



# **MRA Agreed Procedure for Entry Assessment and Re-Qualification**

## **MAP05**

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## I Change History

Version	Status	Dated	Reason for Change
1.0	Authorised	01/10/99	Correction of minor typo in Appendix 3 – as agreed by the MEC on 9/9/99
2.0	Authorised	06/04/00	Exemptions process added.
3.0	Authorised	09/08/00	Supplier Entry Review changes
4.0	Authorised	10/01/02	Extensions into Scotland to be processed under Re-Qualification; minor change to Declaration form in line with MRA Clause 11.
5.0	Authorised	17/03/03	Consolidates a number of earlier drafts and includes new Distributors; revisions for policy change through MDB; GB wide application; update workflow diagrams and responsibility tables to reflect current process.
6.0	Authorised	25/01/06	Revised according to Review Group recommendations.
6.1	Authorised	20/11/09	Issued to industry incorporating MAP CP 0091
6.2	Authorised	23/02/12	Issued to industry incorporating MAP CP 0123
6.3	Authorised	26/06/14	Issued to industry incorporating MAP CP 0187
6.4	Authorised	06/11/14	References Update
6.5	Authorised	29/06/17	Issued to industry incorporating MAP CP 0288
6.6	Authorised	01/11/18	Issued to industry incorporating MAP CP 0296
6.7	Authorised	27/02/2020	Issued to industry incorporating MAP CP 0319

## II Quality Assurance

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Reviewer(s)			
Eugene Asante	MRA Delivery Team	Accuracy	27/02/2020
Andrew Bard	MRA Delivery Team	Accuracy	27/02/2020
Approval			
MDB		Acceptance of CPs	30/01/2020
Authorisation for Use			

### III Related Documents

- MRA Products (<https://www.mrasco.com/mra-products/mra-agreed-procedures/>)
- MRA Entry Assessment Products (<https://www.mrasco.com/becoming-a-party-to-the-mra/>)

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### INTRODUCTION

#### 1.1 Purpose

This MRA Agreed Procedure (MAP05) describes the processes agreed by the MRA Executive Committee (MEC) for Entry Assessment and Re-Qualification as mandated in Clause 11 of the MRA.

The purpose of Entry Assessment is to provide a level of assurance to MRA Parties that new MRA Parties (licensed Suppliers and Distribution Businesses) are able to operate in accordance with the requirements of the MRA and associated products (collectively referred to as the “MRA Service Company (MRASCo) Product Set”) prior to commencing the use or provision of Metering Point Administration Services (MPAS).

The Re-Qualification of existing MPAS providers, to assure their continued operation in accordance with the requirements of the MRASCo Product Set, will apply where a Distribution Business intends to make a Material Change to its MPAS provision.

These processes mitigate the risk that the actions of a Supplier or Distribution Business will lead to a failure of industry processes as a result of its inability to comply with the obligations set out in the MRASCo Product Set. In order for the Entry Assessment and Re-Qualification Processes to be as unobtrusive as possible, prospective Applicants are requested to contact MRASCo at the earliest possible time to discuss their plans so that they can incorporate MRA assurance requirements within their internal testing programmes.

#### 1.2 Scope

This MRA Agreed Procedure covers the MRA Entry Assessment and Re-Qualification processes in respect of the obligations set out in the MRASCo Product Set. This MRA Agreed Procedure is underpinned by further documentation referred to as the “MRA Entry Assessment Product Set”, which details specific requirements for each step of the Entry Assessment and Re-Qualification processes and is available to all MRA Parties on the MRASCo website: <https://www.mrasco.com/becoming-a-party-to-the-mra/>.

Any assessment requirements under the Balancing and Settlement Code (BSC) or other mandated agreements are specifically excluded from the scope of this MRA Agreed Procedure. However, there is an industry requirement for the Entry Assessment and Re-Qualification Processes to be aligned and streamlined with the equivalent processes under the BSC wherever practicable. As a result, co-ordination with the equivalent BSC processes will be made (the equivalent process steps and timings) in order to minimise any additional effort required for Entry Assessment and Re-Qualification under the MRA and BSC entry process. Applicants should therefore also consider MRA assessment requirements in

conjunction with the equivalent requirements and documentation under the governance of the BSC when planning entry into the electricity market.

### 1.3 Main users of this Procedure and their responsibilities

This procedure is of direct relevance to the following Market Participants and individuals:

- Licensed Suppliers and Distribution Businesses who are MRA Parties, or have applied to accede to the MRA, and intend to undertake Entry Assessment (which in the case of Suppliers may be in respect of a particular Market Segment);
- Suppliers who are MRA Parties and intend to undertake Entry Assessment in respect of any additional Market Segment(s);
- Distribution Businesses who are MRA Parties and need to undertake Re-Qualification prior to implementing a Material Change to their MPAS provision;
- MEC and the MRA Entry Process Board (MEPB), which has been established by MEC pursuant to MRA Clause 11.5 to Approve or Disapprove an Applicant undertaking Entry Assessment and Re-Qualification;
- The Authority, in determining any appeal raised by an Applicant pursuant to MRA Clause 11.7; and
- MRASCo, acting as the MRA Secretariat, with responsibility for administering the Entry Assessment and Re-Qualification on behalf of MEC.

Applicants undertaking the Entry Assessment and Re-Qualification Processes are obliged by the MRA to provide reasonable access to relevant personnel, procedures, systems and data to enable MRASCo to undertake the Entry Assessment and Re-Qualification Processes, as relevant.

The Entry Assessment and Re-Qualification shall be carried out in accordance with a formal plan agreed with MRASCo. Where an Applicant wishes to revise this plan, or operates outside this plan, MRASCo shall endeavour to accommodate such revisions, but may need to give priority to any existing commitments with other Applicants.

