

# **DSC Change Proposal Document**

Customers to fill out all of the information in the sections coloured Xoserve to fill out all of the information in the sections coloured

### **A1: General Details**

Change Reference:	5206			
Change Title:	TPI/PCW Acce	ess		
Date Raised:	08/07/2020			
	Organisation :	Organisation ENGIE		
Sponsor Representative	Name:	David	Madden	
Details:				
	Name: Simon Harris			
Xoserve	Email:	Email: simon.harris@xoserve.com		
Representative Details:	Telephone:	: 01212292642		
	Business Owner:			
Change Status:	Proposal		U With DSG	Out for Review
Change Status:	Uvoting		Approved	Rejected

### **A2: Impacted Parties**

	Shipper	Distribution Network Operator
Customer Class(es):	NG Transmission	□ IGT
		Other [Suppliers, End users.]
Justification for Customer Class(es) selection	Positive results with no direct impact as explained below.	

### A3: Proposer Requirements / Final (redlined) Change

Problem Statement:	It's imperative that we improve the efficiency and accuracy of any supplier switch for the end customer, the supplier and ourselves. We currently contract over 3500 MPRN's per year, which has a contractual consumption of over 2.6 TWh's.		
	The central problem is the avoidable excess costs and delays for customers, suppliers and TPIs due to lack of visibility of the switching process		

Lack of transparency of the central data means that issues or objections with a transfer are often not noticed until too late which can result in transfer delays, customers paying penalties and /or out of contract rates or not getting the contract they signed up to. Suppliers lose out if they have purchased the energy and have to sell it back to the market or if there is a delay to their contract starting. To try and compensate for lack of transparency, NGP has to continually communicate with multiple suppliers and the end customers to try to find out if there are any problems and it's often difficult to ascertain what is going on in a timely manner. This is a drawn out inefficient process that causes long delays in identifying objections and causes an admin burden on all parties as well as a poor customer experience.

In many cases we rely on the end customers to provide us with information regarding meter transfers, a burden we would be able to reduce with direct access. This would be especially helpful to our many multi-site customers and provide a much better customer service and experience.

There are often cases where NGP are not notified of objections by suppliers until too late in the switching process which results further unnecessary urgent admin between NGP and the suppliers as NGP race to discover the issue and resolve it. This lack of visibility to objections increases the risk of a customer being on expensive out of contract rates. Access to XOSERVE would enable NGP to proactively check for objections independently without involving the suppliers or customers and would ensure a more accurate and more efficient process for all.

We have multiple examples of erroneous transfers which have gone undetected until after the transfer has happened. This again results in urgent admin needed between the suppliers and NGP and also causes further severe dissatisfaction from customers and excess cost.

The current transfer process is opaque and causes customer dissatisfaction and complaints with the switching process being perceived as difficult. This is something we want to address. Suppliers are focusing on improving live rates and onboarding customers more efficiently but the time it takes for a new supplier to identify an objection, communicate this with us and then us to raise the query with the end customer is extensive. This process further delays the transfer for all parties and causes problems across the marketplace.

Access to XOSERVE will allow us to proactively monitor and manage our portfolio and reduce the above issues substantially. As an example, since gaining access to ECOES, we have seen an improvement in our on time electricity go live rates of over 40% since implementing our process of cross referencing ECOES directly instead of relying of third parties to provide us with information. This access has allowed us to substantially improve the electricity industry switching process. With access to XOSERVE we can do the same for the gas market and we'll be able to support suppliers with onboarding acquisition meters and end users to experience a much more efficient and cost effective transfer process.



