![MRA logo - MRA Service Company]

Guidance on raising Issues and Change Proposals during the Switching and Retail Code Consolidation Significant Code Review's (SCR's)

This is the supporting guidance document that outlines the processes for managing issues and progressing changes to the MRA and its associated products[1] during the Switching and Retail Code Consolidation SCR's. This guidance document shall be utilised when a Party to the MRA or (in the case of Issues) other industry participant:

- Raises an Issue that they believe impacts the MRA or associated products; or
- Raises a Change Proposal to the MRA or associated products.

Background

Ofgem launched the Switching Significant Code Review (SCR) in November 2015, with the objective of improving customers' experiences of switching Energy Suppliers by implementing a new switching process and Central Switching Service (CSS). As part of the development of the regulation and governance changes required to deliver this, it was decided to introduce a dual fuel Retail Energy Code (REC) to replace the Master Registration Agreement (MRA) and Supply Point Administration Agreement (SPAA) to harmonise gas and electricity processes and rationalise the content of the codes.

The creation of the REC also presented an opportunity to further consolidate and rationalise a number of codes in the retail energy market, to create code governance arrangements that drive innovation and positive outcomes for consumers. Ofgem subsequently launched the Retail Code Consolidation SCR in November 2019 to deliver the required changes to retail code governance to achieve these outcomes.

As the Switching SCR is impacted by the majority of systems and processes under the MRA, and the Retail Code Consolidation SCR will lead to the closure of the MRA and the transfer of existing obligations from the MRA to the Retail Energy Code or other codes[2], required changes to the MRA or MRA Products will be significantly impacted by the two SCRs.

Submission of Change Proposals – Assessing Impacts against the SCR's

When completing a Change Proposal (CP), the Proposer will be asked for their views on whether the modification impacts a Significant Code Review and whether the Change Proposal should be notified to the Authority to determine if the change is within scope of the SCR. Where a Change Proposal is submitted, the Code Administrator will assist the Proposer with this assessment and recommendation.

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[1]Data Transfer Catalogue (DTC), MRA Agreed Procedures (MAPs), E2E Diagrams and Working Practice Product Set (WPPS)
[2]Balancing and Settlement Code (BSC), Distribution Connection and Use of System Agreement (DCUSA) or Smart Energy Code (SEC)

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On completion of the Change Proposal, if the Change Proposal does impact on one of the SCR's, the Code Administrator will complete a further assessment of the expected impact of the Change Proposal to the Switching Programme and SCR's which will include an assessment of:

- Impacts to Switching Programme primary and secondary systems[3] and consequential impacts this may have on testing or readiness requirements for the Programme.
- Impacts to the end-to-end physical design of the Switching Programme or the logical design contained within Abacus; including data, interfaces, process and service descriptions.
- Impacts to the Business Case of the Switching Programme.
- Impacts to the drafting of the Retail Energy Code or consequential changes to other codes.
- Any other impacts on the scope, objectives or timetable of either SCR, including the Programme Plan and the milestones contained within the Plan. This will include considerations from a resourcing perspective and whether when viewed in the context of cumulative delivery, this change is appropriate.
- Impacts any of the Switching Programme documents under change control, for example the E2E Testing Plan, Core Systems and Services Integration Approach or E2E Data Migration Strategy.

There will also be an assessment of the benefits and drawbacks of the Change Proposal proceeding during the SCR, and any risks or impacts associated with delaying the Change Proposal until after the conclusion of the SCR. This will include the consideration of any manual workaround solutions that could be implemented prior to the Change Proposal being progressed after the conclusion of the SCR, and any costs associated with implementing this solution. The Code Administrator will provide this assessment to the Authority with their recommendation on how the Change Proposal should be proceed.

The Authority will decide whether to:
- Allow the Change Proposal to proceed to Impact Assessment for a time period determined by MDB;
- Suspend the progression of the Change Proposal pending further action (e.g. Impact Assessment, Switching Programme Change Request, Request for Information, etc);
- Suspend the progression of the Change Proposal until the conclusion of one or both Significant Code Reviews.

The Code Administrator will maintain a log of all Change Proposals that are impacted by the Significant Code Review along with the status of these.

MRA Issues Process
Where a Change Proposal or strawman solution is developed to resolve an Issue under the MRA Issues process, it is expected that an assessment of the impacts against the SCR's are considered, and views from Ofgem are sought at this stage.

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[3]The Central Switching Service (CSS) (including the Service Management System, Registration System and Address Matching), MPAS, ECOES, UK Link, DES, Gemini and DSP

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Where this change impacts the drafting of changes associated with the SCR's it is expected that the required changes to the SCR drafting should be identified by the relevant Expert Group as part of the solution. These changes should be discussed with Ofgem, and where relevant, the DCC and Systems Integrator (SI), prior to submitting a Change Proposal.

If Ofgem provide consent for a Change Proposal to proceed under the SCR during the Issue Resolution stage, then details of this approval including any terms, conditions, dependencies and associated timescales should be clearly detailed in the Change Proposal to enable this to progress as proposed. If the Change Proposal proceeds to MDB based on this information, Ofgem will be notified of this and will have an opportunity to object to progression prior to this being presented at MDB.

Central System Changes

Any changes to central systems that directly impact the Switching Programme design (such as MPAS or ECOES) will be subject to approval by the Authority prior to progressing during the Switching SCR and a Switching Programme Change Request will be required if these proceed. This will be assessed in accordance with the Switching Programme Change Management process[4], and will consider impacts to (as well as other criteria in the Change Management process):

- The Switching Programme design and approved documentation (including consequential impacts on other systems).
- Timescales for delivering the change and impacts on Switching Programme milestones.
- Testing and testing milestones.
- Additional costs associated with testing re-runs / regression testing.
- Urgency of the change and the implications of this not being implemented prior to CSS go-live.

Any changes to non-core systems to the Switching Programme, that are impacted by the Retail Code Consolidation SCR (such as GDCC, SDEP and other ECOES functionality[5]) should be treated in the same way as a change impacting the drafting of the Retail Code Consolidation SCR, as changes to these services will also require changes to the associated REC Service Definition documents that will be introduced through this SCR. As these changes may be progressed outside of the MRA Change Process, Ofgem should be engaged at the point of Impact Assessment, prior to the approval of any changes to these services or updates to the associated documents.

The Code Administrator will ensure that Ofgem are engaged and have the opportunity to make a representation if changes to these systems are proposed during the Retail Code Consolidation SCR.

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[4] https://www.ofgem.gov.uk/publications-and-updates/switching-programme-change-management
[5] Functionality not relevant to the provision of an Electricity Enquiry Service, such as Crossed Meters and Misdirected Payments functionality.