The Authority provides the only route of appeal for any Applicant that is dissatisfied with any decisions made by MEC or MEPB in relation to Entry Assessment and Re-Qualification. The principles of the appeal process and the valid criteria for lodging an appeal are set out in MRA Clause 11.

### 1.4 Exemptions from undertaking Entry Assessment

MRA Clause 11.3.1 permits an Applicant to apply to MEC to grant it a partial exemption from Entry Assessment. The circumstances in which an Applicant is likely to be granted an exemption include the use of systems and/or processes that have been demonstrated to comply with Entry Assessment requirements.

Applicants shall discuss their desire for exemptions with MRASCo at the earliest opportunity. Any application for exemption should be made within Entry Assessment Questionnaire (EAQ) Part 0 and should be accompanied by supporting information and evidence. The onus is on the Applicant to provide sufficient detailed evidence to support their application for exemption. MRASCo will assess the application and ask for clarifications and may need to inspect the Applicant's pertinent business records in support of its application for exemption. MRASCo will then make a recommendation to MEPB, who will decide whether the exemption should be upheld or rejected.

## 1.5 Structure

The remainder of this document is structured as follows:

- Section 2 provides a high-level description of the MRA assessment requirements in respect of Entry Assessment and Re-Qualification;
- Section 3 describes the Entry Assessment Process from initial application through to unrestricted market operation; and
- Section 4 describes the Re-Qualification Process, which Distribution Businesses are required to complete prior to implementing any Material Change to their MPAS provisions that were Approved by MEPB under Entry Assessment or previous Re-Qualification.

## 1.6 Definitions

Whilst MRA terms are used where applicable, a complete set of terms and acronyms relating to the Entry Assessment and Re-Qualification can be found in the MRASCo Glossary of Terms, which is published as part of the MRA Entry Process Products (see document 10454 Information for Applicants).

## 2 OVERVIEW OF MRA ASSESSMENT REQUIREMENTS

This section provides a high-level description of the Entry Assessment and Re-Qualification processes. Each process is described more fully in Sections 3 and 4 of this document.

### 2.1 Entry Assessment Process

Suppliers and Distribution Businesses must complete the Entry Assessment Process in order to be considered by MEPB to be Approved to participate in the market, i.e. to use or provide MPAS. The Entry Assessment Process is illustrated in Figure 1.

#### Figure 1: Entry Assessment Process

The Entry Assessment Process for Distribution Businesses does not differentiate between categories of Metering Point, however Suppliers are able to complete the Entry Assessment Process and be Approved to participate in specific Market Sectors, as defined in relation to the following categories of Metering Point:

- Half Hourly Metering Points;
- Non- Half Hourly Metering Points at Domestic Premises; and
- Non- Half Hourly Metering Points at non-Domestic Premises.

Where a Supplier has been approved for one of these Market Sectors and subsequently wishes to extend its operations in to a different Market Sector, it must complete the Entry Assessment Process and be approved to participate in that Market Sector.

#### 2.1.1 Pre-requisites and preparation for Entry Assessment

Prior to commencing Entry Assessment, Applicants must satisfy the pre-requisite criteria set out in Section 3.1.

To initiate the Entry Assessment Process, the Applicant will make a formal application to MRASCo and access documentation providing guidance on the Entry Assessment Process and requirements. If required, a potential Applicant may request a preliminary meeting with MRASCo to discuss these requirements prior to its formal application to commence the Entry Assessment.

Access to the Electricity Central Online Enquiry Service (ECOES) will be granted by the Central Administration Service (CAS) once a Supplier or Distribution Business commences Market Scenario Testing. Use of ECOES will be monitored by the CAS during this phase of Entry Assessment. If a Party is not subsequently approved for Controlled Market Entry (CME) by MEPB, access to ECOES will be subject to review by CAS and may be withdrawn.

Any ECOES information that is required by a new entrant for testing purposes prior to commencing Market Scenario Testing will be provided to them by the CAS. Any such information must only be used for the purposes of testing and must remain confidential. For

the avoidance of doubt, data provided for this testing will not be via access to ECOES being granted to the new entrant at this time.

### 2.1.2 Entry Assessment

Entry Assessment is designed to ensure the Applicant has systems and processes that enable it to operate in accordance with the obligations of the MRASCo Product Set. Initially, assessment comprises Self-Assessment by the Applicant, which is verified by MRASCo on a sampling basis. This is an iterative process where MRASCo identifies issues during assessment that require resolution.

On completion of the Self-Assessment steps, MRASCo will advise the Applicant of any issues and observations raised, which impact compliance with the MRASCo Product Set and make recommendations for remedial action. Once remedial action has been taken, MRASCo will advise the Applicant whether they may progress to the next stage of Entry Assessment.

The later phase of Entry Assessment is designed to provide appropriate assurances regarding the Applicant's operational capability to complete a number of pre-defined routine market scenarios.

The number of scenarios required to be carried out will, in part, be determined by MEPB based on an Applicant's exemption request and possible recommendations made by MRASCo in relation to the request.. Applicants that can provide evidence of a comprehensive approach to internal readiness assurance and appropriate risk assessment and mitigation may be granted condensed project timescales by MRASCo..

Progression through the latter steps of Entry Assessment is an iterative process, where MRASCo identifies issues during assessment that require resolution.

### 2.1.3 Evaluation and Approval

Successful completion of all steps in Entry Assessment provides a level of assurance that the Applicant can operate in accordance with the obligations of the MRASCo Product Set and has developed appropriate risk mitigation and exception handling arrangements.

On completion, MRASCo will issue a "Consolidated Outcome Report" to MEPB detailing the resolution of any issues and observations raised in assessment, baseline compliance and making recommendations for CME operating conditions.