	Cannot provide automated online cost comparison service without		
	access to AQ's.		
	Our unique market leading cost comparison switching site Business		
	Energy Quotes provides electricity derived from Electralinks thus avo	• •	
	consumption data themselves. Cu		
	provide the same process for gas	6	
	without XOSERVE access.		
	Accuracy of gas consumption esti		
	Without XOSERVE we rely on gas		
	which is time consuming for the customer and NGP and may introduce inaccuracies due to human error.		
Change Description:			
Proposed Release:	ASAP		
Proposed	⊠ 10 Working Days	15 Working Days	
Consultation Period:	20 Working Days	Other [Specify here]	

### A4: Benefits and Justification

Benefit Description:	<ol> <li>In a similar manner to the improvements we've made given access to ECOES, the ability to actively manage our gas portfolio via the transparency of using XOSERVE will greatly reduce the incidences of:         <ol> <li>Switching delays,</li> <li>Avoidable out of contract costs and / or penalties incurred by our customers,</li> <li>Excess costs to suppliers if gas has to be sold back to the market or if a contract start date is delayed (iv) Improved go live rates for suppliers</li> <li>Streamlined and efficient communication of the switching process saving time for customers, suppliers and NGP as NGP reduce the need for labour intensive information gathering from customers and suppliers.</li> <li>Suppliers will see improved go live rates</li> <li>Much improved customer satisfaction with regard to the switching process. Increased switching speed and accuracy and reduced level of complaints</li> <li>Confirm MPRN AQ's enabling us to provide our automated online commercial price comparison service (Business Energy Quotes) to gas or dual fuel customers and making switching easier and quicker and comparable to the enhanced service enjoyed by our electricity customers</li> </ol> </li> <li>Improvement in gas consumption accuracy for NGP and suppliers when securing acquisition contracts by having access to historic consumption data. Experience of access to ECOES:</li> </ol>

	The go live rate for our electricity supplies has been greatly improved by having ECOES access and has reduced customer issues immeasurably resulting in cost and efficiency savings for end users and suppliers. We have particularly seen a dramatic increase of power meters on boarding on time since our ECOES access has been approved and implemented as part of our process. Customer complaints are also much reduced We have been categorised as a low risk user by ECOES/GEMSERV after being subjected to their extensive compliance checks to ensure the safety of the data available via the platform. I trust this independent assessment goes some way to reassure you that we request this data understanding the magnitude of its sensitivity and our capability to meet any level of scrutiny you see fit. We work to IS)27001 data security standard. All data is handled with explicit customer consent amongst other checks and protocols, including but not limited to: Screenshot ability is disabled for all ECOES approved users (except developers and directors). Screen monitoring is set up in order to review how data is viewed by individuals. Printing ability is disabled unless redirected via manager for ECOES approved users (except developers and directors). ECOES users must ensure an in date letter of authority provided by the customer has been signed prior to data search. Scanning is only available to authorised individuals. Ban on personal devices. Ban on any paper removal from the office. All e-mail's, incoming and outgoing, are duplicated and archived for integrity and compliance purposes and tamper prevention as well as dip checks for appropriate use only. <i>What, if any, are the tangible benefits of introducing this change? What, if any, are</i> <i>the intangible benefits of introducing this change?</i>
Benefit Realisation:	Immediately. When are the benefits of the change likely to be realised?
Benefit Dependencies:	Not Applicable Please detail any dependencies that would be outside the scope of the change, this could be reliance on another delivery, reliance on some other event that the projects has not got direct control of.



### A5: Final Delivery Sub-Group (DSG) Recommendations – Removed

(see Section C for DSG recommendations)

### A6: Service Lines and Funding

Service Line(s) Impacted - New or existing	Service Area 24 - Additional Service Request or Third Party Request		
Level of Impact	Major/ Minor/ Unclear/ None		
If None please give justification			
Impacts on UK Link Manual/ Data Permissions Matrix			
Level of Impact	Major/ Minor/ Unclear/ None		
If None please give justification			
	Customer Classes/ Funding	Delivery of Change	On-going Budget Amendment
	🖂 Shipper	100 %	XX %
Funding Classes	National Grid Transmission	XX %	XX %
	Distribution Network Operator	XX %	XX %
	🗌 IGT	XX %	XX %
	Other <please specify=""></please>	XX %	XX %
ROM or funding details:			
Funding Comments:			

