



The MRA Agreed Procedure for Issues Resolution and Change Management

MAP 17

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Contents

2	INTRODUCTION.....	6
2.1	Background.....	6
2.2	Purpose.....	6
2.3	Scope And Objectives	6
2.3.1	Scope.....	6
2.3.2	Objectives	7
2.4	Exclusions.....	7
2.5	Associated References	7
2.6	Glossary.....	8
3	THE ISSUES AND CHANGE MANAGEMENT PROCESSES	12
3.1	Introduction	12
3.2	Overview Of The Procedure	12
4	ISSUE RESOLUTION	15
4.1	The Role Of GDEG	15
4.2	The Role Of IREG	16
4.3	The Issues Resolution Process.....	16
4.3.1	Helpdesk Enquiries	16
4.3.2	Raising An MRA Issue	17
4.3.3	Scheduling New Issues.....	20
4.3.4	Assessment Of Issue	21
4.3.5	Requests for Further Information.....	22
4.3.6	Development Of Solution Proposals.....	23
4.3.7	Outcomes Of Issue Assessment	23
5	SOLUTION PRE-ASSESSMENT	25
5.1	Submission Of Pre-assessment Request	26
5.2	Evaluation of Proposed Solution.....	28
5.2.1	Impacts on Central Systems.....	28

5.2.2	Issuing The SPF For Assessment	28
5.2.3	Evaluation Of Proposals.....	29
5.3	Solution Progression	30
5.3.1	No Further Action Required.....	30
5.3.2	Change Proposal Raised	30
5.3.3	Raising Party Raises An MRA Issue	30
6	CHANGE PROPOSALS.....	31
	32
6.1	Raising A Change Proposal	33
6.1.1	Completion Of The CP Form.....	33
6.1.2	Initial Validation Checks	36
6.1.3	Assessment Periods	36
6.1.4	Urgent Changes.....	38
6.2	Impact Assessment.....	38
6.2.1	Issuing Change Proposals for Assessment.....	38
6.2.2	Assessment By Parties	39
6.3	Voting Preference	40
6.4	MDB Procedures For Change Proposals.....	41
6.4.1	MDB Voting.....	41
6.4.2	Post MDB Actions	43
7	SoS Consents	44
7.1	Authority Determination.....	46
7.1.1	Request For Determination	46
7.1.2	Authority Decision	46
7.2	Secretary of State Consent	47
7.2.1	Request For Consent	47
7.2.2	Secretary of State Decision.....	48
8	APPEALS.....	49

8.1	Raising An Appeal.....	52
8.2	Notification Of An Appeal To Other Parties	54
8.3	MRA Forum Procedure For Appeals	54
8.4	Appeals To The Authority	54
8.5	Conclusion Of The Appeals Process	55
9	IMPLEMENTATION OF CHANGES	56
9.1	Product Updates	57
9.2	Central System Updates	57
9.3	Product Releases.....	57
	Appendix 1 – Definition of Symbols in Process Workflows	58
	Appendix 2 - Constitution of the MRA Development Board.....	59
1	Formation and Objects	59
2	Membership	59
3	MDB Secretary.....	59
4	Alternates.....	60
5	Non-Voting MDB Attendees	60
6	Duties.....	60
7	Powers.....	60
8	Quorum and Decision Making	61
9	Meetings	63
10	Appeals	63
11	Funding	63
12	Other Expert Groups.....	63

2 INTRODUCTION

2.1 Background

In 2011, the Master Registration Agreement Executive Committee (MEC) undertook a consultation on the Master Registration Agreement (MRA) Change Process. Responses to this consultation provided the basis for a number of enhancements to its operation. One of these enhancements related to the MRA Agreed Procedures (MAPs) in relation to Issues and Change Management.

Following this feedback, MEC agreed to the review, updating and merging of the MRA MAPs relating to the overall change process. As a result, MAP07 (the Issue Resolution Procedure for MRASCo Products) and MAP06 (the Change Management Procedure for MRASCo Products) have been amalgamated and updated into this new Procedure, MAP17, *the MRA Agreed Procedure for Issues Resolution and Change Management*.

This Procedure has been further reviewed and updated following the changes to the MRA in relation to the Green Deal made by the Secretary of State (SoS) with effect from 1st October 2012.

2.2 Purpose

Pursuant to Clauses 9.23 and 10.4 of the MRA, this Procedure sets out the processes relating to Change Procedures and Operational Issues Procedures and in relation to the MRA, MRA Products, and procedures issued pursuant to the MRA.

In addition, this Procedure provides for processes relating to the resolution of issues and development of changes to products created to support the inter-operability of the market in relation to the recitals of the MRA.

The processes and procedures referenced above are together referred to as the Issues Resolution and Change Management processes.

This Procedure encompasses the process for resolving inter-operational issues where the solution requires changes to the industry design, and has a material impact on the Master Registration Agreement (MRA) and/or other products that fall within scope of this Procedure as set out in Section 1.3.1 below.

In addition, it provides the procedures for the raising, assessment and implementation of changes to the MRA, and other products as set out in Section 1.3.1 below.

The aim of this Procedure is to use consensus to develop coherent fit-for-purpose market based solutions. They should represent the most appropriate changes to resolve issues and support market development.

2.3 Scope And Objectives

2.3.1 Scope

Issue Resolution and Change Management processes related to the following products are within the scope of this Procedure:

- The MRA;
- The Data Transfer Catalogue;

- Procedures agreed and issued by MEC pursuant to the MRA (the “MRA Agreed Procedures”);
- Working Practice Product Set (“WPPS”); and
- The End-to-End Diagrams.

Within this Procedure, these products are referred to as “the MRA and associated products”.

2.3.2 Objectives

This Procedure covers the end-to-end processes for Issue Resolution and Change Management under the MRA. As such, it will, in relation to the products defined as being within the scope of this Procedure:

- Define the process for resolution of inter-operational issues;
- Allow proposals for changes sponsored by participants to be put through the appropriate Change Management process;
- Set out the process for the proposal, assessment, formal voting, appeals and authority to implement a change to the MRA or its associated products;
- Comply with all the obligations placed on MEC in the MRA relevant to Issues Resolution and Change Management as set out in the MRA; and
- Provide for Issue Resolution and the raising of Change Proposals.

2.4 Exclusions

This Procedure does not consider the implementation of changes to the MRA, MRA Products, or procedures issued pursuant to the MRA as a result of directions received from the SoS using powers under the Energy Act (2008) in relation to smart metering or the Energy Act (2011) in relation to Green Deal Matters.

Guidelines (GDs) are also excluded from this Procedure.

2.5 Associated References

This Procedure is designed to be in accordance with Clauses 9 and 10 of the MRA, and is accordingly subordinate to any requirements set out in those or associated clauses.

Any additional documentation provided to assist parties in the operation of this Procedure is provided for guidance purposes only. If any discrepancy exists, this Procedure shall take precedence.

Forms for use within these procedures, and as amended from time to time, are published on the MRASCo website.

2.6 Glossary

Acronym	Definition	Description
	Appeal	In the context of this MAP, relates to an appeal raised by a Party to an MDB decision as described in Section 7.
	Appeal form	A form completed by a Party wishing to appeal to an MDB decision, submitted to MRASCo.
	Appeal hearing	For the purpose of this MAP, refers to the hearing of an appeal at the MRA Forum convened to resolve the appeal.
	Appeal Period	The time available to raise an appeal. In the case of appeals against MDB decisions, this shall be 10 WDs after the issue of the minutes of the MDB meeting at which that decision was made, in accordance with the timescales set out in the MRA (Clause 6) for appeals against MEC decisions.
	Authority	As defined in the MRA.
	Authority-Led Modification	As defined in the MRA.
BSC	Balancing and Settlement Code	As defined in the MRA.
	BSC Agent	As defined in the MRA.
	BSC MDB Member	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
	BSC Requirements	As defined in the MRA.
	Change Management	The process by which Change Proposals are progressed through this Procedure.
	Central Systems	IT systems operated by MRASCo for common use by MRA parties and other industry participants as appropriate.
CP	Change Proposal	As defined in the MRA.
	Change Report	As defined in the MRA.
	Class	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
	Distribution Business	As defined in the MRA.
	Distribution Members	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
	DNO Member	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
DTC	Data Transfer Catalogue	As defined in the MRA.
DTN	Data Transfer Network	As defined in the MRA.
DTS	Data Transfer Service	As defined in the MRA.
DTSA	Data Transfer Service Agreement	As defined in the MRA.
ECOES	Electricity Central Online Enquiry Service	As defined in the MRA.
E2E	End-to-End diagrams	The diagrammatical representation of the GB Electricity Retail Design as contained within the MRASCo Model.

Acronym	Definition	Description
GDA	Green Deal Arrangements Agreement	Means the agreement of that name required to be maintained pursuant to Standard Condition 38 of the Electricity Supply Licence;
	GDA Panel	Means the body constituted under Clause 5 of the GDA or, where Clause 5.3 of the GDA applies, the Secretary of State;
GDCC	Green Deal Central Charge application set	The solutions developed to fulfil Supplier obligations in regard of the "Central Charge Database" as defined in Standard License Conditions
GDIP	Green Deal Interested Participant	As defined in the MRA
	Green Deal Matters	As defined in the MRA
GDEG	Green Deal Expert Group	A sub-committee of MRA Executive Committee (MEC) established in accordance with clauses 6.53 and 6.54 of the MRA. Under instruction of MEC, and in accordance with the MRA, the GDEG considers changes required to the MRA and associated MRA and MRASCo products that are required as a consequence of changes to Energy Licence Conditions, introduced by the Secretary of State under powers contained within the Energy Act (2011).
GU	Guidelines	An ancillary document supporting the MRASCo product set.
IA	Impact Assessment	Assessment of the technical, business and implementation impact of a Change Proposal on their organisation, undertaken by parties and IIPs.
	IDNO	As defined in the MRA.
	IDNO Member	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
IIP	Interested Industry Participant	As defined in the MRA.
	Issue Resolution	The process which focuses on the progress and completion of Issues under the MRA.
IREG	Issue Resolution Expert Group	A group of technical experts representing a cross-section of industry participants, brought together to define a solution to an operational issue. IREG act under direction from MDB and report to them. Terms of Reference for IREG are available on the MRASCo website.
MAP	MRA Agreed Procedure	A procedure agreed and issued by MEC pursuant to specific MRA clauses.
CM	MRA Contract Manager	As defined in the MRA.
	Large Supplier	Means one of six largest Suppliers in Great Britain, calculated by reference to the number of Metering Points for which they are Registered.
	Large Supplier Member	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
	Market Participant Id	As defined in the MRA.
MDB	MRA Development Board	The sub-committee of MEC, constituted pursuant to Clause 6.53A of the MRA.

Acronym	Definition	Description
	MDB Chairman	As defined in Paragraph 2.4 of the Appendix 2 to this MRA Agreed Procedure.
	MDB Member	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
MEC	MRA Executive Committee	A body constituted pursuant to Clause 6 of the MRA and defined therein.
	Metering Point	As defined in the MRA.
Forum	MRA Forum	As defined in the MRA.
	MRA Issue	An issue raised by a Party that may have a material impact on the MRA or associated products, including both MRA Products and MRASCo Products.
MIF	MRA Issue form	A form used by a Party to raise an issue.
	MRA Product	As defined in the MRA.
	MRA Objective	As defined in the MRA.
MRASCo	MRA Service Company	Custodian of MRASCo Products. Advises industry on the design products under their control, including any implementation issues. Identifies changes to the MRASCo Product set resulting from industry initiatives.
MCA	MRA Change Administrator	<p>The MCA provides a single point of contact within an organisation for all Change Management matters. Their role will be to co-ordinate, within their organisations, all communications about Change Management matters.</p> <p>The MCA is an individual registered with MRASCo by the organisation's MRA Contract Manager. The role of the Contract Manager is defined in the MRA and required by Clause 42. The MCA may appoint an alternate who may act in the registered MCA's absence. Should an organisation not register an MCA the Contract Manager will be deemed to fulfil this role. Where liaison regarding CPs is required with an organisation, not a signatory to the MRA, that organisation may also nominate an MCA to act as the point of contact. This will include for example Ofgem, the DTS Controller, IIPs, and MRASCo specialists.</p> <p>MCAs will be responsible for ensuring that their organisations raise CPs properly, including completing the appropriate CP form relating to the MRA or MRASCo Product. Should any CPs for other products need to be raised in conjunction with the change, the MCA will be responsible for ensuring their organisation does this in a timely manner.</p>
	MRASCo Product	A product whose maintenance is managed by MRASCo.
	Operational Issue	As defined in the MRA.
	Operational Issues Procedure	As defined in the MRA.
	Party	A Party as defined in the MRA.
	Pre-assessment Pack	A set of Solution Pre-assessment forms, circulated to MRA parties and IIPs for industry evaluation.

Acronym	Definition	Description
	Registered	As defined in the MRA.
SoS	Secretary of State	Means the Secretary of State for Energy and Climate Change, or such person(s) as it has notified the parties as being appointed to act on its behalf for the purposes of any matters relating to this Procedure.
	Secretary of State Consent	Means a consent given by the Secretary of State in accordance with Clause 9.18D of the MRA.
SCR	Significant Code Review	As defined in the MRA.
SCR Phase	Significant Code Review Phase	As defined in the MRA.
	Smaller Supplier	Means a Supplier that is not a Large Supplier
	Smaller Supplier Member	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
	Solution Pre-assessment	The process of assessing potential solutions prior to the raising of a Change Proposal.
SPF	Solution Pre-assessment form	A form outlining an industry issue and proposing a solution involving a change to the MRA and/or its associated products, submitted prior to a formal CP being raised.
	Supplier	As defined in the MRA.
	Supplier Members	As defined in Paragraph 2.1 of the Appendix 2 to this MRA Agreed Procedure.
WD	Working Day	As defined in the MRA.
	Working Group	A group established under the authority of MEC to carry out specific activities in relation to MRA Issues or CPs.
WPPS	Working Practice Product Set	The collated set of non-mandated working operational practices, workarounds and guidance as agreed between parties and approved by MDB.

3 THE ISSUES AND CHANGE MANAGEMENT PROCESSES

3.1 Introduction

This Procedure describes the processes for managing issues and progressing changes to the MRA and associated products. This procedure shall be utilised when a Party or (in the case of Issues) other industry participant:

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

3.2 Overview Of The Procedure

A summary of the overall end-to-end Issues and Change Management Processes is illustrated¹ in Figure 1 and consists of processes covering:

- Issue Resolution;
- Solution Pre-assessment;
- Generation of Change Proposals;
- Impact Assessment;
- MDB Processes in relation to Change Management;
- Appeals;
- Authority Decision;
- Secretary of State Consent; and
- Implementation.

Each of which are described in more detail in the sections below.

