

## Market Change Request

Number		Title	Priority
<b>MCR</b>	<b>0169</b>	Addition of Vulnerable Customer data deletion flag on 102	<i>Medium</i>

Date	Version	Reason For Change
08.10.2008	1.0	Market Change Request raised containing no changes from the associated Discussion Request.

CHANGE REQUEST:		
<b>Name of Requesting Organisation</b>	RMDS	
<b>Contact name</b>	Jessica Gregory	
<b>Date Change Request Raised</b>	08 <sup>th</sup> October 2008	<b>Originating Discussion Request</b>
		<b>DR</b> 0157

Detail of Discussion Request
<p><b><u>Background</u></b></p> <p>CER produced a <a href="#">directive</a> 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"> <li>0001 Visually Impaired</li> <li>0002 Speech Impaired</li> <li>0003 Hearing Impaired</li> <li>0004 Elderly</li> <li>0005 Language Difficulty</li> <li>0006 Learning Difficulty</li> <li>0007 Mobility Impaired</li> <li>0003 Life Support</li> <li>0004 Non-Life Support</li> <li>0005 Medical Institution</li> </ul> <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. The display of these items was also under debate during the writing of this DR. The outcome of discussions with the Data Protection Commission resulted in Part 2 of the DR being written (see below)</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"> <li>1. <b><u>Change of Supplier (CoS):</u></b> 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.</li> <li>2. <b><u>The Change of Legal Entity (COLE):</u></b> 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 maintain the attributes on the previous customer for future use. Again, the onus is on the</li> </ol>

## **Detail of Discussion Request**

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 – Part 1**

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.

### **Proposed Change – Part 2**

Discussions have been held with the Data Protection Commission (DPC) to decide on whether the life and non life flags can be displayed on the extranet. The reasoning behind this, is to provide more transparency to suppliers of the critical data which should result in fewer cases of accidental loss of life/non life support data during CoS.

The outcome of the discussions was that the DPC agreed to the life/non life data being displayed on the extranet on condition that all relevant customers were notified of this intention.

Part 2 of this DR covers the customer notification exercise as well as the technical implementation of the two data items on the extranet.

ESB Networks would be involved the notification exercise. The detail of this process will be developed and implemented by Networks.

Once customer notification has taken place, the existing mechanism for displaying vulnerable customer

<b>Detail of Discussion Request</b>	
attributes on the extranet will be amended to include the life and non life flags. This should involve a relatively small change.	
<b>Reason for Discussion Request</b>	
To provide more detail to suppliers in order to support and enhance their business processes. To ensure customers who may be using life or non life support are marked as such during the CoS process.	
<b>Market Design Documents impacted by Request</b>	
Retail Market Participant Extranet Website.doc	
<b>Date of IGG where discussed</b>	18 <sup>th</sup> September 2008
<b>Change Request xref (if applicable)</b>	N/A

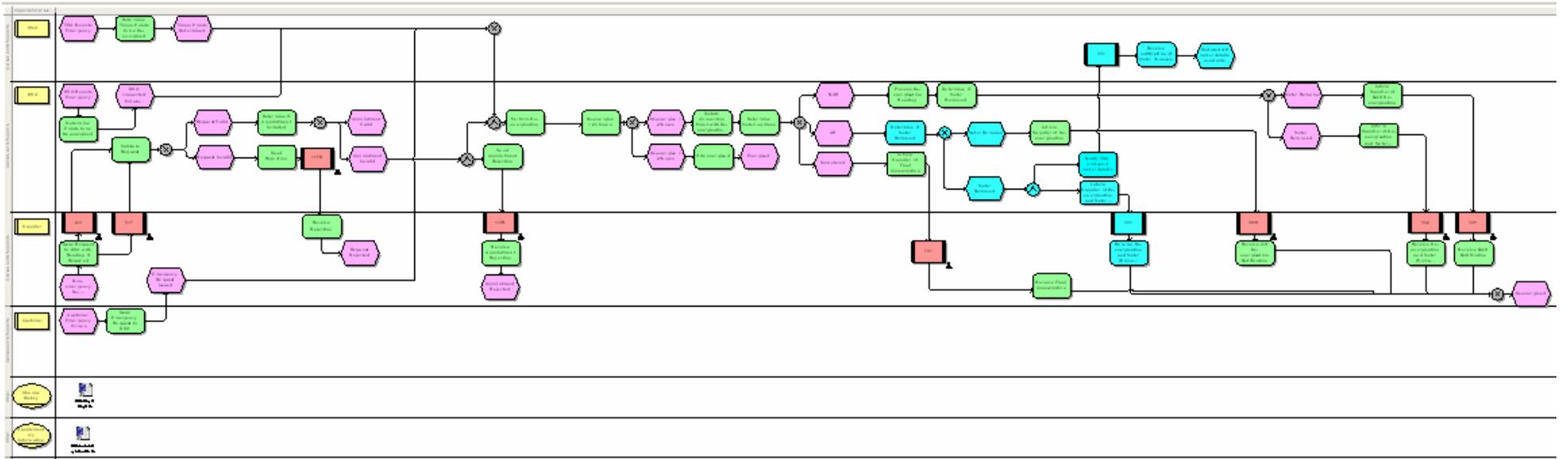
<b>PART 2 MARKET ASSURANCE:</b>				
<b>Applicability</b>				
ESB Networks	Suppliers	TSO	SSA	Generators
<b>Scope of Test</b>				
Connectivity	DTT	MSA	IPT	Other
			No. Of Scenarios	

<b>PART 3 RESPONSES AND MODIFICATIONS:</b>
<b>Collation of Impact Assessment</b> <i>(from Form C)</i>
<i>Not Applicable</i>
<b>Modifications Included</b>
<i>Not Applicable</i>
<b>Reason for Modifications</b>
<i>Not Applicable</i>

<b>PART 4 ASSESSMENT &amp; RECOMMENDATION:</b>
<b>Part 4(a) ASSESSMENT</b>
<b>Summary of Impact Assessment</b>
<b>Recommendation on Implementation Plan</b>

<b>Part 4(b) RECOMMENDATION</b>			
<b>ACCEPTANCE</b>	<b>REJECTION</b>	<b>NO RECOMMENDATION</b>	<b>COMMENT</b>
<b>Reason for Recommendation</b>			
<b>Date of Recommendation</b>			

# APPENDIX 1



APPENDIX 2

