1. Introduction

1.1 Purpose

The purpose of this document is to set out the high-level Assurance framework for Market Participants in the Retail Electricity Market. Specifically, this document outlines the application of assurance services relating to the following four areas:

- 1. New entrants to the Retail Electricity Market;
- 2. Continual assessment: applying to
 - a. participants certified in the Small and Large Supplier categories as to ensure their market operational systems and processes are maintained at a satisfactory level as they grow in the market.
 - b. Self-Supplier, Export Only, Demand Side Unit and Participant Generators to ensure the rules relevant to the market roles have been maintained.
- 3. Requalification and Material Change¹: where existing Market Participants (MPs) wish to enter new market segments (not previously qualified), change their market role or, make changes to existing operational systems (that interact with the market related systems), processes or IT infrastructure.²
- 4. Market Exit: the assurance process applied when a participant leaves the market.

This document provides coverage for both the Strategy and Processes for new entrant and market participant assurance.

Combined with the Market Change Assurance Strategy this document supersedes and replaces the Market Assurance Strategy for the Retail Electricity Market v3.0 issued June 2021 and the Market Assurance Processes for the Retail Electricity Market v3.0 June 2021.

1.2 Background

In February 2005, the Retail Electricity Market opened to full competition. As the Market continues to develop, changes to the participants, their systems and infrastructure occur, including:

- new organisations that wish to become Market Participants;
- existing Market Participants that wish to operate in additional Market Segments;
- the Market Design and central systems adapting to change requests from Market Participants, changing trading arrangements and improvements in technology;
- Market Participants initiating and implementing changes to their own systems for their own business purposes, with these changes having the potential to impact on the participants' ability to operate non-disruptively in accordance with the Market Design; and
- Small Suppliers growing and wishing to operate on a larger scale.



¹ defined in Appendix 7 (section 6.7). A Material Change represents a change to a Market Participant's business and/or operational processes, and/or technical infrastructure (e.g. automation) that alters the participant's internal systems and methods of Market interaction from that initially assured

 $^{^2}$ for the avoidance of doubt participants should liaise with RMDS in the first instance to review assurance requirements for the proposed changes



The Commission for Regulation of Utilities (CRU) decided that, in all such situations, independent assurance is required to give confidence to the Market that the risk of disruption has been mitigated, and that this assurance service should be procured through Retail Market Design Service (RMDS). The organisation providing the assurance service is referred to as the Assurance Body throughout this document.

In all cases the reference point for assurance is the published Retail Electricity Market Design, as agreed by the Industry Governance Group (IGG), approved by the CRU and published on the RMDS website.

1.3 Scope

As part of their licence, it is obligatory for Market Participants to:

- ensure the successful completion of the relevant aspects of the assurance processes; and
- adherence to assurance requirements conforming to this Assurance Strategy, as approved by the CRU.

New Entrant and Market Participant Assurance is applicable to all new entrants and all existing Market Participants (MPs) that have been certified to operate in any market role within the Retail Electricity Market (as defined in section 1.4).

As stipulated by the CRU, independent assurance is required as part of a Supplier license. It is mandatory for all Market Participants to have successfully completed all relevant aspects of the Market Participant Entry process according to the Market Role and market segments requested (detailed in this document), before commencing live operations in any segment of the Retail Electricity Market.

Upon the Assurance Body certifying entry into the Retail Electricity Market, Market Participants are obliged to ensure they comply with the requirements of this Assurance Strategy, and the Market Change Assurance Strategy and the processes outlined, as approved by the CRU. This includes the subsequent phases of Assurance in the Market Participant lifecycle as outlined in this document.

Organisations wishing to enter the Retail Electricity Market should in the first instance contact the CRU to obtain the relevant regulatory license. Following receipt of their license the Market Participant should contact RMDS to discuss the Market Entry processes relevant to their market role and market segments as required.

1.4 Definition of Market Roles

There are six market role categories within the Retail Electricity Market (outside of System Operator roles), that are defined below;

Market Role	EMMA ³	Market Segments⁴	Key definitions
Self-Supplier	No	Non Domestic (QH)	 A Self-Supplier is a Supplier who: supplies energy to only one site; does not compete to supply energy to any third party; and

³ Electronic Market Message Application (EMMA) – solution hosted by the Market Participant & ESB Networks TIBCO server environments to facilitate sending and receiving of Retail Electricity Market Messages



⁴ As defined in section 1.5



			 does not use market messages to support its operations. A Self-Supplier may register only one metering point.
Export Only	No	Non Domestic (QH) (Export Only)	 An Export-Only Supplier is a Supplier who: has more than one de minimis / non-participant sites which they want to register for export only up to a maximum of 10 sites; has financial control over export payments from the SEMO rather than receive payments as a generator via a bi-lateral contract agreement with a supplier; and supplies energy to only one site.
Demand Side Unit 5	No	N/A	 Market Role solely for operating a distribution connected DSU in the retail electricity market; No requirement to register any MPRNs; One or more individual Demand Sites that can be dispatched by the TSO as if it was a generator.
Small Supplier	Yes – Small EMMA	All ⁶	 A Small Supplier is a Supplier that has, or intends to have within the foreseeable future, less than 1,000 MPRNs registered; Limited to register a maximum of 999 MPRNs. Sends and receives market messages to operate within the Retail Market;
Large Supplier	Yes – Large EMMA	All ⁶	 A Large Supplier is a Supplier that has, or intends to have within the foreseeable future, more than 999 MPRNs registered; With no limitation to the number of MPRNs registered; Sends and receives market messages to operate within the Retail Market;



⁵ Distribution network connected

⁶ Market Participant or new market entrant to select required segments as part of the application form



Market Participant Generator	Yes ⁷	Market Participant Generator	 A Generator entering the Market without the use of Market Messages but receiving readings via an EMMA would be subject to assurance for that scope.
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Table 1 - Definition of Market Participant Categories in the Retail Electricity Market

1.5 Definition of Market Segments

There are presently five market segments within the Retail Electricity Market, that can be selected by Small and Large Suppliers as part of the initial market entry assurance or entered as part of a later requalification application. The market segments are defined below;

Market Segment	Key definitions		
Domestic	 Domestic is an MPRN with a DUoS group of DG1 or DG2; Metering Types: Non-Interval, Interval (HH). 		
Non Domestic	 Non-Domestic is any MPRN where the DUoS Group is not: DG1, DG2, DG3, DG4; Metering Types: Non-Interval, Interval (HH); 		
Non Domestic (QH)	 Non-Domestic is any MPRN which have a Quarter Hour meter installed and can be identified by a Meter Configuration Code of MCC10 or MCC11; Metering Types: Interval (QH) 		
Domestic (Pre-Payment Metered)	 Prepayment meter owned by ESB Networks and installed for customers who are in financial difficulty (financial hardship PAYG meters); Meter Type: Non-Interval. 		
Unmetered	Charges for electricity consumption are not measured via a meter and have a DUoS Group of DG3 or DG4. Provided for small electricity loads where the usage is predictable.		

Table 2 - Definition of Market Segments in the Retail Electricity Market



⁷ EMMA type will be dependent on the individual circumstances and requirements



1.6 New Market Entrant or Participant Change Assurance Triggers

The triggers for when participant assurance activities are required, are detailed below. The triggers align to the participant assurance lifecycle process that are detailed in <u>section 4</u>.

Market Participant Lifecycle Phase	Assurance Type	Market Roles	Trigger
Phase 1: Application & Entry Assessment	Phase 1: Application & New Entrant		Receipt of New Entrant Application form.
Phase 2: Continual Assessment / Balance Scorecard	Recertification	Self-Supplier Export Only Demand Side Unit ³ Participant Generator Small Supplier Large Supplier	CRU requests a Market Participant applies for a requalification or material change depending on the outputs of this Phase.
Phase 3:	Requalification i) New Market Role and/or	Self-Supplier Export Only Demand Side Unit ³ Participant Generator Small Supplier Large Supplier	Market Participant Requalification Application.
Requalification & Material Change	ii) New Market Segment(s)	Participant Generator Small Supplier Large Supplier	
	Material Change	Participant Generator Small Supplier Large Supplier	Market Participant Material Change Application.
Phase 4: Market Exit	Market Exit	Self-Supplier Export Only Demand Side Unit ³ Participant Generator Small Supplier Large Supplier	Market Participant notifies RMDS intention to leave the market.
	Supplier of Last Resort (SoLR)	Small Supplier Large Supplier	Supplier of Last Resort (SoLR) event is notified to RMDS by the CRU.

Table 3 - Definition of New Market Entrant and Participant Assurance triggers in the Retail Electricity Market



There are several events that may trigger a requirement for assurance to be carried out. The approach to assurance for the different types of events is commensurate with the perceived risk in each case, in line with the Guiding principles.

Phase 1: Application & Entry Assessment

New entrant

An organisation's potential to pose a risk to the Market is at its greatest when it first enters the Market. Consequently, the assurance approach is most demanding for this event, tempered by the type of Market Participant the organisation wishes to be approved as.

Phase 2: Continual Assessment / Balance Scorecard

This phase seeks to ensure that the systems, procedures, infrastructure and market message processing assessed for market entry assurance (or requalification where applicable) are being maintained at a satisfactory performance level and within the assurance categories and market segments approved. There are two areas covered within this phase of assurance, continual assessment and the Balance Scorecard.

Phase 3: Requalification & Material Change

New Market Role

Where market participants wish to enter a new market role a requalification application is progressed that will follow similar steps as Phase 1. Where applicable the assurance approach will be tailored to ensure no duplication of assurance activities that have already been completed.

New Market Segment

The assurance process to cater for existing Market Participants entering a new Market Segment(s) is identical to that for a new participant but with the scope limited to the requirements applicable to the new Segment(s). For example, where a Large Supplier wishes to enter the Unmetered Market segment, they shall undertake Market Assurance for the new Market segment only.

Material change (Market Participant's systems or processes)

The procedures and systems used by Market Participants to operate in the market will be subject to change from time to time. Most changes to a Market Participant's processes and systems would be for the company's own business purposes. Where such internal changes may impact on its ability to inter-operate in the Market (e.g., if there is a change to the software that generates registration messages) there may be a requirement for assurance that the change has been (or is being) managed in such a way that the risk of an adverse impact on the Market has been minimised.

Phase 4: Market Exit

The assurance process applied when a participant leaves the market in a planned exit, or via the Supplier of Last Resort process (SoLR).





2. Objectives

2.1 The focus and objective of New Entrant and Market Participant Assurance Strategy and Approach

The overall objective of Market Participant Assurance and Approach is that should one of the triggers identified in section 1.6 materialise, the assurance activities and processes will:

- give confidence to the CRU and all Market Participants that potential risks that may cause Market disruption are mitigated; and
- provide confidence that market operations will not be disrupted by the introduction of new market entrants, requalifications and changes.

2.2 The guiding principles of New Entrant and Market Participant Assurance Strategy and Approach

The guiding principles underpinning this Assurance Approach can be condensed into the following;

• Assurance activities should not place an unnecessary burden on the participant;

A risk-based approach is taken for several elements of the strategy, and the Participant's own project plan is considered when deriving a specific assurance approach for them.

Assurance process must be appropriate to all types of new market entrant;

Reflecting this principle, the Assurance Strategy includes a tiered approach for new entrants. It has fewer demanding requirements for Small Suppliers and Generators, with Large Suppliers subject to the full Assurance Process.

• The level of Assurance should be balanced with the risk of amendments and additions;

Amendments and changes, both to the Market Design and to Participant's own systems, will vary considerably in terms of impact and scale. The assurance approach will assess the nature, scale, and impact of risks when changes are introduced. And the approach taken for a specific change will be commensurate with the risk posed by it.

Market assurance should be evidence based;

The assurance approach is to be proportionate and appropriate in how much and what evidence is collected by the Participant and provided to the Assurance Body.

Assurance process must be appropriate to market roles in a subset of segments;

Organisations may choose to operate in only specified Market Segments. The Segments that may be selected are outlined in section 1.5. The assurance approach taken for each Market Participant focuses on the Segment(s) for which approval has been requested.

• The approach and outcomes provide confidence for the Market to proceed with the introduction of new entrants or the requalification's / material changes and continual assessment of existing Participants.