MEPB will then decide whether to Approve or Disapprove an Applicant and consider the application of any further conditions in relation to its decision, pursuant to MRA Clause 11.4. Amongst other things, this will include CME requirements and may also include Re-Assessment Thresholds/Milestones.

### 2.1.4 Controlled Market Entry

CME is an initial period of market participation by Suppliers and Distribution Businesses that is subject to CME Conditions authorised by MRASCo. The processes and systems used when approval was given to exit the testing stages are expected to be used

throughout CME. Any changes to these processes and systems must be notified to MRASCo and may be subject to further assessment as determined by MRASCo.

A Supplier or Distribution Business may commence CME only when it has been Approved by MEPB and has agreed to operate in accordance with the CME Conditions. A Supplier may operate only in those Market Sectors for which it has been Approved. For the avoidance of doubt, any Approval given by MRASCo in respect of Distribution Businesses does not differentiate between Market Sectors. (MPAS). A Distribution Business's operation must include the provision of a Meter Point Administration Service (MPAS).

Following Approval and agreement of CME operating conditions, Suppliers and Distribution Businesses must then observe the requirements of CME until notified by MRASCo that specified operating conditions no longer apply, following successful completion of a CME Exit Audit.

## 2.2 Re-Qualification Process

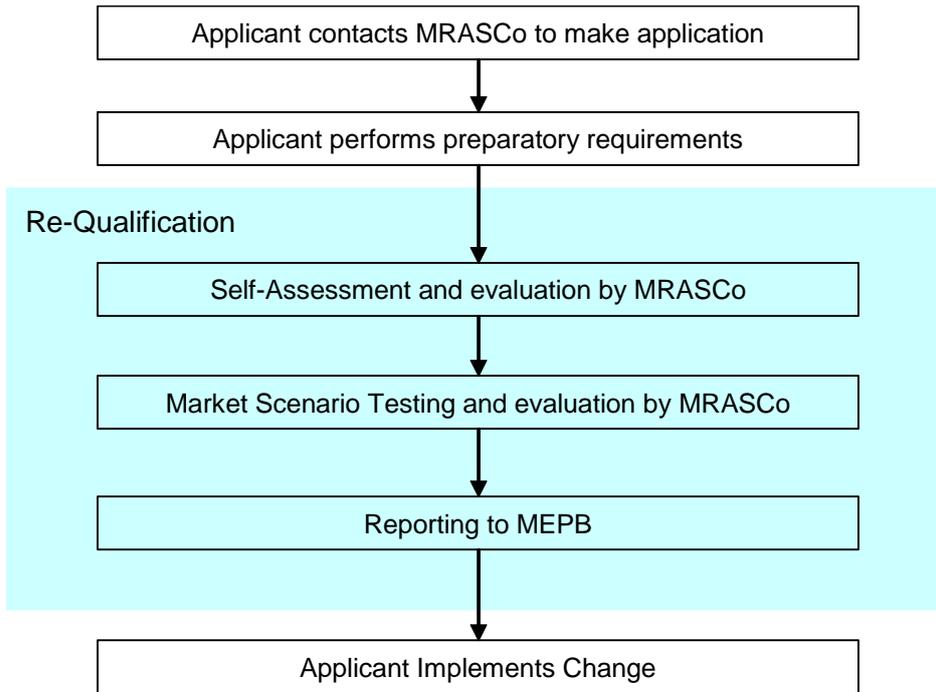
The Re-Qualification Process describes the activities that a Distribution Business must follow where it makes, or intends to make, a Material Change to its systems and processes that support its provision of MPAS.

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

Assessment under the Re-Qualification Process may comprise some or all activities under the Entry Assessment Process, however such assessment will be contingent on the nature of the Material Change and places greater emphasis on self-assessment rather than prescribed assessments or witnessed testing. The nature of the Re-qualification requirements will be the subject of agreement between the organisation involved and MRASCo.

The Re-Qualification Process is illustrated in Figure 2.

Figure 2: Re-Qualification Processes



## 3 ENTRY ASSESSMENT PROCESS

### 3.1 Triggers

The Entry Assessment process is triggered when a Supplier or Distribution Business that has not previously been Approved, submits an Entry Assessment Application form to MRASCo. In the case of Suppliers that have been Approved for certain Market Sectors, this process includes Suppliers Entry Assessment Applications in respect of other Market Sectors. For the avoidance of doubt, this process does not prevent any Applicant who has not been Approved unconditionally from re-applying to be Approved at any time.

### 3.2 Pre-requisites and preparation for Entry Assessment

Prior to commencing the Entry Assessment, Applicants must satisfy the following pre-requisite criteria:

- To have acceded, or applied to accede, to the MRA;
- To be a Party to the Data Transfer Service Agreement (DTSA); and
- To have agreed a formal plan with MRASCo for completing Entry Assessment.

If required, a potential Applicant may request a preliminary meeting with MRASCo to discuss these requirements prior to its formal application to commence the Entry Assessment Process.

In preparation for the Entry Assessment Process, potential Applicants should contact MRASCo to request an Information Pack (“10454 Information for Applicants” document), which describes the requirements of the Entry Assessment Process and an application form to commence the Entry Assessment Process (see “Appendix D”).

Within 10 working days of receiving a completed Entry Assessment Application Form, MRASCo will offer a planning meeting with the Applicant to discuss:

- The contents of the Information Pack;
- The expectations and requirements of the Entry Assessment Process;
- Any application for partial exemption from Entry Assessment Process; and
- The next steps to be undertaken by the Applicant when they are ready to proceed.

All meetings shall normally be held at MRASCo’s offices; however the joint planning meeting with both MRASCo and BSCCo will be held at a mutually agreed venue.

