

Form A – IGG Design Discussion Request

Discussion Request Number	Title	Priority
DR 157	Addition of Vulnerable Customer data deletion flag on 102	<i>Medium</i>

Name of Requesting Organisation	RMDS
Contact Name	Jessica Gregory
Date Request sent to RMDS	24 June 2008

Date	Version	Reason for Change
24 th June 2008	0.1	First draft
29 th July 2008	0.2	Changed flag from appearing on 105 message to 102 message
7 th August 2008	1.0	<i>Distributed to the market for approval</i>

Detail of Discussion Request
<p><u>Background</u></p> <p>CER produced a directive in December 2005 which required electricity and gas providers to safeguard the provision of supply where a customer was deemed vulnerable (vulnerable customer being defined by CER as those reliant on electrical life support equipment, the elderly and the visually/hearing/mobility impaired). The directive was translated into various Network and Market system changes and additions during 2007. There are still a few changes which will come into effect during the next schema change.</p> <p>There are currently 10 coded vulnerable customer attributes:</p> <ul style="list-style-type: none"> 0001 Visually Impaired 0002 Speech Impaired 0003 Hearing Impaired 0004 Elderly 0005 Language Difficulty 0006 Learning Difficulty 0007 Mobility Impaired 0003 Life Support 0004 Non-Life Support 0005 Medical Institution <p>All of these flags besides Life Support and Non-Life Support are displayed on the Extranet. The data protection commission explicitly forbade the display of these two attributes.</p> <p>ESBN relies on the supplier providing vulnerable customer data. The implications to processes are as follows:</p> <ol style="list-style-type: none"> 1. <u>Change of Supplier (CoS)</u>: Networks does not pass the vulnerable codes on to a new supplier during a CoS. The onus is on the supplier to gather this data from their new customer. The supplier can be alerted to vulnerability (if an existing customer changing supplier at a site) by looking at the extranet which displays 8 of the 10 codes. 2. <u>The Change of Legal Entity (COLE)</u>: The COLE process deletes all existing attributes associated with the MPRN and customer. The assumption here is that a new customer is moving in to a site and thus would not maintain the same vulnerable flags as the previous customer. We will not

Detail of Discussion Request

maintain the attributes on the previous customer for future use. Again, the onus is on the supplier to always provide these attributes when doing a change of legal entity.

3. Change of Customer Details (COCD): The COCD process is the mechanism for a supplier to add or remove a vulnerable attributes during the lifecycle of the customer.

Proposed Change

The DR arose out of the concern that the vulnerable customer data for life support and non life support is not transferred to the new supplier during a change of supplier process. That is, Networks is not allowed due to data protection legislation, to pass this data between suppliers during the CoS process.

The concern is that this critical data may not be gathered by the new supplier which would result in the data being lost from the Networks system. This data acts as a marker in the system which alerts users to the customers condition as well as being used within system processes to prevent certain events occurring (for example de-energisation).

The proposal is to alert the new supplier during the CoS process to the fact that this data (life support or non life support) did exist on the customer record in Networks system. The alert will be in the format of a flag on the 102 message which indicates that some vulnerable data has been removed from the record.

It is suggested that the flag be named something like "VC attribute deleted". The data values would be Y or N.

The logic would work as follows:

The flag on the 102 MM would be marked as Y when:

- an 010 was received and COLE is marked as N **AND**
- there was a life or non life support marked on the existing BP **AND**
- there was no life or non life support sent by supplier and consequently not added to the BP after full CoS process.

Since the change involves a new code and field being added to a message it will necessitate a schema change to the 102 MM.

It must be noted that if the life/non life is to be added after the 102 is received, it should be added once the 105 has been received.

It will also necessitate a change to the CoS workflow. The change would involve including a check step which performs the above logic and populates the outbound 102 message with the new code.

This code and field will not be included in the Change of legal entity process or in the change of customer details process.

Members of the Data protection commission (DPC) have reviewed the proposed solution in terms of legislation and have agreed that this requirement does not breach any DP legislation.

Reason for Discussion Request

To provide more detail to suppliers in order to support and enhance their business processes.

Market Design Documents impacted by Request

Retail Market Participant Extranet Website.doc

Date of IGG where discussed

Detail of Discussion Request	
Change Request xref (if applicable)	

PART 2 MARKET ASSURANCE:				
Applicability				
ESB Networks	Suppliers	TSO	SSA	Generators
Scope of Test				
Connectivity	DTT	MSA	IPT	Other
			No. Of Scenarios	

Scope of Discussion Request							
Correction to Documentation	Business Process	Market & MP Systems	MPCC	Readings Processor	Market Gateway	Schema	Web Forms
X		X					