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|-----------------------------------|------------------|-----------------|-------------------------------------------------------------------------|--------------------|------------|
| Market Change Request 1219 | | | SPAYG – System & Process Changes necessary to deliver policy | | |
| Status | Issued to Market | Priority | High | Status Date | 21/09/2022 |

| Date | Version | Reason for Change | Version Status |
|-------------------|------------|-----------------------------------------------------------------------------------------------------------|----------------|
| 06/12/2021 | 1.0 | Initial Draft to facilitate Market Discussion | Final |
| 28/02/2022 | 1.1 | Updated following Technical Working Group | Final |
| 06/04/2022 | 2.0 | Updated version to remove temporary PAYG flag and add in consideration for debt flagging process | Final |
| 18/05/2022 | 3.0 | Updated version to change to non-schema impacted | Final |
| <u>24/08/2022</u> | <u>4.0</u> | <u>Updated version to document additional changes proposed as part of MCR1219 re-versioning exercise.</u> | <u>Final</u> |

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

| Classification of Request | |
|----------------------------------|----------------------|
| Change Type | Non-Schema Impacting |

| Detail of Request |
|---------------------------|
| Reason for Request |

Background

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

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

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

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

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

- Day/Day+1 or D+5 CoS Processing
- ~~PAYG Flag which is available as an identifier pre switch~~
- ~~Discreet Debt Flag for consumers switching, as a result of debt but no available thick or thin PAYG solution. Policy clarification required.~~

- ~~CTF algorithm suitability for PAYG service provision (CTF degradation should only be impacted by genuine communications degradation and not MDMS or system issues). Evidenced by issue with mass CTF 4-3 degradation recently and the impact it would have on SPAYG.~~
- ~~Contingency process for failure in technology chain (day to day and critical/mass failure),~~
- ~~SLAs and query management between Suppliers (on behalf of customer) and ESN for D2D support. Extend to major tech outages at any point in tech chain (similar to point on contingency process)~~
- ~~Transition process between SPAYG and Credit for existing customers.~~

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

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

Proposed Solution

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

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

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

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

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

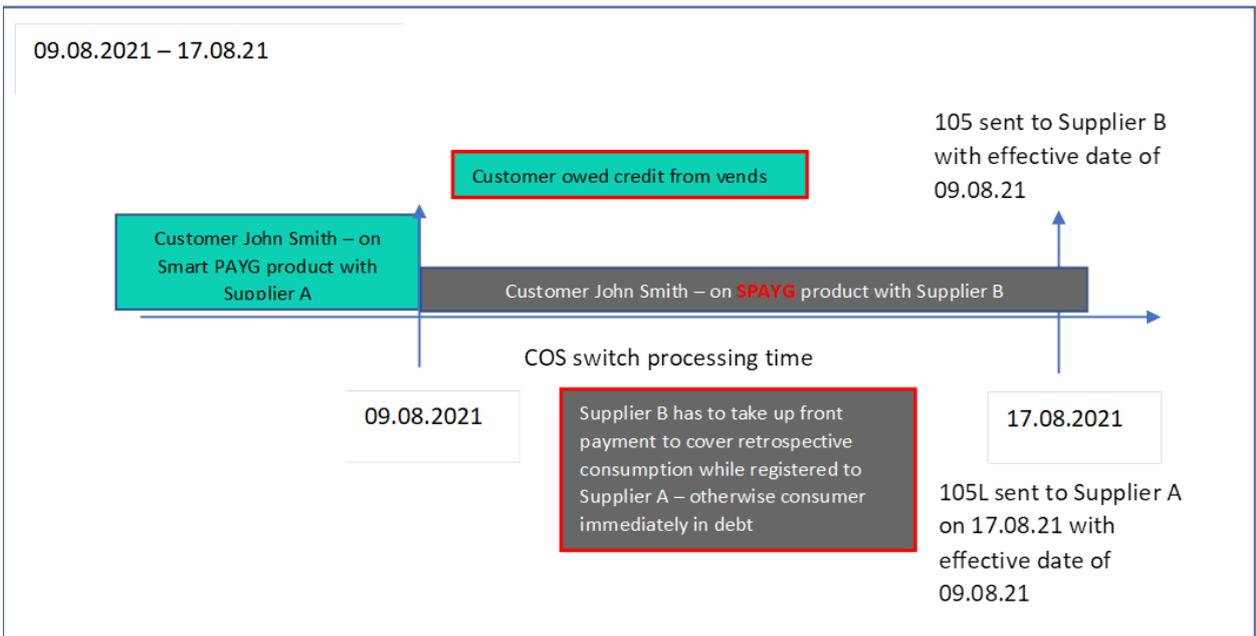
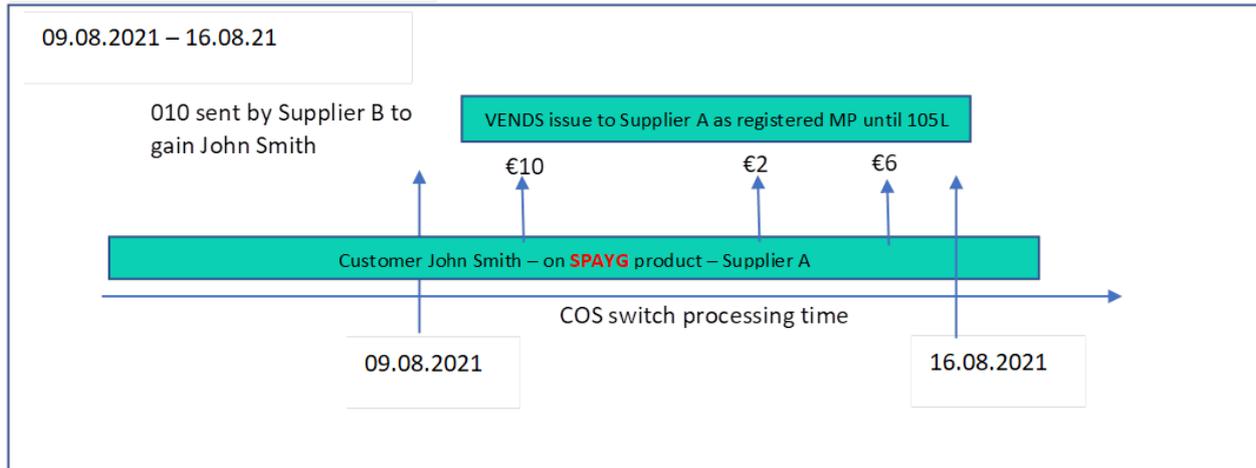
SPAYG to SPAYG

