

Consultation Response

iGT072: Non-effective Days for Cutover to Single Service Provision

Responses invited by: 08 May 2015

Respondent Details

Name: Kirsty Dudley

Organisation: E.ON UK

Support Implementation

Qualified Support

Neutral

Do Not Support

Please briefly summarise the key reason(s) for your support / opposition

To assist with iGT039 we support the need for non-effective days to aid transition into Single Service Provision.

For supplies which have no amendments before/during the non-effective period there are reduced risks, this is because the information will have been migrated into the Xoserve parallel database. The increased risks relate to supplies which are 'inflight' during the non-effective days; these include processes such as Change of Supply/new connection/asset amendments.

Where a change of supply has been initiated prior/during the non-effective days these are being classified as 'inflight'; a supporting document has been produced by Xoserve to help understand how the activities will conclude, however, this is a high-level approach and doesn't give scenarios or recognise the intricate processes required for shippers to link the inflight changes between the old and new processes.

The modification has concentrated on the Change of Supplier process and does not extend to cover the New Connection process which is also impacted by transition. The current proposed legal text stops the sending of supply point confirmations for Change of Supply but allows the sending of bulk confirmations using the Project Summary Report (PSR) to continue. To ensure that Xoserve have an accurate Supply Point Register for go live it would be better to also recommend ceasing of issuing PSRs during the non-effective days so it is aligned with the other principles outlined in this modification proposal.

If the implementation date remains as 01/10/15 the change gives Shippers less than the recommended 6 months to develop and deploy strategies to limit disruption which could be caused to customers; although we recognise it is essential this change is implemented in conjunction with Project Nexus Implementation date as it acts as the transition mechanism. It is also recognised that Ofgem will provide support with this transition if required.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

Yes

Please state any new or additional issues that you believe should be considered

The inclusion of New Connection Supplies into the modification as it currently focusses around Change of Supplier and Asset Amendments.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

As outlined in the workgroup report this change would better facilitate objective c, this is because it will act as the transition mechanism to migrate iGT supplies into Single Service Provision which will meet the licence obligations.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

Impacts and costs are linked to iGT039, UNC440, UNC432 and UNC434.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

The change delivery needs to coincide with the Project Nexus Implementation Date.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

In majority yes, there are a couple of points which would require further work – these include:

1.7.2 C&D Information and 1.7.3 C&D Notification: Although we recognise what these points are trying to achieve it is not necessarily clear that the legal text is only intending to hold back file updates for the non-effective days but installation work will still continue as per the C&D regulations.

1.8 issuing a bulk confirmation: This modification has focussed around the Change of Supply process and through the working group it was discussed that Project Summary Reports (PSRs) would still continue via the Bulk Confirmation during the non-effective days, as the legal text doesn't allow a Supply Point confirmation in 1.7.17 it would also be a sensible suggested approach not to issue bulk confirmations either throughout the non-effective period. The PSR process is completed early in the development process and often during the planning stage; therefore the impacts of holding back the PSR issuing for the non-effective days should be negligible.

Further Comments

Is there anything further you wish to be taken into account?

Although the issuing of the portfolio cuts at the initiation of the non-effective days and also on Project Nexus Go-Live date there does not appear to be sufficient checks to ensure that supplies are migrated. There is potentially the requirement for portfolio reconciliation activity post implementation to ensure all supply information is migrated and also migrated with accurate information.

The purpose of the non-effective days is to create a period where the supply point register is static to enable a reconciled transition between the iGTs and Xoserve; for New Connection supplies which could be registered during the non-effective period how would the following be completed if a Project Summary Report (PSR) is issued:

- How will the information be updated with Xoserve?
- How will the CSEP ID be allocated?
- What if a Shipper wishes to reject the PSR?
- What about inflight PSRs where supply contracts haven't been agreed with the Supplier & Developer, there may be unregistered MPRNs in a pending state to be resolved and the migration plan doesn't address this process.

Responses should be submitted by email to iGTUNC@gemserv.com