The Assurance Body is providing assurance that the introduction of new market entrants, existing market participants into new market segments or market role categories and market participant changes that are deemed material and the risks of disruption have been mitigated.



3. Assurance approach and techniques

3.1 Summary of the New Entrant and Market Participant Assurance Strategy and Approach

The new entrant and market participant assurance strategy and approach contains seven distinct stages, which typically occur in sequence. It should be noted however depending on the market role / market segment(s) being requested or the level of change being introduced by the market participant, the requirement for some stages may not be required and the depth of probing may differ for certain stages.

Appendix 1 (section 6.1) details the process flows, that provide an overview of how the steps and stages progress through the Market Participant assurance lifecycle. Section 3.2 below details the activities and desired outputs from each of the stages listed below.

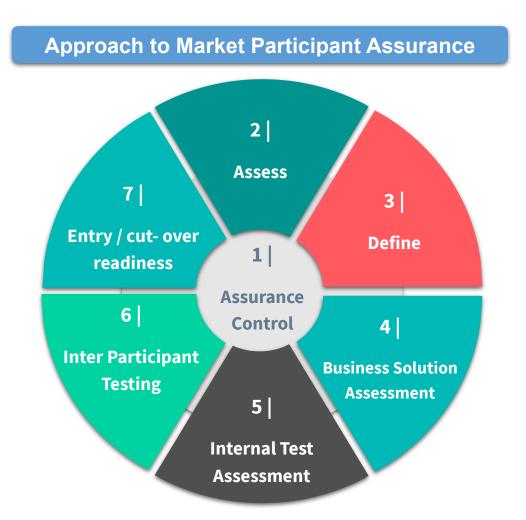


Figure 1 - Outline approach to the New Entrant and Market Participant Assurance Strategy and Approach

The key stages of the approach are **summarised** as follows;



- 1) Assurance control the overall project governance that the Assurance Body will follow including plans, communication strategy and reporting back to Market Participant, RMDS and CRU either through step completion documentation, meetings or an ad-hoc targeted intervention.
- 2) Assess the approach to reviewing (where relevant) the market entry / requalification or material change application form (including participant questionnaire), project plans, impact assessments and test plans for the new entry, requalification or material change, assessing the effective impact on the market.
- 3) Define defining the assurance approach for the new entry, requalification or material change, depending on the market role, market segments being requested and for an existing Market Participant, previous assurance certification undertaken (where applicable). The primary outputs of the define stage will be the creation of the market design coverage tab of the Self-Assessment Return (SAR) and/or the creation of an Assurance Approach document.
- 4) Business Solution Assessment (BSA) the first stage of the Assurance Approach. It has the primary objectives of verifying that the Market Participant's processes, systems and records have been, or are being, designed and built-in compliance with the Market Design and ensuring that the Market Participant has a robust plan for preparing for Market operation. The aim of the BSA stage is to gain assurance that the proposed processes and systems/solutions (or changes to) are/have been designed appropriately to meet the requirements of the Market Design.
- 5) Integration Test Assessment (ITA) the ITA stage is focused on assessing the evidence provided by the new entrant or Market Participant on completion of their internal and integration testing scenarios. With the prime objective of verifying that the Participant has carried out satisfactory testing of their systems and processes before entering the formal market testing stage (IPT). The ITA stage requires the Market Participant to perform integration testing on their systems and processes. The ITA Stage is the stage during which internal integration testing is assessed by the Assurance Body for completeness and effectiveness. All key Market scenarios and the full functionality of any automation must be included in the testing. Test plans, scripts and results must be retained for assessment by the Assurance Body.
- 6) Interparticipant Testing (IPT) IPT provides an opportunity for market testing in a simulated live environment. IPT is seeking to ensure the solution or changes adopted by the new entrant or Market Participant are working as expected before they are released into production. This is the final opportunity for the Market Participant to test the solution developed to enter the market or the changes made to their systems / processes. IPT is used to verify that the Market Participant's processes, systems and staff can operate in the live Market. The Market Participant performs several defined Market scenarios in a test environment that replicates the whole market infrastructure.
 - IPT requires co-ordination between the Market Participant, RMDS and ESB Networks with regards to planning, data set-up and gathering of evidence. For IPT to be possible, the Market Participant must have an EMMA installed and be connected to ESB Networks' test market hub.
- 7) Market Entry / Cut-over readiness focused on the ability and confidence to proceed with market entry into the market role and/or the new segment(s) or the change being introduced, the go-live or the cut-over. This stage also seeks to gain confidence in the post go-live support model and contingency plans. From a Market Participant perspective, a self-declaration will be returned to the Assurance Body showing the confidence and approval of their ability to proceed with the market entry or material changes being implemented.

Following these key stages, the Assurance Body will then develop a final assurance assessment report for approval by CRU who uses it to inform its decision on whether to approve the Market Participant to





operate in the Retail Electricity Market. This report provides an outline of the assurance work performed, resultant outcomes, together with a recommendation regarding the progression to Go-Live and/or Cutover.





3.2 Assurance specific techniques overview

The Market Design baseline contains the requirements to which the Market Participant's processes and systems must comply for inter-operation in the Market. The Assurance process stages are described below. These stages are applicable to different assurance scenarios. In some cases, the stages may be combined, the depth of assessment reduced or increased, or they may be omitted. Notwithstanding this, the underlying techniques of assurance still apply, and an understanding of these techniques will help to smooth the Assurance Process and potentially reduce timescales.

All new market entrants, requalifications, and material change applications will complete the first three steps, control, assess and define. For new market entrants the table contained in Phase 1 - Application and Entry Assessment provides the overview of the assurance stages that will be used depending on the market role being applied for. For the other phases in the market participant lifecycle journey an individual assurance approach will be developed where necessary.

These Stages are intended to broadly map onto the Participant's own project for readiness to operate in the Market (for example design, test and go-live). This stepwise approach helps ensure that problems can be identified as early as possible so that any corrective action can be applied by the Participant as easily and economically as possible.

For an assessment to be possible, the Participant must design, develop, and test business procedures and instructions, records systems and possibly IT applications to ensure that they are compliant with the Market Design. The Participant retains documentary evidence to demonstrate this. The Assurance Body carries out the Assessment by:

- examining this evidence, together with the procedures, instructions, and other related information, and comparing them with the requirements;
- reporting any discrepancies that are thereby identified; and
- following up to verify that discrepancies have been corrected.

The Assessment should be timed such that all the documents, records, and information, whether electronic or paper, will already be in existence by the time of the Assessment. Apart from test evidence produced during Inter-Participant Testing, evidence should not be created dynamically within the timeframe of the assessment.

Format of assessments at each stage

Assessments are usually conducted at the Assurance Body's local offices based on the evidence provided. The Participant is not required to be present. Occasionally an Assessment may be conducted partially at the Participant's site, depending on the stage of the Market Assurance Process involved and the conditions prevailing within that stage. The process employed for all Assessments is as follows:

- Opening dialogue, which may be by meeting, phone or email depending on the circumstances. Here, the objectives, scope and procedure for the Assessment are described by the Assurance Body, and the Participant describes the structure of its systems, processes, and organisation for Market operation.
- Submission of the relevant Market Assurance returns by the Participant, analysis of these by the Assurance Body and clarification dialogues as necessary.





- Submission of the Participant's evidence for the relevant assurance stage. This may comprise (but is not limited to) documented business processes, specifications, and test results.
- The execution of the tests (IPT Stage only).
- Comparison of the evidence with the current Market Design or Market Design Release and discussion with the appropriate Participant staff, during which a judgement of compliance is made by the Assurance Body.
- Documentation of outcomes is in the form of areas of concern as appropriate.
- The Participant must provide a corrective action for areas of concern raised and submit evidence to show that this has been effectively implemented. When satisfied, the Assurance Body will close the area of concern.
- There is no requirement for the Participant to respond to observations.
- Where the scale or duration of the assessment requires (mainly for a new Large Supplier), daily or periodic exchanges of information take place. These are usually referred to as checkpoint meetings and will usually take place on the telephone or electronically. At these meetings, the assessment team reports its activities, gives details of any areas of concern for the day, and requests the Participant to agree these and to propose corrective actions for all areas of concern as appropriate. The Participant is asked to report its progress, any problems and anticipated activity for the following day.
- Closing dialogue, which takes place at the end of the Assessment and at which all open areas of concern (if any) and Corrective Actions for the Assessment are formally reported to the Participant's representatives.
- The assessment stage report (for lengthy assurance programmes only) is produced by the Assurance Body, addressed to the CRU, and copied to RMDS. This will contain:
 - o the scope for which the Participant/Market Participant was assessed,
 - o the level of assurance applied (e.g., whether a Large or Small Supplier or Self-Supplier/DSU/Export Only),
 - o the Assurance carried out,
 - o the number of areas of concern raised (as appropriate),
 - o any areas of concern remaining (based on areas of concern not closed), and
 - o whether, in the opinion of the Assurance Body, the Participant has demonstrated compliance for the stage of Assurance involved and any impact on subsequent stages of Assurance.
- Production of the outcome report.

3.2.1 Control

The assurance control refers to the overall project governance that the Assurance Body will follow including plans, communication strategy and reporting back to the CRU and RMDS either through step completion documentation, meetings with MPs / new entrants or ad-hoc targeted interventions. Appendix3-Roles and Responsibilities provides an overview of the stakeholders involved as participants in this strategy document aligned to the key stages. In addition to the milestone stage completion points, the Assurance Body will have weekly meetings with RMDS and regular meetings with the CRU outlining progress.





3.2.2 Assess

The assess step includes reviewing (where relevant) the new entrant or MP application form (market entry, requalification / material change or market participant exit) including participant questionnaire, electricity supply licence, project plans, impact assessments and test plans for the new entry, requalification or material change, assessing the effective impact on the market.

<u>Phase 1 – Application and Entry Assessment</u> provides an overview of how the Assurance Body will define the techniques used for a new market entrant depending on the market role. A tailored assurance approach will be presented to CRU for approval (at the define stage) for requalification's and material changes where for any reason the defined assurance approach in Phase 1 requires amendment or the assurance trigger is non-standard.

3.2.3 Define

The primary deliverable from the define stage is the completion of the Market Design Coverage tab of the Self-Assessment Return (SAR) and/or an Assurance Approach document for approval by CRU (where required, see Section 5).

The SAR is a workbook that contains the outputs of the key assurance deliverables during a participant assurance assessment. An overview of the sections are outlined below;

- Market Design Coverage tab will detail the processes required to be assurance certified (dependent
 upon participant specific requirements). This tab will enable Market Participants to outline their
 planned operational approach, confirmation of understanding of the market process and will track
 progress of both the BSA and ITA stages. Internal business processes will be aligned to the retail
 market procedures (MPD's). This makes it easier to review the documents provided and ensures they
 align correctly with the market steps. Additionally, will include the Assurance Body's assessment
 comments and feedback.
- Participant Questionnaires (PQ) are required for each assurance stage (BSA, ITA, IPT and market entry / cut over). The PQs list a series of questions focused on gathering key information ahead of each stage of assurance, each requiring a response. For some questions the response will require documentary evidence to support. Some of the key areas are listed below;
 - o Information on the organisation, structures, locations, architecture of the systems, specifications and the market design processes and solutions have been configured for;
 - O How the business will or has developed systems and processes to ensure they align with the Retail Market Design;
 - Systems and infrastructure performance;
 - o Integration testing criteria, strategy and various confirmations,
 - Confirmation of resources, connectivity and alignment of process documentation for the IPT phase;
- Progress trackers for the BSA and ITA stage;
- **Self-declarations** for BSA, ITA, market entry / cut over (where a change is being made), or market participant exit;
- Business contacts and roles for the project;

All new entrants entering the Small and Large Supplier Market Roles will be required to complete a Self-Assessment Return Document (SAR).

For nonstandard requalification and all material change applications an assurance approach will be developed by the Assurance Body for approval by the CRU.



Where IPT will be required a part of the Assurance delivery, a key activity during the define stage will be to schedule the IPT testing window, to ensure availability of ESB Networks and other relevant parties. Sufficient contingency for issue management, data creation and retesting will be required to be factored within the test window defined and agreed.

