

Discussion Request 1178			Change Of Customer Details		
Status	Approved	Priority	High	Status Date	04/05/2016

Date	Version	Reason for Change	Version Status
27/04/2016	1.0	Issued to Market	Final

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST

Requesting Organisation(s)	Airtricity	Originating Jurisdiction	NI
Request Originator Name	Siobhan Melvin		
Date Raised	21/04/2016		

Classification of Request

Jurisdictional Applicability	NI	Jurisdictional Implementation	NI Specific
If jurisdictional implementation is for one jurisdiction only – is the other jurisdiction required to effect any changes?	No	Co-Ordinated Baseline Version No.	TBC
Change Type	Non-Schema Impacting		

Detail of Request

Reason for Request

Suppliers have had a concern since 2010 that NIE Networks continue to hold previous occupiers' names on market systems even though that occupier has ended their supply agreement with the registered Supplier.

The concerns include the following:

1. As Suppliers are the data processors, they are currently not meeting the necessary requirements under Data Protection legislation
2. Under section 29 "Compliance with Laws and Data Protections" of the MRC Suppliers have an obligation to "ensure all personal data disclosed by it to NIE Networks are accurate and shall ensure that NIE Networks is, at all times, kept up to date regarding any required corrections or deletions if any Personal Data previously disclosed is found to be inaccurate or no longer relevant." 29.5.3. Furthermore, under Section 29.7 of the MRC the Supplier "shall indemnify and keep indemnified NIE Networks against all losses, liabilities, claims, costs (including legal costs and disbursements) and expenses incurred by NIE Networks arising from or in connection with any failure by such Supplier to obtain appropriate Customer consents or to provide fair processing information" - Thus, Suppliers are completely exposed and liable by being unable to inform NIE Networks about any occupiers who they are aware have left a property.
3. In the event of an SOLR NIE Networks will provide to the SOLR a list of customers from the exiting supplier. The SOLR will then upload this customer list to their systems and begin billing the customers. Due to the current process and the exiting supplier being unable to accurately update NIE Networks, the list of customers will contain data belonging to customers with no connection to this site.
4. Suppliers believe NIE Networks are covered by both statute (for non consumption cases) and the Deemed Contract Scheme (for when consumption takes place) in the cases where the site is energised but there is no connection agreement or supply agreement.

Proposed Solution

Suppliers had considered using the MPNI 25 "Change of Legal Entity" process via a MM 016 however we are cognisant of the length of time it will take to implement any changes to market messages and third party systems (eg Liberty).

Therefore, the Suppliers are suggesting using the MPNI 24 "Change of Customer Details" process via a MM 013 to notify NIE Networks when an old occupier moves out and the new occupier is unknown.

Desired Outcome of Proposed Solution

1. The site is left energised by NIE Networks
2. NIE Networks remove the old occupiers name from market systems and not hold that occupier accountable for the electricity supply to the site from the date of the MM013, for example in the case of a connection agreement.
3. The MPNI 24 will need to be updated to reflect that this MM013 can also relate to an unknown customer/occupier.

Scope of Change

Jurisdiction	Design Documentation	Business Process	DSO Backend System Change	MP Backend System Change	Tibco	Supplier EIMMA	Schema	Webforms	Extranet/NI Market Website
ROI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NI	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Co-Ordinated Baseline Market Design Documents Impacted by Request

Market Messages

Message No.	Message Name	CoBL	ROI	NI
No Impact	No Impact	No Impact	No Impact	No Impact

Data Definitions

No Impact

Data Codes

No Impact

Market Message Implementation Guides

ROI	Yes/No	NI	Yes/No
	N/A	Data Processing	Yes

Comments

This DR was reviewed in conjunction with the Long Term Vacant MCR but that MCR does not resolve the short term solution where the occupier is unknown.

ROI - Market Process Diagrams – MPDs

Market Process Diagram Number	Market Process Diagram Description	Affected
None	None	None

NI - Market Procedures		
Market Process Number	Market Procedure	Affected
MP NI 24	MP NI 24 - Change to Customer Details	Y

ROI Guidance Documentation		
Document	Version	Affected
No impact		No Impact

ROI Briefing Documents		
Document/Paper	Version	Affected
No impact		No Impact

User and Technical Documents			
Reference	Name	Version	Affected
No impact			No Impact

Part 2 - Performance and Data Changes	
Market Messages volume, processing etc.	
Data	
Details of Data changes e.g. cleansing	

Part 3 - ReMCoSG / CER Approval		
Approved by	ReMCoSG	CER
Comments		