#### A7: ChMC Recommendation – Initial Review

Change Status:	Approve	🗌 Reject		Defer
DSC Consultation Issue:	🗌 Yes		🛛 No	

#### A7: ChMC Recommendation – Solution Review

Change Status:	Approve	🗌 Reject		Defer
Industry	☑ 10 Working Days		15 Working Days	
Consultation:	20 Working Days		🗌 Other [	Specify Here]
DSC Consultation Issue:	☐ Yes		🗌 No	
Date Issued:	16/11/2020			
Comms Ref(s):	2718.4 - RT - PO			



### A8: DSC Voting Outcome – Solution Review

	⊠ Shipper	Approve
Solution Voting:	National Grid Transmission	Please select.
	Distribution Network Operator	Please select.
	🗌 IGT	Please select.
Meeting Date:	09/12/2020.	
Release Date:	Release: Adhoc TBC	

Please send the completed forms to: box.xoserve.portfoliooffice@xoserve.com

# Section D: High Level Solution Options

### **D1: Solution Options**

Solution Option Summary:	XRN5206 "TPI & PCW Access" Change Proposal can be accessed here. It is thought that the details contained within this Change Pack covers part of the original request. Options surrounding the additional requirements will be looked at separately, potentially in a Part B of XRN5206, but this is yet to be formally agreed. <b>Background</b> In 2016, the Competitions and Markets Authority instructed that data should be provided to Price Comparison Websites (PCW) / Third Party Intermediaries (TPI) to help facilitate faster and more reliable switching for end consumers. As a result, Modifications 0593V and IGT095VV "Provision of access to Domestic Consumer data for Price Comparison Websites and Third Party Intermediaries" were raised to the UNC and IGT UNC, respectively. The CDSP developed (via Joint MIS Development Group (JMDG)) a twin fuel ISupply Point Switching! API as a commercial service to
	Intermediaries" were raised to the UNC and IGT UNC, respectively.
	Following on from this a number of PCW/TPIs have requested access to non-domestic data as some do not work solely within the

domestic area, and many TPIs are focused exclusively on nondomestic consumers. Allowing these parties access to nondomestic would benefit non-domestic consumers as envisaged by the CMA order.

This is expected to also reduce the fees incurred by suppliers and customers as a result of failed/delayed transfers by allowing for accurate online gas quotations for commercial customers using actual industry data, improving market competition and decreasing time customers spend searching for pricing.

#### **Governance Procedures**

To facilitate this change, a number of Disclosure Request Reports (DRR) have been taken to DSC Contract Managers Committee (CoMC) to amend the Data Permissions Matrix and Conditionality Document, details are specified below:

**DRROCT20-01**: This DRR seeks to remove the limitation currently imposed on PCW/TPIs have access to Domestic Data only. This was approved for implementation in line with UNC Modification <u>0697VS</u> (18<sup>th</sup> November 2020) at the CoMC meeting in <u>October-2020</u>.

**DRROCT20-02**: This DRR seeks to provide PCW/TPIs access to additional data items to assist in operational processes, most notably end consumer quoting and information verification with a view to improve the end consumer switching process. This DRR was presented at the CoMC meeting in <u>October-2020</u> but was deferred for additional re-work. This has been completed and is due to be presented back, seeking approval, at the CoMC meeting in <u>November-2020</u>. Again, to be implemented in line with UNC Modification <u>0697VS</u> (18<sup>th</sup> November 2020).

**DRRDEC20-01**: This DRR seeks to provide Suppliers with access to additional data items in line with the data items seeking approval via **DRROCT20-02**. This is because Suppliers also utilise the Supply Point Switching API and are trying to keep API usage consistent within the industry and across effected user groups. This is planned to be taken to CoMC in <u>December-2020</u>.

#### Change/Solution Overview

As there is an existing API that is utilised by PCW & TPIs, with appropriate commercial arrangements in place, the only solution option being put forward is to amend the existing Supply Point Switching API in accordance with the approved DRRs.