SPAYG to Credit

Credit to SPAYG

Example 1: SPAYG to SPAYG

SPAYG - SPAYG



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

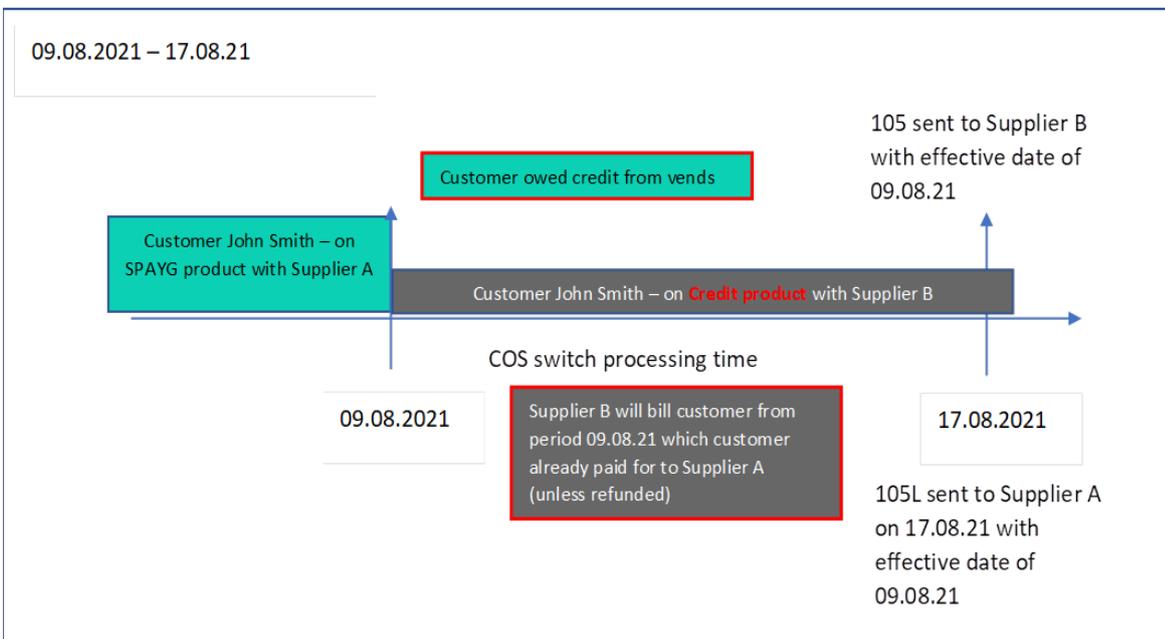
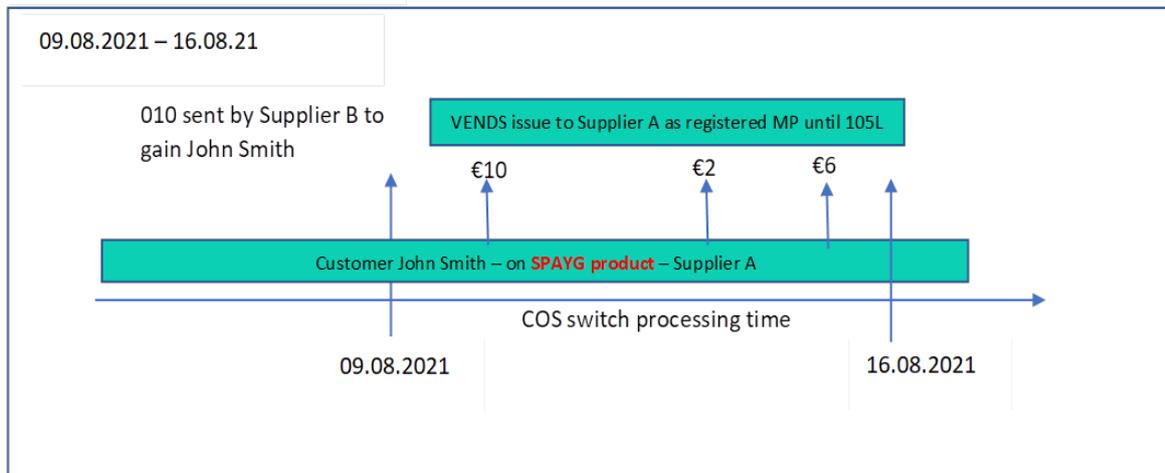
In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.

Supplier A is now left having received vends for the service during the CoSCoS processing period and would be required to reconcile and refund the customer for the vends.

Supplier B must ensure sufficient credit is taken up front for the CoS Processing period to ensure the customer is not immediately in debt once Switch effected (for the period 09.08 – 17.08)

Example 2: SPAYG to Credit

SPAYG - Credit



Customer John Smith registered to Supplier A on a **SPAYG product**. Customer wishes to switch to Supplier B on a **Credit product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21 All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.