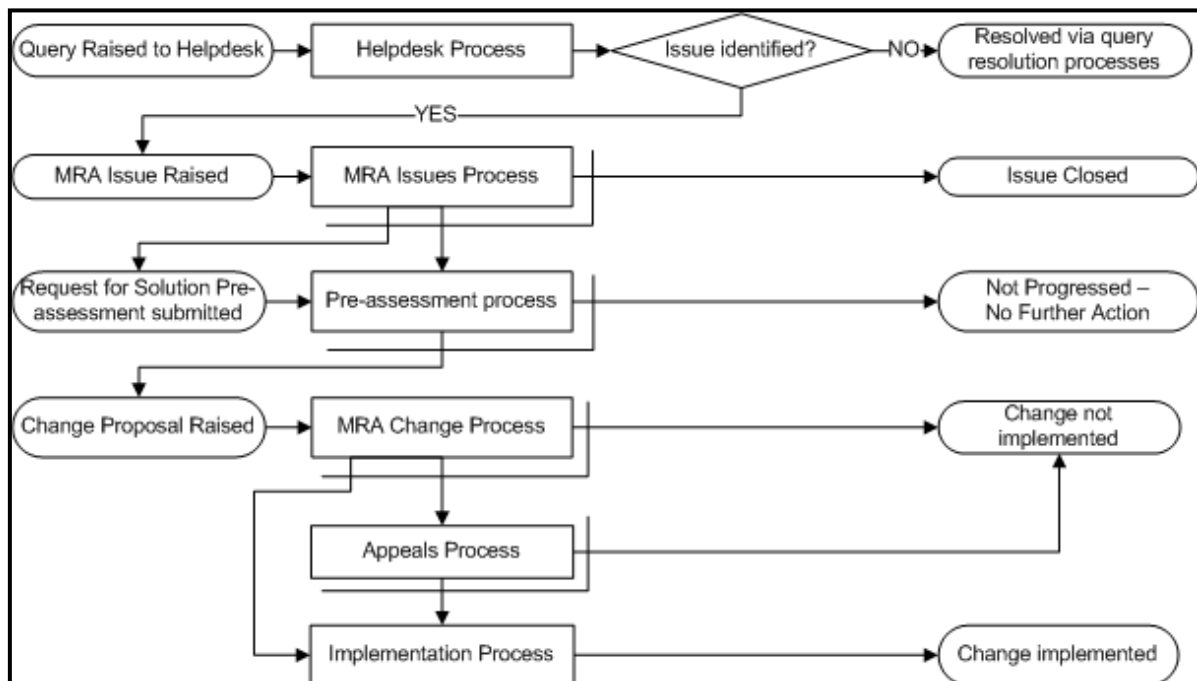


Figure 1 – Overview of the end-to-end Change Management Procedure

¹A glossary of symbols used in the process diagrams within this MAP is provided as an appendix to the document.

Nothing in this Procedure precludes a Party raising a request for a Solution Pre-assessment or a Change Proposal (CP) without first utilising the Issues Resolution process.

Issue Resolution is under the direction of the MRA Development Board (MDB). Issues may be resolved by:

- The Green Deal Expert Group (GDEG);
- An Issue Resolution Expert Group (IREG);
- Other sub-groups as defined by MDB; or
- MDB itself.

MDB may also agree to allocate an issue to MRASCo for resolution or make a recommendation to MEC regarding the formation of a Working Group in order to resolve specific issues.

Any Party to the MRA, Industry Interested Participant (IIP), Green Deal Interested Party (GDIP) or other interested Party may raise issues via the MRASCo Helpdesk. Such issues may be reviewed by IREG, (or where related to Green Deal Matters) GDEG. These groups will each consist of relevant experts from a cross-section of industry participants. MRASCo will co-ordinate, manage and chair any such meeting.

Details of any MRA Issue requiring resolution under the direction of MDB should be provided in the first instance to MRASCo using an MRA Issue Form (MIF), the template for which is on the MRASCo website.

Upon the raising of an industry issue, the process described in Section 4 of this Procedure comes into effect. The outcomes may include:

- Agreement that the issue is resolved without further action; or
- A proposal comprising of a description of the issue and a solution designed to resolve it.

MRASCo will review any such proposal, whether this originates from the review of an MRA Issue or a formal Change Proposal (CP), and will assess whether the solution is defined sufficiently to be issued for comment.

If the proposal fulfils the requirements, MRASCo will give a recommendation on the next step. This will be either to carry out a Solution Pre-assessment, as described in Section 5, or for the proposal to be issued to industry for impact assessment.

Where a CP is raised, MRASCo will ensure that the proposal is completed, clear and unambiguous, and has been properly authorised, as set out in Section 5.1.2. MRASCo will not comment on the suitability of the proposal itself, other than to advise if a similar change has previously been rejected or withdrawn. Where a CP impacts central IT systems which are maintained by MRASCo under MRA governance, and the proposed implementation date is less than 6 months after the date when the CP will be presented to MDB for decision, the originator of the CP will be informed that MRASCo may recommend to MDB an alternate date for implementation of the change as, typically, a minimum of a 6-month period is recommended. This alternate date will be based on feedback from the central service provider and will include any necessary time for system testing.

Pre-assessment allows for an extra period of industry impact assessment, giving a further opportunity for refinement of the proposal before it is raised as a formal CP. However, a Party is not obliged to follow MRASCo's recommendation and is free to raise a formal CP and enter the Impact Assessment process at any point.

In the case of Pre-assessment, the proposal will take the form of a Solution Pre-assessment Form (SPF) and in the case of the Impact Assessment process it will take the form of a CP.

If Solution Pre-assessment is chosen, the end result will be:

- Withdrawal;
- The raising of a new MRA Issue to consider any areas where further expert analysis is required; or
- A formal CP.

If a formal CP is raised at this point, the proposal then continues with the Impact Assessment process. The raising Party will be free to withdraw their proposal at any time.

When a formal CP is raised, the originator should, where possible, identify any impact on the Balancing and Settlement Code (BSC) or BSC products, or any Green Deal Matters.

Where a BSC impact is identified, the BSC Agent shall be made aware of this in order to consider their change process requirements. If the originator does not identify an impact, the BSC Agent may identify it during impact assessment.

Where an impact on a Green Deal Matter is identified, the GDAA Panel and the SoS shall be made aware, in order that they are able to consider impacts on the Green Deal Arrangements Agreement (GDAA) or other Green Deal governance.

Originators should also seek to identify any impacts on other industry codes and agreements, as this will assist in the impact assessment considerations of parties and others.

The MDB process following the submission of a formal CP will result in a decision by MDB to accept or reject the proposal². In the event of MDB acceptance, the CP will be formalised into the appropriate product (subject to Authority Decision and Secretary of State Consent where needed). In the event of a rejection by MDB, the CP will not be implemented. MDB may also vote to defer a decision in order to obtain further information.

Any Party may appeal a decision of MDB, in the case that one or more appeals are received, the proposal(s) will go through the appeals procedure as set out in Section7.

Following the resolution of any appeals, and the provision of Secretary of State Consent (where required), the change will be implemented via the Implementation Process in Section8.

² MDB may defer a decision pending further analysis, in which case the matter will be returned to a later meeting of MDB for acceptance or rejection.

4 ISSUE RESOLUTION

The Issues Management process is used to resolve Issues raised by MRA parties and others that have a material impact on the MRA or associated products.

Issues are often raised via the MRASCo Helpdesk, and are usually considered by the Issues Resolution Expert Group (IREG), with the exception of issues raised in relation to Green Deal Matters, which are usually considered by the GDEG. The roles of IREG and GDEG are further considered below, along with an end-to-end view of the Issues Resolution Process and outcomes.

4.1 The Role Of GDEG

The GDEG is a formally constituted body sponsored by MEC that meets regularly for the express purpose of resolving issues and developing changes relating to Green Deal Matters and supporting appropriate joint working arrangements between MEC and the GDAA Panel in regard of co-ordinated changes to the MRA and GDAA.

MEC agrees the Terms of Reference for this Group. These are located on the MRASCo website.

GDEG will review each Issue raised to it, to determine whether:

- a) The problem relates to a Green Deal Matter; and
- b) It is capable of resolution by making changes to MRASCo products.

Where the issue requires expertise unavailable within the group, GDEG may draw upon additional expertise by invitation.

GDEG will actively seek to group related issues together for consideration where a single or combined solution may be appropriate.

MDB may request the consideration of certain issues together by GDEG, and can ask GDEG to review technical points in relation to Change Proposals raised that impact Green Deal Matters.

GDEG may advise MEC of any need to consider aligned changes between the MRA or MRA related products and the GDAA.

Following consideration of issues raised, GDEG may determine that the issue is not a Green Deal Matter and advise that it be reviewed by IREG or other fora as determined by MDB or MEC.

GDEG may also provide input into the development and testing of technical solutions such as changes to the GDCC.

4.2 The Role Of IREG

The Issues Resolution Expert Group (IREG) is a formally constituted body sponsored by MDB that meets regularly for the express purpose of resolving industry issues.

MDB agrees the Terms of Reference for this Group. These are located on the MRASCo website.

IREG will review each Issue assigned to it, to determine whether

- a) The problem is industry-wide;
- b) Whether it relates to a Green Deal Matter; and
- c) Capable of resolution by making changes to MRASCo products.

Where the issue requires expertise unavailable within the group, IREG may draw upon additional expertise by invitation.

IREG will actively seek to group related issues together for consideration where a single or combined solution may be appropriate.

Where IREG believes an issue requires the formulation of a group with specialist knowledge, it can propose to MDB the setting up of expert groups to address particular topics/ specialist areas.

IREG may determine that an issue relates to Green Deal Matters and advise MDB that it be reviewed by GDEG.

MDB may direct the consideration of certain issues together at an IREG, and can ask IREG to review technical points in relation to Change Proposals raised.

IREG also provides input into the development and testing of technical solutions such as changes to ECOES, GDCC, or other Central Systems.

4.3 The Issues Resolution Process

4.3.1 Helpdesk Enquiries

The MRASCo Helpdesk assists with queries related to the MRA and each instance represents a potential new issue. MRASCo will seek to provide an answer, explanation or advice on progression of a potential issue as illustrated in Figure 2, right.

MRASCo will review the issue to determine its materiality to the inter-operation of the market. Issues that require clarification or are between specific participants will be returned to the originator with an appropriate explanation. Where there is a question regarding the materiality of a potential issue, clarification may be sought from MDB, GDEG, or IREG.

Where MRASCo determines that an issue is one that requires investigation under the Issues Resolution process, they will inform the originator accordingly.

4.3.2 Raising an MRA Issue

Where an issue is accepted into the Issues Resolution process, the originator will complete an MRA Issue Form (MIF) with assistance from MRASCo if required. MRASCo will ensure that the MIF has been completed in line with the guidance in Table 1 below and specifically that a clear business justification has been identified for the need to resolve the issue.

In addition to MRA Issues raised via the Helpdesk, parties who have previously raised a Solution Pre-assessment request, which has not led to consensus on a solution, may also raise a MIF.

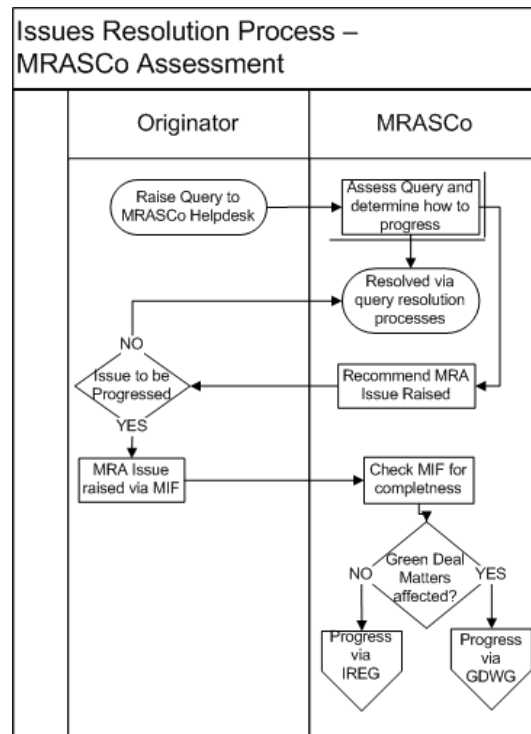


Figure 2 - Initial Issue Assessment

Field Name	Notes
MRA Issue Reference	This will be assigned by MRASCo.
Urgent Issue	This will be completed as “Y” or “N”. Urgent issues are those, which prevent the market from operating as designed and where there is a serious material impact on participants as a result.
Date Issued To Industry	This will be completed by MRASCo and will be the date on which the MIF was circulated to parties and others for assessment prior to IREG.
Title	The short name for the issue raised. This will be completed by the originator and agreed with MRASCo.
Version Number	Completed by MRASCo and updated if any changes are made between the originator raising the issue and its resolution.
Product(s) Affected	The originator will be able to indicate the MRA and associated products affected by the issue i.e. MRA, MAPS, DTC, E2E, or WPPS.
Originator’s Details	The originator may be a representative of an MRA Party, MRASCo employee (normally on behalf of a committee e.g. IREG or GDEG) or nominated representative of an IIP or GDIP
Summary of Issue	This should set out an overview of the issue in 50 words or fewer.
Affected Codes and Agreements	This field should be used to note any other industry codes and agreements that, in the originator’s view, are impacted by the issue raised.

Affected Industry Participant Roles	The originator will indicate which industry roles are affected by the issue. This will include Suppliers, Distribution, Settlement, DA, DC, MOp, PPMIP, MAP, MA, Green Deal Licensee, Green Deal Provider, and Green Deal Remittance Processor
Related Solution Pre-assessments	Where an issue has been raised in order to allow further consideration of a Solution Pre-assessment this will be cross-referenced.
Related CPs	Where a CP has been referred to IREG or GDEG for consideration, this will be cross-referenced.
Related Issues	There may be occasions where an issue is related to a previously resolved issue. This will be referenced in order to provide further information to IREG or GDEG
Attachments	The organisation raising the issue will provide details of any supporting information provided with the MIF.
Priority Provisions Impact	Where there is an impact on priority provisions as defined in the MRA, this should be indicated, including which clauses are affected by either the issue or any proposed solution.
Green Deal Matters Impact	Where there is an impact on Green Deal Matters as defined in the MRA, this should be indicated, including any clauses affected by the issue or any proposed solution. Where the originator determines that there is an impact on or as a result of changes to the GDAA, this should be indicated.
Description of Issue	A detailed description of the issue identified. This may include technical information and examples (or reference to it) as appropriate and should be sufficiently detailed to allow IREG or GDEG to consider the issue. It should also provide cross-reference to the relevant MRA clause(s) and/or associated product(s).
Impact Assessment	This section is mandatory and should outline the impact on industry participants of the issue presented for consideration.
Proposed Solution outline	Where a potential solution for the issue has been identified, an outline should be provided to assist IREG or GDEG in their assessment of the issue.

Table 1 – MIF information requirements

On receipt of a correctly completed MIF, the issue will be logged prior to the MIF being progressed as appropriate. Where the issue relates to a Green Deal Matter, it will be progressed via the GDEG; other issues are progressed via IREG as illustrated in [Figure 3](#) and [Figure 4](#) and further detailed in the following sections.

