

| Market Change Request 1111 | | | Automated Debt Flagging Solution | | |
|----------------------------|----------|-----------------|----------------------------------|--------------------|------------|
| Status | Approved | Priority | High | Status Date | 09/03/2016 |

| Date | Version | Reason for Change | Version Status |
|------------|---------|---|----------------|
| 25/09/2012 | V1 | Issued to Market | Final |
| 09/10/2012 | V2 | Conversion of DR to MCR | Final |
| 28/11/2012 | V3 | MMs impacted and Webforms Code Value Description updated for issue to Market in advance of HWG on 5/12/2012 | Final |
| 02/03/2016 | V4 | Further information on the population of Rejection Reason Codes | Final |

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST

| | | | |
|-----------------------------------|----------------|---------------------------------|-----|
| Requesting Organisation(s) | ESB Networks | Originating Jurisdiction | RoI |
| Request Originator Name | Gerry Halligan | | |
| Date Raised | 16/12/2011 | | |

Classification of Request

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

Detail of Request

Reason for Request

Background

In June 2011 the Commission published a proposed Decision, CER/11/106 - Customer Bad Debt in Electricity & Gas Markets, on the issue of Customer Bad Debt. CER approved the implementation of a debt flagging facility into the Change of Supplier processes for both domestic and small/medium businesses in the electricity and gas markets.

The CER has further ruled on the key dates for implementation, as follows:

- Interim Debt Flagging solution for implementation by 1st Oct 2011
- Automated Debt Flagging solution for implementation by 1st Jan 2013 (Please note, this date cannot be achieved as there is no Jan 2013 Market Release).

As stated in the Decision paper, due to the significant amount of system change required to automate a new process and due to the existing commitment regarding the delivery of the Retail Market Harmonisation Project precluding development in 2011, an interim Working Practice is required to meet the October 1st deadline. RMDS, in conjunction with MRSO, has now initiated Working Practice 20 to serve as the interim solution to the approved debt flagging proposal within the Change of Supplier process.

The interim solution is in place but it is labour intensive. While every effort is being made to reduce risk (i.e. use of Managed File Transfer) there is a big manual effort involved and is therefore open to risk of error which could result in a Data Protection breach if the incorrect files were placed in the incorrect Suppliers Folders.

This DR details proposals for an automated solution following initial debate at the IGG of three potential solution designs. The solution presented in this DR contains details around Option C to implement the automation of Debt Flagging via the Objection/Cancellation process and using existing Market Messages which was presented at the meeting of the IGG on 8th August 2012.

Proposed Solution

This Discussion Request proposes the following:

- to implement the automation of Debt Flagging via the Objection/Cancellation process and using existing Messages
 - no new messages are proposed
 - reuse of existing codes, albeit the meaning of some will change in the Harmonised design
- to suspend the automatic raising in the COS of Service Orders (Re-energisation of DE/NPA /Remove Token Meter) until it is clear that the debt flagging process has run its course for this MPRN
- to introduce two automated timelines to monitor the sending of a Debt Flag by the losing supplier and the sending of a corresponding cancellation of the COS by the new supplier
 - proposals are presented on how long should the timelines stay open
 - each option is timed so that the Debt Flagging process finishes within the current 5 day COS window
- There is no proposal to withdraw/subsequent rejection/confirmation of withdrawal of a Debt Flag
 - There is no cancellation of a COS that has already completed for reasons of Debt Flagging
 - Old Supplier must Debt Flag where specific conditions and thresholds, as specified by CER, are met
 - New Supplier can if they choose Cancel the COS, but is not obliged to do so : in RoI there is no automatic cancellation of a COS when an MPRN is Debt Flagged by the Old Supplier

Do not raise Service Orders (Re-energisation of DE/NPA /Remove Token Meter)
 Introduce automated timelines

Note: DUoS Groups applicable to Debt Flagging are: DG1, DG2, DG3, DG4, DG5, DG5A, DG5B, DG6, DG6A, DG6B

- For all COS, MRSO via the Central Market System will perform automated checks and where there is no COLE either implied or explicit , or a DUoS Group that is valid for Debt Flagging , then there will be a further check carried out such that:

- if the MPRN has been Deenergised for NPA or has a Token Meter that is to be removed then no Service Order will at this point be raised for Reenergisation / Removal of Token Meter resp.

- The Old Supplier will get a notification message 110 from MRSO that they are losing an MPRN in a COS process.