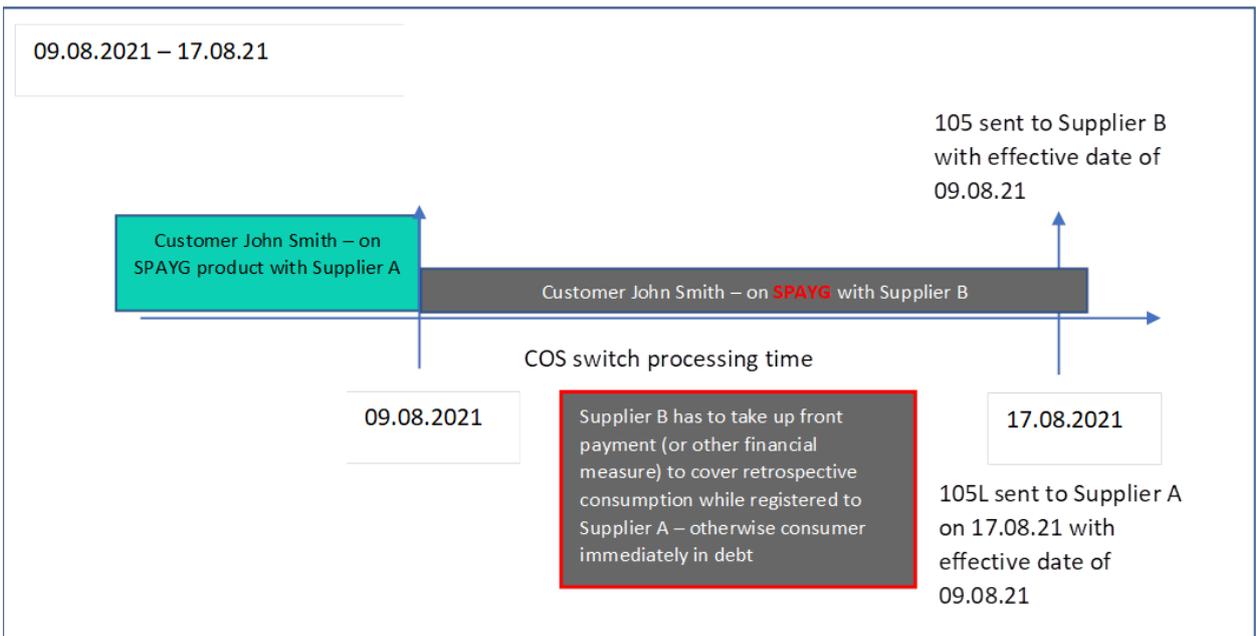
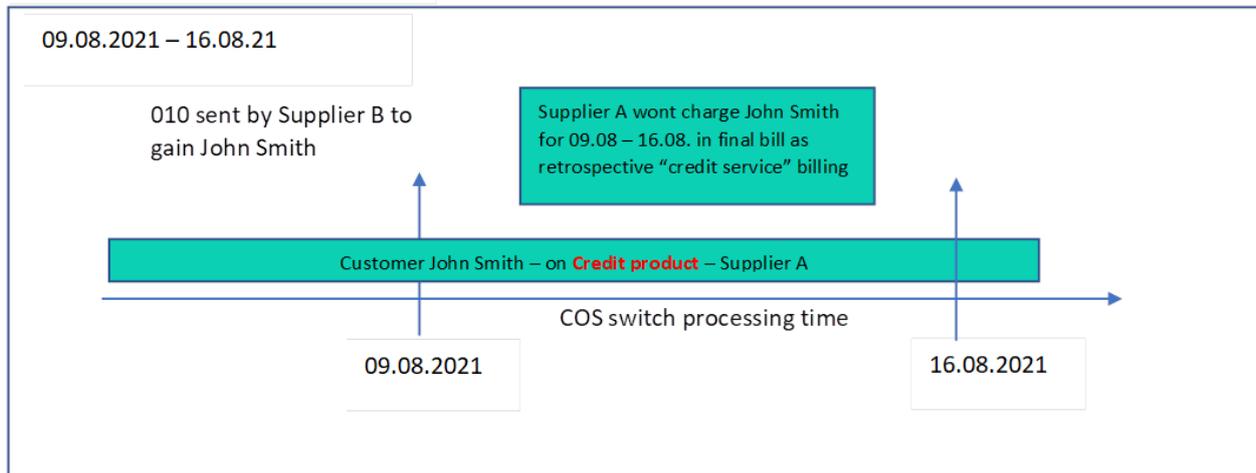
While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A. Supplier A is responsible for DUoS and all terms of supply until such time as a 105L is issued and CoS is effected with switchover in retail systems. The customer has right to energy during the CoS Processing period and as on a Smart PAYG product continues to vend to keep the lights on. Note a switch could take much longer than 6-9 days to process depending on technical/other issues.

In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.

Supplier A is now left having received vends for the service during the CoS processing period and would be required to reconcile and refund the customer for the vends. Supplier B will bill customer on a credit tariff from the 09.08 which unless refunded by losing supplier A, will be paid for twice.

Example 3: Credit to SPAYG

Credit - SPAYG



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

The requirement is

To align the event processing date with the CoS effective date as far as possible to reduce the need for refund and reconciliation.

For the gaining supplier to choose whether to offer the customer a PAYG tariff

Note: Effective Date = Effective from date. Definition MM105 - Effective From Date is the date from which the New Supplier registration to the Meter Point is effective. The registration is effective from 00h00 at the start of this day. Where meter works are required as a result of the CoS request then the effective from date will be the date on which the meter works are completed.