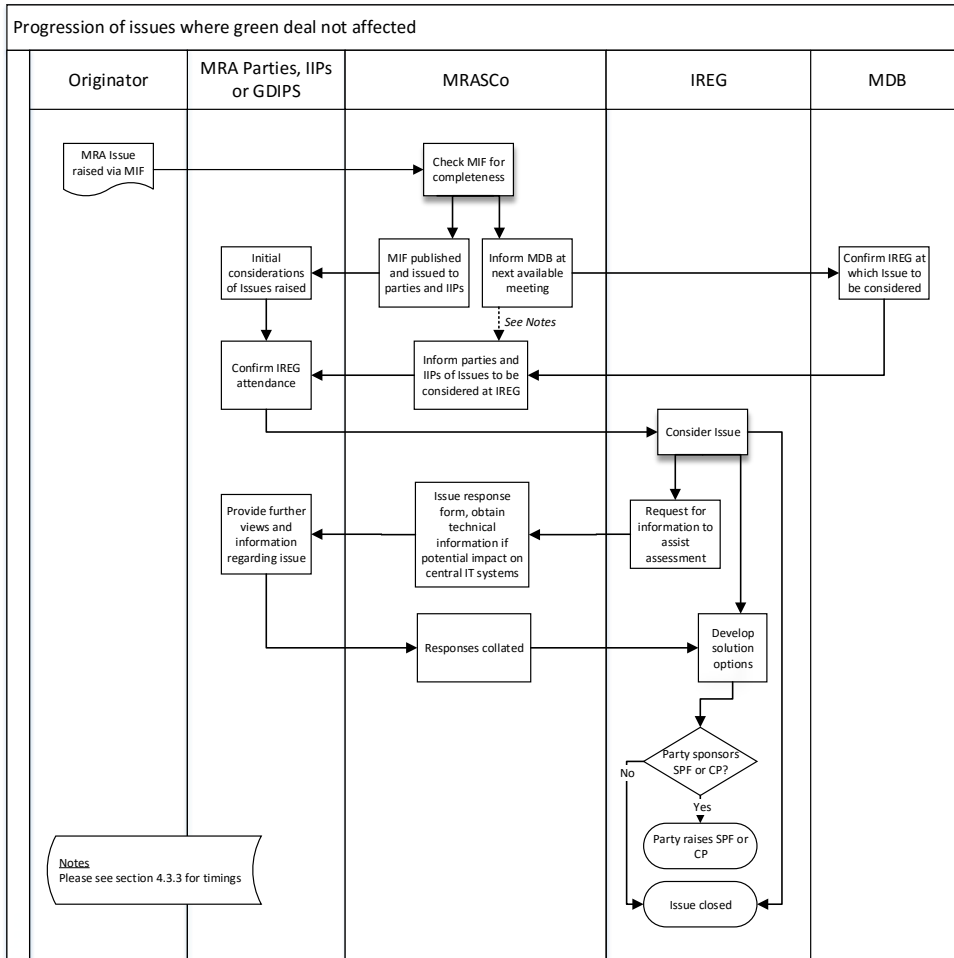


Figure 3 - Progression of Issues where Green Deal Matters not affected

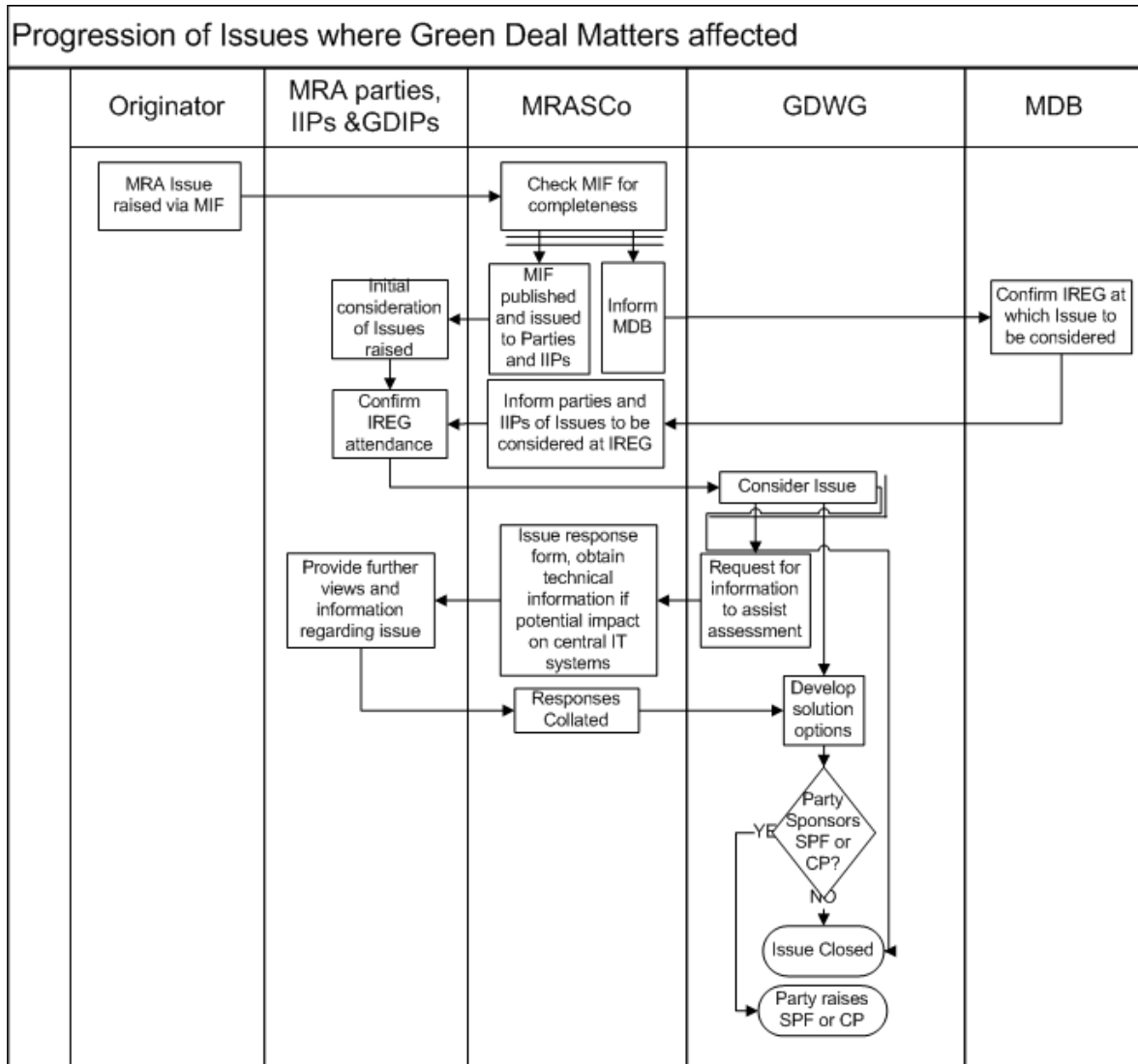


Figure 4 - Progression of issues where Green Deal Matters affected

Note: It is not mandatory to raise an MRA Issue before progressing to a Change Proposal. The issue Resolution process is provided to facilitate the resolution of (usually) complex issues that may have widespread impact. Any participant may initiate a Change Proposal to the appropriate product if they so wish.

4.3.3 Scheduling New Issues

Once an MRA Issue form has been completed it shall be validated by MRASCo. MIFs should, where possible, be submitted seven WDs prior to the MDB meeting and as such subsequently advised to MDB, thereby allowing an informed decision to be taken as to whether an IREG (or GDEG) meeting should take place. However, if such an IREG or (GDEG) meeting has been agreed then this does not preclude any party from submitting a MIF seven WDs prior to the IREG or (GDEG) meeting, and if the agenda permits then that MIF may be discussed at the following IREG (or GDEG) meeting without recourse to MDB. The MIF and any accompanying documents (including relevant information relating to unresolved CPs and Solution Pre-assessments requiring further IREG or GDEG examination) will also be:

- Published on the MRASCo website;
- Communicated to parties' MRA Change Administrators (MCAs);
- Sent to nominated contacts for IREG and IIPs; and
- Where related to a Green Deal Matter sent to nominated contacts for GDEG and GDIPs

MDB may also ask IREG or GDEG to provide expert information regarding a CP prior to a vote; these will be allocated MRA Issue references, and timetabled accordingly.

All MRA Issues raised will also be reported to the next available meeting of MDB, in a summary format such that MDB are able to agree scheduling of IREG meetings accordingly and are informed of matters to be considered by GDEG. MDB may schedule issues for specific IREG meetings in order to prioritise consideration or to group issues raised that cover similar areas.

Following MDB review and agreement, the issue will be added to the agenda for a future IREG or GDEG as appropriate. This information will be circulated to allow parties, IIPs, and (where appropriate) GDIPs, to nominate appropriate expert resource dependant on the issues being discussed at the relevant fora.

MRASCo may also invite industry or technical experts to assist IREG or GDEG in consideration of issues.

4.3.4 Assessment of Issue

In order for IREG or GDEG to commence assessment of new MRA Issues raised by parties, IIPs, or GDIPs, the originator shall be present or be represented by a nominee (which may include MRASCo) at the meeting where the issue is first presented.

Should the originator or nominee not be present, the issue will be deferred. This is to ensure that IREG or GDEG are able to request further information if required to aid their understanding of the issue.

Subject to the above, IREG and GDEG will consider all MRA Issues on the agenda at that meeting and will determine the appropriate course of action. This may include:

- A request for further information from either MRASCo, parties, and/or other industry participants;
- Agreement that potential solutions need to be developed, in which case a Solution Pre-assessment will be developed under this Procedure;
- Development of a proposed solution leading to the drafting of a CP by MRASCo;
- Agreement that the issue does not require progression under this Procedure; or
- That it is an issue that should be considered under the auspices of the BSC, GDAA, or other industry code or agreement.

Where an issue involves a DTC change that requires parallel testing and the relevant dates are not provided, MRASCo will schedule a new agenda item for the next IREG meeting for review and consideration. In addition, testing participants who have a concern relating to the viability of a change that has been through parallel testing should raise this as an issue for IREG. Where such an issue is related to a Green Deal Matter, GDEG will also be informed such that they are able to provide expert opinion to IREG regarding the impact on Green Deal Matters.

4.3.5 Requests for Further Information

IREG or GDEG may request further feedback from parties, IIPs, and (where related to a Green Deal Matter) GDIPs and the GDAA Panel regarding an issue presented for consideration. In this event, MRASCo will provide a response form. This will give an outline of the issue and request feedback on specific areas. The information to be included in the response form is set out in Table 2 below. This will be in two sections, one for the request and one for the response.

Field Name	Notes
Section 1 – Request for Information	
MRASCo Reference	This will be assigned by MRASCo.
MRA Issue Reference	This will be the reference(s) used in the relevant MIF(s) as originally assigned by MRASCo.
Date Issued to Industry	This will be completed by MRASCo and will be the date on which the response form was circulated to parties and others for assessment and review feedback.
Response Deadline	The final date for receipt of feedback by MRASCo. This will normally be 10 WDs prior to an IREG or GDEG meeting.
Title	The short name for the issue raised. This will be completed by the originator and agreed with MRASCo.
Version Number	Completed by MRASCo and updated if any changes are made between the issuing of the response form and the conclusion of the response process.
Summary of Issue	This should set out an overview of the issue in 50 words or fewer.
Affected Codes and Agreements	This field should be used to note any other industry codes and agreements that, in the originator's view, are impacted by the issue raised.
Affected Industry Participant Roles	The originator will indicate which industry roles are affected by the issue. This will include Suppliers, Distribution, Settlement, DA, DC, MOp, PPMIP, MAP, MA, Green Deal Licensees, Green Deal Providers, and Green Deal Remittance Processors.
Assessment Request	An overview of the area which respondents are asked to provide assessment and feedback. This may be supplemented by specific questions.
Question (1-n)	Questions designed to elicit specific response from impacted industry participants.
Attachments	Any supporting information which will assist with assessment.
Section 2 – Response Form	
Respondents Details	Details of the person responding, including name, contact details, and organisation.
Response Date	The date on which the response was provided to MRASCo.
Assessment Summary	A summary response to the request, providing an overview of feedback.

Response (1-n)	Responses to specific questions as set out in Section 1.
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Table 2 – MIF response information needs

In addition, IREG or GDEG may ask MRASCo to obtain further information regarding the impact of the issue and/or any potential solution on central systems such as ECOES or the GDCC. This may include a request to obtain outline costs and an impact assessment from technical service providers.

4.3.6 Development of Solution Proposals

Where IREG or (in regard of Green Deal Matters) GDEG agree that the issue is in-scope and requires a formal solution, MDB will be notified of the need to develop the necessary CPs and MRASCo will facilitate the development of an appropriate solution.

Where a joint MRA and BSC solution is being developed, the BSC Agents change proposals for their own products will be factored into the design.

Where a joint MRA and GDAA solution is to be developed, any related GDAA change proposals notified to MEC will be factored into the design.

Where a solution can be developed by consensus, and any necessary changes to the MRA, MRA Products or MRASCo products identified, MRASCo will facilitate the drafting of CPs and present such drafts to IREG or GDEG as appropriate for final agreement prior to a Party submitting them to the Change Management Process. Any implementation issues identified at this stage will be documented for inclusion on the subsequent CPs to assist the impact assessment process. The processes for submitting CPs are further documented in Section 5.1 of this Procedure.

Where it is considered that an additional period of industry impact assessment is required, for example, for proposals involving complex changes, or where there is no consensus on a solution at IREG or GDEG, Solution Pre-assessment is an optional step in the Change Management Procedure.

In these circumstances, MRASCo will facilitate the drafting of a Solution Pre-assessment Form (SPF) and a Party may take this forward under the Solution Pre-assessment process as set out below in Section 5.

Solution Pre-assessment broadens the options that IREG or GDEG have in order to progress an issue and/or preferred change. It is intended to gauge opinion on its merits. The SPF will outline the issue, a proposed solution if known, and an operational need and justification.

4.3.7 Outcomes of Issue Assessment

Once IREG or (where related to Green Deal Matters) GDEG have considered the issue and taken one of the courses of action outlined above, MRASCo will ensure that both the originator and MDB are informed of the outcome of IREG or GDEG considerations. At this point, the issue will be closed as having been resolved. If no Party is willing to sponsor any proposed SPF or CPs drafted by IREG or GDEG, they will not be progressed.

Once an issue is closed as having been resolved, any Party wishing to re-visit the same subject at a later date should raise a new MRA Issue. In these cases, MRASCo will ensure appropriate cross-referencing to the now closed original issue(s) as appropriate and where practicable to do so.

Where IREG or GDEG determine that no formal solution is required, this does not preclude any Party from continuing to seek solutions by, for example, raising an SPF or formal CP.

Where the issue relates to a Green Deal Matter, the GDAA Panel Secretary will also be informed of the outcome of the issue assessment.

5 SOLUTION PRE-ASSESSMENT

Solution Pre-assessment is an optional step in the development of formal CPs. It may be recommended for proposals involving complex changes where an extra period of industry impact assessment will be of benefit. MRASCo will give a recommendation as to whether a proposal should go through the Solution Pre-assessment process; however, the decision will belong to the raising Party. The process is illustrated in Figure 5, and each step is described in more detail below.

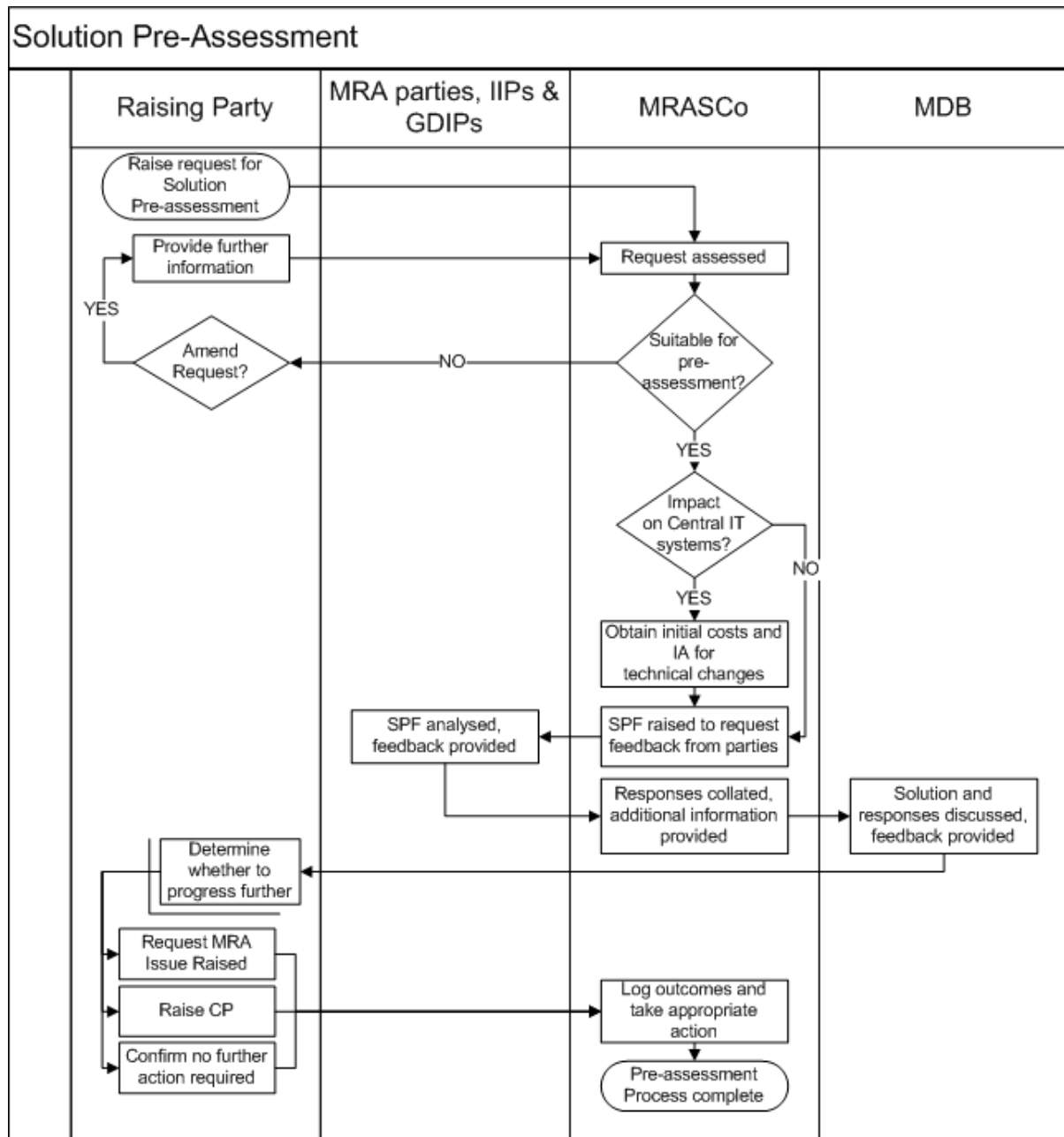


Figure 5 - Solution Pre-assessment Process

5.1 Submission of Pre-assessment Request

Any MRA Party may raise a request for a Solution Pre-assessment using the Solution Pre-assessment Form (SPF) located on the MRASCo website. The SPF will include the items set out in Table 3 – SPF requirements below.