#### **Option 1: Amend existing Supply Point Switching API**

This solution option is looking to remove the restriction of non-domestic data from the existing Supply Point Switching

	API along with adding additional data items to be presented to PCW/TPIs (and additionally to Suppliers).
	General considerations:
	As there are outstanding permission approvals, at the time of writing, if <b>DRROCT20-02</b> is rejected outright at CoMC then the minimal scope of the solution option outlined in this Change Pack is to amend the Supply Point Switching API to allow non-domestic data to be passed to PCW/TPIs. If all or part of <b>DRROCT20-02</b> is approved for implementation, then the changes made to the Supply Point Switching API will include the addition of data items that fall in line with the approved DRR.
	It is also noted that Suppliers currently access the Supply Point Switching API and would also be included in receiving the additional data items via this service. <b>DRRDEC20-01</b> will be presented at CoMC in December-2020, following known data items approved via <b>DRROCT20-02</b> .
	High Level Solution Option
	For reference please see attached link for <u>HLSO for XRN5206</u>
Implementation Date for this Solution Option:	AdHoc - Proposed that delivery of this change would be AdHoc delivery and not be placed into a specific release cycle (e.g. Major/Minor), at a date to be specified following CoMC in December-2020 (subject to DRR approvals).
Xoserve preferred option: (including rationale)	Option 1 – Amending the existing API would provide the most pragmatic approach to delivering the objectives set out in the DRRs.
DSG preferred solution option: (including rationale)	N/A
Consultation closeout:	30/11/2020



# Section E: Industry Response Solution Options Review

### E1: Organisation's preferred solution option

		-			
	Organisation:	Northern Gas Networks			
User Contact	Name:	Name: Helen Chandler			
Details:	Email:	mail: hchandler@northerngas.co.uk			
	Telephone:	01133975471			
Organisation's preferred solution option, including rationale taking into account costs, risks, resource etc.	We support Option 1 to utilise the Supply Point Switching API but would ask that the definitions of a TPI/PCW are transparent and agreed with networks as it is our obligation being discharged.				
Implementation Date:	Approve				
Xoserve preferred solution option:	Approve				
DSG preferred solution option:	Approve				
Publication of consultation response:	N/A				



### E2: Xoserve' s Response

	Thank you for your representation in relation to XRN5206.			
Xoserve Response	Regarding the definitions of PCW/TPI's these are being proposed			
to Organisations	to be included within the Data Permissions Conditionality			
Comments:	Document, with a DRR being processed at December-2020's			
	CoMC for DSC approval.			

### E1: Organisation's preferred solution option

	Organisation:	Oorlagh Chapman		
User Contact Details:	Name:	Oorlagh Chapman		
	Email:	Oorlagh.chapman@centrica.com		
	Telephone:	07557614769		
Organisation's preferred solution option, including rationale taking into account costs, risks, resource etc.	Yes we support (and in all proba Switching Progr As part of Faste additional chang Reg Effective D The current sup check whether a is needed for bo As part of the X available on the Confirmation Eff Supply Point En view " removed. Although a requ considered as p part of the upco XOSERVE in th This field is requ calculating the S a customer is in We would like to • To remo Confirmation Eff and • Add the This would me the XOSERVE A	this change as this change is required by Centrica abilities other Suppliers and Shippers) for the Faster amme. If Switching Programme XOSERVE is making ges to include the REL address and current supplier ate to the Supply Point Switching API. plier Reg Effective Date is needed by suppliers to a customer is in the 'Standstill Period' or not and this oth Dom and Non-Dom sites. OSERVE change to make certain data elements DES API's we were expecting that the fective Date(Portfolio View) which is a part of the equiry API would have the restriction for "Portfolio west was raised for this by Centrica it was not eart of the recent XRN 4801 change (nor are they a ming changes for the DES API's discussed by e recent Extraordinary DSEG meeting).		
	Details-			
	https://www.xoserve.com/services/gas-api-services/			



