

# Re-Qualification Process

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MRA Entry Assessment Team

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## 1. Introduction

### 1.1. Purpose

This document describes the MRA Re-Qualification process that is set out in the governance document “MRA Agreed Procedure for Entry Assessment and Re-Qualification” (MAP05).

The Re-Qualification Process comprises the activities that a Distribution Business must follow where it makes, or intends to make, a Material Change to its systems and processes that support its provision of Meter Point Administration Services (MPAS).

The purpose of the Re-Qualification Process is to provide a level of assurance to MRA Parties that the MPAS will continue to comply with the obligations of, and operate in accordance with, the practices set out in the MRASCo Product Set.

### 1.2. Scope

A Distribution Business may outsource the provision of its MPAS to a third party. However, it remains the responsibility of the Distribution Business to ensure that its MRA obligations are met, including the obligation with respect to Material Changes to its provision of MPAS, whether this is outsourced or not.

The process applies to all Distribution Businesses that have been approved through the MRA Entry Assessment Process, including those who may be operating under Controlled Market Entry at the time of introducing a Material Change.

Changes that occur as a result of industry-wide requirements will require Re-Qualification only where so decided by MEC, Distribution Businesses will be made aware of such decisions as necessary.

### 1.3. Background

Distribution Businesses intending to participate in the UK Electricity Market are first required to be Approved via MRA Entry Assessment Process, this requirement includes the obligation to provide a MPAS. At the time of MRA Entry Assessment the precise configuration of systems and processes that the Distribution Business intends to use in the Market as the MPAS Provider is declared to MRASCo.

To ensure continued compliance with the MRA and MRASCo Products, the Distribution Business, as MPAS Provider, is required to notify MRASCo when a Material Change is to be introduced into their systems and/or processes.

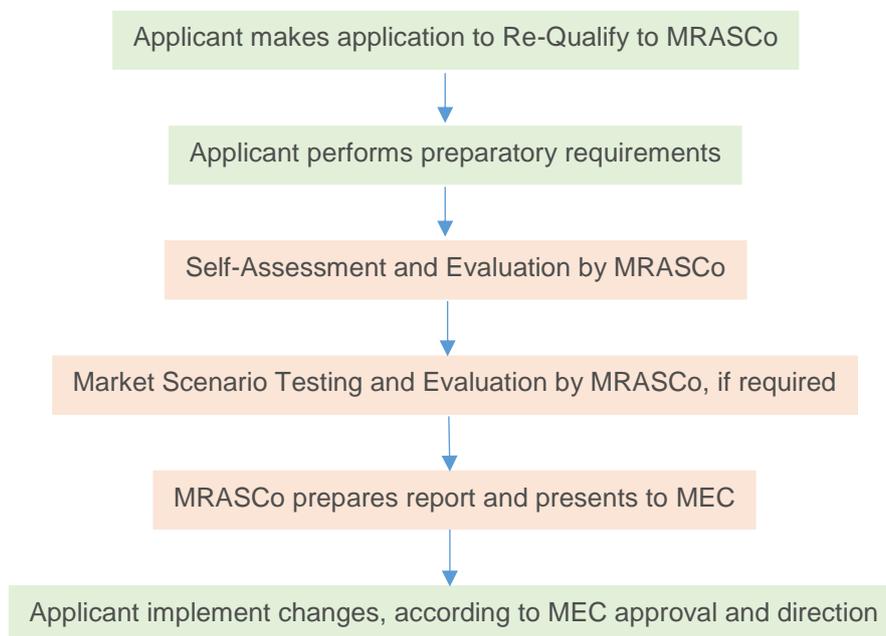
The term “Material Change” is defined in the MRA. Some examples of changes, and their materiality in this sense, are described in sections 4 and 5 of this document.

## 2. Glossary of Terms

The term “MPAS Provider” is used from here on in within this document to mean, as defined in the MRA, a Distribution Business in the provision of its MPAS.

For definitions of other terms used in this document refer to the MRA, MAP05 (The MRA Agreed Procedure for Entry Assessment and Re-Qualification) or the glossary in the document: MRA Entry Assessment – Information for Applicants (ref. 10454).

## 3. Re-Qualification Process



The MPAS Provider should contact MRASCo at the earliest opportunity (as soon as it has been determined that the change is, or may be, material) so that an assessment of the Re-Qualification requirements can be made and an appropriate schedule of activities developed.

In order to confirm that a MPAS Provider has managed a Material Change in such a way as to eliminate or minimise the possibility of disruption to the Market, MRASCo may conduct one, or more, assessments of the MPAS Provider’s systems and processes.