Field Name	Notes
MRA SPF Reference	This will be assigned by MRASCo.
Urgent Issue	This will be completed as “Y” or “N”. Urgent issues are those which prevent the market from operating as designed and where there is a serious material impact on participants as a result.
Date Issued to Industry	This will be completed by MRASCo and will be the date on which the SPF was circulated to parties and others for assessment and review feedback.
Title	The short name for the Solution Pre-assessment. This will be completed by the originator and agreed with MRASCo.
Version Number	Completed by MRASCo and updated if any changes are made between the originator raising the request and the conclusion of the process.
Product(s) Affected	The originator will be able to indicate the MRA and MRASCo products affected by the issue i.e. MRA, MAPS, DTC, E2E, or WPPS.
Originator’s Details	The originator may be a representative of an MRA Party, nominated representative of an IIP or GDIP
Sponsor’s Details	All requests will be sponsored by the MRA Contract Manager of an MRA Party.
Summary of Solution	This should set out an overview of the solution in 50 words or fewer.
Proposed Solution	The originator should provide details of the proposed solutions including how they will impact the MRA and associated products. Where necessary drafting should be provided alongside the SPF. The originator may also highlight other solutions considered and discounted.
Impact Assessment	This section is mandatory and should outline the impact on industry participants of the solution(s) being proposed.
Proposed Assessment Period	This should give the originator’s view of the maximum period which needs to be given to allow for assessment by industry participants, noting that the assessment period will be linked to the MDB calendar, i.e. it will always end 10 WDs before a scheduled meeting of MDB, and must be a minimum of 10 WDs. This period should take into account the urgency and complexity of the proposed solution.
Affected Codes And Agreements	This field should be used to note any other industry codes and agreements that, in the originator’s view, are impacted by either the issue that the solution seeks to address, or the solution itself.
Affected Industry Participant Roles	The originator will indicate which industry roles are affected by the issue that the solution seeks to address. This will include Suppliers, Distribution, Settlement, Data Aggregator (DA), Data Collector (DC), Meter Operator (MOp), Pre-Payment Meter Infrastructure Provider (PPMIP), Meter Asset Provider (MAP), Meter Administrator (MA), Green Deal Licensees, Green Deal Providers, and Green Deal Remittance Processors
Related MRA Issues	Where an SPF has been generated following consideration of an MRA Issue, this will be cross-referenced.
Attachments	The organisation raising the Issue will provide details of any supporting information provided with the SPF.

Field Name	Notes
Priority Provisions Impact	Where there is an impact on priority provisions as set out in the MRA, this should be indicated, including which clauses are affected by either the issue or any proposed solution.
Green Deal Matters Impact	Where there is an impact on Green Deal Matters as defined in the MRA, this should be indicated, including any clauses affected by the issue or any proposed solution. Where the originator determines that there is an impact on or as a result of changes to the GDAA, this should be indicated.
Description of Issue	A description of the issue identified, this may include technical information and examples (or reference to same) as appropriate and should be sufficiently detailed to provide context to any solutions proposed. This provides the justification for the proposed change and should include any output from IREG.
Proposed Implementation Lead Time	The originator's view of the length of time required to develop and implement the proposed solution once required CPs are agreed.

Table 3 – SPF requirements

As far as is practicable, the SPF should include drafting for any proposed CP(s) which may be raised as a result, including any options to be considered.

Forms should be received by 10 WDs prior to MDB so that they can be included in the papers issued in relation to that meeting. If there is a need to obtain further information, this may delay the issuing of the SPF and originators will need to consider this when raising requests.

On receipt of the SPF, MRASCo will:

- Carry out an initial 'sense check' to ensure that the proposal impacts the MRA or an associated product;
- Confirm that the request is authorised and complete, and is suitable for pre-assessment;
- Check the proposal against previous CPs etc. for precedence;
- Consider requirements for any associated changes (to the MRA, MRA Products, BSC Products, or the GDAA) and advise the raising Party accordingly; and
- Consider any related impacts on Central Systems that will require technical impact assessment.

Following these initial checks, MRASCo will make one of the following recommendations to the raising Party:

- Provide further clarification and re-submit request;
- Consider obtaining further definition by raising as an Issue for consideration by IREG or (where related to a Green Deal Matter) GDEG; or
- Progress the proposal via the Pre-assessment Procedure.

Where MRASCo determines that the proposal is suitable for progression via the Pre-assessment process, it will also recommend where a technical impact assessment by, for example, an IT service provider, is appropriate prior to the issuing of the proposed solution to industry for feedback.

The raising Party may consider and follow MRASCo’s recommendations, or decide to withdraw or follow another course of action (e.g. raise a CP).

5.2 Evaluation of Proposed Solution

5.2.1 Impacts on Central Systems

Where there is a potential impact on central IT systems which are maintained by MRASCo under MRA governance, initial costs and technical impact assessment will be obtained concerning any changes to those systems prior to the SPF being issued.

This information will be provided alongside the SPF to assist in analysis of the solution and will include indicative costs and lead times for the development of a solution.

5.2.2 Issuing the SPF For Assessment

MRASCo will include any Solution Pre-assessments in MDB papers and issue to MRA Parties, IIPs, the BSC Agent, and (where related to Green Deal Matters) the GDA Panel Secretary and GDIPs. The MDB papers are issued to parties 5 WDs prior to MDB.

The SPF will then be issued 5 WDs after an MDB and will also include any response forms as outlined in Table 4.

Field Name	Notes
Section 1 – Request for Information	
MRASCo Reference	This will be assigned by MRASCo and will be aligned to the SPF.
SPF Reference	This will be the reference(s) used in the relevant SPF as originally assigned by MRASCo.
Date Issued To Industry	This will be completed by MRASCo and will be the date on which the response form was circulated to parties and others for assessment and review feedback.
Response Deadline	The final date for receipt of feedback by MRASCo. This will normally be 10 WDs prior to an MDB meeting.
Title	The short name for the Solution Pre-assessment. This will be completed by the originator and agreed with MRASCo.
Version Number	Completed by MRASCo and updated if any changes are made between the issuing of the response form and the conclusion of the response process.
Summary Of Solution	This should set out an overview of the solution in 50 words or fewer.
Affected Codes And Agreements	This field should be used to note any other industry codes and agreements that, in the originator’s view, are impacted by the issue raised.
Affected Industry Participant Roles	The originator will indicate which industry roles are affected by the issue. This will include Suppliers, Distribution, Settlement, DA, DC, MOp, PPMIP, MAP, MA, Green Deal Licensees, Green Deal Providers, and Green Deal Remittance Processors..
Assessment Request	An overview of the area which respondents are asked to provide assessment and feedback. This may be supplemented by specific questions.
Question (1-n)	Questions designed to elicit specific response from impacted industry participants.
Attachments	Any supporting information which will assist with assessment.

Section 2 – Response Form	
Respondent's Details	Details of the person responding, including name, contact details, and organisation.
Response Date	The date on which the response was provided to MRASCo.
Assessment Summary	Summary response to the request, providing an overview of feedback.
Response (1-n)	Responses to specific questions as set out in the Request for Information.
Solution Support	Will allow the respondent to indicate their support or otherwise for the proposed solution.
Views on Timescales	The respondent will be able to provide feedback regarding the proposed lead-time for the proposed solution.

Table 4 – SPF response information requirements

The deadline for responses will be 10 WDs before an MDB meeting, in line with the Impact Assessment timetable for MDB. The MDB meeting specified may be the upcoming MDB or may be any other MDB in the future. The deadline will be determined by the timescale outlined by the raising Party in the SPF, for instance a complex change may benefit from a longer period of evaluation.

5.2.3 Evaluation of Proposals

Parties will have at least 10 WDs to return comments, by completing a response form for each solution. If there is more than one SPF in a Pre-assessment Pack, these may have differing deadline dates for responses depending on the length of assessment requested by the raising parties.

Parties, IIPs and (where appropriate) the BSC Agent and/or GDIPs will evaluate the technical, business, and implementation impact of the proposal and send any responses to MRASCo via response form, in line with the timings set out in the SPF, and in any event by the deadline given for the assessment circulated.

Responses should indicate support, or otherwise, to the proposal; plus comments on the solution, which may include modifications or options; and any comments on the implementation date. Any comments not returned by the deadline cannot be included in collated responses to MDB.

Unless an SPF has been raised on behalf of a committee or workgroup, proposers and sponsors of SPFs may request sight of all responses from MRASCo after the response deadline, and may return their own comments to MRASCo at the latest on the 6th WD prior to the MDB where the SPF is to be discussed.

MRASCo will consolidate all comments received and circulate to parties IIPs (and where related to a Green Deal Matter), the GDAA Panel Secretary, and GDIPs at the same time as consolidated responses to any CPs for consideration at the next MDB. This will be 5 WDs prior to the MDB where the Solution Pre-assessment is to be discussed.

The SPF will be an agenda item at MDB. Where a range of responses are received, MRASCo may provide additional technical information in order to assist MDB in their consideration of the pre-assessment.

MDB will review the comments received as part of the pre-assessment and make a recommendation to the raising Party as to how to progress.

5.3 Solution Progression

The raising Party will consider comments from parties, other industry members, and MDB and determine the next steps. These will encompass one of the following actions:

- Decide not to progress solution;
- Raise a CP in accordance with existing provisions (bearing in mind the CP timetable); or
- Seek further input from IREG or GDEG by raising a new MRA Issue.

These actions are summarised below to give context to the relevant sections of this procedure.

5.3.1 No Further Action Required

Following assessment, the raising Party may decide not to progress the solution, in this case, they will inform MRASCo who in turn will ensure that all parties, IIPS, the BSC Agent, the GDAA Panel Secretary, and GDIPs are informed as appropriate.

Once the raising Party has confirmed that they do not wish to progress the solution further, any other Party may do so in accordance with this Procedure.

5.3.2 Change Proposal Raised

If a CP is to be raised, the raising Party completes a CP form and this goes through the Impact Assessment and MDB Procedures as set out in Section 5 below. The raising Party may determine that changes to the solution are required prior to the raising of the CP. Nothing in this process precludes that course of action.

5.3.3 Raising Party Raises An MRA Issue

Where a range of views have been presented in responses, and no consensus reached, the raising Party may request further assistance from IREG or (for Green Deal Matters) GDEG to assist in developing a solution. In this event, a new MIF will be raised as set out in the Issue Resolution process in Section 4.

6 CHANGE PROPOSALS

The CP process is utilised to raise a request for a specified change to the MRA, MRA Products and/or the MRASCo product set. Any Party may raise a CP at any time, however it is recommended that material changes are first considered via the MRA Issue or Solution Pre-assessment processes in order to assist in the development of the CP.

The overall process is illustrated in Figure 6 below.

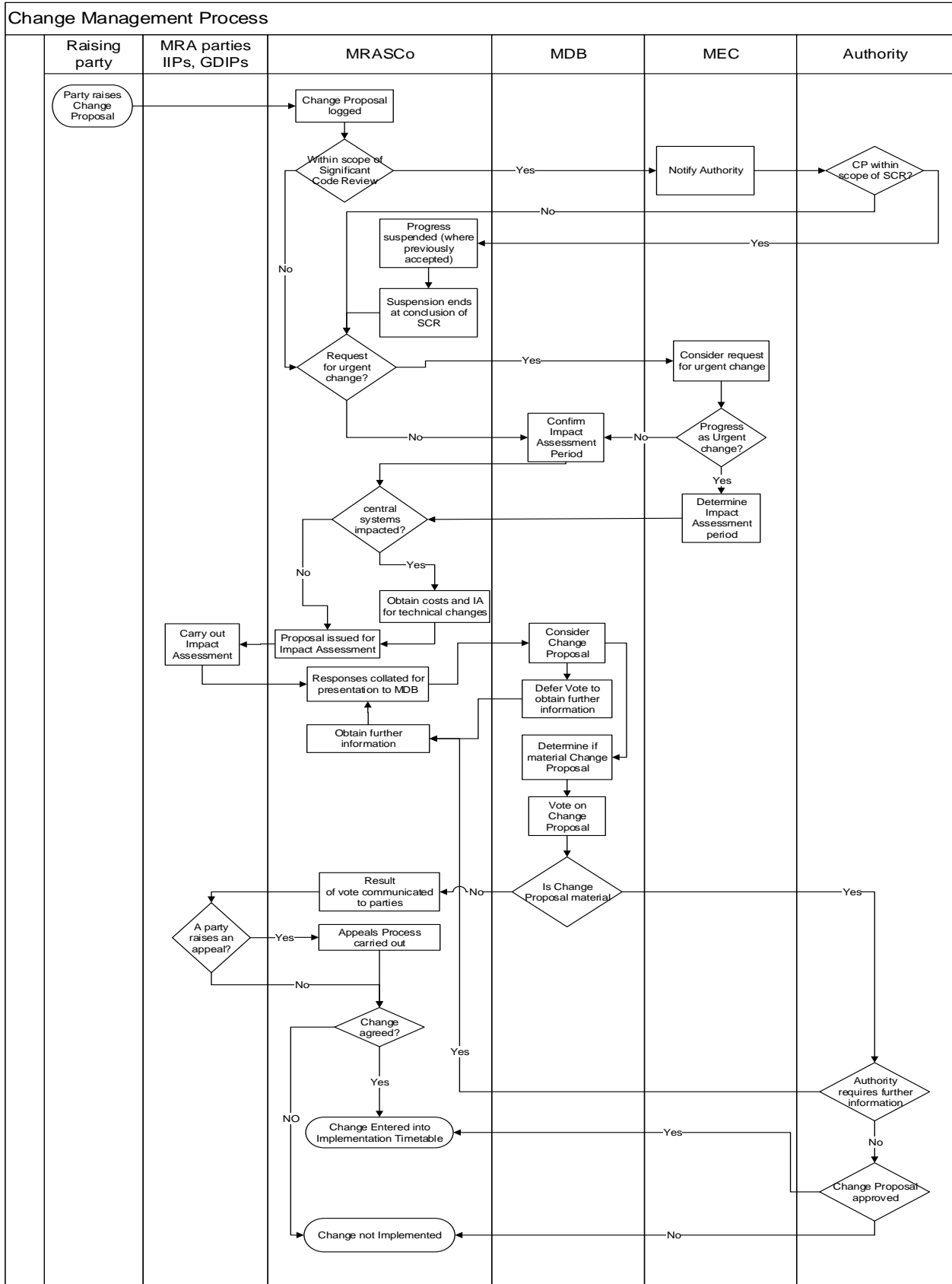


Figure 6 - Change Management Process

6.1 Raising A Change Proposal

Any Party, IIP or (where related to a Green Deal Matter) GDIP may raise a CP, however if the originator is not the MRA Contract Manager of an MRA Party, an MRA Party's Contract Manager must sponsor the CP.

6.1.1 Completion of The CP Form

The raising Party should complete a CP form as published on the MRASCo website. For all CPs, the form will contain information regarding the items set out in Table 5, additional information may be required for change to some products. These additional fields will be included on the same form but are shown separately in Table 6 for clarity.