Prior to the Applicant commencing Entry Assessment, MRASCo will seek to agree the Applicant’s plan and schedule to support the Entry Assessment Process. This plan will take account of the Applicant’s operational requirements, assessment requirements and the resources available to support the Entry Assessment Process. Though it may not be

possible to prepare and agree this plan at the briefing, it must be agreed by MRASCo in writing prior to the commencement of the MRA Entry Assessment Process.

### 3.3 Entry Assessment

The Applicant will have the opportunity to present to the MEPB (via correspondence or in attendance at a meeting) at any point during the Entry Assessment Process to discuss any aspects and/or issues with their Application.

#### 3.3.1 Applicant Presentation

The Applicant will commence Entry Assessment with a presentation of the details of its intended systems and processes to MRASCo assessors. This may take the form of a formal presentation or a discussion around key Applicant documents and include details of its proposed market activity, operating model (systems and process) and risk assessment and mitigation plans in respect of its compliance with the MRASCo Product Set. Any areas of concern will be highlighted to the Applicant. This presentation will normally be conducted at MRASCo's offices or via teleconference but, where more appropriate, may be at the Applicant's site.

#### 3.3.2 Self-Assessment

Following the Applicant's presentation, they will be provided with the EAQ which must be completed and submitted to MRASCo at appropriate times during the process.

The information is required by MRASCo to complete an objective assessment of the Applicant's business solution and the internal testing of that solution.

It is expected that the Applicant will normally submit all evidence in electronic format (or other format agreed by the Applicant and MRASCo). Any delays in providing this information will inevitably impact on the time taken to complete the Entry Assessment.

The Self-Assessment pack comprises:

##### a) High level plan for completing the Entry Assessment Process

The Applicant must agree a high-level plan with MRASCo, which sets out the timetable for completing the Entry Assessment Process. This plan must be submitted and agreed by MRASCo on commencement of Entry Assessment.

**b) Entry Assessment Questionnaire**

The EAQ contains general information about the Applicant and demonstrates that adequate preparations have been made to commence the Entry Assessment Process. This document is in sections, where each section is applicable to stages of the Entry Assessment Process, and must be submitted and agreed by MRASCo prior to the commencement of the applicable stage. Thus the first submission will be at the commencement of Entry Assessment, prior to the Risk Assessment stage.

**c) System Architecture**

The Applicant shall provide MRASCo with a System Architecture definition in support of its Entry Assessment. MRASCo will require an initial version of the System Architecture definition at commencement of Entry Assessment. However, MRASCo will require a final version prior to the Applicant's integration testing. Any changes beyond this point must be discussed with MRASCo.

**d) Internal test strategy and plan**

The Applicant's test strategy and plan showing how they intend to conduct internal testing of their systems and processes covering MRASCo Product Set. The test strategy must be submitted on commencing Entry Assessment with the plans submitted prior to the testing taking place.

**e) Change and configuration management procedures**

The Applicant must have robust change and configuration management procedures in use during the qualification stages and inter-operating in the market. An electronic copy of these procedures must be forwarded to MRASCo on commencement of Entry Assessment.

All documents submitted to MRASCo must be subject to the Applicant's own change and configuration management procedures.

**f) Configuration Management Return (CMR)**

The Applicant must complete a Configuration Management Return, which indicates how it will meet its obligations under the MRA and operate in accordance with the MRASCo Product Set. The initial submission must include:

- Business process references for all relevant activities detailed within the MRASCo Model;
- Business process references for MRA obligations;
- Progress on agreements with industry parties;
- Progress on Agent appointments;
- List of business processes with current version numbers;

- List of any proposed managed services; and
- List of systems/ applications that will support the business solution.

This document must be updated throughout all steps of the Entry Assessment Process and an updated version submitted to MRASCo after completion of the Self-Assessment and market scenario testing phases. The initial version will be presented to MRASCo at the commencement of Entry Assessment.

#### **g) Business processes**

It is expected that the Applicant will have a complete set of business processes (that relate to the MRASCo Product Set) available for assessment at the commencement of Entry Assessment. A copy of the business processes that relate to market operation must be provided to MRASCo. During the course of the Entry Assessment Process, when any business processes are updated, the CMR must be updated as applicable and a copy of the updated business processes, together with the CMR, must be forwarded to MRASCo.

#### **h) Work instructions**

It is expected that the Applicant will have detailed work instructions that support the business processes. A complete set of these work instructions must be made available to MRASCo for assessment, prior to commencement of the Applicant's internal integration testing.

#### **i) Internal test evidence**

During internal testing the Applicant must produce and retain evidence for submission to MRASCo. This must be at a level of detail that will enable MRASCo to assess the completeness and effectiveness of the testing. MRASCo can advise on this. When internal testing has been completed, the Applicant must submit the test evidence to MRASCo. It is expected that this information will be supplied electronically.

### **3.3.3 MRASCo verification of Applicant Self-Assessment**

MRASCo will provide verification of the Applicant's self-assessment on a sampling basis and request further details from the Applicant as necessary. Whilst this verification will normally be carried out at MRASCo's offices, MRASCo reserves the right to perform all or part of the assessment at the Applicant's premises where deemed necessary.

The purpose of MRASCo's verification is to gain assurance that the Applicant has developed an appropriate business solution and has undertaken relevant internal integration testing to ascertain its compliance with the MRASCo Product Set.

#### **(i) Business Solution Assessment**

From the initial submission of the Self-Assessment pack MRASCo will assess the Applicants business solution. This assessment is primarily to obtain an assurance that the Applicant's systems and processes cover the requirements of the MRA and the MRASCo Product Set, and that the Applicant has entered into all relevant contracts and agreements.

In areas where MRASCo does not find the necessary compliance, this will be documented and communicated to the Applicant. It is then the responsibility of the Applicant to propose and carry out, with agreement from MRASCo, corrective actions to resolve all issues. If the Applicant has already commenced internal testing at this point, an impact assessment must also be carried out to determine whether areas of the system or business processes that have already been tested are affected. In this case, re-testing may need to be performed.