A timetable will be agreed and the MRASCo Assessor will provide details of which particular areas will be assessed and the staff that will be needed in support.

A Material Change under the Re-Qualification Process will be assessed using the general framework of the MRA Entry Assessment Process. That is to say there will be a self-assessment by the MPAS Provider concerned, potentially followed by testing and/or other actions, all of which will be subject to assessment by MRASCo.

The intention is to verify that the MPAS Provider has in place effective processes for the management of the material change that will eliminate or minimise the possibility of disruption to the market by the introduction of the change.

Part of the self-assessment element is the completion of the Re-Qualification Return by the MPAS Provider. In many cases, the MPAS Provider will be able to demonstrate the effectiveness of their processes without the need to carry out additional testing for MRASCo.

The assessment will require the MPAS Provider to make available their normal records for management of change. MRASCo may also wish to talk directly to the MPAS Provider's development staff and business users. MPAS Providers are required to provide statistics/feedback to MRASCo on request to facilitate the assessment process. Information collated during an assessment is for the sole purpose of assessment and is treated in the strictest confidence.

Findings may be raised during the assessment and the MPAS Provider is expected to propose corrective actions and agree these with MRASCo. When the corrective actions have been carried out evidence will need to be provided to MRASCo so that the Finding(s) can be closed.

Upon completion of each stage of the assessment(s), and when all Findings have been closed, MRASCo will produce a report for presentation to MEC, and progression to the next stage, or exit from the process, is contingent on MEC review and approval. The report will detail the areas of the MPAS Provider's operations that were assessed and outline the conclusions reached and the reasons for these. MEC may require further information or request additional actions to be completed prior to approving the report.

Re-Qualification should have concluded (MEC reviewed and approved), *prior* to the change/s becoming operational. Unlike the MRA Entry Assessment Process, an Applicant does not require Approval for the implementation of a change to its systems, processes or staff. However, MEC may instruct the Applicant to undertake remedial work before, or in some cases after, implementation to resolve outstanding concerns or to clarify areas where information appears to be inconclusive.

MEC will direct whether it requires MRASCo to verify any remedial work.

## 4. Material Change

**Note that it is the MPAS Provider that decides whether the change is 'Material', in discussion with MRASCo where appropriate.**

The term 'Material Change' is identified in this document as the trigger for the Re-Qualification process. This term is formally defined in the MRA. However, to aid understanding of what this means in practice, a fuller explanation and a number of examples appear below. Where there is any conflict or dispute, the definition in the MRA will prevail.

The MRA is concerned with the inter-operation of Market Participants. All MPAS Providers use systems to inter-operate with other Market Participants and these vary from manual and semi-automated to fully automated solutions.

Changes to such systems fall into the following broad categories:

1. Changes that are wholly internal to the MPAS Provider (including its Managed Service Operators), have no impact on the MPAS Provider's inter-operation with other Market Participants and are not concerned with MRA obligations. These are **NOT 'Material Changes'** in the context of Re-Qualification.
2. Changes in areas that support the MPAS Providers inter-operation with other Market Participants (including the support provided by the MPAS Provider's Managed Service Operators) but do not change the structure or format of the dataflows. These should be considered as **possible 'Material Changes'** in the context of Re-Qualification.
3. Changes in areas that are concerned with MRA obligations. These should be considered as **possible 'Material Changes'** in the context of Re-Qualification.
4. Changes to the structure or format of the dataflows used in inter operation, which affect more than one MRA MPAS Provider. These are changes to the Retail Design and **not 'Material Changes' in the context of Re-Qualification unless declared so by MEC.** These must be controlled through the MRA Change Management process.

Examples of changes that might be considered 'Material' are:

- Consolidation of business systems and processes following merger or acquisition,
- Migration to a new MPAS,
- Upgrade or relocation of market gateway,
- Changes to business processes that result in different operational procedures, and
- The introduction of the new or changed systems that receive, generate or process dataflows.

As well as the type of change, as indicated above, the scale of the change must also be taken into account. Such factors will assist in the assessment of any risk to the MPAS Provider's ability to continue to meet its MRA obligations and to inter-operate with other Market Participants.

## 5. Re-Qualification Triggers

The table below shows typical events in relation to their likely impact on an organisation's ability to continue to comply with its MRA obligations and the corresponding probability of the applicability of MRA Re-Qualification. The area of change appears in the left hand column and the degree of impact across the top, classified as Low, Medium and High.