	Supply Point Enquiry
	(https://umbraco.xoserve.com/media/41375/xoserve-query-apis- technical-specification-v102-tracked.pdf)
Implementation Date:	Approve
Xoserve preferred solution option:	Approve
DSG preferred solution option:	Approve
Publication of consultation	N/A
response:	

# E2: Xoserve' s Response

Xoserve Response to Organisations Comments:	Thank you for your representation in relation to XRN5206. Unfortunately the additional requirements you have put forward are not currently within scope of this change and they also cannot be included due to the REL not being a data item currently held within UK Link and the Confirmation Effective Date being within the Supply Point Enquiry API (not the impacted Supply Point Switching API). We would however be happy to continue to work with you in progressing with and developing these requirements further.
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# E1: Organisation's preferred solution option

	Organisation:	SSE Energy Supply Ltd			
User Contact	Name:	Megan Coventry			
Details:	Email:	megan.coventry@sse.com			
	Telephone:	02392277738			
Organisation's preferred solution option, including rationale taking into account costs, risks, resource etc.	We agree in principle with removing the restriction on TPIs/PCWs from accessing non-domestic data in the Supply Point Switching API. However, allowing this may increase a potential risk that TPIs/PCWs will rely on this data rather than seeking data from the customer which could be more accurate. For example, instead of asking the customer to provide their current consumption in order to quote, the TPI/PCW may just take the AQ from the Supply Point Switching API. The AQ may not accurately reflect the customer's ongoing requirements (especially due to Covid-19), which could lead to inaccurate initial quotation.				
Implementation Date:	Approve				
Xoserve preferred solution option:					
DSG preferred solution option:	Approve				



Publication of	Γ
consultation	
response:	

# E2: Xoserve' s Response

	Thank you for your representation in relation to XRN5206. In regards to your concerns, we have, throughout the development of this change, discussed how the data will be used with regards to
Xoserve Response	PCW & TPIs and details of this provided to the CDSP. The data
to Organisations	will in the main be used to validate both End Consumer and
Comments:	Supplier provided data to ensure as accurate quotations (based on
	the actual needs of the end consumer) can be provided. This is
	also to assist in raising any concerns early with both parties to
	avoid potential issues with switching and post switching support.



# Section F: Approved Solution Option

### **F1: Approved Solution Option**

XRN Reference:	XRN5206 - TPI_PCW Access
Solution Details:	Option 1: Amend existing Supply Point Switching API This solution option is looks to remove the restriction of providing non domestic data via the existing Supply Point Switching A PI along with adding additional data items to be presented to PCW/TPIs (and additionally to Suppliers). Please see DRROCT20 01, DRROCT20 02 & DRRDEC20 01 (to be submitted but will not exceed the data items proposed in DRROCT20 02) for a breakdown of proposed data items to be included.
Implementation Date:	ТВС
Approved By:	ChMC
Date of Approval:	09/12/2020

# **Version Control**

#### **Document**

Version	Status	Date	Author(s)	Remarks
1.0	With DSG	19/08/2020	Jai Le Resche	Updated with ChMC outcome from the meeting on 12th August
2.0	For Approval	07/12/2020	Rachel Taggart	Updated with the Solution review Change Pack
3.0	Approved	11/12/2020	Rachel Taggart	Updated with outcome from ChMC on 9 <sup>th</sup> December



# Appendix 1

#### **Change Prioritisation Variables**

Xoserve uses the following variables set for each and every change within the Xoserve Change Register, to derive the indicative benefit prioritisation score, which will be used in conjunction with the perceived delivery effort to aid conversations at the DSC ChMC and DSC Delivery Sub Groups to prioritise changes into all future minor and major releases.