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

• **D + 5 (Working Days) processing and effective date for a PAYG customer** ○ The proposal is to populate a required date of D+5 (working days) where the new Supplier is offering a PAYG tariff whereby the effective date in these scenarios will be D+5 (working days) and processing will align to the effective date. The key issue is the alignment of switch and processing. ○ MM010 (change of supplier request) should be populated with a required date of D+5 (working days) where the new Supplier is offering a SPAYG tariff to the Customer. The CoS will complete to an effective date of D+5 (working days) and the CoS completion messages will be sent once D+6 is reached. ○ ~~This option would also require disconnection code D05 and reconnection code E05 to be allowable to allow any existing PAYG services to continue (subject to Customer Protection implications that would require CRU approval).~~

• **Change of Smart Data Services as part of a CoS to facilitate SPAYG** ○ The proposal is to populate a required date of D+5 (working days) and also request a change to Interval Data services. The effective date in these scenarios will be D+5 (working days) and processing will align to the effective date. The key issue is the alignment of switch and processing. ○ ESNB would reconfigure the Meter from Non-Interval data services to Interval data services on D+5 (working days) and the CoS completion messages will be sent once D+6 is reached ○ The customer would be registered to the gaining Supplier as an Interval customer

De-Energisation and Re-Energisation for Reason De-Energise (HH PAYG) – Re-Energise (HH PAYG) while a CoS is in progress

Valid requests to De-Energise by the Old Supplier via MM017 with Meter Point Status Reason code D05 (De-Energise (HH PAYG)) will be attempted within the allowed De-Energisation period up to the date of CoS processing. MM017 received with reason D05 after this time will be rejected with Reject Reason CIP (CoS in Progress) on the date of CoS processing.

Valid requests to Re-Energise by the Old Supplier via MM017 with Meter Point Status Reason code E05 will be attempted up until 9am on the date of CoS processing. An MM017 received from the Old Supplier with reason E05 after this time will be rejected with Reject Reason CIP (CoS in Progress). Once 9am on the required date is reached, where an MPRN has a status of DR (de-energised remotely), ESNB will initiate the re-energisation as required to complete the CoS

Changes to MM110: Notification to Old Supplier of a Change of Supplier

- ESNB will populate the Required Date field on the MM110 sent by MRSO to the Old Supplier to advise that a Registration Request has been accepted from a New Supplier. This field is currently not populated.
- ESNB's view is that this will enable the Old Supplier to understand the period during which they can continue to submit a valid MM017 with reason D05 / E05 for the MPRN.*
- The Required Date field on the MM010 will always be populated in both Smart and Legacy scenarios, regardless of the MCC.
- Note: The CoS processing date may exceed the required date for remotely operated site in the event of an Objection from the Old Supplier submitted via MM012 prior to CoS completion, or where Non-Interval Smart Data Services requested as part of the CoS cannot be completed remotely.

Change of Supplier Registration Acceptance / Provisional Acceptance (MM102 / MM102P)

MM102 / MM102P will continue to issue to the New Supplier following the acceptance of a valid registration request as per the current rules.

ESNB propose the following additional usage of MM102P and MM102 where a change in energisation status initiated by a valid MM017 with reason D05 / E05 requested by the Old Supplier is carried out while a CoS is in progress

Additional use of MM102P

- MM102P will issue to the New Supplier following completion of a request from the Old Supplier to De-Energise via MM017 with reason D05 where the CoS is in progress. Re-Energisation is now required to complete the CoS request and ESNB will initiate the re-energise the meter to complete the CoS, as per current process.
- MM102P will issue to the New Supplier following completion of a request from the Old Supplier to Re-Energise via MM017 with reason E05 where a CoS is in progress and a Smart Data Services (MCC) Change was requested as part of the CoS. ESNB will initiate the Smart Data Services Change to complete the CoS and MM102 will issue on completion of the Smart Data Services Change followed by MM105, as per current process.

Additional use of MM102

- MM102 will issue to the new Supplier on completion of a valid request from the Old Supplier to Re-Energise via MM017 with reason E05 while the CoS is in progress and no Smart Data Services (MCC) change is requested as part of a CoS, viz the CoS completion is not dependant on ESNB carrying out further meter works.

Removal of the 5 day Objection Window

- The five day objection window currently prevents the processing of a CoS until five days have elapsed from the notification of the CoS to the Old Supplier
- Where there is a CoLE (explicit or inferred) as part of the CoS, Debt Flagging Wait Periods do not apply. The removal of the five day objection window would allow a CoS with a CoLE for a Smart remotely operated meter with a required date of D (Non Interval only) or D+1 to be processed on and effective from the required date.
- In the case of a Smart PAYG CoS with CoLE, this would reduce the window during which a change in Energisation Status via 017 with reason D05 or E05 could be requested by the Old Supplier.
- For a Non-Interval CoS, processing on D / D+1 is dependant on the required reads are available to ESNB or, where reads are not available, the Supplier has indicated on MM010 that an estimate is acceptable.