Thus, for instance, where a MRA MPAS Provider:

- Makes a change to the user interface of a system that does not affect the system's functionality, the impact is LOW and it is unlikely that MRA Re-Qualification is required.
- Makes staff changes due to acquisition of a new company, the impact is MEDIUM and the MPAS Provider should discuss the changes with MRASCo to determine whether Re-Qualification is required and what this may comprise.
- Replaces an industry-facing manual process by an automated process, the impact is HIGH and it is almost certain that Re-Qualification is required.

These are only examples and are not meant as a definitive list of Material Change. These examples are intended to assist MPAS Providers in their own assessment of whether a change they are intending to make is likely to require Re-Qualification. In all cases, if the organisation is in doubt about the need for Re-Qualification, MRASCo will discuss and advise.

	TYPICAL IMPACT ON MRA OBLIGATIONS		
	Low	Medium	High
<b>System Change</b>	Change to user interface	Gateway change	
	Change to billing system (where not industry-facing)	Replacement of system with established, proven system	Replacement of MPAS system
		Regulatory changes (Re-Qualification required only if specified by MEC)	Bulk migration of data with industry content
			Invalidation of exclusions and/or exemptions granted in initial entry assessment

<b>Process Change</b>	Process updates for improvement of accuracy and clarity	Manual process replaced by automated process (not industry-facing)	Manual process replaced by automated process (industry-facing)
	Minor process changes to reflect changing reporting structure or internal company policy		Major rewrite of process
<b>Staff Change</b>	Routine staff changes and associated intra-company re-organisations	Staff changes due to acquisition of new company	Relocation requiring total staff replacement

## 6. Re-Qualification Principles

MPAS Providers must comply with the following principles with respect to the Re-Qualification process:

- Where a change is being made, including changes to the management processes of the MPAS Provider, an effective assessment must be carried out by the MPAS Provider to determine whether the change is a Material Change in the context of Re-Qualification.
- The MPAS Provider must notify MRASCo when proposed Material Changes are identified. This must be prior to the intended date of introduction of such changes into their normal market operations.
- The MPAS Provider must ensure that they have in place, at all times, effective management procedures as demonstrated at the time of Approval or subsequent Re-Qualification.
- The MPAS Provider must ensure that any Material Changes are designed, developed, tested and implemented in accordance with their own management procedures.
- The MPAS Provider must keep management records and allow MRASCo Assessors reasonable access to these records and other evidence as appropriate, and allow interviews of business users where necessary. In this manner, MRASCo may gain a reasonable level of understanding of the management processes employed by the MPAS Provider in implementation of the change.

## 7. Change History

VERSION	STATUS	DATE	REASON FOR CHANGE
0.1	Draft	1 Sep 99	Initial Draft for Project & EG Review
0.2	Draft	23 Sep 99	Amended following all review responses
1.0	Authorised	30 Sep 99	
1.0	Authorised	20 Mar. 01	Insertion of Copyright clause
1.1	Draft	30 July 01	Changes requested by MEPB
1.2	Draft	09 August 01	Remove references to Annual Return
1.2	Authorised	28 Nov 01	
2.0	Authorised	3 Dec 01	Oct Nov 2001 including Utilities Act changes, and Scotland process change.
2.1	Authorised	28 Aug 02	Make generic for all MPAS Provider types
2.2	Authorised	11 March 2005	Removed re-qual for Scotland para from 1.2
2.2	Authorised	10 Sep 2005	QA Review.
2.3	Draft	06 Jan 2006	Document updated to be in line with MAP05
3.0	Authorised	16 August 2007	Update in line with Revised MAP05
4.0	Draft	02 Feb 2017	Updates made to reflect governance changes, general review and brand updates.

## 8. Quality Assurance

NAME	ORGANISATION	ROLE
Elizabeth Montgomerie	Gemserv	Author
Dajana Hanusek	Gemserv	Reviewer
Richard Nichols	Gemserv	Reviewer
MEC	MRA Executive Committee	Approver

## 9. Related Documents

- MRA Products  
<http://www.mrasco.com/MRA+Products>
- MRA Entry Assessment Products  
<http://www.mrasco.com/Download+Library/Entry+Process+Papers>
- MRASCo Web Site  
<http://www.mrasco.com>

MRA Service Company Limited  
8 Fenchurch Place  
London  
EC3M 4AJ  
03490321

Tel: +44 (0) 20 7090 1029

[www.mrasco.com](http://www.mrasco.com)

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