- The First Wait Period of 48hr is kicked off. [FWP]

- This is to allow the Old Supplier to carry out their own checks and where a Debt Flag is necessary then the MPRN is sent by the Old Supplier to MRSO via the 012MM Notification of Objection with 'DCN' Objection Reason Code Note DCN will apply to Commercial as well as Domestic sites for RoI Debt Flagging [See #7.1]

- MRSO will perform automated checks via the Central Market System [See #7] on the 012MM and where passed will send the Debt Flagged MPRN to the New Supplier via the 112MM Notification of Objection, DCN Objection Reason Code.

Should these checks detect a problem then the 012MM will be rejected and the 112R Notification of Objection - Rejection will be sent to the Old Supplier with the appropriate reject reason code [See #7]

- Should the 012MM not be received by MRSO from the Old Supplier while FWP is open then it will be rejected via 112R Notification of Objection - Rejection with reject reason code 'TIM' [See #7]

- Where the Old Supplier has not sent in a valid DCN code on the 012MM before the expiry of FWP then the ReEnergisation or Token Meter Removal Service Order is now raised, where needed.

- the 112W would normally be sent from MRSO to the New Supplier when the existing Objection expiry window has been reached but this will not apply for Debt Flagging and no 112W will be triggered at the expiry of FWP

- the Cos process will continue as normal
- Otherwise at the expiry of FWP and where the Old Supplier has sent in a valid Debt Flag on 012MM the ReEnergisation or Token Meter Removal Service Order will not be raised.
- The **Second Wait Period** of 48hr is kicked off [SWP] . This is to allow the New Supplier time to send in an 011MM Cancellation Registration Request before Service Orders are raised.

See #6 for greater detail on the meaning and interpretation of the DE cancellation reason code in RoI.

• If the New Supplier sends in an 011MM Cancellation Registration Request with the cancellation reason code 'DE' Objection for Debt there will be new validations to check if MRSO has received the 011MM either before the start of the SWP or after the SWP expiry. If the New Supplier sends in an 011MM Cancellation Registration Request with the cancellation reason code 'DE' Objection for Debt there will be new validations to check if MRSO has received the 011MM before the SWP expiry.

- If the New Supplier sends in an 011MM Cancellation Registration Request with the cancellation reason code 'DE' Objection for Debt there will be new validations to check if MRSO has received the 011MM before the SWP expiry.

If not then the Cancellation Registration Request will be rejected on a 111R Notification of Objection - Rejection and with the existing TIM rejection reason code [See #7]

- Where the New Supplier does not send in a valid Cancellation 011MM by the expiry of the SWP then the ReEnergisation or Token Meter Removal Service Orders will be raised, where needed.
- and the Cos process will continue as normal.

Sundry items

#1 The 110 is proposed to be amended to indicate where there is a COLE either explicit or inferred.

#2 Where the Old Supplier submits a late 012MM Notification of Objection with 'DCN' Objection Reason Code then the proposal is to reject back to the old supplier via 112R with reject reason code 'TIM'
- 012MM must arrive into MRSO before expiry of 48hr First Wait Period

#3 QH sites, where eligible for Debt Flagging, will need to be accommodated in the final approved design and changes to accept an objection for reasons of debt flagging at an interval site are proposed

#4 Unmetered will be included in Debt Flagging and

- As Unmetered is a manual process the assumption is that the Debt flagging process for Grouped Unmetered will be manual and via the current SFTS
- Single Point Unmetered will to be part of the automated solution

#5 Suppliers' sign-up process should include a warning where a prospective customer is de-energised due to NPA or has a token meter to be removed that the physical work of Re-Energisation or Removal of Token Meter may be prevented from starting until the Debt Flagging process has run its course.

#6 Proposals for cancellation of COS due to Debt Flagging

General

- In RoI there is no automatic cancellation of a COS for Debt Flagging when an objection for Debt Flagging has been raised by the Old Supplier.

It is up to the New Supplier whether or not they will submit a cancellation 011MM.

- 'DE' Objection for Debt is proposed to become a valid Cancellation Reason Code value for the RoI 011MM Cancel Registration Request .