Assess and Define stages Exit Criteria

In order that the Assess and Define stages have been completed, the Assurance Body will require the review and satisfaction with:

• Completed application form for the relevant Assurance qualification, including the declaration signed by appropriate company executive.

Depending on the Supplier Assurance qualification:

- Participant Questionnaire completion BSA tab (contained within the SAR).
- Market Design Coverage tab of the SAR agreed and updated for each required MPD, working practice or briefing document with;
 - (i) the planned operational approach,
 - (ii) business process document title and reference,
 - (iii) confirmation of full understanding of market process, working practice and briefing documents; and
 - (iv) operational responsibility upon go live for the required market process audit requirements.
- Business contacts tab of the SAR completed.
- A plan relevant to the scale and complexity of the project, detailing all the key participant requirements aligned to the completion of the required Assurance activities.
- Participant to provide a timeline relevant to the project, to ensure duration of key assurance phases and milestone dates are agreed with RMDS and the Assurance Body.
- The CRU approval of an Assurance Approach (where required, refer to Section 5).





3.2.4 Business Solution or Design Assessment

3.2.4.1 Business Solution Assessment (Large Supplier)

The aim of the Business Solution Assessment (BSA) stage is to gain assurance that the Participants systems and processes are designed and built to meet the requirements of the Market Design. It also provides comfort that the personnel who will be operating these systems understand what they will be doing. This step occurs early in the Assurance process as Participants are documenting their business processes and system designs.

The New Entrant or Market Participant will be required to create or update the design of a suite of business process and system designs to the extent necessary to demonstrate compliance with the Market Design baseline. For a participant entering additional Market segments, they will complete the market segments relevant to them. The full list of Market Design documents are available on the RMDS website.

Where the BSA stage assurance technique is required, a completed Self-Assessment Return (SAR) will be required. The scope of the assurance requirements will be confirmed via the SAR during the Assess and Define stages. The BSA stage assessment will encompass:

- Satisfaction with the participants processes to comply with the Market Design. The assessment will cover system automation, exception management and manually triggered processes. System design and architecture, market message creation, processing and validation.
- Review of the participants project management, issue resolution and change manage procedures.
- Where necessary, the Assurance Body may request a site visit to gain a fuller understanding of the Participant's design, especially where there is a significant degree of automation involved.
- Completion of the integration test strategy participant questionnaire will be required to be completed during the BSA stage. The Assurance Body will assess the responses and supporting documentary evidence to ensure comfort that there is a satisfactory test plan and strategy in place before entering the ITA stage.

During the BSA stage the SAR will be updated to provide a log of review comments, feedback, participant responses and confirmation of approvals. In addition, will be updated with the current documentation references and versions for alignment.

Any issues identified are formally documented as areas of concern, and the Market Participant is expected to propose and agree corrective actions. The results of the actions are then verified. An outcome report is produced on completion of the BSA, which is sent to the new entrant and RMDS for information. If corrective actions are completed in a timely manner, then a positive outcome can be reported. Otherwise, the report will be updated on completion of the corrective actions.

BSA Documents Required

The Participant is required to provide the following prior to the commencement of BSA:

- A plan for their project that shows all their Assurance stages and the project activities on which they depend. Timings must be appropriate for those dependencies. The plan may be included within a more comprehensive project plan.
- A completed Application Form, with the declaration signed by an appropriate company executive.
- A Self-Assessment Return (SAR) with:
 - o For Large Suppliers, the BSA section of the Participant Questionnaire;
 - o the message routing worksheet completed except for test references; and
 - o all other worksheets fully completed.





- Satisfactory responses to requests from the Assurance Body for clarification on the above items.
- A start date and duration agreed with the Assurance Body.

The Participant is required to provide the following on commencement of BSA:

- a copy of all documented business processes and detailed instructions referred to in their SAR,
- a copy of the job aids for the instigation market messages,
- a copy of all systems specifications and design documents referred to in their SAR,
- a definition of the records that the Participant intends to maintain,
- a copy of the schematics of system architectures of all systems referred to in their SAR, and
- an organisation chart of their organisation and of their project.

BSA Exit Criteria:

In order that the BSA stage has been completed, the Assurance Body will require the review and satisfaction with:

- ITA Participant Questionnaire completion (contained with the SAR);
- Participants business processes to satisfy the retail market design. For the avoidance of doubt all selected processes on the Market Design Coverage tab of the SAR have been approved by the Assurance Body and updated accordingly;
- BSA declaration signed by appropriate company executive (Self Declaration BSA) contained within the SAR workbook.

The Business Solution Assessment stage is completed when the Assurance Body has closed all areas of concern following resolution by the New Entrant or Participant.

3.2.4.2 Business Design Assessment (Small Supplier)

A Small Supplier may have less automated processes to facilitate the retail market business operations, where this is the case and the utilisation of the market provided webforms application is a key feature in the participants processes, an assessment of the business design/processes and records will be carried out to verify their adequacy to support small-scale operations in the Market. Whilst many aspects of the BSA stage for a Large Supplier will apply the key differences will be;

- (i) testing the market knowledge and ability to create validated outbound market messages via webforms;
- (ii) monitoring and actioning the receipt of notification, confirmation and rejection market messages;
- (iii) how internal records are updated with customer/MPRN detail/statuses, meter read messages and how individual processes are tracked to completion;
- (iv) access and controls for records management and maintenance.

For the avoidance of doubt where a Small Supplier is implementing an integrated system that will generate market message XMLs (for some or all market processes and messages) and is not using webforms for all XML market message creation, they will be required to follow the Large Supplier assurance steps of BSA and ITA.

Process/Records Review Entry Criteria:

In order that the Assurance Body may commence the Process/Records Review Stage the Participant is required to:

• have defined the records that they intend to maintain for the purposes of supporting their registered metering points,





- have documented all their market-facing business processes, and
- submit the above along with the following documents, duly completed, to the Assurance Body:
 - o the Small Supplier Questionnaire, and
 - o the Self-Assessment Return (SAR) (test references do not need to be completed as they will not be applicable to a Small Supplier).

Small Supplier BDA Exit Criteria:

In order that the Small Supplier BDA stage has been completed, the Assurance Body will require the review and satisfaction with:

- All applicable market procedures are covered (e.g. Meter Works procedures, Data Processing and Data Aggregation procedures etc);
- The order of events is followed for each market procedure;
- They can populate all outgoing Market Messages to ESB Networks including how they populate these e.g. via Webforms and the source for populating data items;
- They process the data contained in all inbound Market Messages from ESB Networks, including use of incoming data items for updating internal records; and
- They maintain appropriate records to support the above.
- BSA declaration signed by appropriate company executive (Self Declaration BSA) contained within the SAR workbook.

The Process/Records Review Stage can be considered complete when:

- the Assurance Body has completed its review; and
- any Findings have been satisfactorily addressed by the Participant.



3.2.5 Integration Test Assessment (ITA)

The aim of the ITA stage is to ensure that the internal and integration testing undertaken by the Participant is robust and has sufficient depth and width to gain comfort that the system is compliant with the retail Market Design. ITA should be carried out soon after completion of the Participant's internal testing, with the prime objective of verifying that the Participant has carried out satisfactory testing of their systems and processes. It verifies that the following have been carried out satisfactorily:

- Testing has included a set of end-to-end, integrated tests that cover the Market Design functions. This may be referred to as Integration Testing, Acceptance Testing, User Acceptance Testing, Functional Testing, or some other term.
- The testing programme is complete.
- The test outcomes have been reviewed by a competent person.
- Any problems have been fixed and re-tests run as required.
- Results show that the processes and systems are functioning as expected.

Where the ITA stage assurance technique is a requirement, the Self-Assessment Return (SAR) will be used to record and track the stage outputs. The scope of the ITA assurance requirements will be confirmed via the SAR during the Define stage, to ensure a sufficient range of market processes are covered. The ITA stage assessment will encompass:

- Participant to provide test evidence to demonstrate the satisfactory completion of end-to-end integrated testing that cover each of the required market processes agreed in the SAR. Evidence will typically include system screen shots, XML's etc. Also detailing system status, data and processes before and after step executions. To provide comfort that the systems and processes are working as expected.
- The tests should document and follow the steps contained within the business processes provided and assessed during the BSA stage. When the normal business processes trigger communications or documentation as part of system automated end to end customer journey, these should also be provided as part of the ITA evidence pack.
- In addition, the test evidence should be referenced against the SAR ahead of the evidence being provided and aligned to the test strategy/plan provided in earlier assessment stages.
- Detail should be provided on any issues resolved during the testing program and provide evidence of any areas re-tested.
- The Assurance Body will review all of the evidence and generally meet with the Participant to probe deeper into the documentation. This meeting also provides an opportunity to deep dive any queries that may arise.
- Should any material issues arise, the Assurance Body will agree a resolution with the Market Participant. Any issues identified are formally documented as areas of concern and the Participant is expected to propose and agree corrective actions. The results of the actions are then verified. The Assurance Body provides written confirmation of the outcome, any corrective actions to be taken, and the next steps on completion of the ITA Stage. If corrective actions are completed in a timely manner, then a positive outcome can be reported. Otherwise, the report will be updated on completion of the corrective actions.

ITA Entry Criteria:

The Participant is required to meet the following entry criteria prior to the commencement of the ITA Stage.

The Participant must:





- have completed the BSA Stage;
- have no outstanding Findings from the BSA Stage whose correction would require any internal integration tests to be repeated;
- have completed internal Integration testing;
- have submitted the following documents to the Assurance Body prior to the assessment:
 - o the ITA section of the SAR, and
 - o the SAR updated to include test references,
- have responded satisfactorily to requests for clarification from the Assurance Body on the above; and
- have agreed a start date and duration with the Assurance Body.

ITA Documents Required:

The Participant is required to provide the following on commencement of the ITA Stage:

- a copy of the versions of all documented business processes, detailed instructions, systems specifications, records details, architectures, and organisation charts that were used as the basis of internal integration testing;
- copies of schematics of system architectures, if changed;
- project and company organisation charts, if changed; and
- a complete set of internal Integration test scripts and test results.

ITA Exit Criteria:

In order that the ITA stage has been completed, the Assurance Body will require the review and satisfaction with:

- ITA Participant Questionnaire completion (contained with the SAR);
- Participants Integration Test outputs, evidence and Assurance Body review has been completed for all ITA scenarios identified and agreed in the Market Design Coverage tab of the SAR;
- The are no unresolved issues raised, that have not been satisfied in full;
- The ITA declaration has been signed by an appropriate company executive (Self Declaration ITA) contained within the SAR workbook.

The ITA Stage is completed when the Assurance Body has closed all areas of concern produced during ITA following resolution by the Participant.

ITA Notes:

- Test evidence is inspected on a sampling basis to obtain a level of assurance that Integration Testing has been carried out in an effective manner.
- The Participant's test plan must include tests that, in total, exercise a substantial range of Market scenarios sufficient to prove the robustness of the Participant's processes.
- Test execution must follow the Participant's defined business processes.
- Tests must be executed in an internally integrated environment. Where processes are carried out on behalf of the Participant by a third-party service operator, these must be included in the tests.
- Test evidence must include prints or electronic copies of the messages involved as well as 'before' and 'after' screenshots of screen, database, or other relevant record types to indicate that appropriate actions have occurred, and that data is contiguous throughout the test.
- Test results must be collated and indexed so that it is clear to which test and test step evidence relates.





• Where the SAR references manual business processes, these must be exercised wherever they form part of a test scenario. Any documents that would normally be produced in normal business operations must be produced and retained as evidence (e.g., letters or contracts).





3.2.6 Inter Participant Testing (IPT)

The aim of IPT is to gain assurance that the Participant can correctly operate the key scenarios that it will meet in the Market using its declared systems, business processes and operational staff within normal, operational conditions and utilising the full Market technical infrastructure. Some operational time constraints may be relaxed.

The process is seeking to get as close to a live environment as is reasonably possible and to provide the new entrant or supplier with the opportunity to conduct testing of their system (or system updates) and processes in regards the Market Process Design and Market Messaging schema, as a final step before supplier market entry, new market segment entry or the cut over of a material change to their live production environment.