## **(ii) Integration Testing Assessment**

There are various levels of testing that are typically carried out by Applicants, such as unit testing, interface testing, system testing etc. Integration testing involves running key scenarios that may be encountered in live operation using integrated systems and processes (e.g. ICT applications and infrastructure, documented business processes and work instructions).

Integration testing must be conducted by the Applicant to prove that its systems and procedures meet all appropriate MRA obligations as well as the Applicant's own internal requirements. At the commencement of the Entry Assessment Process, MRASCo will review the Applicant's approach to integration testing, as detailed in its test strategy. Issues raised at this point may have an impact on the Applicant's subsequent testing.

Once the Applicant has completed integration testing, they must submit test evidence from all of the tests including test status and fault reports. Again, it is expected that this information will be supplied electronically. This evidence will be verified on a sample basis by MRASCo to check for completeness and compliance with the requirements of the Entry Assessment. If, during this assessment, MRASCo does not gain the necessary level of assurance that the testing has been completed satisfactorily, this will be communicated to the Applicant. Corrective actions and follow-up will then be required as agreed with MRASCo.

### **3.3.4 Self-Assessment Completion**

Following completion of the Self-Assessment steps, MRASCo will evaluate the Applicant's compliance with Entry Assessment requirements thus far and report its conclusions. It should be noted that all issues raised during the Self-Assessment steps must be cleared in order to proceed.

As part of its evaluation, MRASCo's report will specify the extent of testing required for further progression through Entry Assessment, which may be subject to the agreement of Re-Assessment Milestones/Thresholds based on:

- The market sectors the Applicant is applying to operate in (Suppliers only);
- Applicant's business plan;
- Exemptions granted; and
- Self-Assessment results including any issues raised.

This report will be provided to the Applicant who will be asked to agree the recommendations as appropriate in liaison with MRASCo.

### 3.3.5 Market Scenario Testing

Entry Assessment will then require the Applicant to complete a series of tests (“market scenario tests”, “MST”) as agreed. The purpose of MST is to provide a level of assurance that the Applicant can support certain activities within operational timescales using its business systems, processes and operational staff.

Market scenario testing consists of a combination of tests performed using the Data Transfer Service (DTS) (“external tests”, comprising DTS connectivity tests) and tests performed internally on the Applicant’s systems (“internal tests”, comprising routine market scenarios).

### 3.3.6 MRASCo will offer advice and guidance to the Applicant at the outset of the testing. The Applicant must provide a test schedule to be agreed with MRASCo. Internal MST

Internal market scenario test (IMST) consist of a number of routine scenarios, jointly owned by MRASCo and the BSC, that the Applicant can expect to perform in the live market. The Applicant is responsible for simulating dataflows for all Market Participants other than their own Market role based on pre-defined data agreed with MRASCo.

The tests will be executed in “real time”, with evidence presented to MRASCo at agreed points as per the test plan submitted prior to the commencement of IMST.

### 3.3.7 Internal MST Adjudication

MRASCo will evaluate all MST results in accordance with the test execution principles detailed in document 10454 Information for Applicants and raise issues as appropriate, within 1 working day. Applicants will be required to resolve issues and this may require the Applicant to demonstrate compliance by re-running certain MSTs prior to completion of Entry Assessment.

### 3.3.8 External MST

The DTS Connectivity Tests (DTSCT) are designed to demonstrate that the Applicant has configured its DTS gateway correctly and can correctly transmit, receive and validate all relevant DTC data flows from and to their systems in accordance with MRA data transfer standards.

The DTSCT will also include a number of exception tests whereby invalid data will be sent to the Applicant for identification and resolution using its systems and business processes.

MRASCo will participate in the DTSCT and will evaluate the test results and raise any issues as appropriate within 1 working day of DTSCT completion. Any issues identified will need to be reviewed and addressed by the Applicant before DTSCT can be considered as successfully complete. This may require updates to systems and/ or business processes together with further testing.

### 3.3.9 Entry Assessment Completion

MRASCo will evaluate the Applicant's compliance with Entry Assessment requirements and discuss the status of any issues raised with the Applicant. MRASCo's evaluation of the Applicant's compliance with Entry Assessment requirements will be reported to MEPB within the Consolidated Outcome Report (as described in Section 3.4).

## 3.4 Evaluation and Approval

### 3.4.1 Evaluation

On completion of the Entry Assessment Process, MRASCo will request the Applicant to provide an up-to-date Configuration Management Return and declare any material changes that have been made and not assessed by MRASCo.

Within 2 working days following this, MRASCo will evaluate the Applicant's overall compliance with the requirements and will confirm whether it believes the Applicant has successfully completed the Entry Assessment Process.

If there are unresolved problems or if material changes have been made, it may be necessary to re-visit appropriate parts of the Entry Assessment Process before MRASCo can complete its evaluation. In such circumstances, this work will need to be rescheduled by both the Applicant and MRASCo in accordance with their respective responsibilities set out in Section 1.3 of this document.

MRASCo will then prepare a Consolidated Outcome Report to be presented to MEPB at the next monthly meeting to assist it in considering whether to Approve or Disapprove the Applicant. MRASCo will send the Applicant a copy of this report for information if requested.

The Consolidated Outcome Report includes the following information:

- Summary of the Applicant's performance throughout the Entry Assessment Process
- Details the resolution of any issues raised during Entry Assessment Process; and
- Makes recommendations to MEPB for any CME conditions that would take effect following Approval. However, it is recognised it may not always be possible to make recommendations regarding CME conditions within the Consolidated Outcome Report and that these may need to be agreed between the Applicant and following Approval.

### 3.4.2 MEPB resolution to Approve or Disapprove the Applicant

At its monthly meeting MEPB will evaluate the results and will reach a decision on whether to Approve or Disapprove the Applicant.