- This will be available for use in RoI for Domestic and Commercial MPRNs.
- 'DE' Objection for Debt is proposed to be made available as a valid code for entry on the RoI Webforms for the 011MM Cancel Registration Request

• The harmonisation MMGs for ROI 011MM Cancel Registration Request states that Cancellation Reason ME denotes that the Supplier Cancellation of Registration is due to Customer above the Debt threshold with Old Supplier. It is proposed that Cancellation Reason DE Objection for Debt will replace the current interim use of ME, and that ME will revert to being the code that represents the cancellation reason for a Meter Registration error

Where a Supplier submits an 011MM and the cancellation is for Debt Flagging there will be new validations to check if MRSO has received the 011MM before an expiry window

The expiry window is proposed as follows:

- There will be new validations to check if MRSO has received the 011MM from the new supplier either before the start of the SWP or after the SWP expiry. There will be new validations to check if MRSO has received the 011MM from the new supplier before the SWP expiry.
- where late, TIM is proposed to be sent on a 111R Change of Supplier Cancellation Rejection to the New Supplier where the 011MM with Cancellation reason DE Objection for Debt is received from the new Supplier after the expiry of the SWP
- The 011MM Cancellation Registration Request with cancellation reason code DE Objection for Debt will not be accepted if sent in before the start of the SWP , with a rejection sent back to the new supplier 111R Notification of Objection - Rejection with the existing reject reason code IRC – The Cancellation Reason Code is invalid. In this event existing reject reason code TIM will also be populated on the MM111R to indicate that the 011MM has arrived too early.

Notes on Objection Messages 012, 012W, 112, 112R , 112W

#7

7.1 The Harmonised code value description for objection reason code 'DCN' Debt contact notification (residential only) is proposed to be amended to 'DCN' Debt contact notification , as DCN will apply to Commercial as well as Domestic sites for Rol Debt Flagging .

- 'DCN' Debt contact notification is proposed to become a valid objection reason code value for the 012MM Notification of Objection for Rol.

- 'DCN' Debt contact notification is proposed to be made available as a valid code for entry on the Rol Webforms for the **012MM** Notification of Objection . The current Code Value Description (CVD) on both the HBL and on NI Webforms for DCN is 'Debt Contact Notification (residential only)'. This relates to NI processes which is for Residential only. This CVD will be amended on the HBL and on NI Webforms to read 'Debt Contact Notification' as agreed between ROI and NI.

7.2 Existing reject reason codes will continue to be used as normal for non-debt flagging reasons on the 112R and, multiple reject reason codes may appear on the one MM112R.

7.3 Changes to existing reject reason code usage for Rol **112R** Notification of Objection Rejection are proposed as follows:

IRC – The Objection Reason Code is invalid (not for Erroneous Transfer) will be changed to allow for an **012MM** to be submitted with a 'DCN' Debt contact notification objection reason code

QHM – An objection is not valid for an Interval Meter Point will be changed to allow for an 012MM to be submitted for an Interval Meter Point with a 'DCN' Debt contact notification objection reason code .

Note QHM will remain as a valid objection reject code eg should ' ET' be submitted for QH site

TIM – The objection has been received more than 60 days after effective date of Change of Supplier will be changed to allow for a check against the new automated timelines where an 012MM is submitted with a 'DCN' objection reason code, such that 'TIM' will be sent on a **112R** to the Old Supplier where the **012MM** is received from the Old Supplier after the expiry of the FWP . In other words,

- the present timeline that suspends the Change of Supplier process for a period of 10 working days as a result of an 'ET' Erroneous Transfer code will not apply in Debt Flagging Cases as identified by an 012MM with a DCN objection reason code

In June 2011 the Commission published a proposed Decision, CER/11/106 – Customer Bad Debt in Electricity & Gas Markets, on the issue of Customer Ba

- an 012MM with a DCN objection reason code that is received by the CMS any time after the expiry of the FWP will be 'late', and is proposed to be rejected on a 112R with a reject reason code 'TIM'

7.4 Existing Rejection Reason Codes will become valid in Rol for use on the 112R Notification of Objection Rejection

following validation of an 012MM Notification of Objection with 'DCN' Debt contact notification

7.4.1 **COL** where there is a COLE with the COS [COL rejection reason 'Change of Legal Entity in progress']

7.4.2 **IID** Rejection Reason 'Invalid/Incomplete data' will apply where the DUoS Group is invalid

7.5 Existing rejection reason codes that are valid for RoI on the **112R** and which will be valid as a result of a 'DCN' Debt contact notification objection reason code being sent on an **012MM** are :

AMM – The Meter Point Address on the message does not match that held by DSO for the MPRN

IMP – The MPRN does not exist or is for a Grouped Un-metered site (either at GMPRN or TMPRN level) or is not valid for this jurisdiction

SNR – The Supplier submitting the objection is not registered to this MPRN and is not the Old Supplier for this MPRN

IA – The **012** received was a duplicate request. MRSO Already have a valid, open objection for this MPRN

Note on IA: this means that the receipt in MRSO of an **012MM** which has either the same or a different objection reason code than a concurrent open **012 MM** is not valid and will be rejected.