Testing scenarios will be developed in line with the market design relevant to the market role and market segment, to replicate the requirements that will need to be facilitated by the participant in live environment. The scenarios will test the end-to-end journey of the retail market processes encompassing different variations and customer / MPRN outcomes. IPT is facilitated by a central test service provided by ESB Networks and coordinated by RMDS. Sufficient planning and co-ordination are essential for managing:

- the schedule for testing, including any re-tests;
- the creation of test data; and
- problem processing.

The IPT stage will be coordinated by the IPT workbook prepared by RMDS that will contain the following information:

- Test plan and schedule outlining the steps, dates and expected messages for each testing scenario;
- Test data set up;
- The test scenarios developed by the Assurance Body and agreed by RMDS;
- Supplier Information including contact details.

In addition to the IPT workbook a prerequisite to testing the participant is required to complete the IPT participant questionnaire, containing a series of questions pertinent to IPT and a confirmation that they can enter this phase. The Assurance Body will review these responses to confirm they are satisfactory before progressing with IPT. Where they are not satisfactory, corrective actions and timeframes are agreed with the Participant.

As far as reasonably possible normal timeframes are maintained during the tests, but some may be relaxed due to IPT window time-constraints.

The tests are run by the Participant and ESB Networks, coordinated by RMDS. Both the Participant and ESB Networks produce appropriate evidence of each test step to support the test outcomes. This will include, but is not limited to, message prints, screenshots, reports, and file, and database prints.

IPT Entry Criteria:

For IPT to be a success the following conditions require Assurance Body satisfaction before testing commences:

- All previous stages of Assurance have been satisfied (e.g. BSA and ITA); and
- Have no outstanding areas of concern that would affect the outcome of a test scenario,
- IPT Participant Questionnaire completion (contained within the SAR);





- Respond satisfactorily to any requests for clarification from the Assurance Body following receipt by them of the above,
- The participant has agreed a plan for scenario execution with RMDS, and
- The participant has agreed and/or validate with RMDS the data to be used during the scenario execution.
- Test environments for the participant systems and market provided systems and solutions, required for testing are available and the initial connectivity tests have been successful;
- The IPT plan has been prepared, reviewed by RMDS and cascaded to the relevant Market Participant;
- Agreed test scenarios have been developed by the Assurance Body as incorporated into the IPT workbook, reviewed by RMDS and cascaded to the relevant Market Participant;
- Test data has been developed for use for the IPT tests;
- That the required resources to support IPT have been identified and are available;
- The Participant has declared that their systems can undertake IPT testing, and that they have successfully satisfactorily passed any preceding Assurance stages;

IPT Test Scenarios:

The scenarios are created in conjunction with RMDS who are responsible for issuing and ensuring the test data is populated and managing the performance of the tests. The scope of the test scenarios and expected IPT coverage will be dependent upon the supplier category and market segments requested for new entrants and the specific detail of the requalification or material change for existing market participant changes. These will be selected from a bank of test scripts that cover all of the key retail market procedures currently in the market message schema.

The IPT workbook will define the test scenarios, schedule and track the required outputs. The testing window will usually be scheduled for 3 weeks, that will also cater for a contingency period if required.

IPT Notes:

- All scenarios must be carried out in a timely manner in accordance with the agreed schedule to avoid unnecessary delay to any other Participants involved in the testing.
- The execution of a scenario may be abandoned only with the agreement of RMDS, which will consider the impact on all Participants concerned.
- It is the Participant's responsibility to follow the scenarios and complete all steps as required.
- The Participant must collect the relevant evidence stipulated by each scenario to demonstrate compliance with the Market Design, its business processes, and its systems, submitting this to the Assurance Body via RMDS. The types of evidence required are as for ITA above. Standing documents that have not changed do not need to be resubmitted.
- RMDS will also collect evidence and submit this to the Assurance Body.
- The Assurance Body will verify that actual results match the expected results. Where there is a discrepancy an Incident Record will be raised.

IPT Exit Criteria:

In order that the IPT stage has been completed, the Assurance body will require the review and satisfaction with:

- Confirmation from the New Entrant or Market Participant and ESB Networks that all tests have been undertaken and completed successfully;
- Each IPT test will require evidence to be provided by Market Participants and ESB Networks (as detailed below), that has been reviewed and considered passed by the Assurance Body (within the defects tolerance);





• The IPT scenarios/scripts identified must be completed within the maximum level of defects as below:

Class ⁸	Max no of defects allowed
1	0% of test population ⁹
2	0% of test population ⁹
3	5% of test population ⁹
4	10% of test population ⁹

- There are no defects raised during IPT that remain open and considered material (refer to Appendix 7 Section 6);
- The market entry / cut over readiness declaration has been signed by an appropriate company executive, contained within the SAR workbook.

IPT Evidence required:

The Assurance Body will primarily use screen shot evidence of outputs from the Market Participant systems, webforms (where applicable), test RMP extranet together with XML outputs showing the Market Message details. In addition screenshot evidence will be provided by ESB Networks of XML outputs for the market messages sent and received to the Hub. RMDS will collate the evidence as provided by the Market Participants / ESB Networks and provide to the Assurance Body.

The Market Assurance Body will also seek to understand and review any issues from a technical perspective that occurred during IPT i.e., that delayed the progression of testing.

Where applicable the Assurance Body may seek an on premise demonstration of the system to walk through the processes and market interactions. The Assurance Body also reserves the right to be present at the supplier's premises during IPT to observe the tests taking place.



⁸ Definition of defect classes contained within Appendix 6 (<u>section 6.6</u>)

⁹ Total number of tests conducted as included in the IPT workbook



3.2.7. Market Entry / Cut Over Readiness

The final stage of the assurance approach is for the Market Participant to complete a Market Entry or Cut Over Readiness declaration to confirm market readiness for the new entry, requalification or material change and satisfaction that their processes as assessed throughout the assurance stages are ready and complete in their live environment to successfully operate according to the Market Design.

The Cut Over Readiness declaration is a self-declaration to provide comfort that:

- The systems and procedures that have been implemented, or modified or otherwise impacted as
 a result of the changes (in the case of requalification or material change) will at the time of
 implementation, continue to fully meet the applicable market design obligations, work together
 correctly and accurately, have been completely and successfully tested and will not degrade the
 Market Participants ability to inter-operate with the Market;
- Comfort that the Market Participant has a cut-over plan and where necessary post go-live support.
- Robust levels of training and handover to business and operational teams have occurred.

Upon exit of the IPT stage and receipt of the Cut Over declaration the Assurance body will assess the readiness for the market entry, requalification or material change, where satisfied will issue the final assurance assessment outcome report recommending satisfaction of the market assurance process to the CRU for approval.

3.3 Participant Assurance process timelines

Appendix 2 (section 6.2) provides an overview of the high level estimated timelines for the key participant assurance processes, each individual application will have its own unique requirements and where the process involves other parties there will be dependencies on availability of systems. The timelines do not include the requirements for participants to design, build and test their systems and will be dependent on individual participants' circumstances.

Where an individual assurance approach is required, the document will include a proposed timeline for the assurance activities that will be aligned as close as possible to the participant's plan.

It is estimated that the process of Market Entry is typically six to nine months from giving notice of Entry. Each Participant is strongly advised to discuss their circumstances with RMDS.

3.4 Additional Assurance considerations

3.4.1. Involvement of Third Parties

A Participant may use third parties to provide specific systems and services. Third parties may also carry out partial or complete business processes on behalf of the Participant. A Participant's overall business solution for entering and operating in the Market may therefore contain a mix of internal and external systems, processes, and services.

Market Entry assurance (including the execution of IPT Scenarios) encompasses all those systems, processes and services that form part of the Participant's business solution, including any third parties. The business architecture developed by the Participant should be provided to the Assurance Body as early as practicable so that any impact on the Market Entry Assurance Process can be determined.

During the Market Entry Assurance Process, evidence of compliance is sought at all points necessary for both the design and internal testing for all systems, processes and services described in the business





architecture. This means that third parties may be required to become involved in testing and to provide test evidence. Evidence from third parties must be at the same level of detail as that required from the Participant.

3.4.2. Assessment Team

The assessment team comprises one or more Assessors (usually no more than two) from the Assurance Body. If more than one, one will act as Lead Assessor and will be the main point of contact for the Participant. Similarly, the Participant is expected to provide a single point of contact to act as the primary channel for communication between the Participant and the Assurance Body throughout the assessment. This is not necessarily a full-time activity.

3.4.3. On-Site Assessments (Exceptional)

For any on-site assessment activity required by the Assurance Body the Participant is required to provide the following:

- ready access to appropriate Participant staff to explain to the Assessors how compliance with the Market Design requirements is demonstrated by the evidence,
- a private area in which the assessment team can work,
- use of an appropriate area for the opening meeting, the daily checkpoint and closing meeting; and
- access to an unrestricted internet connection.

If there are any difficulties in providing the above, these should be discussed with the Lead Assessor well in advance of the Assessment. The Lead Assessor should be advised of local arrangements (such as hours of work, site access arrangements/restrictions or safety and evacuation procedures).

3.5 Assurance Assessment Outcome Report

On completion of all stages of the Market Entry Assurance Processes, the Assurance Body will prepare a report summarising the outcomes of each stage of the process, the status of any areas of concern, and a recommendation on the readiness of the Participant to commence operation in the Market. This will be addressed to the CRU, with copies also sent to RMDS.

The Participant will have sight of the draft report to confirm factual accuracy prior to the Assurance Body issuing the final report to the CRU and RMDS.

3.6 Final Assurance Exit Criteria

Assurance is completed when:

- All applicable Assurance stages, as described above, have been completed and all exit criteria met,
- The Assurance Body has closed all the areas of concern raised in all stages following their resolution by the Participant(s) (corrective actions may include the necessity for further Market Entry Assurance and/or IPT activity),
- The Assurance Body has prepared an outcome report and submitted this to the CRU, with copies also sent to RMDS, and
- The CRU has accepted the outcome report and has decided to approve or not approve the Participant(s) to operate in the Market or for the Market Design update to go live.





4. Market Participant Assurance lifecycle process

4.1 Market Participant Assurance Lifecycle Process

The following four phases (outlined in Figure 2) align with the natural path that a Market Participant will ultimately follow and accordingly there should be an Assurance approach and techniques aligned with each phase.

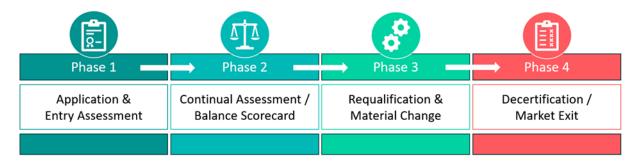


Figure 2 – Market Participant Assurance Lifecycle Process

Phase 1: Application and Entry Assessment – The new entrant will complete an application form indicating their desire to enter the market for a Market Role and the relevant and required market segments. The form will also provide high level details on their business organisation and structures. Then follow the relevant entry process depending on the market role and market segments that they are seeking to operate in.

Phase 2: Continual Assessment / Balance Scorecard — This stage applies to all participants. A Balance Scorecard will also be produced for all participants certified in the Small and Large Supplier categories in the Retail Electricity Market (irrespective of the approved market segments or MPRN volumes). This phase is aimed at ensuring that once a participant has entered the market, their market operational performance is maintained in line with their certification and at a satisfactory level.

Phase 3: Requalification and Material Change – Where market participants wish to enter a new market role or additional market segments a requalification application is progressed that will follow similar steps as Stage 1. Where applicable the assurance approach will be tailored to ensure no duplication of assurance activities that have already been completed. A material change application will be processed where a market participant advises a material change of to their previously certified processes, systems and/or infrastructure e.g., new or change to the operating system that creates and processes XML market messages, automation of a previously manual market facing process, change to TIBCO server infrastructure IP address. If in doubt a Market Participant should consult RMDS for advice, who will liaise with the Assurance Body where necessary.

Phase 4: Market Exit / Supplier of Last Resort – The assurance process applied when a participant leaves the market in a planned exit, or via the Supplier of Last Resort process.