Change Driver Type	CMA Order MOD / Ofgem					
Change Driver Type	9					
	EU Legislation     License Condition					
	□ BEIS					
	□ SPAA Change Proposal □ Additional or 3 <sup>rd</sup> Party Service Reques					
	Other (please provide details below)					
Please select the customer	Shipper Impact					
group(s) who would be impacted	□Xoserve Impact □National Grid Transmission Impact					
if the change is not delivered						
Associated Change reference	XRN5138					
Number(s)						
Associated MOD Number(s)	N/A					
Perceived delivery effort	$\boxtimes$ 0 – 30 $\square$ 30 – 60					
	□ 60 – 100 □ 100+ days					
Does the project involve the	□ Yes (If yes please answer the next question)					
processing of personal data?	⊠ No					
'Any information relating to an identifiable						
person who can be directly or indirectly identified in particular by reference to an						
identifier' – includes MPRNS.						
A Data Protection Impact	□ New technology □ Vulnerable customer data □ Theft of Gas					
Assessment (DPIA) will be	□ Mass data □ Xoserve employee data					
required if the delivery of the	□ Fundamental changes to Xoserve business					
change involves the processing of	□ Other (please provide details below)					
personal data in any of the						
following scenarios:	(If any of the above boxes have been selected then please contact The Data Protection					
	Officer (Kevin-Eltoft-Prest) to complete the DPIA. Kevin-Eltoft-Prest. Information can be					
	found: https://xoserve.sharepoint.com/dept/tech/infosec/Documents/Forms/AllItems.aspx					
Change Beneficiary	☑ Multiple Market Participants □ Multiple Market Group					
How many market participant or segments stand to benefit from the introduction of the	□ All industry UK Gas Market participants □ Xoserve Only					
change?	One Market Group     One Market Participant					
Primary Impacted DSC Service	Service Area 24: Additional Service Request or Third Party					
Area	Request					
Number of Service Areas	□ All □ Five to Twenty □ Two to Five					
Impacted	⊠ One					
Change Improvement Scale?	$\Box$ High $\Box$ Medium $\boxtimes$ Low					



How much work would be reduced for the customer if the change is implemented?						
Are any of the following at risk if the change is not delivered?						
□ Safety of Supply at risk ⊠Customer(s) incurring financial loss □ Customer Switching at ris						
Are any of the following required if the change is delivered?						
Customer System Changes Require				Customer Training Required		
	own Impact to Sy	stems / Pr	ocesses			
Primary Application impacted	⊠BW	🛛 ISU		;		
		🗆 EFT	$\Box$ IX			
	🗆 Gemini	□ Birst	□ Othe	r		
Business Process Impact	□AQ	×	SPA			
·	□Reads		Portal			
	□ Other			3		
Are there any known impacts to	Yes TPI/PCW c	onsumption of	API's from the C	DSP		
external services and/or systems						
as a result of delivery of this change?	🗆 No					
Please select customer group(s)			_			
who would be impacted if the	Shipper impact					
change is not delivered.	□ Xoserve impact □ National Grid Transmission Impact					
	Workaround currently in operation?					
Is there a Workaround in	□ Yes					
operation?	⊠ No					
If yes who is accountable for the workaround?	□ Xoserve					
workaround :	<ul> <li>External Customer</li> <li>Both Xoserve and External Customer</li> </ul>					
What is the Frequency of the		and Externa	al Customer			
workaround?						
What is the lifespan for the						
workaround?						
What is the number of resource effort hours required to service						
workaround?						
What is the Complexity of the	Low (easy, repe	titive, quick ta	sk, very little risk	of human error)		
workaround?	□ Medium (moderate difficult, requires some form of offline calculation, possible risk of					
	human error in deterr	-				
	□ High (complicate task, time consuming, requires specialist resources, high risk of human error in determining outcome)					
Change Prioritisation Score	nemen on or in dotoin	ung Satoonn	~/			

### **Document Control**

#### **Version History**

Versio	on	Status	Date	Author(s)	Summary of Changes
1		Draft	27/04/18	Anesu Chivenga	
1.1		approved	27/12/19	Pooja Patel	Updates have been made to the DPIA information