Table 5 – Standard CP Form data

Field Name	Notes
MRA CP Reference	This will be assigned by MRASCo and will uniquely identify the product affected and the sequence in which the CP was raised.
Version Number	Completed by MRASCo and updated if any changes are made between the originator raising the CP and the conclusion of the process.
Change Type	This will be: <ul style="list-style-type: none"> • A “housekeeping” change to make minor modifications to products where there is no material impact; • A “standard” change to products which will follow the processes set out in this MAP and will have some material impact; or • An “urgent” change requiring a MEC decision pursuant to Clause 9.24 of the MRA. The originator should also state whether it considers the CP to be a material Change Proposal here.
Title	The short name for the CP. This will be completed by the originator and agreed with MRASCo.
Why Change	This should set out an overview of the proposed change and the rationale for change, in 50 words or fewer.
Date Raised	This will be completed by MRASCo and will be the date on which the CP was circulated to parties and others for impact assessment.
Significant Code Review	This should give the originator's view as to whether the CP falls within the scope of a SCR during a SCR Phase.
Related MRA Issues Number	Where a CP has been generated following consideration of an MRA Issue, this will be cross-referenced.
Related Pre-assessment Number	Where a Solution Pre-assessment has been carried out this will be cross-referenced to provide context for parties.
Solution	This should set out the detail of the proposed change, including any MRA legal text or Data Flow red-lining.
Case for Change	The originator should outline the benefits of the change which shall include whether it considers that the change would better facilitate the MRA to achieve the MRA Objectives.
Originator's Details	The originator may be a representative of an MRA Party or a nominated representative of a IIP or GDIP.
Sponsor's Details	All requests will be sponsored by the MRA Contract Manager of an MRA Party.
Summary of Impacts	This section is mandatory and should outline the impact on industry participants of the change being proposed, including the issue being addressed.

Field Name	Notes
Originator's view of Impacted Parties	This will highlight organisations that will be particularly affected by the CP and will assist in helping MRA parties to identify relevant changes. The originator should indicate which industry roles (Suppliers, Distribution, Settlement, DA, DC, MOp, PPMIP, MAP, MA, Green Deal Licensee, Green Deal Provider, or Green Deal Remittance Processor) are, in their view, impacted by the change. Where an MRA Party differs from this view and believes their obligations are affected by the proposal, they may vote, but should indicate in their response why they are of the view that they are impacted. The originator may indicate other impacted organisations (e.g. MOps, Data Collectors etc.) and/or industry codes for information, however only Suppliers, Distribution Businesses, and the BSC Agent will be entitled to vote.
Originator's view of Impact on MRA Central Systems	The originator should highlight whether the proposed change has any impact on the MRA Central Systems.
Implementation Date	The originator's view of the length of time required to develop and implement the proposed solution once required CPs are agreed. This may be a specific date of a scheduled release or other date as appropriate. This should take into account the guidelines given [on the form (6 months minimum for changes impacting systems and software; 4 months minimum for changes impacting operational procedures; 2 months minimum for changes to documentation unless DTC change in which case 4 months minimum for all changes)]. Where a consequential change to central IT systems which are maintained by MRASCo under MRA governance is required a lead time of at least 6 months from MDB acceptance of the Change Proposal to Implementation is recommended
Implementation Technique	This will be: <ul style="list-style-type: none"> • "Big Bang". A go-live date requiring compliance from that date hence; or • "Parallel Test". This will create a period of time within which parties must attain compliance with the change.
MRA Product/ Other Codes Affected	If there are any associated changes to MRASCo products, this should be made clear on the CP form along with any known details of the status of the associated change. The assessment period and implementation date of such changes (if known) should be taken into consideration when raising the CP. Any changes to other products, for example Settlement Agreements, should be stated (if identified).
Associated Changes	If there are any associated changes with the proposed change, the originator should reference them here.
Attachments	The originator raising the CP will provide details of any supporting information provided with the CP form, including drafting for product changes.

In addition to the above, there will be additional fields for changes to some products that reflect the nature of those products. These are summarised in Table 6 overleaf.

Field Name	CP Type (Product)	Notes
Implementation Technique	DTC	Where the technique is relevant to DTC changes, the originator may propose Big Bang, Optional, or Parallel Test implementation.
Data Flow Reference And Version Number	DTC	The reference and version as contained in the baseline version of the DTC against which the Change is being raised.
Data Item Reference	DTC	As per the DTC.
Domain Name	DTC	As per the DTC.
Parallel Test Dates	DTC	Where a period of parallel testing is indicated, the originator may provide dates between which this testing will occur.
Value Of Test Flag	DTC	As per the DTC.
Secretary of State Consent Required	MRA, DTC, MAP	The originator should indicate where Secretary of State Consent will be required pursuant to Clause 9.18D of the MRA.
Priority Provisions Impact	MRA	Where there is an impact on priority provisions as set out in the MRA, this should be indicated, including which clauses are affected by the CP.
Green Deal Matter	MRA, DTC, MAP	Where there is an impact on Green Deal Matters as defined in the MRA, this should be indicated, included which clauses or products are impacted by the CP.
MAP Affected Reference	MAP	The name and reference number of the MAP affected by the change.
Working Practice Affected Reference	WPPS	The name and reference number of the WP affected by the change.
MRA Objectives		The proposer will state the reasons why it believes that the MRA or MRA Product would, if the CP was implemented, better facilitate the MRA to achieve the MRA Objectives.

Table 6 – Additional information for specific products

The CP form and associated drafting may be submitted to MRASCo at any time. Subject to Section 5.1.2, all new completed forms received at least 10 WDs prior to a scheduled meeting of MDB will be considered at that meeting in order to confirm the assessment period as set out in Section 5.1.3. Again, subject to Section 5.1.2, CPs received after the deadline or not completed by that date will be held over to a future scheduled meeting of MDB.

In the event that the CP is a material Change Proposal and/or Secretary of State Consent is required pursuant to Clause 9.18D, proposers and sponsors should take into consideration that there is no defined period for either the Authority or the SoS to provide a decision, which may have an impact on the intended implementation date for the CP. To ensure that the anticipated period for business-readiness can still be met if the implementation date is compromised, the CP can specify a 'lead-time'. For example, a CP could have an implementation date shown as 'the later of dd/mm/yyyy or 3 months from receiving the Authority's determination.

6.1.2 Initial Validation Checks

On receipt of the CP from the raising Party, MRASCo will check that the CP form has been completed fully and correctly and is appropriately authorised. The checks undertaken will include ensuring that the request

- Is a specific change to the MRA or a single associated product;
- Is completed correctly and is authorised by an MRA Contract Manager;
- Has been raised against the correct version of the product impacted; and
- Is accompanied by suitable drafting.

The CP may be returned to the originator with recommendations for any amendments, for additional information to be included, or to confirm key details.

If a DTC change requires parallel testing and the relevant dates are not provided then MRASCo will recommend to MDB that the drafting be presented to IREG for review and recommendation under the Issues Resolution process.

In addition, MRASCo will:

- Identify where the CP has resulted from the Issue Resolution or Pre-assessment processes and ensure correct cross-referencing where required;
- Check to determine if any similar CPs have been raised and liaise with relevant MCAs as required; and
- Confirm if there are any associated changes to the MRA or other energy codes that will need to be progressed in parallel.

Where a CP is submitted during SCR Phase MEC will:

- not circulate the CP (unless it is an Authority-Led Modification) to the parties unless the Authority otherwise directs in accordance with clause 9.19A of the MRA; and
- comply with MEC's obligations under clause 9.19B of the MRA.

6.1.3 Assessment Periods

The Issues Management and Change Management processes provide for a minimum assessment period of 10 WDs. In practice, some CPs will be complex and necessitate a longer assessment period for parties. The assessment period shall be 30 WDs unless MDB determines that the assessment period needs to be shorter.

Subject to Section 5.1.2, all validated CPs received by MRASCo up to 10 WDs before an MDB meeting will be summarised and presented to that meeting. MDB will confirm the assessment period, if any technical assessment is required in advance of industry impact assessment and whether MRASCo should produce a Change Report (which will always be required when the CP relates to the modification of the MRA).

MDB will state its initial view of whether the CP falls within the scope of Clause 9.5 or 9.5A of the MRA.

Where technical assessment is required, MDB will instruct MRASCo to obtain relevant costs and an IA for required changes to Central Systems that are managed by MRASCo (e.g. ECOES, GDCC). MDB will give timescales for this assessment and the subsequent Impact Assessment by industry.

Assessment periods may vary depending on the complexity of the changes, but will always be a minimum of 10 WDs and will always end 10 WDs prior to an MDB meeting. Details of relevant dates are located on the MRASCo website.

Where there is no impact on Central Systems, MDB will agree the impact assessment period and MRASCo will issue the CP for industry review and comment 5 WDs after the MDB meeting.

Where the originator considers that the change is of an urgent nature, they may request a shortened Impact Assessment and implementation period by asking MRASCo to present the CP to MEC as an urgent change as set out in Section 5.1.4 below.

6.1.4 Urgent Changes

The MRA requires that the decision making process for any CP involves assessment by parties prior to a decision to accept or reject that change being made. This procedure sets out timescales for such assessment and for implementation.

However, under Clause 9.24 of the MRA, where any change is proposed which MEC determines is of an urgent nature, MEC may decide to reduce the timescales set out in this procedure.

If a Party wishes MEC to consider such a course of action, they should inform MRASCo accordingly when raising the CP. MRASCo will then present the CP to MEC for consideration as an urgent change.

When considering urgent changes MEC will give regard to the Ofgem guidance on urgent changes, this states that an urgent change should:

Be linked to an imminent issue or a current issue that if not urgently addressed may cause:

- *A significant commercial impact on parties, consumers or other stakeholder(s); or*
- *A significant impact on the safety and security of the electricity and/or gas systems;*
or
- *A Party to be in breach of any relevant legal requirements.*

Where MEC determines that the change is urgent, the CP will be issued to parties for assessment in line with any shortened timescales agreed.

If MEC does not agree that the change is urgent, the Party may withdraw either the CP or request that it is progressed under the standard change process.

6.2 Impact Assessment

6.2.1 Issuing Change Proposals for Assessment

Within 5 WDs of the confirmation of the assessment period, MRASCo will:

- Distribute a CP pack, containing all the CPs requiring impact assessment and (unless directed otherwise by MDB) a Change Report (which will include MDB's initial view of whether the CP falls within the scope of Clause 9.5 or 9.5A of the MRA), to all parties, IIPs, and (where related to a Green Deal Matter) the SoS, the GDAA Panel Secretary and GDIPs showing where appropriate the relevant product release date and the implementation date/ technique for the change;
- Confirm the deadline for return of responses. Parties will usually have at least 10 WDs to undertake Impact Assessment and respond by at least 10 WD before the MDB meeting at which the CP is to be considered; and
- Update the CP records to show that the CP has been issued for impact assessment, recording the MDB date at which the CP will be voted on.

Where a previously considered change has been significantly modified following Impact Assessment or more information has been provided, the CP may be re-issued for full impact assessment. In this case, the version number for the CP will be incremented.

6.2.2 Assessment By Parties

Parties, IIPs and (where related to Green Deal Matters) GDIPs are invited to review the CP pack to identify the technical, business and implementation impact of the changes on their organisations, considering effects on agents of the organisation where appropriate.

These responses will be made via a request for information. This will include the information as set out in Table 7.

Field Name	Notes
Section 1 – Request for Information	
MRASCo Reference	This will be assigned by MRASCo and will be aligned to the CP.
CP Reference	This will be the reference(s) used in the relevant SPF as originally assigned by MRASCo.
Date Issued to Industry	This will be completed by MRASCo and will be the date on which the response form was circulated to parties and others for assessment and review feedback.
Response Deadline	The final date for receipt of feedback by MRASCo. This will normally be 10 WDs prior to an MDB meeting.
Title	The short name for the item requiring impact assessment, as per the CP.
Version Number	Completed by MRASCo and updated if any changes are made between the issuing of the response form and the conclusion of the CP process.
Summary Of Change	This should set out an overview of the proposed change in 50 words or fewer.
Affected Codes And Agreements	This field should be used to note any other industry codes and agreements that, in the originator's view, are impacted by the CP.
Affected Organisations	The originator will indicate which industry roles are affected by the issue. This will include Suppliers, Distribution, Settlement, DA, DC, MOp, PPMIP, MAP, and MA.
Attachments	Any supporting information that will assist with impact assessment.
Section 2 – Response Form	
Respondent's Details	Details of the person responding, including name, contact details, and organisation.
Response Date	The date on which the response was provided to MRASCo.
Impact Assessment	Summary response to the request, providing an overview of feedback.
Solution Support	Will allow the respondent to indicate their support or otherwise for the proposed change.
Views On Timescales	The respondent will be able to provide feedback regarding the proposed lead-time for the proposed solution.
Views on whether the CP is a material Change Proposal	The respondent will be able to provide feedback on the proposer's and MDB's assessment of whether the CP is a material Change Proposal.
MRA Objectives	The respondent will be able to provide feedback on whether it believes that the MRA or MRA Product would, if the Change Proposal was implemented, better facilitate the MRA to achieve the MRA Objectives.

Table 7 – CP response information requirements

Responses must be returned to MRASCo by 12 noon on the due date shown on the CP pack if they are to be included for consideration. Responses should indicate agreement or rejection of the solution (which could include views on technique for implementation) and implementation date only. Comments may also be included, e.g. for modification. In the event of rejection, a reason must be included in the response.

The CP form will indicate the originators' view as to which parties are affected by the change. If a Party believes they are affected but this is not reflected in the CP form, they should indicate why the change affects them in their impact assessment response. A Party may submit comments even if they are not impacted by a change.

Unless a CP has been raised on behalf of a committee or workgroup, proposers and sponsors of CPs may request sight of all responses from MRASCo after the response deadline, and may return their own comments to MRASCo at the latest on the 6th WD prior to the MDB where the CP is to be discussed.

MRASCo will collate all responses and circulate these to MDB 5 WDs before the MDB meeting at which the change is to be considered. Papers to support the CPs for consideration at MDB will include:

- All the responses received by the due date;
- A summary of the acceptances/ rejections for the solution, date and technique broken down by MRA Party category (Suppliers, Distribution Businesses, and Settlements);
- Any comments submitted;
- Any additional information provided by MRASCo to assist in parties' consideration of the changes; and
- Any comments on responses provided by the proposer or sponsor to assist in parties' consideration of the changes

Other papers that may be issued include:

- Where a DTC CP using parallel testing (when a flow is in "test") has been agreed by MDB, a paper to confirm the implementation date for each new flow version ("go-live") will be presented two months prior to the go-live date;
- Reports from IREG and GDEG, highlighting work in progress; and
- An implementation schedule showing product release dates and the implementation dates of CPs that have already been agreed by MDB.

Parties, IIPs and (where related to Green Deal Matters) GDIPs may amend their responses on or before the date 5 WDs before the MDB meeting at which the CP is to be considered.

6.3 Voting Preference

Prior to the MDB meeting at which a vote is due to take place, each Smaller Supplier may notify the Smaller Supplier Members how it wishes the Smaller Supplier Members to exercise their vote in accordance with paragraph 8 of the Appendix 2 to this MRA Agreed Procedure.

Prior to the MDB meeting at which a vote is due to take place, each IDNO may notify the IDNO Member how it wishes the IDNO Member to exercise its vote in accordance with paragraph 8 of the Appendix to this MRA Agreed Procedure.

6.4 MDB Procedures For Change Proposals

The MDB includes representation from all MRA Party categories (Supplier, Distribution, and Settlements) and meets in accordance with a published timetable. Its business includes voting on CPs in accordance with the Appendix to this MRA Agreed Procedure. A vote is taken on the solution and date for implementation for each CP and a decision reached. MDB decisions will be one of those set out in Table 8. The outcomes of MDB's decisions are set out in Table 8 (which are subject to the Authority or MRA Forum determining otherwise).