¹⁰ defined in Appendix 7 (section 6.7)





4.2 Phase 1 – Application and Entry Assessment

4.2.1 Assurance activities undertaken

When considering the specific approach for a new Retail Market Entrant, Table 4 outlines the key assurance steps and techniques that will be taken for a new entrant. The assurance stages and techniques depend on the Market Role being entered. Table 4 details the assurance activities that will be undertaken by the Assurance Body:

	Control	Assess	Define	BSA (or BDA)	ITA	IPT	Entry / Cut Over
All Market Roles	Yes	Yes	Yes	-	-	-	-
Self-Supplier				No	No	No	Yes
Dema	Demand Side Unit (Distribution Connected)					No	Yes
Export Only				No	No	No	Yes
	Yes	No ¹¹	Yes	Yes			
Large Supplier				Yes	Yes	Yes	Yes
	Yes	Yes/No 12	Yes/No 11	Yes			

Table 4 - Summary of assurance activities performed for New Entrant Supplier Assurance

4.2.2 New Entrant Assurance Approach

The Assurance Approach is a standardised method to providing assurance for each Market Role.

Table 4 above details the stages of Market Participant Assurance that have been defined in <u>Section 3</u> of this strategy and approach. Section 3 also provides detail of the assurance technique activity, stage exit criteria and where relevant the entry criteria.

Table 5 below details the documentation, test evidence, reporting and deliverables for each new entrant market role and includes a documentation and reporting matrix for stakeholder visibility and responsibility.

Appendix 1 (Section 6.1) provides detail of the processes and timelines for typical new entrants into each of the market roles.



¹¹ Where a Small Supplier is implementing a system that will automate sending of some or all XML market messages the Large Supplier BSA and ITA Assurance stages will be applicable

 $^{^{\}rm 12}$ Depending on market segments and assurance approach agreed



New Entrant and Market Participant Assurance Strategy and Approach

4.2.3 Documents, evidence, reports and communication requirements

The following table outlines the key stakeholders involved in the development and approval of the key Assurance requirements, evidence and documents. The documentation and reporting matrix for New Market Entrant Assurance by market role are outlined below. The definitions for the acronyms are as follows:

- who will develop (D) the deliverable documents;
- the stakeholders who will approve (A) these deliverables;
- the stakeholders who will review and provide feedback (R) to the owners of the deliverable documents; and
- those stakeholders who will primarily get sight (I) of the deliverable document for information purposes.

Stage	Document / Evidence / Report	Market Role					Stakeholder					
		Self- Supplier, Export Only, Demand Side Unit	Generator	Small Supplier	Large Supplier	Delivery	Assurance Body	RMDS	CRU	New Entrant / Market Participant	ESB Networks	
1	Progress updates and reports	Y	Y	Y	Y	Weekly Ad Hoc	D D	R R	- R	- R	-	
2	Application form & questionnaire: - Completed for the relevant Supplier Category applied for	Υ	Y	Υ	Υ	Instigate entry process	А	R	I	D	-	
3	Self-Assessment Return (SAR): - BSA Participant Questionnaire tab	N	Y	Υ	Y	Agreed Timeline	D	R	I	D	-	

¹³ Documentation and evidence requirements will be detailed in full in the relevant assurance approach (if required), SAR and IPT Workbook



							l				
	- Market Design Coverage tab										
	- Business Contacts tab										
	- New Entrant plan & timeline	N		Υ	Υ		R	Α	-	D	I
4	Business Design Material:										
	- Business solution/process	N	Υ	Υ	Υ		А	-	-	D	-
	evidence										
	- IT system & data specification /					Agreed					
	architecture					Timeline 					
	- IT technical infrastructure										
	Self-Assessment Return (SAR):	N	Υ	Υ	Υ		Α	1	I	D	_
	- Self Declaration BSA tab		·		·		, ,				
	BSA section of the Final		.,	.,	.,			_			
	outcome report	N	Υ	Υ	Υ	Milestone	D	А	I	 	-
5	ITA Output Material:										
	- Internal test evidence /	N	Υ	Y/N ¹⁴	Υ	Agreed Timeline	А	-	-	D	-
	scenario outcomes										
	Self-Assessment Return (SAR):		Y	Y/N ¹⁴	Υ		A	I	I	D	
	- ITA Participant Questionnaire	N									-
	tab										
	- Market Design Coverage tab										
	- Self Declaration ITA tab										
	ITA section of the final outcome	NI	V	Y/N ¹⁴	V	Milesters		۸			
	report	N	Υ	Y/N '*	Υ	Milestone	D	А	I	I	-
6	IPT Workbook (that will detail):	N	Υ	Υ	Υ	Agreed Timeline	D	D	-	1	1
	- IPT scenarios										

 $^{\rm 14}$ Dependant on Small Supplier market facing systems and processes





	- IPT Workbook	N	Υ	Y	Υ		D	А	-	1	I
	- Schedule for testing activities - Data set up requirements (test MPRNs)	N	Υ	Υ	Υ		D	А	-	I	R
	IPT Issues log	N	Υ	Υ	Υ		D	R	I	I	I
	IPT Output Material & test evidence (examples below): - Market Message XML screenshots from both Supplier's and ESBN systems - Screenshots from Supplier's system to detail registration / MPRN status and process workflows - Screenshots from RMP extranet detailing MPRN and energisation status	N	Υ	Y	Υ		A	I	-	D	D
	Self-Assessment Return (SAR): - IPT Participant Questionnaire tab	N	Y	Y	Υ		А	I	I	D	-
7	Self-Assessment Return (SAR): Market Entry Declaration	N	Υ	Υ	Υ	Agreed Timeline	A	I	I	D	-
	Final Assurance Outcome report	Υ	Υ	Υ	Υ		D	R	А	-	-
	Assurance Completion Letter	Υ	Υ	Υ	Υ	Milestone	D	I	-	1	-

Table 5 - Summary of document and reporting matrices for Market Participant Assurance Strategy and Approach by Market Role



4.3 Phase 2 – Continual Assessment / Balance Scorecard

This phase seeks to ensure that the systems, procedures, infrastructure and market message processing assessed for market entry assurance (or requalification where applicable) are being maintained at a satisfactory performance level and within the assurance categories and market segments approved. There are two areas covered within this phase of assurance, that primarily relate to Large and Small Suppliers.

4.3.1. Annual assurance declaration and return

An assurance declaration will be distributed by the Assurance Body to all Small and Large Suppliers on an annual basis. This document will be similar to the Participant Questionnaire though much smaller in content. Suppliers will be required to complete each question and provide a signature from a company executive/senior manager. Suppliers must include details of their current systems, outline if they have had any material changes to their systems, or processes in the last 12-months. Once returned, the Assurance Body will review them and if the changes are considered material in nature (refer to Appendix 7 – Section 6) will recommend a requalification is applied for.

The annual assurance declaration will be quick and easy in terms of providing a response. With the aim not to be too onerous on suppliers, it will consist of a series of questions which will provide sufficient evidence to confirm systems and processes are aligned to the certified level.

However, it should be noted that any Market Participant should notify RMDS in advance of making a material change at any stage during the year e.g., changing their business management systems. They should not wait for the annual assurance declaration and return.

4.3.2. Balance Scorecard

The Balance Scorecard consists of an assessment to ensure that once a participant has entered the market, their market operational performance is maintained in line with their certification and at a level above what is indicated as satisfactory in the Balance Scorecard Guidance Document.

Performance is measured across a number of key areas on a bi-annual basis as defined in the Retail Electricity Market Balance Scorecard Guidance Document. The Retail Electricity Market Balance Scorecard Guidance Document is designed to give a detailed summary of the Balance scorecard sections and the calculation method used for each of the following sections.

- 1. Market Message Rejections
- 2. TIBCO Outages
- 3. Base Certification
- 4. Operational Systems

4.3.3. Process for sustained poor performance

4.3.3.1. Potential Market related identified issue

Should several suppliers receive a poor/red overall Balance Scorecard, then this would typically be a trigger for the Assurance Body to investigate whether this has been caused by Market related issue or pan supplier issue. A Market related issue will affect several suppliers in the Market and suggest that a



retail market system, processing or market design clarity may need to be reviewed for overall improved performance. The Assurance Body may propose a cross body workshop consisting of RMDS, Market Participants and ESB Networks to identify the root cause of the scorecard identified issue. Depending on the outcome of the analysis, the next steps could potentially include a review of the market design and or the current systems/software, for suppliers to review their own internal processes and systems to resolve the issues encountered, or for market assurance lessons learned.

4.3.3.2. Large or Small Supplier specific performance

If a supplier individually receives a poor/red Balance Scorecard, the Assurance Body will initially schedule a meeting with the supplier. This meeting will review and analyse the scorecard with the individual Market Participant to provide feedback to the supplier on the factors impacting the scores. The Assurance Body and RMDS will assist the supplier to provide feedback and advice on how to improve their scorecard in the future. For example it might be a case of staff requiring additional internal training in areas such as sending Supplier outbound Market Messages or how to correctly schedule a planned TIBCO outage.

Where a Supplier has breached its certification limits or operating in a category not certified for, the Assurance Body will begin to put a plan in place for the supplier to requalify or advise the participant they need to return to the certified limits.

The Balance Scorecard will be completed on a bi-annual basis. Any supplier that has received four consecutively red Balance Scorecards will be referred to the CRU for review and next steps will be decided. If the CRU determines that a recertification is required, the following steps will be taken.



Figure 3 – Resolution plan once triggered by the CRU.

The decision taken by the CRU will then be discussed with the Participant, RMDS and the Assurance Body. It would be anticipated that a high-level resolution plan is created incorporating key milestones and suggested dates and stakeholder responsibilities.

- The Recertification activities undertaken are broadly aligned with the requalification processes outlined in section 4.4;
- Finally, a report summarising the outcome from the above stages is prepared by the Assurance Body, reviewed by RMDS and submitted for approval to the CRU. The Assurance Body will include a recommendation together with a summary of the evidence that was used to support the decision. The recommendation indicates whether in the Assurance Body's view the Participant has successfully passed recertification and whether there are any outstanding considerations.





The Assurance Body will the provide the outcome report to the CRU for their final review and approval of the recertification.





4.4 Phase 3 - Requalification and Material Change

Phase 3 of the Market Participant lifecycle provides assurance activities relating to Market Participant requalification requests for a new market role and/or additional market segments (not initially assurance certified). In addition any Material Changes required by Participants to their systems, infrastructure or processes previously certified by the Assurance Body.

4.4.1. Market Participant Requalification

There are three key triggers instigating a Market Participant requalification, from an assurance perspective. An existing Market Participant applying for entry into a new market role, an existing market participant applying for entry into a new market segment (not previously market assured) or due to supplier specific performance (see <u>Section 4.3.3.2</u>). A combined assurance approach will be considered where market participants are requesting a new market role in addition to a request to enter new market segments, or is accompanied by a material change application.

4.4.1.1 New Market Role Category

When considering the specific approach for a participant wishing to enter a market role, Table 6 outlines the key assurance steps and techniques that will be undertaken depending on the existing market role approved. The assurance stages and techniques will depend on the Market Role being applied for.

	Control	Assess	Define	BSA	ITA	IPT	Entry / cut over
All Market Roles	Yes	Yes	Yes	-	-	-	-
Self-Supplier, Demand Side Unit or Export Only to Small Supplier ¹				Yes	No	Yes	Yes
Self-Supplier, Demand Side Unit or Export Only to Large Supplier ²				Yes	Yes	Yes	Yes
Small Supplier to Large Supplier				Yes	Yes/No 15	Yes	Yes

Table 6 - Summary of assurance activities performed for New Market Role Assurance

Assurance Approach

¹ Requalification will follow the same approach and process as a New Entrant into the Small Supplier category, refer to <u>Section 4.2</u>

² Requalification will follow the same approach and process as a New Entrant into the Large Supplier category, refer to <u>Section 4.2</u>

Where a Small Supplier wishes to requalify as a Large Supplier, this could also be combined with entry into new market segments. The Assurance Approach for the requalification will require to be assessed based on the suppliers' specific new requirements, previous assurance qualifications undertaken and any changes to the market segments requested. This will be covered in the Assess and Define stages of the Supplier Assurance process. This will require an Assurance Approach document created and approved by the CRU.

4.4.1.2. New Market Segment

When considering the specific approach for a participant wishing to enter a new market segment, Table 7 outlines the key assurance steps and techniques that will be undertaken depending on the existing

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¹⁵ Depending on individual supplier circumstances



Market Role approved. The assurance stages and techniques will be dependent on the existing market role in addition to the market segments being applied for.