In other words an **012MM** with an objection reason code of ET cannot be in train at the same time as an **012MM** with an objection reason code of DCN .

Neither can there be a duplicate **012MM** with the same objection reason codes.

7.6 The Old Supplier cannot submit an **012W** withdrawal of an **012MM** which was raised with a 'DCN' Objection Reason Code . It is not clear why this would be needed from a business perspective and no additional new functionality or messages are proposed to handle the complexities of a withdrawal of a DCN , eg no message or functionality currently exists to automatically reject where an 012W withdrawal message is invalid

Notes on Cancellation Messages - 011 , 011A , 111 ,111R ,111L, 111A

7.7 Message 011 Cancel Registration Request is currently sent by an existing or prospective new Supplier to MRSO in order to request cancellation of a registration to a Meter Point. The message may be sent either before the registration is confirmed or within 65 days following confirmation in the event of an erroneous transfer

- It is not proposed to extend the current process whereby a cancellation is processed after the COS completes to the Debt Flagging solution:
- For non Debt Flagging Cancellations, Message **111A** is sent to the Old Supplier if the request is for cancellation of a Change of Supplier that has been completed and is not subject to an outstanding objection; message 111A will not be sent by MRSO as a result of a Debt Flagging Cancellation
- Message **011A** is sent by an Old Supplier to MRSO to indicate agreement, or otherwise, to the cancellation of a New Supplier's registration to a Meter Point. An Old Supplier should only send message 011A in response to receipt of message **111A** : Therefore message 011A will not be a valid message for the Debt Flagging process, and should MRSO receive a message **011A** where there was no corresponding **111A** message then **111R** will not be sent to the New Supplier to indicate that the New Supplier registration will not be cancelled.
- Message **111L** is currently sent to the Old Supplier to indicate cancellation of the registration for non-Debt Flagging Cancellations , and the RoI market design will be extended to send a **111L** to the Old Supplier for a Debt flagging cancellation with Cancellation Reason Code 'DE'.
- Message **111** is currently sent to the New Supplier to indicate cancellation of the registration for non-Debt Flagging Cancellations, and the RoI market design will be extended to send a **111** to the New Supplier for a Debt flagging cancellation with Cancellation Reason Code 'DE'.
- Message **111** is also currently sent to **TSO for Interval Meter Points**, however it is proposed that TSO will not be sent Message 111 in cases where the COS is cancelled by the New Supplier before completion due to Debt Flagging

7.8 Existing reject reason codes will continue to be used as normal for non-debt flagging reasons on the 111R and, multiple reject reason codes may appear on the one MM111R.

7.9 Changes to existing reject reason code usage for Rol **111R** Change of Supplier – Cancellation Request Rejection are proposed as follows:

TIM – The cancellation request has been received more than 65 days after effective date of Change of Supplier will be extended to cater for where **011MM** with Objection for Debt cancellation reason code 'DE' is received from the new Supplier after the expiry of the SWP

IRC – The Cancellation Reason Code is invalid will be extended to allow for cases where an 011MM is submitted with a DE Objection for Debt cancellation reason code before the start of the SWP and a rejection is sent back to the new supplier on the **111R** Notification of Objection – Rejection

•If the 011MM Cancellation Registration Request with cancellation reason code DE Objection for Debt arrives from the New Supplier when there is an open objection for an Erroneous Transfer arising from an 012MM Notification of Objection with Objection Reason Code 'ET' Erroneous Transfer sent in by the Old Supplier, then a rejection message 111R will be sent back to the New Supplier with reject reason codes TIM to indicate that the 011MM has arrived but there is no open SWP and IRC- The Cancellation Reason Code is invalid. In other words an 011MM with a Cancellation Registration Request with cancellation reason code DE Objection for Debt cannot be in train at the same time as an 012MM with an objection reason code of ET.