Decision	Outcome
Accept	The CP will be implemented as drafted, and/or on the date proposed.
Accept Modified	The CP will be implemented as per any modifications agreed at MDB that do not require further impact assessment.
Defer	MDB is agreed that more information is required before determining whether to accept or reject the change.
Reject	The CP will not be implemented.

Table 8 – MDB Decisions regarding CPs

MDB representatives may also declare “No Interest” or “Abstain”, which does not count as a vote for or against the CP. MDB must positively accept any CP in accordance with the Appendix to this MRA Agreed Procedure.

Any MRA Party may appeal a decision of MDB as set out in Section 7.

MDB will vote on the basis of its judgment, made in good faith, as to whether the MRA or MRA Product would, if the Change Proposal was implemented, better enable the MRA to achieve the MRA Objectives.

6.4.1 MDB Voting

Before deciding whether to accept or reject a CP, MDB will consider whether the CP is a material Change Proposal.

MDB voting processes are set out in the Appendix to this MRA Agreed Procedure.

MDB may defer a CP if in its opinion it considers the resolution put to a meeting requires further investigation or modification to achieve agreement. This may include where for example:

- an alternative CP has been raised by a party; or
- volumes of changes are high or parties indicate more time is needed to conduct their Impact Assessment. The CP may then be scheduled for consideration at the next or any subsequent MDB meeting.

Where MDB identifies that substantive changes are required to any aspect of the CP it may either vote to reject the CP or the sponsor may withdraw for further consideration.

Where MDB defers a CP:

- it may re-issue the CP for full impact assessment;
- any requirements for additional information to be elicited from the sponsor will be clearly specified and recorded by the MDB Secretary. The proposer will be informed and requested to provide the information. In the event that this requires a modified CP to be issued for Impact Assessment, this will be issued in the next available CP pack; and
 - it may refer the CP (“original CP”) to GDEG where the original CP relates to a Green Deal Matter or otherwise to IREG and request that it considers whether an alternative solution would better address the issues raised in the original CP and if appropriate suggest an alternative CP.
 - Upon any such referral:
 - MDB will enclose an updated Change Report (if applicable) with the referral notice, which will include reasons for the decision to refer the CP to GDEG or IREG.
 - By the relevant time specified by MDB in its referral notice (“Required Time”), GDEG or IREG (as applicable) will either notify MBD that it:
 - does not believe that an alternative solution would better address the issues raised in the original CP; or
 - does believe that an alternative solution would better address the issues raised in the original CP, and will provide MBD with an alternative CP accordingly.
 - GDEG or IREG (as applicable) and MDB may agree in writing to change the Required Time.
 - GDEG or IREG (as applicable) may request, and MDB will provide, such clarification and further information that GDEG or IREG (as applicable) considers reasonably necessary.
 - If GDEG or IREG (as applicable) does provide MBD with an alternative CP within the Required Time, the vote on the original CP shall take place at either: (1) the MDB meeting where the alternative CP is considered, or (2) if the alternative CP is withdrawn or deemed to be withdrawn, the next MDB meeting following the withdrawal or deemed withdrawal.
 - If the alternative CP has not been submitted by a party by the time specified by MDB in its referral notice (which MBD may revise from time to time) it shall be deemed to have been withdrawn.
 - If GDEG or IREG (as applicable):
 - does not provide an alternative CP by the Required Time; or
 - informs MBD that it does not believe that an alternative CP would better address the issues raised in the original CP,

MDB shall vote on the original CP at such time as it considers appropriate.

At any MDB meeting at which both an original CP and an alternative CP is considered, MDB will only be able to vote to accept either the original CP or the alternative CP.

In deciding whether to accept or reject a CP, MDB will consider whether the modification would, as compared to the existing provision of the MRA, better enable the MRA to achieve the MRA Objectives.

A CP may only be **Accepted Modified** if the proposer consents to such modifications.

If the CP is **Accepted Modified**, the CP will be updated, the version number will be incremented, and this revised version of the CP will be issued alongside the MDB Minutes.

Where a DTC change is not to be implemented via parallel testing then MDB has the discretion to retain or increment the Flow Version Number. MDB will ensure that there is only ever a maximum of two versions of any flow in the DTC and in use over the DTN.

A proposer may withdraw a CP at any point up to a formal MDB vote, either in writing to the Chair or verbally at an MDB meeting through their MDB representative or the Chair.

A decision by MDB to accept or reject a material Change Proposal shall have the status of a recommendation to the Authority to determine that the proposal is to be accepted or rejected, and shall not by itself have the effect of an acceptance or rejection of the material Change Proposal.

6.4.2 Post MDB Actions

The formal minutes of the MDB meeting will record the decision(s) taken in respect of each CP considered. MRASCo will author these minutes and distribute them to all interested parties within 5 WDs of the MDB meeting.

MDB will procure that a Change Report relating to each material Change Proposal is submitted to the Authority within 5 Working Days of its recommendation under Clause 9.20 of the MRA.

MRASCo will produce and distribute to all interested parties an updated Change Report (if applicable) reflecting the decision taken in respect of a CP at the MDB meeting within 5 WDs of the relevant MDB meeting.

Where the Authority receives a Change Report under Clause 9.20B of the MRA relating to a material Change Proposal, the Authority will decide whether that proposal shall be accepted or rejected.

Where a CP has been accepted which requires Secretary of State Consent, a request for consent to the change will be issued to the SoS in accordance with the processes set out in Section 6 of this Procedure, and cannot have effect until the required consent is received. Although MRASCo may request Secretary of State Consent immediately after acceptance of the CP, the SoS will not begin the consent process until the end of the appeal period.

Subject to the paragraph immediately below, where a Party disagrees with a decision made by MDB, they may lodge an appeal to the MRA Forum, provided they do so within 10 WDs of the issue of the MDB minutes recording the decision as further detailed in section 6 of this Procedure. The minutes are distributed electronically, and transmission is deemed to start the appeal period. Where the appeal relates to a CP, the MDB decision shall not have effect until the MRA Forum determination regarding the appeal (or the appeal is withdrawn).

Notwithstanding any other provision of this Procedure, no person may appeal, pursuant to Clauses 6.45 to 6.48 (inclusive) of the MRA, a recommendation that MDB has made to the Authority pursuant Clause 9.20 of the MRA.

10 WDs after distributing the MDB Minutes, MRASCo will determine whether any valid appeals have been received. If one or more valid appeals have been received, the Appeals Procedure as set out in Section 7 of this Procedure will be followed. If no valid appeals have been received, after the Authority has made a determination pursuant to Clause 9.20E of the MRA that a material Change Proposal shall be accepted (if required), MRASCo will implement any changes approved by MDB per the processes set out in Section 6 of this Procedure, subject to Secretary of State Consent where required. The process for obtaining required consents is further detailed in Section 6 of this Procedure.

Any CP which:

- has been agreed by MDB;
- is not under appeal;
- the Authority has determined shall be accepted pursuant to Clause 9.20E of the MRA, where required; and
- has received Secretary of State Consent where required,

is deemed to be a formally ratified change to the MRA or associated products and the relevant product will be updated in accordance with that change.

A change may become effective on a date other than a scheduled release date. Parties are reminded that they must be compliant with the change at its effective date, and not when the updated product is published.

7 SoS Consents

The MRA requires that any material changes relating to:

- Any Green Deal Matters;
 - (where such a change may materially affect Green Deal Matters) defined terms in the MRA; or
- Any change to the MRA affecting those provisions requiring or permitting referral to the SoS

are not to have effect without the prior written consent of the SoS. These matters are set out in Clause 9.18D of the MRA.

There is some overlap between the clauses covered by Clauses 9.5, 9.5A and 9.18D; this leads to the need for some MRA changes to be the subject of a determination of the Authority and receive the SoS' consent before they can be implemented.

The process for requesting Secretary of State Consents is outlined in Figure 7 below and further detailed in the sections, which follow.

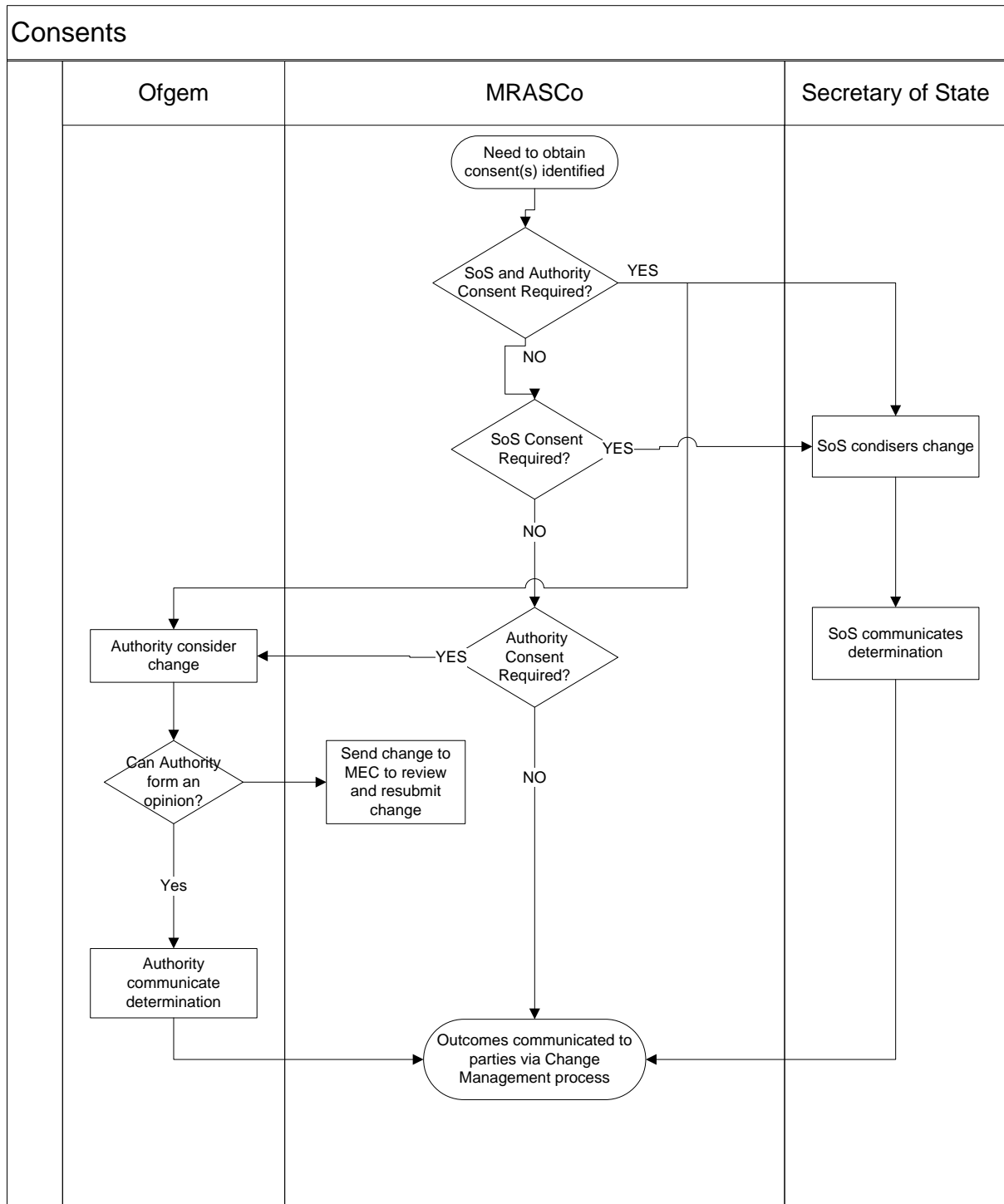


Figure 7 - Process for requesting consents to make MRA changes

7.1 Authority Determination

7.1.1 Request For Determination

When a material Change Proposal is accepted or rejected under the MRA Change Management Procedure, a 'statement of fact' in support of or against (as applicable) the proposed change and a Change Report will be submitted to the Authority in order to assist in determining whether to accept or reject the proposed change. MRASCo shall prepare a submission to the Authority requesting that the Authority accepts or rejects the change (the Authority Determination Request). The Authority Determination Request will comprise the following statements of fact:

1. The MRA CP reference;
2. The description of the Change;
3. MDB's view of whether the MRA would, if the Change Proposal was implemented, better enable the MRA to achieve the MRA Objectives;
4. The proposed implementation date of the Change; and
5. Any other information considered relevant.

The information at point 5 shall consist of an extract of the MDB minutes in relation to the vote and any other minuted discussions regarding the CP. Where necessary, The Authority may request further information regarding the proposed change from MRASCo to inform the decision by The Authority whether to accept or reject the proposal.

For the avoidance of doubt, in the event that a CP is Agreed Modified at MDB, the modified CP shall be the version of the CP submitted to the Authority for determination.

7.1.2 Authority Decision

Where the Authority determines that it cannot properly form an opinion on whether to accept or reject a material Change Proposal, the Authority may direct MEC to, in which case MDB shall, revise and resubmit the Change Report in accordance with Clause 9.20D of the MRA.

MDB will be notified whether the Authority has accepted or rejected the material Change Proposal. MRASCo will notify MRA parties and other interested parties of the Authority's decision. Ofgem may take additional steps to bring the Authority's decision to the attention of relevant parties where appropriate. MRASCo shall ensure that the change records are updated with the Authority's decision.

There is no defined period for the Authority to provide a decision to accept or reject a material Change Proposal. This may impact on the intended implementation date for the CP, especially where business-system changes and/or DTC changes are associated with the CP.

Provision is made in the CP pro-forma for a 'lead time' to be specified so that the implementation date is not compromised by waiting for the Authority's decision, and so that the anticipated period for business-readiness can still be met. By way of example, a change could have an implementation date shown as 'the later of dd/mm/yyyy or 3 months from receiving the Authority's decision.'

Details of the Authority's decision in respect of appeals can be found in Section 6.

Where the Authority has notified MDB that it has accepted a material Change Proposal, the change will be progressed via the implementation processes as set out in Section 8.

If the Authority rejects a material Change Proposal, the change cannot be implemented into the relevant product.

7.2 Secretary of State Consent

7.2.1 Request For Consent

When a CP affecting matters listed under Clause 9.18D of the MRA is accepted via the Change Management process, a 'statement of fact' in support of the proposed change will be submitted to the SoS in order to assist in its determinations in relation to consenting to the proposed change.

MRASCo shall prepare a submission to the SoS requesting that it grant consent for the agreed change (the SoS Consent Request). The SoS Consent Request will comprise the following statements of fact:

1. The CP reference;
2. The description of the Change;
3. The justification for the Change;
4. The proposed implementation date of the Change; and
5. Any other information considered relevant.

This information at points 1-4 above shall be provided through the submission of the completed CP pro-forma and supporting drafting. Originators and sponsors for CPs may wish to take due consideration of this when completing the justification section of the CP form.

The information at point 5 shall consist of an extract of the MDB minutes in relation to the vote and any other minuted discussions regarding the CP. Where necessary, the SoS may request further information regarding the proposed change from MRASCo to inform the decision by the SoS to consent to the proposal.

For the avoidance of doubt, in the event that a CP is Agreed Modified at MDB, the modified CP shall be the version of the CP submitted for Secretary of State Consent.

7.2.2 Secretary of State Decision

Upon receipt of a decision letter by MEC, MDB will be notified whether Secretary of State Consent has been granted or declined. MRASCo will circulate the letter to MRA parties and other interested parties.

The SoS may take additional steps to bring its decision to the attention of relevant parties where appropriate. MRASCo shall ensure that relevant change records are updated with the Secretary of State Consent decision and that the letter is filed in association with the relevant CP.

There is no defined period for the SoS to provide a decision. This may impact on the intended implementation date for the CP, especially where business-and central market system changes and/or DTC changes are associated with the CP.

Provision is made in the CP pro-forma for a 'lead time' to be specified so that the implementation date is not compromised by consent, and so that the anticipated period for business-readiness can still be met. By way of example, a change could have an implementation date shown as 'the later of dd/mm/yyyy or 3 months from receiving Secretary of State Consent'.

Details of the Secretary of State Consent process in respect of appeals can be found in Section 7.