	Control	Assess	Define	BSA	ITA	IPT	Entry / cut over
Overall	Yes	Yes	Yes	-	-	-	-
			Small Supplier	Yes	No	Yes	Yes
			Large Supplier	Yes	Systems & segment dependent 16	Yes	Yes

Table 7 - Summary of assurance activities performed for a Supplier New Market Segment entry

Assurance Approach

A bespoke Assurance Approach will be required for new market segment entry. This will be dependent upon the market segments requested for entry, previous assurance qualifications undertaken and the market role (this may also be subject to a change application). This will be covered in the Assess and Define stages of the Market Participant Assurance process. Applications for new market roles and new market segments (or if accompanied with a material change application), the assurance process will be combined.

Where the Participant is also introducing a Material Change, which may well be the case in an expanding business and very likely where the Large Supplier approach is applicable, the assurance for the Material Changes will be carried out in parallel. These will depend on the nature of the changes to business processes and systems, the planned volume of registrations and other pertinent factors. In this way, the Participant will be subject to only one assurance programme.

The following Requalification activities will apply:

- initial discussions between the Participant and the Assurance Body regarding the planned changes and any potential assurance requirements,
- agreement of an assurance plan between the Participant and the Assurance Body,
- provision from the Participant of any requested supporting documentation to the Assurance Body, who will assess the requirements and propose appropriate actions based on:
 - ω the scope of the request, ω the Requalification thresholds set,
 - ω the Participant's business plan,
 - ω the Participant's previous Market Entry assessment,
 - ω the Participant's operational experience, and
- carrying out and completing the agreed plan.

4.4.2. Supplier Material Change

A Material Change, as defined: represents a change to a market participant's business and/or operational processes, and/or technical infrastructure (e.g. automation) that alters the market participant's internal systems and methods of Market interaction from that initially or previously assured. When considering the specific approach for a supplier wishing to make material changes to



¹⁶ Will be dependent upon the market segments involved together with the proposed supplier systems and processes.



their systems, processes and infrastructure please also refer to Appendix 7 – Section 6). Table 8 outlines the key assurance steps and techniques that will be undertaken depending on the existing market role. The assurance stages and techniques will be dependent on the existing market role in addition and the specific detail of the material change being considered.

It is the responsibility of market participants to ensure that any material changes to their systems, processes and infrastructure are advised to RMDS, with instigation of the material change assurance process (completion of the material change application form). As a minimum, Participants are required to inform RMDS of a Material Change through submitting the Requalification for Material Change Application form and questionnaire as early as possible once a change is identified, and no less than 40 working days before the proposed implementation date. Appendix 7 — Section 6 details some typical examples of what is considered a trigger for a Material Change requalification. If a supplier is in any doubt that a proposed change requires an assurance approach, RMDS should be contacted in the first instance.

	Control	Assess	Define	Self- Assessment	ITA	IPT	Cut Over
Overall	Yes	Yes	Yes	-	-	-	-
Small Supplier			Yes	No	Yes / No ¹⁷	Yes	
Large Supplier				Yes	Yes / No ¹⁷	Yes / No ¹⁷	Yes

Table 8 - Summary of assurance activities performed for a Supplier Material Change

Assurance Approach

The Assurance Approach for a material change application will be tailored to the specific detail of the changes being implemented, in addition within the context of market role and market segments. The Assurance Approach will be developed in the Assess and Define stages of the assurance process.

4.5 Phase 4 – Market Exit / Supplier of Last Resort

4.5.1 Decision for Market Exit

Market Exit or Supplier of Last Resort (SoLR) Assurance can arise from a number of scenarios or triggers and stakeholders, an overview has been provided below:

4.5.1.2. Participant requested exit and sudden Supplier exit

In the event a Participant is no longer wanting to be part of the Retail Market they will notify a number of stakeholders, including CRU and RMDS. This will be a trigger for RMDS to notify the Assurance Body. This trigger can also be the consequence of a SoLR process commencing.

4.5.2.2. Commission for Regulation of Utilities (CRU) action

CRU decision that a Market Participants supply licence will be revoked for reasons deemed appropriate by them.



 $^{^{\}rm 17}$ Will be dependent upon the specific detail of the supplier material change



4.5.2. Assurance Body activities

In terms of Assurance, the focus will be to ensure the Participant has taken the appropriate business and technical steps to confirm there is no risk to other Participants in the market or the central market systems.

Upon receiving the notice from RMDS, the Assurance Body issues a participant questionnaire for the Participant to populate. The questions contained in the spreadsheet focus on the steps that have been / are being taken by the Participant during their withdrawal. This includes how MPRN's will be transferred to other Participants whether via Change of Supplier where it is a planned exit or a SOLR event. It also covers how their market systems are decommissioned and removed from their solution and technical landscape.

The Questionnaire will also contain a declaration by a company executive confirming that they have taken the necessary business and technical steps required to ensure no risk to other Participants in the market.

The Assurance Body will review the responses to the questionnaire and prepares a short report for the CRU and RMDS.

If any issues arise, then the Assurance Body will contact the Participant to discuss and seek an agreeable resolution.

4.5.3 Documentation requirements

The following documents will be completed as part of the Market Exit / SoLR assurance process:

- 1. Notice of Supplier Market Exit / SoLR letter signed by a company executive / senior manager or notice provided by the CRU where applicable;
- 2. Participant Questionnaire;
- 3. Declaration signed by a company executive or senior manager;
- 4. Report to the CRU.

4.5.4. Inactive Suppliers

The Assurance Body as part of the annual reassurance process will undertake a review of any Market participant deemed inactive. Where the Market Participant has requested to retain assurance certification of their market role and approved market segments, this will require Assurance Body approval.

Inactive market participants are required to ensure that their market facing systems, processes and infrastructure are maintained at a level to ensure compliance with the retail market design. Therefore, there is no special assurance dispensation for inactive market participants and they are required to complete all relevant assurance phases of Market Releases (where applicable).

An inactive market participant is defined as having any of the following identified (for a minimum period of one year):

- A Large or Small Supplier retaining an EMMA application / capability and TIBCO server infrastructure, however not having any MPRNs registered to their supplier ID e.g. a supplier who was previously active in the market that has no MPRNs registered to them, however, wishes to retain the capability to register MPRNs at some point in the future that is not presently known;
- A Self-Supplier or Export Only Supplier with no MPRNs registered;
- A Supplier who gained approval for Market Entry but who has not connected to the live central systems and, in the period since approval, one or more Market Design Releases have been completed, will be subject to Requalification before it may commence operation.





4.5.5. Market Exit timescales

The Assurance Body will align the timescales for Market Exit / SoLR assurance activities to those provided by the exiting participant or the CRU.

Where there is an immediate exit the assurance body will assume the above documentation will be completed by the company or its administrators (where applicable).





5. Assurance governance and reporting

5.1 Assurance governance

5.1.1 Market Participant Obligations

New entrants to the Market and already-active Market Participants are obliged to comply with the Market assurance processes as summarised in this strategy and detailed within the accompanying Assurance Processes for the Irish Retail Electricity Market document. Where a new entrant or an existing Market Participant fails to satisfactorily complete the applicable assurance processes, the Assurance Body will inform the CRU, who will make a judgement and determine a course of action.

5.1.2 Approval of Assurance Process

The Assurance Processes comprise this Assurance Strategy and several documents that support it. The strategy and all the supporting documents are available to all Market Participants via the RMDS website. Any changes to this Assurance Strategy, requires the approval of the CRU, and any approved updates will be published on the RMDS website. Supporting documents are maintained in line with this strategy and so changes to these do not require CRU approval. Responsibility for maintaining the assurance processes rests with the Assurance Body, to whom requests for clarification should be addressed. The review and approval process for this Assurance Strategy document is the same as for Market Design documents and changes. This includes the opportunity for all Market Participants to comment on any changes to it, and for the IGG to recommend a course of action. Any Market Participant may raise a change request; this will be circulated to all Market Participants and will be discussed at the IGG.

5.1.3 Approval of Assurance Operations

The CRU is the approval body in all cases. The Assurance Body will prepare reports at each of the approval points containing recommendations to the CRU. The CRU will then determine whether to approve or reject the recommendations. An approval may be subject to conditions as seen fit by the CRU. If this is the case, then the Market Participant will be required to provide to the CRU (through the Assurance Body) any reasonable information required to monitor compliance with such conditions and to determine when the conditions may be lifted. Market Participants must complete the appropriate assurance and be approved for each Market Segment in which they wish to operate. Any approval is limited to the scope for which assurance has been satisfactorily completed and for which the CRU has specifically given its approval.

5.1.4 Approval of Assurance Strategy

The New Market Entrant and Supplier Assurance Strategy and any subsequent reversioning will require CRU approval, before being brought to an IGG meeting for approval.



5.2 Assurance reporting

5.2.1 RMDS AND CRU

As co-ordinating and authorising bodies respectively, RMDS and the CRU will be kept informed of the progress being made by organisations undertaking the specific Assurance Processes. The CRU will authorise completion of the assurance undertaken and will provide an approval or rejection of the matter being assured, whether it be a new Market Entrant, Market Participant Requalification or Material Changes being introduced.

The Assurance Body will produce a report for the CRU, and a copy of the report will also be sent to RMDS. Depending on the type of assurance, the report will include details on some or all the following:

- a description of the Assurance carried out;
- a summary of how the Participant completed each stage of the process;
- a description of the Material Change and/or change or removal of thresholds;
- how the Participant has managed the design, implementation and testing of the change or has prepared for increased traffic;
- a summary of Observations and Findings raised; and/or
- the Assurance Body's opinion.

The Assurance Body will keep RMDS informed of the timeframes. RMDS will contact the Participant shortly before the Participant's implementation date and arrange for ESB Networks to monitor the Market Messages and provide appropriate support should any issues arise in the early stages.

The CRU, as the regulatory authority, will be kept informed of the progress being made by named new entrants and existing Market Participants undertaking assurance activity. The CRU will be provided with detailed reports to support its informed decisions on:

- approval for a Market Participant to begin operation in the Retail Electricity Market or in an additional Market Segment;
- a go/no-go decision on the cutover to live operation of a change for which a Market Participant has been the subject of Requalification.

5.2.2 INDUSTRY GOVERNANCE GROUP (IGG)

The Assurance Body reports at each meeting of the IGG. The reports include an update on all active Assurance activities, such as new Suppliers entering the Market, Market Design change assurance and Requalifications. These reports are provided at a high level. No information of a confidential nature will be shared for the updates.

The updates will focus on:

- The scale of activity with respect to new entrants, existing Market Participants' assurance for new Market Segments, and Material Changes being made by Market Participants to their systems;
- Assurance plans, progress, and status report for Market Design changes; and
- Plans and progress for changes to the Assurance Process itself, including the results of Post Implementation Reviews.





5.2.3 Reporting to ESB Networks and MRSO

RMDS and the Assurance Body will keep both ESB Networks and the MRSO informed of the various Market level activities and support requirements to ensure coordination to support the new entrant or existing participants. They will be kept informed of:

- The date a new entrant wishes to commence trading and in what Market Segments;
- The implementation dates for Material Changes being developed by Market Participants; and
- Inter-Participant Testing requirements.

Information of a commercial nature will not be shared in this way.