- MRSO will accept a valid MM012 with objection reason ET up to 60 days following completion of the CoS, ESNB do not propose a change to this timeline. Objections for reason of Erroneous Transfer will continue to be accepted while a CoS is in progress, however the mandatory five day window during which these can be submitted will no longer apply)
- Note: in order to ensure the integrity of the CoS process and consistent processing, the ESNB proposal is that the five day ET objection window would be removed for CoS for both Smart and all other NQH MPRNs.
- A CoS with CoLE for a non-remotely operated meter (Smart or other NQH) with a required date of D or D+1 could also be processed on and effective from, a required date of D / D+1. This is provided that the required reads are available to ESNB or, where reads are not available, the Supplier has indicated on MM010 that an estimate is acceptable.

D / D+1 CoS Processing

The removal of the 5 day objection window will allow D / D+1 CoS Processing where:

- A CoLE is included on a valid MM010 request or inferred by ESNB
- Meter works required as part of the CoS can be carried out remotely
- Manual intervention is not required by MRSO on receipt of the MM010 (e.g. due to an errors in the MM010)
- For a Non-Interval CoS, the required reads are available or, where reads are not available, the New Supplier has indicated on MM010 that an estimate is acceptable. (Note that where the New Supplier indicates a Read Arrangement of SC (Scheduled Read), ESNB will wait for the next Scheduled Read date to process the CoS, as per current process.)

PAYG Flag

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

Debt Flag for switches away from Suppliers with no PAYG facility

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

CTF algorithm suitability for SPAYG service provision

DR1222 has been created to look at CTF algorithm.

Contingency process for failure in SPAYG Technology Chain

DR1221 has been created to look at contingency process for failure in the SPAYG technology chain.

The debt flagging process will be examined to provide clarity in relation to how it operates and ensure it continues to work effectively as per existing policy.

Scope of Change

| Design Documentation | Business Process | DSO Backend System Change | MP Backend System Change | Tibco | Supplier EMMA | Schema | Webforms | Webservice | Extranet Market Website |
|--------------------------|--------------------------|---------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Market Messages

| Message No. | Message Name | ROI |
|---------------|--------------------------------------------|----------|
| MM102 | Change of Supplier Registration Acceptance | Impacted |
| MM102P | Change of Supplier Provisional Acceptance | Impacted |
| MM110 | Notification to Old Supplier of CoS | Impacted |

Data Definitions

No Impact

Data Codes

No Impact

Market Message Implementation Guides

| Message Guide | Yes/No |
|---------------------------|------------|
| <u>Meter Works</u> | <u>Yes</u> |
| <u>Meter Registration</u> | <u>Yes</u> |

Market Process Diagrams – MPDs

| Market Process Number | Market Procedure | Affected | |
|-------------------------|-------------------------------------------------|---------------------|--|
| MPD 1 | Change of Supplier Non Interval | Yes | |
| MPD 2 | Change of Supplier Interva | Yes | |
| MPD 3 | Objection & Cancellation | Yes | |
| MPD 3.1 | Automated Debt Flagging | Yes | |
| MPD 9 | De-Energisation | Yes | |
| MPD10 | Re-Energisation | Yes | |

| Guidance Documentation | | |
|------------------------|---------|-----------|
| Document | Version | Affected |
| No impact | | No Impact |

| Briefing Document | | |
|-------------------|--|----------|
| Briefing Document | | Affected |
| No Impact | | Yes |

| User and Technical Documents | | | |
|------------------------------|------|---------|-----------|
| Reference | Name | Version | Affected |
| No impact | | | No Impact |

| Comments |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>All Market Design Documentation for SMART Metering Retail Market Design Workshops affected by this MCR can be found on the RMDS Secure Website.</p> <p> MPD01 Change of Supplier Non Interval MPD02 Change of Supplier Interval MPD03 Objection & Cancellation MPD03.1Automated Debt Flagging MPD09 De-energisation MPD10 Re-energisation ROI MMG Meter Registration ROI MMG Meter Works </p> |

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

| | |
|--------------------|------------|
| Approved by | CRU |
| | |