Any Approval granted by MEPB may be qualified to the extent that it may impose certain conditions as it sees fit. Such conditions are expected to include CME operating conditions. Where the Applicant is not in a position to determine CME conditions, it is expected that

any Approval granted by MEPB would be qualified to the extent that the Applicant agrees and complies with such conditions prior to commencing any use or provision of MPAS.

However, MEPB may resolve to Disapprove the Applicant if an error, problem, breach of testing principle or issue of non-compliance with the MRASCo Product Set occurred during assessment or testing which presents an unacceptable risk to MRA Parties. If an application is rejected by MEPB, then the Applicant will need to carry out remedial work and this will need to be assessed by MRASCo. In cases where the remedial work is extensive, the Applicant may have to submit a new Application for Entry Assessment if it wishes to become Approved under the MRA. The Consolidated Outcome Report will indicate where within the process the Applicant has failed and hence where additional effort will be required in any future application.

MRASCo will continue to monitor the Applicant's progress against the plan of remedial work and will provide feedback to MEPB as part of the reporting process. MRASCo will make arrangements with the Applicant for it to take the corrective actions specified by the MEPB with the shortest possible delay, but subject to it not causing disruption to other Applicants who are progressing through the Entry Assessment Process.

Within 2 working days of MEPB's resolution, MRASCo shall notify the Applicant, BSCCo and the Authority of the MEPB decision.

The sole and exclusive remedy of an Applicant who is dissatisfied with MEPB's decision is to refer the matter to the Authority in accordance with the provisions of MRA Cause 11.

## 3.5 Controlled Market Entry

### 3.5.1 Overview of CME

Following Approval, Suppliers and Distribution Businesses are permitted to use and provide Metering Point Administration Services subject to MRASCo's decision regarding CME conditions.

CME comprises specified operating conditions relating to Registrations to which the Applicant must adhere, and completion criteria that must be met before these operating conditions may be lifted. During CME Applicants are required to provide regular performance reports to MRASCo that are subject to increased scrutiny and investigation, where required.

The process is designed to provide other Market Participants with a degree of assurance that any initial problems experienced will be contained and also to provide the Applicant with an opportunity to prove their systems and business processes in a controlled environment.

Further details of the CME process and relevant pro-forma can be found in the document entitled "Controlled Market Entry Process", which is included within the MRA Entry Assessment Product Set.

### 3.5.2 Agreeing CME conditions

The CME conditions are proposed by the Applicant and presented to MRASCo, for approval. MRASCo will discuss and agree the applicable CME conditions with the Applicant. These conditions will take into account a number of factors including:

- The Applicant's business plan;
- The Applicant's relevant operational experience;
- The Applicant's use of business systems and processes that are proven elsewhere in the market;
- The Market sector(s) for which the Applicant has been Approved (Suppliers only); and

Applicants have provided mandatory contacts, as detailed in the MAPs, via the MRASCo website industry contacts database, on or before the commencement of CME and also upon the exit of CME if contacts have changed.

Different types of CME conditions apply to Suppliers and Distribution Businesses due to differences in their responsibilities for Registrations under the MRA. MRASCo may authorise a change to the conditions during the CME process to allow the Applicant to prove its capability at higher volumes.

#### (i) CME conditions for Suppliers

The CME operating conditions applicable to Suppliers would typically include:

- A maximum registration rate (i.e. x Registrations per month);
- A cap on the total number of registrations that may be initiated within the CME period; and
- A number of Registrations that must be "proven" prior to a CME Exit Audit

The operating conditions would apply to Registrations within specific Market Sectors and be subject to completion conditions requiring a certain number of Registrations to be "completed" insofar that the Supplier has received the Change of Supplier meter reading from its appointed agents.

MRASCo will discuss the conditions with the New Supplier which may include various other conditions contingent to the Applicant, for example:

- A variation in the rate of registration so that, for example, registration rates may increase over time as the Applicant gains experience;
- A minimum expectation of time to be spent in CME;
- Review points at which the conditions may be reviewed and varied; and
- Other conditions, for example increased monitoring by MRASCo where a higher rate of registration is proposed.

Suppliers should note that where it has been Approved to participate in individual Market Sectors, CME conditions will be set for each Market Sector and the Supplier may both commence and complete CME separately for each Market Sector.

### **(ii) CME conditions for Distributors**

CME operating conditions and completion criteria for Distribution Businesses will be primarily dependent on both the scale of the distribution network and the Distribution Business's performance during the Entry Assessment Process.

Typical CME criteria for Distributors will be proving a minimum number of new metering point connections, operating successfully for a minimum period and migration of any Metering Points previously registered on private networks.

MRASCo may authorise a change to the conditions part way through the CME process to allow the Applicant to prove its capability at higher volumes.

Note that criteria for Half Hourly (HH) and Non Half Hourly (NHH) connections will be set for each Market independently. Further, the Applicant may start and/or complete CME for each Market separately.

### **3.5.3 CME Process**

MRASCo will notify the Applicant of appropriate CME Conditions and the scope of reporting required during CME.

As part of the CME process, the Applicant is required to provide MRASCo with the following information, i.e.

- Advanced notification of its intention to commence CME;
- Regular progress reports on the numbers of registrations or new connections initiated and completed; and
- Details of all problems experienced.

MRASCo shall check all information submitted by the Applicant within 2 working days of receipt and discuss and seek to resolve any associated issues with the Applicant.

### **3.5.4 CME Exit**

When the Participant believes it has met the completion criteria for CME, it should contact MRASCo using a CME Completion Return to self-certify that it has successfully proved its operational capability. This self-certification will require verification by a senior executive from within the Applicant's organisation. At this point, Applicants should also provide mandatory contacts, as detailed in the MAPs, via the MRASCo website industry contacts database if contacts have changed since CME commencement.