5.3 CRU report approval – New Market Entrant:

Table 9 below provides a summary of the reports that will be developed for CRU approval:

Approach or Stage Output Report	Self- Supplier, Export Only, Demand Side Unit	Generator	Small Supplier	Large Supplier	Comments
Assurance Approach	N	Y	N	N	Standard Assurance Approach detailed in Section 4.2 applies
Business Solution Assessment (or Design for Small Suppliers)	n/a	Y/N	γ 18	γ 10	
Integration Test Assessment	n/a	Y/N	n/a	γ 10	
Inter-Participant Testing	n/a	Y/N	Y	Y	Where IPT has been successful, the IPT report will be combined with the Final Assurance report
Final Assurance Outcome report	Υ	Υ	Y	Υ	

 ${\it Table 9-Summary of reports that will be developed for CRU approval}$



¹⁸ Relevant section of the final assurance outcome report



5.4 CRU report approval – Requalification and Material Change:

Table 10 below provides a summary of the reports that will be developed for CRU approval:

Approach or Stage Output Report ¹⁹	New Market Segment	Material Change	Comments
Assurance Approach	Υ	Υ	Standard Assurance Approach detailed in <u>Section 4.2</u> apply
Business Solution Assessment (or Design for Small Suppliers)	γ 10	γ 10	
Integration Test Assessment	Y/N ²⁰	Y/N ¹²	ITA report section dependent upon the Assurance Approach agreed. Not applicable for Small Suppliers.
Inter-Participant Testing	Y/N ²¹	Y/N ¹³	ITP report section dependent upon the Assurance Approach agreed.
Final Assurance Outcome report	Y	Y	

Table 10 - Summary of assurance activities performed for a Supplier Material Change

5.5 Matrix of reporting and communications

Table 5 in section 4.2.3 provides the matrix for documents, evidence, reports and communication requirements for market entry applications, in addition requalification's defined in section 4.4.

When individual assurance approach documents are required, the matrix will be aligned to the requirements in each stage provided in Table 5.



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¹⁹ Reports will be dependent on the inclusion of Assurance phases as dictated by the type of Requalification and/or Material Change Assurance Approach

²⁰ Dependent upon the Assurance Approach agreed

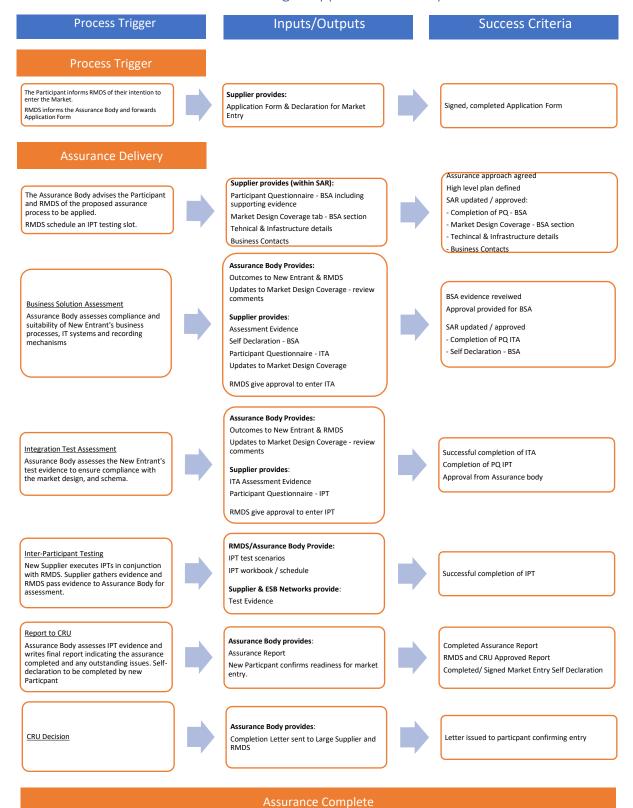
²¹ Where IPT has been successful, the IPT report will be combined with the Final Assurance report



6. APPENDICES

6.1 Appendix 1 – Market Participant Assurance process flows

6.1.1 New Market Entrant - Large Supplier assurance process flow







6.1.2 New Market Entrant – Small Supplier assurance process flow

Process Trigger Inputs/Outputs **Success Criteria Process Trigger** The Participant informs RMDS of their intention to enter the Market. Supplier provides: Signed, completed Application Form Application Form, questionairre and Declaration for Market Entry RMDS informs the Assurance Body and forwards Assurance approach agreed Supplier provides (within SAR): High level plan defined The Assurance Body advises the Participant Participant Questionnaire - BSA including SAR updated / approved: and RMDS of the proposed assurance process to be applied. supporting evidence - Completion of PQ - BSA Market Design Coverage tab - BDA section RMDS schedule an IPT testing slot. - Market Design Coverage - BSA section Technical & Infastructure details - Techincal & Infrastructure details Business Contacts **Business Contacts Assurance Body Provides:** Outcomes to New Entrant & RMDS Updates to Market Design Coverage - review BSA evidence reviewed comments Approved provided for BSA Business Design Assessment Supplier provides: Assurance Body assesses compliance and Assessment Evidence SAR updated / approved suitability of New Entrant's business Self Declaration - BSA processes, IT systems and recording mechanisms - Self Declaration - BSA Participant Questionnaire - ITA (where - Completion of PQ ITA (where applicable) applicable) - Completion of PQ IPT (where applicable) Updates to Market Design Coverage RMDS give approval to enter ITA or ITP stage depending on New Entrants systems Assurance Body Provides (where applicable): Outcomes to New Supplier & RMDS Updates to Market Design Coverage Integration Test Assessment (where Successful completion of ITA required) Supplier provides (where required): Completion of PQ IPT Assurance Body assesses the New Entrant's test evidence to ensure compliance with the market design, and schema. ITA Assessment Evidence Approval from Assurance body Participant Questionaire - IPT Updates to Market Design Coverage RMDS give approval to enter IPT RMDS/Assurance Body Provide: Inter-Participant Testing IPT test scenarios New Supplier executes IPTs in conjunction IPT workhook / schedule Successful completion of IPT with RMDS. Supplier gathers evidence and RMDS pass evidence to Assurance Body for assessment. Supplier & ESB Networks provide: Test Evidence Report to CRU Assurance Body provides: Assurance Body assesses IPT evidence and Completed Assurance Report writes final report indicating the assurance Assurance Report RMDS and CRU Approved Report completed and any outstanding issues. Self-New Particpant confirms readiness for market Completed/ Signed Market Entry Self Declaration declaration to be completed by new entry. Particpant **Assurance Body provides:** Completion Letter sent to Small Supplier and RMDS **CRU** Decision Letter issued to particpant confirming entry

Assurance Complete





6.1.3 New Market Entrant – Self Supplier, Export Only and Demand Side Unit assurance process flow

Assurance Stages Inputs/Outputs **Success Criteria** Process Trigger The Participant informs RMDS of their intention to enter the Supplier Category. Supplier provides: Signed, completed application form, Questionnaire Self-Supplier / DSU / Export Only Application RMDS informs the Assurance Body and Form for entry and Questionnaire forwards Application Form. Status Review Assurance Body assesses compliance of Assurance Body provides: Assurance Body assesses compliance of Self-Supplier / DSU / Export Only application, completes report indicating assurance completed and any outstanding issues. Completed Assurance Report RMDS and CRU Approved Report Assurance Outcome Report to the CRU Assurance Body provides: CRU Decision Completion Letter sent to Self-Supplier / DSU / Letter issued to particpant confirming entry **Export Only Supplier and RMDS**





6.1.4. Requalification – Large Supplier entering new market segment process flow

Assurance Stages Inputs/Outputs **Success Criteria Process Trigger** The Participant informs RMDS of their intention to enter a new Market Segment. Supplier provides: Signed, completed Application form Application Form for Entry to Additional RMDS informs the Assurance Body and forwards Application Form. Market Segment. CRU requests a recertification to occur. **Assurance Delivery** Supplier provides: Market Segment Questionnaire including Declaration Completed PQ The Assurance Body advises the Participant Completed SAR and RMDS of the proposed assurance Process Evidence Assurance body approach notification Outline of IT solution, technical infrastructure process to be applied. and system specification RMDS schedule an I PT testing slot Database logical architecture provided Test evidence including plan, test specs and Assurance Body Provides: Reveiwed evidence from BSA Outcome report to New Supplier & RMDS Approved provided for BSA **Business Solution Assessment and** Integration Test Assessment (Combined) PQ Part 2 completed and signed Assurance Body assesses compliance and suitability of existing Supplier's business Supplier provides: Successful completion of ITA SAR (If changed) Completion of PQ Part 3 processes, IT systems and recording mechanisms Approval from Assurance body RMDS give approval to enter ITA Inter-Participant Testing New Supplier executes IPTs in conjunction Supplier provides: Successful completion of IPT with RMDS. Supplier gathers evidence and RMDS pass evidence to Assurance Body for Participant Questionnaire Part 4 Completion of Part 4 PQ and Delcaration assessment. Report to CRU **Assurance Body provides:** Assurance Body assesses IPT evidence and RMDS and CRU Approved Report writes final report indicating the assurance completed and any outstanding issues. Assurance Report Completed/ Signed Self Declaration Assurance Body provides: Letter as confirmation of entry to new market **CRU** Decision Completion Letter sent to Large Supplier and RMDS

Assurance Complete



6.1.5. Requalification – Small Supplier entering new market segment process flow

Assurance Stages Inputs/Outputs **Success Criteria Process Trigger** The Participant informs RMDS of their intention to enter the Market Segment. Signed, completed Application Form RMDS informs the Assurance Body and Application Form for Entry to additional Market Segment. forwards Application Form. CRU requests a recertification to occur. **Assurance Delivery** Supplier provides: Small Supplier Questionnaire The Assurance Body advises the Participant and RMDS of the proposed assurance SAR Completed PQ, Process Evidence Completed SAR, process to be applied. Outline of IT technical infrastructure Assurance body approach notification RMDS schedule an IPT testing slot Definition of records that will be maintained Supplier provides: New Segment Participant Questionnaire Process / Records Review Reveiwed evidence from BSA Assurance Body assesses compliance and Approved provided for BSA suitability of New Supplier's business processes, IT systems and recording **Assurance Body Provides:** PQ completed and signed Outcome report to RMDS and New Supplier mechanisms RMDS give approval to enter IPT Inter-Participant Testing New supplier executes IPTs in conjunction Supplier provides: Successful completion of IPT with RMDS. Supplier gathers evidence and RMDS pass evidence to Assurance Body for Completion of Part 4 PQ and Delcaration Participant Questionnaire Part 3 assessment. Assurance Body provides: **CRU** Decision Completion Letter sent to Small Supplier and Letter issued to particpant confirming entry Completed Assurance Report RMDS and CRU Assurance Body assesses IPT evidence and Assurance Body provides: Approved Report writes final report indicating the assurance Assurance Report Completed/ Signed Self Declaration completed and any outstanding issues. **Assurance Complete**





6.1.6 Material Change process flow

Assurance Stages Inputs/Outputs **Success Criteria Process Trigger** The Participant informs RMDS at least 40 working days before intended go-live date of their intention to: Make the material change (please see Appendix 7) to their Business processes / systems/ staff; or Market Participant provides: Request provided by Market Participant Operate beyond the Small Supplier Request for Requalification Assurance threshold; or Requalification Questionnaire Become active at least one MDU has taken place. RMDS informs the Assurance Body and forwards Application Form. **Assurance Body Provides:** Assurance Body discusses the change with Documentation of Assurance Approach the Participant and agrees whether Requalification is required. Notifies Market Participant Define stage completed and Market Participant compeltes questionairre If Requalification is required, the Where the Participant intends to operate beyond the Small Supplier threshold, the Assurance Body will initiate the relevant Assurance Body advises the Participant and RMDS of the proposed assurance process to be applied. stages of the Large Supplier Market Entry Assurance Process. Participant carries out agreed activities and Regualification questinairre completed Part 3. <u>Assessment</u> provides: Assuruace review completed on Systems and Assurance Body assesses evidence and Evidence on agreed actions Processes provides feedback to Participant. Requalification Questionnaire Part 3 Assurance Body provides: Assurance Body assesses evidence and Assurance completes requalitfication report to CRU writes final report indicating the assurance completed and any outstanding issues. Assurance Report **Assurance Body provides: CRU** Decision Process completed Completion Letter sent to Small Supplier and RMDS

Assurance Complete





- 6.2 Appendix 2 Supplier Assurance estimated timelines ²²
 - 6.2.1 New Market Entrant / Requalification (additional market segment) Large Supplier assurance timeline

New Market Entry / Entry to additional Market Segment (Large Supplier - Estimated)



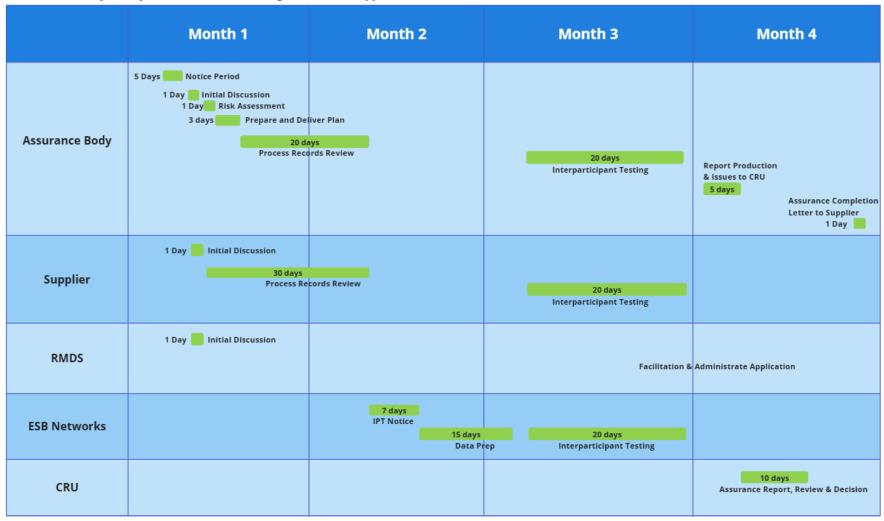
²² All timelines are provided for estimate purposes only, in order to outline indicative durations for each of the Assurance stages. Actual timings will be dependent upon the level of assurance required as well as the individual Suppliers ability to complete each Assurance assessment stage in addition to the ability to schedule infrastructure requirements and IPT windows.