•And, refer to the General section in which other uses of TIM and IRC on MM111R are documented

7.10 There are no proposals to introduce any new Rejection Reason Codes for use on the **111R** Change of Supplier – Cancellation Request Rejection

7.11 Existing rejection reason codes that are valid for Rol on the **111R** and which will be valid as a result of a 'DE' Objection for Debt cancellation reason code being sent on an **011MM** Cancel Registration Request are :

IMP – The MPRN does not exist or is for a Grouped Un-metered site (either at GMPRN or TMPRN level) or is not valid for this jurisdiction

SNR – The Supplier submitting the cancellation request is not registered to this MPRN

IA – The 011 received was a duplicate request. MRSO Already have a valid, cancellation for this MPRN

TSR – Trading Site Rejection

7.12 Existing reject reason code usage for Rol **111R** Change of Supplier – Cancellation Request Rejection which will not apply to **011MM** with Objection for Debt cancellation reason code 'DE'

CAN – The Old Supplier has not agreed to the cancellation request

IMS – A cancellation request is received for New Registration and the MPRN status is Energised

Sundry items

#8 Service Orders for certain MPRNs that are Deenergised for NPA or need a Token Meter to be removed are prevented from being raised by this process from 3 and possibly up to 4 time periods ref#11 for time periods
- There is no Fast-tracking element in this proposal

#9 Not all MPRNs that are Deenergised for NPA or need a Token Meter to be removed will meet the euro criteria for Debt Flagging.

• It is the Old Supplier and not MRSO who is able to perform this calculation after receipt of the 110MM. This is why all of these MPRNs would be included in the process to prevent the Service Orders from being raised , and not just those that are eligible for Debt Flagging

#10 In the specific Debt Flagging scenario where Service Orders are not being raised pending the outcome of the Debt Flagging process then Suppliers would need to be aware that the 102P will issue even though no Service Order has been raised at that point , and in cases where there is a cancellation of that COS then no Service Order may have been raised at all even though a 102P has issued

• ESB Networks SLA timelines start as normal once the Service Orders are raised.

#11

General

The proposal is that the start of the automated timeline will be from an identified trigger , and not from midnight.

This allows for a Service Order to be raised earlier than if using a midnight-midnight clock , and from a Customer perspective the Re-Energisation following NPA to be processed as soon as possible
 Days are Working days, and therefore Weekends and Bank Holidays are not counted within the wait period timelines <<48hr + 48hr >> wait periods
 FWP starts from when 110 is outbound from SAP and ends a max of 48hr later
 SWP starts from when 112 is outbound from SAP and ends a max of 48hr later

This timeline is consistent with WP20 and along Gas timelines

Up to 4 days longer for impacted Customers to have Service Order raised for Reenergisation of NPA or Token Meter removal

Scope of Change

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

Co-Ordinated Baseline Market Design Documents Impacted by Request

| Market Messages | | | | |
|-----------------|-------------------------------------|------|-----|----|
| Message No. | Message Name | CoBL | ROI | NI |
| 011 | Cancel Registration Request | Y | Y | |
| 012 | Objection to Change of Supplier | Y | Y | |
| 110 | Notification to Old Supplier of CoS | Y | Y | |
| 111 | Registration Cancellation | Y | Y | |
| 112 | Notification of Objection | Y | Y | |

| Data Definitions |
|------------------|
| No Impact |

| Data Codes |
|------------|
| Yes |

| Market Message Implementation Guides | | | |
|--------------------------------------|--------|----|--------|
| ROI | Yes/No | NI | Yes/No |
| Meter Registration | Y | | |

| Comments |
|---|
| HBL Code Value Description will be amended from 'Debt Contact Notification (residential only)' to 'Debt Contact Notification' |
| WP 0020 will be amended as the manual Debt-Flagging process will only be relevant for Grouped Unmetered |

| ROI - Market Process Diagrams – MPDs | | |
|--------------------------------------|--|----------|
| Market Process Diagram Number | Market Process Diagram Description | Affected |
| MPD 1 | MPD 1 - Change of Supplier - NQH Metered | Y |
| MPD 2 | MPD 2 - Change of Supplier - QH Metered | Y |
| MPD 3 | MPD 3 Objection and Cancellation | Y |
| MPD 33 | MPD 33 - CoS - Single Point Unmetered | Y |
| MPD 36 1.1 | MPD 36 1.1 Change of Group MPRN_CoS | Y |

| NI - Market Procedures | | |
|------------------------|------------------|-----------|
| Market Process Number | Market Procedure | Affected |
| No Impact | No Impact | No Impact |

| ROI Guidance Documentation | | |
|----------------------------|---------|----------|
| Document | Version | Affected |
| WP 0020 Debt Flagging | 4.0 | Y |

| 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 | | |
| | | |

Process diagram v6.doc
 (see embedded document by clicking on icon below)