MRASCo will review the Applicant's CME Completion Return within 3 working days of receipt and agree a date with the Applicant to undertake an audit of its business records to

verify compliance with CME conditions and seek evidence that the Applicant can operate in accordance with the requirements of the MRASCo Product Set.

MRASCo will advise the Applicant of its recommendation to MEPB within 2 working days of the CME audit completion and whether it considers the Applicant to be capable of operating in accordance with the MRASCo Product Set. MRASCo will submit a report to MEPB at the next monthly meeting outlining the findings of the audit and providing its recommendation as to whether the Applicant should exit CME. MEPB will then determine whether the Applicant may exit CME or whether the CME Conditions should be extended. Within 1 working day of the meeting, MRASCo will issue a CME Outcome Letter confirming the MEPB decision to the Applicant, which shall be copied to MEPB and the Authority.

The sole and exclusive remedy of an Applicant who is dissatisfied with MEPB's decision is to refer the matter to the Authority in accordance with the provisions of MRA Clause 11.

## 4 RE-QUALIFICATION

Each Supplier and Distribution Business that has been Approved under the MRA is responsible for ensuring that it maintains its ability to comply with its MRA obligations and operate in accordance with the requirements of the MRASCo Product Set.

It is recognised that organisations may develop and enhance their systems and processes over time to support changing operational requirements. Suppliers may make changes at any time without recourse to MEC, however, a Distribution Business is required to undertake the Re-Qualification Process where it makes or intends to make a Material Change to those systems, processes or staff that support its provision of Meter Point Administration Services. MRASCo are available to advise whether a change should be considered Material.

The Re-Qualification Process is organised along the lines of the Entry Process. That is:

- A Distribution Business, which has been previously Approved by MEPB to operate in the Market without restriction, determines that it intends to implement a Material Change and submits a Re-Qualification Application Form (see APPENDIX C)
- There is an initial analysis after which MRASCo will make recommendations to the Applicant on the content and extent of subsequent assurance activities. The assurance requirements should be proportional to the degree of risk to the market posed by the change;
- The initial assessment reviews the Applicant's internal design and testing of the change and makes recommendations on the extent of additional testing required, if any;
- The Applicant carries out the additional testing and the results are assessed by MRASCo;
- The Applicant formally declares its intent to make the change operational and that any risk of disruption to the market that may have resulted from the change has been eliminated or mitigated;
- MRASCo evaluates the extent to which risks to the Market have been mitigated and reports to the MEPB;

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

Re-qualification should have concluded, and the MRASCo evaluation report received by the Applicant prior to the change becoming operational.

The process should not impose additional substantial resource requirements on the Applicant's project. Approaches to achieve this include:

- Any meetings should be planned into the project and should correspond with appropriate project-defined review points;
- Appropriate project documents should be used as evidence in preference to creating special evidence so that there should be no need to carry out additional activities and prepare additional documentation solely for the purpose of achieving the necessary assurance requirements. MRASCo will provide guidance to the Party on what evidence should be maintained;
- For large programmes of work it may be appropriate to sub-divide the work into two or more Re-Qualifications as agreed between MRASCo and the Party.

It should be noted that:

- The Applicant must keep MRASCo informed of progress and provide reasonable access to relevant personnel, procedures, systems and data to enable MRASCo to undertake the necessary assessments;
- Where changes are introduced during CME, these shall be treated for Re-Qualification purposes in the same way as if Controlled Market Entry did not apply;
- Changes to a Party's systems or processes that would require changes to the MRA, the MRASCo Product Set or the Validation Procedures (as defined in the MRA), are outside the scope of the Re-Qualification Process and changes to these industry documents are subject to the MRA Change Control process;
- Changes resulting from industry-wide requirements will require Re-Qualification only where so decided by MEC;
- A Party should initiate Re-Qualification only if the proposed changes can be contained entirely within its internal systems and processes (which, for the purposes of this procedure, might include its interface with its Agents).

Re-qualification should have concluded, and the MRASCo evaluation report received by the Applicant prior to the change becoming operational. Unlike the Entry Assessment Process, an Applicant does not require Approval for the implementation of a change to its systems, processes or staff. However, MEPB may instruct that the Applicant undertakes remedial work before, or in some cases after, implementation to resolve outstanding concerns or to clarify areas where information appears to be inconclusive. MEPB will direct whether it requires MRASCo to verify any remedial work.

## **5 PUBLICATION OF INFORMATION**

MRASCo will publish and maintain on the MRASCo Website a list of each Supplier and Distribution Business that has been Approved under the MRA. The list will identify those parties who have completed CME and those which are progressing through CME. Information published will be limited to the registered company name, and registration number (as recorded with Companies House), MPID and category of party (i.e. Supplier or Distributor).

## **APPENDIX A. MRA Entry Assessment Information Pack**

The Information Pack contains the following:

1. MAP05: MRA Procedure for Market Entry and Re-Qualification (this document)
2. 10454: MRA Entry Assessment – Information for Applicants
3. 10468: Entry Assessment Questionnaire and Guidance on its Completion and of the Configuration Management Return
4. 10475: Configuration Management Return
5. 10635: MRA Entry Assessment & BSC Qualification Processes – Storyboards
6. MRA Entry Assessment Application form (Appendix B)
7. Application for Exemption form (Appendix C)
8. CME Notification of Commencement form (Appendix D)
9. Sample Confidentiality Undertaking (Appendix E)

Items 1-5 of the above are conveniently available from the MRASCo website at <https://www.mrasco.com/becoming-a-party-to-the-mra/> in:

- “MRA Products/MRA Agreed Procedures” (MAP05)
- “download library/entry process papers” (remaining documents)

The above can be provided in other formats on request.

Items 6-9 appear as appendixes to this document as indicated.