Once the SoS decision letter is received by MRASCo it will be circulated to parties. Where consent is granted, the change will be progressed via the implementation processes as set out in Section 8.

If Secretary of State Consent is not given, the change cannot be implemented into the relevant product.

8 APPEALS

The MRA provides for any MRA Party to raise an appeal to the MRA Forum in respect of any MEC decision. Since MEC have delegated the responsibility for MRA Change Control to MDB, a Party may appeal a decision made by MDB in writing (other than a recommendation that MDB has made to the Authority pursuant to Clause 9.20 of the MRA).

Where an MDB decision has been appealed to the MRA Forum, and following the outcome of that appeal, any Party may raise a further appeal to the Authority in respect of the decision of the MRA Forum.

In the case of a change to the DTC that does not relate to items used under the BSC, any industry participant affected by such change may raise an appeal against the decision of MDB or the MRA Forum, notwithstanding that the industry participant is not a Party to the MRA. For the purposes of this section 7 only, the term 'Party' should be assumed to include provision for such appeals unless explicitly stated.

This section sets out the process that will be followed in the case of an appeal against an MDB or MRA Forum decision in respect of the CP (an appeal) and is not intended to apply to an appeal by a Party against a MEC decision.

Any appeal must be:

- Notified via MRASCo within the Appeal Period;
- On the grounds set out in the MRA (Clause 6 and Clause 7 (as applicable)); and
- Supported by a submission in writing substantiating the grounds for the appeal.

The process is illustrated in Figure 8, and described in further detail in the following sub-sections. An appeal pro-forma is provided on the MRASCo website in order to assist with the preparation of an appeal.

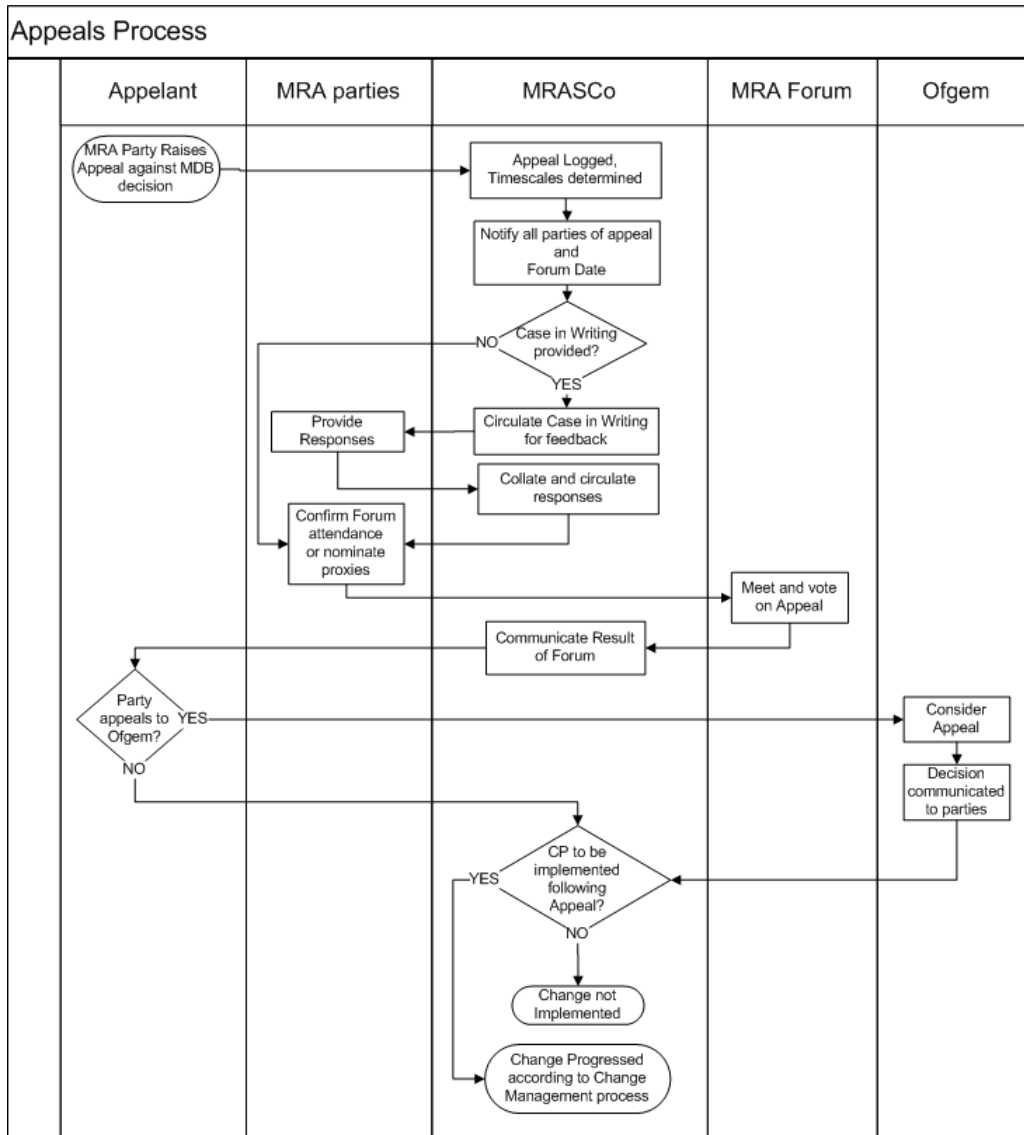


Figure 8 - The Appeals Process

The following procedure will be used if one or more appeal(s) have been received. If no appeals have been received by the due date, the MDB or Forum decision will stand and any changes will be implemented as applicable, subject to Secretary of State Consent if required.

The appeal process has a number of minimum periods within it. These are set out in Table 9.

Parties have indicated that there are benefits in aligning the hearing date with an MDB meeting. The recommended date is the next available MDB date, as this allows time for assessment of the appellant’s case prior to the hearing; ensures a minimum attendance at the Forum of the MDB representatives; and is a logical audience for the hearing, since the appeal relates to an MDB decision. Utilising the MDB date may involve expanding the period for consideration of the appeal slightly.

It should be noted that any appeal hearing will be conducted under MRA Forum arrangements and will not be conducted under MDB business.

Event	Timing
MDB decision	At MDB, usually last Thursday of the month.
Parties informed of decision via MDB Minutes	Within 5 WDs of MDB
Appeal deadline	By distribution of Minutes + 10 WDs (appeals may be submitted in <10 WDs)
Appeal acknowledged and parties informed	On receipt of appeal
Forum date notified (e.g. next available MDB date)	Within 2 WDs following receipt of appeal
Deadline for submission of case in writing	19 WDs before MRA Forum
Forum papers and agenda issued	18 WDs before MRA Forum
Deadline for return of responses to any written case	8 WDs before MRA Forum
Appeal responses collated and circulated	5 WDs before MRA Forum
Deadline for submission of attendance confirmations or proxies	1 WD before MRA Forum
MRA Forum resolution	MRA Appeal Forum Meeting (usually aligned to MDB)
MRA Forum Minutes issued	Within 10 WDs of Forum (likelihood these will be issued at same time as MDB Minutes)
Notification to MEC and MRASCo of an appeal to the Authority	Forum Minutes + 10 WDs (appeals may be submitted in <10 WDs)
Notify parties of a further appeal to Ofgem	Within 1 WD of receipt of copy of appeal above
Ofgem determination	Outside of the scope of this procedure

Table 9 – Example appeal timings

Note that the overall timelines for the appeals process would depend on the exact timings of submission of documents and on the agreed date for the MRA Forum as further expanded on in the sections that follow.

8.1 Raising An Appeal

Any Party who wishes to appeal an MDB decision must do so within 10 WDs of the issue of Minutes of the MDB meeting at which that decision was made (the “Appeal Period”). In the event that this period has expired, an appeal cannot be raised. Parties should therefore take due consideration of the Appeal Period when preparing for any appeal and should ensure that notification of an appeal is made in due time.

An appeal raised by one Party does not preclude another Party also lodging an appeal in respect of that same decision. Once an appeal has been raised, the relevant MDB decision shall have no effect, pending the outcome of the appeal.

The Party’s MRA Contract Manager should issue the notification of an appeal for the Party using the pro-forma provided on the MRASCo website. The notification shall be addressed to the MDB Chair and directed to MRASCo. Further guidance on completing the pro-forma is provided in Table 10.

Field Name	Notes
Appeal Reference Number	This will be assigned by MRASCo and will be aligned to the CP being appealed.
Date Received	The date the appeal was received by MRASCo. This must be within 10 WDs of the notification of an MDB decision to parties.
Date Issued To Parties	This will be completed by MRASCo and will be the date on which the appeal notification was circulated to parties.
Part A – Authorisation	
Name Of Party Appealing	The name of the Party making the appeal.
MRA Contract Manager Details	Name, email and telephone details for the Party’s MRA Contract Manager (or where the appellant is not an MRA Party a nominated contact)
MDB Meeting Reference And Date	The appellant should complete the reference and date of the MDB where the decision being appealed is minuted.
CP Being Appealed	The CP Reference and title to which the appeal relates should be entered by the appellant.
Brief Description Of Decision To Be Appealed	A short description of the decision made by MDB.
MRA Contract Manager signature	The MRA Contract Manager (or where the appellant is not an MRA Party a nominated contact) shall authorise by their signature the raising of an appeal – this may be an electronic signature.
Part B – Appeal	
Justification For Appeal	The appellant should set out the grounds for their appeal and should support this with a written substantiation of those grounds. It should be noted that the general grounds for appeal are set out in the MRA (under Clause 6) and parties are advised to refer to these when documenting their reason. If an appeal does not state one of the grounds set out under the MRA, the appeal cannot be progressed to the MRA Forum.
Case In Writing	A case in writing or the written substantiation may be provided supplementary to the notification, depending on when the appellant wishes the appeal hearing to be convened. The appellant will indicate if they intend to submit such a case in writing.

Field Name	Notes
Resolution	This section should clearly note the decision and CP, if relevant, under appeal and state the vote that will be put to the MRA Forum.
Requested Date For MRA Forum To Be Convened	The appellant will indicate a preferred date for the MRA Forum to consider the appeal, this should consider the period needed for parties to consider any case in writing and submit responses to the appeal. The final date will be confirmed by MRASCo prior to issuing appeal details to parties.
Part C – Responses to Appeal	
Respondents Details	Details of the person responding, including name, contact details, and organisation.
Response Date	The date on which the response was provided to MRASCo.
Comments On Appeal	Parties may provide comments on the appeal. These will be circulated to all parties prior to the MRA Forum. A vote is not required at this time as voting and proxy forms are circulated separately.

Table 10 – Appeals pro-forma

Once an appeal has been raised, the relevant MDB decision shall have no effect, pending the outcome of that appeal and where applicable, no requests for Secretary of State Consents will be made in relation to the decision under appeal.

The appellant should submit the appeal pro-forma, duly completed, and all supporting information to MRASCo. An appellant should also decide whether they wish to submit a case in writing or proceed straight to a hearing at a meeting of the MRA Forum. This should be indicated in the appeal pro-forma, as this will be part of the information circulated to parties at the time the appeal is notified.

A case in writing or the written substantiation may be provided supplementary to the notification, dependant on when the appellant wishes the appeal hearing to be convened.

A Party may also wish to present their case orally at the appeal hearing. It is not recommended that the appellant conducts their case through the exclusive means of a presentation at the hearing, since attendance at the MRA Forum can be by proxy, and resolutions can be made through the use of proxy forms with a pre-cast vote.

In the absence of any further consultation, it is unlikely that a Party’s initial impact assessment in relation to a CP will have altered without any further input on the appellant’s case. Allowing for an additional period of assessment between the appeal and the hearing gives an opportunity for consideration of the merits of the appeal prior to the MRA Forum.

If the appellant wishes to provide parties with a period of assessment for the appeal, then they may also wish to request time to prepare their written submission and gather any supporting evidence (case in writing) prior to circulating this to parties for assessment. In any event, the case in writing should be provided no later than 19 WDs prior to the Forum date, in order to provide for assessment and collation of responses.

Appellants should also consider the benefit of submitting a case in writing in line with the MDB Change Pack issue dates, since parties anticipate this date each month and have internal processes to obtain assessment evaluations from within their business.

In the event that the appellant wishes to proceed to the hearing at a MRA Forum without an assessment period, they should use reasonable endeavours to provide the written submission supporting the justification for the appeal under cover of the appeal pro-forma, but in any event no later than 19 WDs prior to the Forum date.

8.2 Notification Of An Appeal To Other Parties

On receipt of a correctly completed pro-forma, MRASCo records the details of the appeal and notifies all parties via their MRA Contract Managers that an appeal has been received.

If an assessment period is provided by the appellant, parties are asked to respond with comments and are given a deadline to return their responses.

At the same time, MRASCo will notify the date of the MRA Forum to parties. Parties will have at least 10 WDs notice in order to allow sufficient time for other parties to consider their responses to the notification.

On receipt of a notification, MRA parties submit their responses to the appeal within the given deadline (if they choose to respond). A response is not compulsory.

MRASCo will then collate all responses relating to the appeal and circulate these to all parties 5 WDs prior to the date of the MRA Forum.

8.3 MRA Forum Procedure For Appeals

Parties confirm their attendance at the MRA Forum, or submit proxies if they will be unable to attend, in accordance with the provisions of MRA Clause 7.

The MRA Forum will meet when convened by MRASCo. The agenda will list the CPs being appealed, and supporting documentation, including the appeal pro-forma, will be provided. A vote will be taken at the MRA Forum as to whether the MDB decision should be overturned. No other business in relation to the appeal can be resolved at the Forum.

The outcome of that vote will be published in the form of Minutes and will be distributed by MRASCo within 10 WDs of the Forum.

The constitution of the MRA Forum is fully described in Clause 7 of the MRA.

8.4 Appeals To The Authority

MRA parties have 10 WDs from the date the MRA Forum minutes are issued to consider whether to appeal to The Authority against the resolution of the MRA Forum. Details of the procedure for appealing against MRA Forum decisions are set out in Clause 7.26 of the MRA. In making an appeal to the Authority, a Party should also copy MEC into the notice of appeal.

Appeals to The Authority are not covered in the scope of this MRA Agreed Procedure as the Authority applies the process. The following information is therefore provided for guidance only.

Under the procedure that the Authority currently proposes to follow in the event that an MRA Party does raise such an appeal with The Authority, The Authority will circulate a notice of the appeal to all MRA parties and MRASCo. It is intended that the notice will detail the procedure The Authority intends to adopt in determining the appeal and it will likely invite any addressees of the notice to make written representations and/or present its case in person to the case officer and decision maker respectively in relation to the appeal. This procedure is based on 'Ofgem's Procedures for Determining Disputes Affecting Customers'.

When making a decision regarding an appeal, the kinds of considerations to which The Authority is likely to have regard include SLC 23 of the Electricity Distribution Licence, The Authority's statutory duties, the Change Report and the views of MRA parties expressed at MDB, the MRA Forum and during The Authority appeal consultation process.

8.5 Conclusion Of The Appeals Process

10 WDs after distributing the MRA Forum Minutes, MRASCo will assess whether any notification of appeals to The Authority have been received. If one or more appeals have been received, MRASCo will wait for The Authority to conduct their appeals process.

Once an appeal against an MRA Forum decision has been received, The Authority will conduct the appeals process and publish the result to MRA parties and MRASCo.

If the MRA Forum's decision is not appealed to the Authority, MRASCo will action the resolution as necessary.

When the appeals process is complete (including any appeals to the Authority), the decision(s) will be notified to MRA parties and MRASCo for action as appropriate. MRASCo will ensure that the outcome is also noted at the next MDB meeting.

Where an MRA Forum decision has not been appealed, and as a result Secretary of State Consent is required in relation to the resolution of the MRA Forum, the processes set out in section 6 of this Procedure shall apply.

Where the Authority has accepted a material Change Proposal that requires Secretary of State Consent, that change shall not have effect until or unless such Secretary of State Consent is given.

Where Secretary of State Consent is withheld in regard to any change agreed following either a resolution of the MRA Forum or a decision by the Authority, that change shall have no effect and will not be implemented.