6.2.2 New Market Entrant / Requalification (additional market segment) – Small Supplier assurance timeline

New Market Entry / Entry to additional Market Segment (Small Supplier - Estimated)







6.2.3 New Market Entrant – Self-Supplier, Export Only, Demand-side Unit assurance timeline

Self-Supplier/Demand-side unit/Export Only Market Entry Assurance indicative timeline





6.3 Appendix 3 – Roles and Responsibilities

Title	Role	Description	Responsibility
Commission for Regulation of Utilities	Regulatory Authority	The CRU is responsible for the regulation of all utilities, including the electricity market, in Ireland.	Responsible for the review and approval of the Market Participant Assurance strategy and approach document.
(CRU)			The CRU has the ultimate approval for all market entry's (new entrants, new market roles or new market segments for existing participants) and go live / cutovers for requalification / material change applications.
EirGrid	Transmission System Operator (TSO)	Independent TSO for the electricity market and the Market Operator in the wholesale electricity trading system.	Responsible for ensuring adequate knowledge of the approved strategy and process and ensuring relevant assurance phases and stages are adhered to.
ESB Networks (ESBN)	Distribution System Operator (DSO)	ESB Networks Ltd is the independent Distribution System Operator for Ireland. It provides connection and metering services for all electricity customers.	Responsible for ensuring adequate knowledge of the approved strategy and process and ensuring relevant assurance phases and stages are adhered to.
IGG	Industry Governance Group	Oversees the ongoing operation of the Retail Electricity Market. Chaired by the CRU and consists of representation from Suppliers, RMDS, DSO, MRSO and EirGrid.	Responsible for the review and approval of the Market Assurance strategy and process document. This includes the opportunity for all Market Participants to comment on any changes to it, and for the IGG to recommend a course of action. Any Market Participant may raise a change request; this will be circulated to all Market Participants and will be discussed at the IGG.
Market Participants (MPs)	Suppliers (Small and Large), Self-Suppliers, Export Only, Demand Side Unit, Generators	Any participant in the SEM who has a license to supply electricity in accordance with the applicable governing rules.	Responsible for ensuring adequate knowledge of the approved strategy and process and ensuring relevant assurance phases and stages are adhered to.
RMDS	Retail Market Design Service	A ringfenced function within ESBN, responsible for all aspects of the retail market design. The role of RMDS involves the cost effective support for and delivery of quality systems that will help achieve the CRU's objectives of encouraging competition in supply markets and quality of service to all customers.	Owners of the assurance strategy and approach



·	Responsible for fulfilling the assurance strategy and process activities.



6.4 Appendix 4 – Glossary

The glossary used within this document can be found on the RMDS website here: <u>Glossary of Terms |</u> RMDS (rmdservice.com)

6.5 Appendix 5 – Risk approach

The Assurance Body when reviewing the Market Participant Self-Assessment Questionnaires will align its approach around a risk score methodology.

The Assurance Body will assess the responses and evidence gathered and decide on an overall risk score.

The risk score is based upon a Quantitative Methodology. The Assurance Body use a risk matrix which contains two dimensions to the scoring, namely;

- The *severity of the risk* how significant the risk will be in achieving the overall goals of the project (impact), and
- The *likelihood of the risk* materialising.

Each of these dimensions are assigned a score weighting from 1 to 5 and when combined, provide an overall risk score. The matrix below outlines the various combinations of scores.

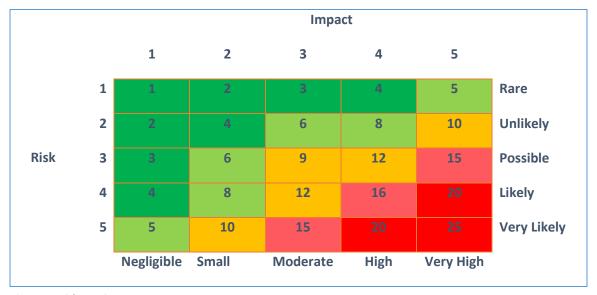


Figure 4 - Risk matrix



6.6 Appendix 6 – IPT log defect Severity Classification

The classification of severity will be as follows:

- Class 1 Defects that render the entire IPT scenario unusable. All testing activities shall be immediately stopped. Testing should only be resumed after evaluation and corrective measures have been completed. Will usually require the provision a new test window.
- Class 2 Defects which render a critical function of the processes or IPT test scenario unusable. They include drastic program or system errors such as application failures, inability to perform data transfers, failure to access databases, and inability to display information to the users. Testing of the specific scenario/test should be immediately stopped. Testing should only be resumed after evaluation and corrective measures have been completed.
- Class 3 Defects that produce erroneous results from any material function of the process. These are defects that prevent a test scenario/script from completing successfully.

Although the expected results do not match those expected:

- o it will not adversely impact key processes and procedures; or
- o there is a workaround which enables the expected outcome to be achieved and will be progressed towards a permanent solution;

Testing will continue and the defect will be evaluated and corrected by the end of the IPT stage;

Class 4 - This class of defect includes items that do not significantly impact the usability of the
processes, such as an error in text or view displayed, spelling errors or documentation errors. A
correction plan will be established, testing will continue, and the defect will be evaluated and
corrected at a time agreed with the Supplier.

6.7 Appendix 7 – Examples of Material Change

A Material Change represents a change to a Supplier's business and/or operational processes, and/or technical infrastructure (e.g. automation) that alters the Supplier's internal systems and methods of Market interaction from that initially assured.

The table below details some typical examples of what is considered a trigger for a Material Change requalification.

If a market participant is in doubt as whether the change is considered material, RMDS should be consulted in the first instance.

6.7.1. Material Change requalification assurance required

Change Type	Description
System Change or update	Relocation of EMMA server (resulting in change to IP addresses)
	New or replacement to the market facing back office system that will generate XML market messages





	New or replacement middleware that provides interface between the back office system and the EMMA
Change to processes	Automation of several market processes that were previously manually processed
	Change to how key process steps and stages are structured
Business transformation project	Acquisition or merger of supplier portfolios by bulk transfer of MPRNs
	Acquisition of supplier portfolio by a company not presently in the Electricity Market, resulting in a high proportion existing staff being made redundant
New Market Role or additional market segments ²³	Should a small supplier MPRN volume be expected to permanently exceed 1,000 MPRNs
	As identified in section 1.1 should there be any MPRNs held in market segments not certified by the Assurance Body

6.7.2 Material Change requalification assurance unlikely to be required ²⁴

Change Type	Description
System Change or update	Change to customer facing portal (e.g. website) where customers obtain copies for bills and communications
	Additional customer sales acquisition channels that utilise the same market processes
	Creation of new tariff types
Change to processes	Refinements to process steps or stages that follow the same structure



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 $^{^{23}}$ Threshold relates to small supplier only. If identified will follow requalification supplier assurance process.

²⁴ If a market participant is in doubt as whether the change is considered material, RMDS should be consulted in the first instance.



6.8 Appendix 8 – Examples of Assessment Evidence

The evidence that will be required to provide assurance for a project will be dependent on the scale, scope and nature of the change(s) involved. Typically, however, examples of evidence will include the following:

Change management

Evidence that the required change(s) is fully understood and a detailed plan for implementation has been constructed.

Detailed cutover plan

This plan should show how all the changes will be rolled out into the Participant's live environment. This may be through reminders to staff on the revised business process changes or how updating of software systems will be performed. (There will, in general, be a central plan including a series of timed tasks for the cutover day. This will be developed by RMDS in conjunction with Participants.)

Database/Records Definition

This is a part of the system specification and is a definition of the data held by the Participant for the purpose of supporting its market inter-operation and the structure of that data. This could be, for example, a database definition or spreadsheet layout.

Documented Business Processes

Whilst the Market Design provides a high-level view of events and actions, these are insufficient to define a specific Participant's internal processes for operating. Each Participant is therefore expected to set its internal processes out in some documentary form. Processes referenced as applicable to the Supplier's segment(s) in the SAR must be defined and documented to reflect the Participant's internal processes.

Such processes should describe, as a minimum:

- How to initiate a Market activity e.g., energise a meter. This should include the source, within the Participant's records, of any data required to populate a Market message.
- How to react to a Market event e.g., receipt of a specific Market message. This should include any
 updating of the Participant's records using the data from the message that has been received and
 any response that is required.
- Where there is automated processing there should be a definition of that automation.
- A definition of the records that are to be held to support Market-facing activities

Business processes may be in any form, including textual, diagrammatic or a combination, and may refer to the Market Design as necessary.

Dress rehearsals

In the context of cutover, especially where a significant timescale is involved, evidence that the plan has been trialled at full scale, including all logistics considerations.





Fall-back plan

This plan should explain how operations will continue if there is a failure to implement the intended change(s). It will provide details on what workaround systems will be put in place, if any, and how the Participant will deal with other affected Participants. There will, in general, be a central plan developed by RMDS and discussed with Participants, and a plan that each Participant develops to ensure its own business continuity.

IT System Specification

For the automated elements of a Participant's business processes, this is a detailed definition that sets out where the requirements of the Market Design are to be embodied as system functions together with a definition of the Participant's database.

IT Technical Infrastructure

This is a high-level definition of the technical elements of the Participant's Market systems and would include such items as servers, message routers, communication links or applications. The intention is to describe the elements deployed for Market activities and the path(s) followed by Market Messages/market data.

Problem management

Evidence of the use of an effective problem management system, to capture and resolve issues during the implementation of the change. Process/system changes Evidence that the changes to the business process and systems that will be used to operate within the Market have been made. Where software solutions are being applied, information on the requirements, testing and test results will be evaluated.

Test Outcomes

A summary of the tests carried out, the outcomes of those tests and any re-tests that have taken place.

Test Plan

As a minimum, this comprises a list of all the individual tests (test cases) to be carried out and grouped as necessary. It may also set out the timing for the test runs and the allocation of resources.

Test Results

The detailed evidence from which the test outcomes are derived. At the minimum, this would include the results as recorded by the tester, perhaps on the test specification/script (see below). Ideally, and always in the case for Inter-Participant Testing, this will be supplemented by 'before' and 'after' screenshots of the state of the systems or database/records at each step.

This would include for example screenshots, database extracts or reports. Evidence should be taken before and after each test step, such that the effects of receiving a Market Message, are demonstrated and, conversely, from where the data that populates an outgoing Market Message is derived.





Test Specification/Script

A detailed specification of each test (case) including the initial conditions that need to be created, each step to be carried out, the expected results (this could be per step or overall) and the completion criteria. This can also be referred to as a 'script' and is usually formatted so that results can be recorded both stepwise and overall.

Test Strategy

A document that sets out the broad approach to testing, including, but not limited to, the types of testing to be included (e.g., factory acceptance test, system test or user acceptance test), the environments on which testing will take place, the types of staff to be involved, the test management structure and responsibilities.