There are a number of other documents available via the website. These will be required at various stages of Entry Assessment but the Information Pack contains those that require the earliest attention.

## APPENDIX B. MRA Entry Assessment Application

**MRA**

Company name:	
Name:	
Title/Position:	
Address:	
Tel:	
Email:	
Fax:	
Date:	

I confirm that it is our intention to undertake the MRA Market Entry Assessment for operating in Great Britain in the following Licensed Role (*tick box(es)*):

	Distribution Business		Supplier (please also indicate types of supply using the boxes below)
			Half Hourly
			Non Half Hourly, Non-Domestic
			Non Half Hourly, Domestic

Please provide as much of the following as you are able:

Have you applied to OFGEM for an appropriate electricity licence?	
Are you a Party to the MRA?	
Target date for registration of first metering point.	
How critical is this date to your business?	
Are you prepared to accept conditions on your approval to operate in the market in order to enter the market more quickly?	
Date expected to be ready to start MRA Entry Assessment.	

Please e-mail this application to: [assurance@gemserv.com](mailto:assurance@gemserv.com), fax to: 0207 090 1001 or post to: The MRA Secretariat, c/o Gemserv Ltd, 8 Fenchurch Place, London EC3M 4AJ.

## APPENDIX C. Application for partial exemption from the Market Entry Assessment

# MRA

Company name:	
Name:	
Title/Position:	
Address:	
Tel:	
Email:	
Fax:	
Date:	

I confirm that it is our intention to operate in Great Britain in the following Licensed Role (*tick box(es)*):

	Distribution Business		Supplier (please also indicate types of supply using the boxes below)
			Half Hourly
			Non Half Hourly, Non-Domestic
			Non Half Hourly, Domestic

Please e-mail this application to: [assurance@gemserv.com](mailto:assurance@gemserv.com) or [helpdesk@gemserv.com](mailto:helpdesk@gemserv.com), fax to: 0207 090 1001 or post to: The MRA Secretariat, c/o Gemserv Ltd, 8 Fenchurch Street, London EC3M 4AJ.

#	Item to be Assessed	Your Response	Evidence available to support your response
1.	Are you a party to the MRA, or have you applied for accession the MRA?		
2.	What is the nature of the exemption(s) to the MRA Market Entry Process for which you are applying?		
3.	What is your justification for exemption from these aspects of the Market Entry Process?		
4.	What changes have been made to the systems and processes since compliance with MRA Market Entry Process requirements was last demonstrated?		
5.	Are you prepared to allow the MRA Secretariat to verify your claims by inspection of your pertinent management records?		

**APPLICANT ORGANISATION :**

**DECLARATION BY COMPANY EXECUTIVE**

**We confirm that :**

- **we wish to apply for the exemption(s) to the MRA Market Entry Process described above;**
- **the systems and processes that we will use in the Market have already been demonstrated or are subject to demonstration to fully meet those Market Entry Process requirements to which these exemptions relate;**
- **the granting of this exemption(s) presents no risk to operation of the Market;**
- **this application is true and accurate and materially correct in all respects**

**Approved by :**

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<b>Print Name</b>	<b>Signature</b>	<b>Position</b>	<b>Date</b>

## APPENDIX D. CME Notification of Commencement

To: The MRA Secretariat  
c/o Gemserv  
8 Fenchurch Place  
LONDON  
EC3M 4AJ

Date: .....

I confirm that we will commence Controlled Market Entry on.....(date) and that we agree to abide by the CME operating conditions agreed with the MRA Secretariat.

**From: Company name** .....

**Contact name/address** .....

**Tel:** .....

**Fax:** .....

**Email:** .....

**Authorised by (signature)** .....

**PRINT NAME** .....

**TITLE/POSITION** .....

Please e-mail this application to: [assurance@gemserv.com](mailto:assurance@gemserv.com), fax to: 0207 090 1001 or post to: The MRA Secretariat, c/o Gemserv Ltd, 8 Fenchurch Place, London EC3M 4AJ.

**APPENDIX E. Sample Confidentiality Undertaking****MRA****ENTRY PROCESS BOARD / SECRETARIAT****Confidentiality Undertaking Pursuant To Clause 37. of the Master Registration Agreement  
Dated 1 June 1998 ("MRA")**

To: the parties to the MRA

I, ....., hereby undertake to the parties to the MRA that I shall preserve the confidentiality of, and shall not directly or indirectly reveal, report, publish, disclose or transfer to any other person, including but not limited to my employer in accordance with Clause 37.10 & 37.11 of the MRA, or use for any purpose other than in relation to my obligations as a member of the *MRA Entry Process Board / Secretariat* \* pursuant to the MRA, any Confidential Information received by me to which I have access only by virtue of my position as a member of the *MRA Entry Process Board / Secretariat* \* except to the extent expressly permitted by Clause 37.2 of the MRA in relation to parties to the MRA.

I further undertake that I shall:

- (A) treat and safeguard as private and confidential all Confidential Information;
- (B) ensure proper and secure storage of all Confidential Information;
- (C) following my retirement or dismissal as a member of the *MRA Entry Process Board / Secretariat* \*, return to the *MRA Entry Process Board / Secretariat* \* any Confidential Information which I received as a member of the *MRA Entry Process Board / Secretariat* \*, together with any copies thereof.

I agree that I will continue to comply with this undertaking and that the terms of this undertaking will continue to apply to me following my retirement or dismissal as a member of the *MRA Entry Process Board / Secretariat* \*.

For the purposes of this undertaking, the term "**Confidential Information**" shall have the meaning given to that term in the MRA and shall include all information relating to the proceedings of Market Entry & Re-Qualification pursuant to Clause 11.

This undertaking is not intended to constitute a legally binding contract.

Signed:

.....

\* delete as appropriate