9 IMPLEMENTATION OF CHANGES

Once a CP has been Accepted by MDB, the appeals process has been completed, and any required consents obtained, the agreed change will be entered into the Implementation Process. This process ensures that product versions are correctly maintained and that changes are implemented at the required date.

The process also makes provision for testing of technical changes to central systems that are operated under MRA governance. Figure 9 provides an overview of the implementation process, with more detail provided in the sections that follow.

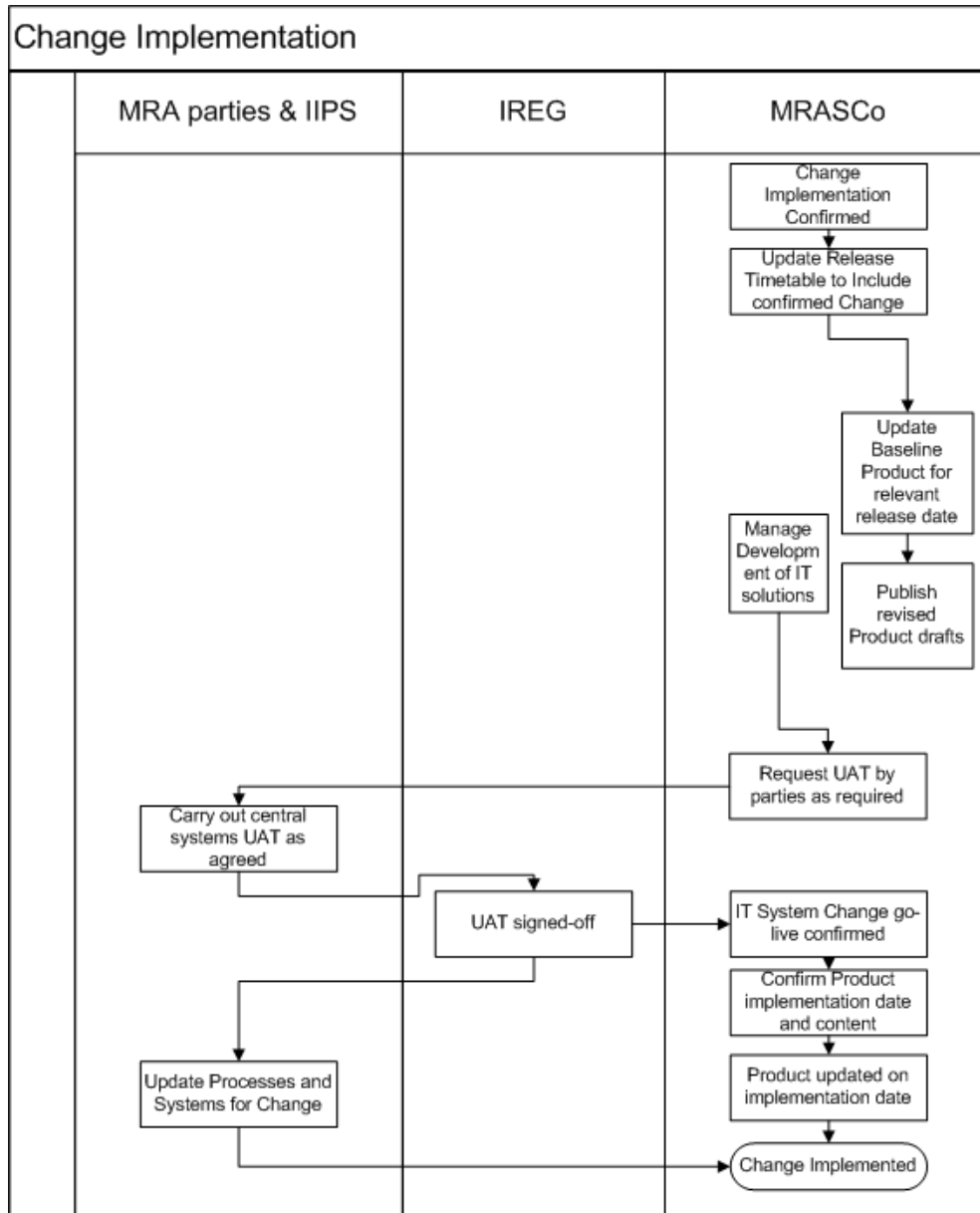


Figure 9 - Implementation Process

9.1 Product Updates

Once a change has been confirmed, MRASCo will update the release timetable and the Monthly Product Timetable (MPT) and distribute to parties and IIPs. Where the change relates to Green Deal Matters, the SoS, the GDAA Panel Secretary and GDIPs will be informed of the release date.

MRASCo will also commence updates to the impacted version of the product to which the change applies. This may not be the next version to be released where there are several changes awaiting implementation. All updated baseline and draft product versions will be published on the MRASCo website.

9.2 Central System Updates

Where a change to central IT systems such as ECOES or the GDCC is required as part of the implementation of a change, MRASCo will manage the development of the IT solution in parallel to the drafting of product changes.

This will include:

- Obtaining confirmation of costs with technical service providers;
- obtaining approvals from MEC and the MRASCo Board in order that funds can be released from the budget; and
- The development of test scripts for User Acceptance Testing (UAT). The scope and nature of testing required will be agreed by IREG as part of the implementation process.

Where appropriate, MRA parties, IIPs, and GDIPs may be requested to take part in acceptance testing for technical changes. It will not be mandatory for any Party to take part in testing, but experience has shown that testing by a number of parties ensures robustness of the developed solution prior to implementation. Where testing is to be undertaken, MRASCo will liaise with IREG in order to confirm scope of the required testing.

If testing cannot be signed off in time to allow systems to be updated on the relevant release date for the accompanying product change(s), MDB will be informed at the earliest opportunity. MDB will determine appropriate action, which may include the raising of a further CP to delay the implementation date of a change.

Once all testing is complete and (where parties have taken part) signed off by IREG, MRASCo will confirm the release date (including any planned system outages) to parties and other system users and stakeholders in accordance with procedures issued pursuant to the MRA.

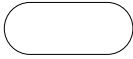

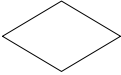


9.3 Product Releases

A change may be implemented as part of a wider timetable release, or outside the release schedule, where agreed, as part of the acceptance of the CP. In either event, MRASCo will confirm the release 5 WDs before the implementation date and revised products will be released by the end of the day on which the change is schedule to be implemented.

On implementation, all affected products will be updated accordingly, with previous versions being withdrawn.

Appendix 1 – Definition of Symbols in Process Workflows

The process maps contained within this document utilise a standard set of symbols to represent key events and steps. These are summarised below.

Symbol	Usage
	Terminator – Used at the entry and exit point of a process.
	Process – Defines an action in the workflow of the process, will be in the swim lane of the owner of that activity.
	Decision – A decision with two or more defined output paths.
	Parallel Processing – Two or more processes carried out in parallel as a result of a process action.
	Mutually Exclusive Process – Used where one (and only one) of a number of different process activities can result from a given activity.

Appendix 2 - Constitution of the MRA Development Board

1 Formation and Objects

In clause 6.53A of the MRA, MEC establishes MDB as a sub-committee whose purpose is to manage on MEC's behalf, both technical and commercial changes to the MRA and MRA Products.

2 Membership

2.1 Subject to paragraph 2.3 of this Appendix, MDB shall consist of the following representatives ("MDB Members") from the following categories:

- (a) six MDB Members from six different Large Suppliers (the "Large Supplier Members");
- (b) two MDB Members from two different Smaller Suppliers (the "Smaller Supplier Members") as appointed by the Smaller Suppliers via an agreed Smaller Supplier rota;
- (c) six MDB Members from six different Distribution Businesses ("DNO Members") appointed by the Distribution Businesses from time to time;
- (d) one MDB Member ("IDNO Member") appointed by the IDNOs from time to time; and
- (e) one MDB Member ("BSC MDB Member") appointed by the BSC Agent,

the Large Supplier Members and Smaller Supplier Members collectively being the "Supplier Members" and the DNO Members and the IDNO Member collectively being the "Distribution Members". The Supplier Members, Distribution Members and BSC MDB Member are each a "Class".

2.2 A MDB Member appointed pursuant to paragraph 2.1(a), (b), (c) and (d) shall be an employee or contractor of the relevant Party.

2.3 MEC may in its absolute discretion remove and appoint MDB Members from time to time.

2.4 MEC will determine the chairman of MDB ("MDB Chairman"). The MDB Chairman is entitled to speak at meetings of MBD but not (subject to paragraph 8.3 of this Appendix) to vote.

3 MDB Secretary

MRASCo (or its nominee) shall provide secretarial support to the MDB as reasonably required. This support shall include: taking minutes; agreeing and sending out agenda/calling notices; booking meetings; controlling the logging and circulation of documents and maintaining contact lists.

4 Alternates

Each MDB Member other than the BSC MDB Member may appoint an alternate to attend, speak and vote at the MDB meeting in the MDB Member's absence.

5 Non-Voting MDB Attendees

5.1 The following are entitled to attend, to speak but not to vote at any MDB meeting:

- (a) MRASCo (or its nominee), who will attend meetings to advise on change co-ordination matters and MRA Products that are the subject of Change Proposals;
- (b) an observer representing the Authority;
- (c) any expert required by the MDB Members and agreed in advance of the meeting by the MDB Chairman; and
- (d) any other person who may have a legitimate interest in the business of the MDB, as agreed in advance of the meeting by the MDB Chairman.

6 Duties

6.1 MDB's duties will be to:

- (a) act in accordance with the MRA and in particular clause 9, and this MRA Agreed Procedure 17;
- (b) act reasonably, without undue delay and without prejudice to any Party or Class of Party;
- (c) report to MEC and the MRA Forum from time to time, and as requested, detailing the MDB's activities, and to copy minutes of its meetings to MEC; and
- (d) keep accurate and complete written records of its meetings, activities and resolutions.

6.2 The BSC MDB Member and MRASCo (or its nominee) shall be responsible for ensuring a coordinated response to all Change Proposals that relate to the BSC Requirements in order to maintain consistency between the MRA and the BSC.

7 Powers

7.1 MDB will have the following powers:

- (a) on behalf of MEC, to direct the work of MRASCo (or its nominee) with respect to the development and modification of the retail design;
- (b) to authorise the progression of Operational Issues through the Operational Issues Procedure;
- (c) to review Change Proposals to the MRA and MRA Products;

- (d) to approve, modify or reject Change Proposals to the MRA and MRA Products;
- (e) to decide the timing of the implementation of any approved Change Proposal, the final form of the Change Proposal and the manner in which the Change Proposal should be made;
- (f) to undertake any other requirements with regard to the definition or development of the retail design, as directed by MEC;
- (g) to initiate and manage projects for issues relating to the development of the MRA, DTC, E2E and WPPS (“MRASCo Product Set”) as appropriate;
- (h) to seek such additional advice as may reasonably be required for the analysis of any proposed change;
- (i) to discuss such issues as it feels fit to further the control of changes to the MRA and associated documents;
- (j) to approve or reject applications from Interested Industry Participants to receive updates;
- (k) to determine, agree and revise from time to time, all the MRA Agreed Procedures; and
- (l) to carry out functions relating to ECOES as directed by MEC from time to time.

8 Quorum and Decision Making

8.1 All decisions of the MDB shall be by resolution proposed and voted on at a MDB meeting. No MDB resolution shall be made unless the MDB is quorate.

8.2 A MDB quorum will be:

- (a) at least four (4) Distribution Members or their alternates in attendance, including at least three (3) DNO Members with an aggregate of more than 750,000 Registered Metering Points;
- (b) at least five (5) Supplier Members or their alternates in attendance; and
- (c) where matters which relate to or affect the BSC Requirements are to be considered, the BSC MDB Member.

8.3 In extenuating circumstances, where a MDB Member is delayed or unable to complete his or her journey to the meeting, the absent MDB Member may request the MDB Chairman to approve the nomination of a MDB Member already in attendance within the relevant Class to act as his or her alternate for the whole or part of the meeting. As there is a single Party in the BSC MDB Class and there is only one IDNO Member they may lodge their vote with the MDB Chairman.

8.4 The MDB Members shall vote by Class as follows:

- (a) The MDB Members within each Class entitled to vote shall have one vote each.
- (b) Subject to paragraphs 8.8 and 8.9 below, a MDB Member shall declare that the resolution under discussion is of "no interest" if (1) the resolution does not have a direct impact on its obligations under the MRA and/or (2) it is impartial to the resolution, and as a result its declaration will not be considered when calculating the majority within its Class.
- (c) Subject to paragraphs 8.8 and 8.9 below, a MDB Member may abstain from voting if it is unable to decide whether to accept or reject the resolution and such abstention will not be considered when calculating the majority within its Class. All MDB Members abstaining from voting shall state their reasons for the doing so.
- (d) The MDB Members within each Class may vote to accept or reject the resolution or to accept the resolution with an agreed modification. All MDB Members rejecting a resolution shall state their reasons for the rejection.
- (e) Where the majority of votes cast by the members within each Class entitled to vote are to accept the resolution, then that Class has accepted the resolution.
- (f) Otherwise the relevant Class has rejected the resolution.
- (g) MDB shall only accept a resolution when all Classes entitled to vote have (1) accepted the resolution, (2) declared "no interest" in accordance with paragraph 8.4(b) or (3) abstained from voting in accordance with paragraph 8.4(c).

8.5 MDB may defer voting on a Change Proposal if in its opinion it considers the resolution put to a meeting requires further investigation or modification to achieve agreement. This may include where for example:

- (a) an alternative Change Proposal has been raised by a Party; or
- (b) volumes of changes are high or parties indicate more time is needed to conduct their Impact Assessment. The Change Proposal may then be scheduled for consideration at the next or any subsequent MDB meeting.

8.6 The BSC MDB Member shall be entitled to vote in accordance with Clause 6.40 of the MRA.

8.7 When voting on a resolution, each MDB Member shall consider the obligations, acting as MEC, set down in Clause 6.51 of the MRA, the views of the Parties IIPs and GDIPs (where related to Green Deal Matters), the results of any impact assessments and the advice of any relevant experts and the Authority's representative.

8.8 Each Smaller Supplier Member will exercise its vote as a representative of all Smaller Suppliers, remaining cognisant of the responses that it has received from Smaller Suppliers pursuant to Section 5.3 of this MRA Agreed Procedure. If the Smaller Supplier Member has not received any responses pursuant to Section 5.3, the Smaller Supplier Member will have

discretion on how to exercise its vote in accordance with the principles set out in this MRA Agreed Procedure and the MRA.

8.9 The IDNO Member will exercise its vote in accordance with the majority of responses that it has received from IDNO pursuant to Section 5.3 of this MRA Agreed Procedure. If there is no such majority or the IDNO Member has not received any responses pursuant to Section 5.3, the IDNO Member will have discretion on how to exercise its vote in accordance with the principles set out in this MRA Agreed Procedure and the MRA.

9 Meetings

9.1 Meetings will normally be held monthly as required, with additional meetings held depending on the number and urgency of any outstanding Change Proposals. The MDB Members shall agree the dates, times and locations of MDB meetings on the advice of MRASCo or its nominee.

9.2 Minutes will be produced and issued to all attendees within five Working Days of the meeting. Additionally, a copy of the minutes will be issued to all Parties, IIPs, GDIPs (where related to Green Deal Matters) and to MEC.

10 Appeals

Any resolution made by MDB shall be treated as a MEC decision for the purposes of Clauses 6.45, 6.46, 6.47 and 6.48 of the MRA.

11 Funding

11.1 MRASCo will be responsible for the costs of meeting rooms, refreshments and supporting services.

11.2 MDB Members will be responsible for their own costs of attending MDB meetings.

12 Other Expert Groups

Where MDB believes a development project, Change Proposal or issue requires the formulation of a group with specialist knowledge, it may nominate subsidiary expert groups to address particular topics/specialist areas within its remit. Membership, terms of reference and meeting frequency shall be agreed by MDB before the first meeting of any such group. All such expert groups shall report to MDB. The MDB Chairman shall ensure that work is co-ordinated and not duplicated between different groups.