

Discussion Request 1212			Cooling off period for MCC changes		
Status	Approved	Priority	Medium	Status Date	31/03/2021

Date	Version	Reason for Change	Version Status
24/03/2021	1.0	Issued to Market	Final

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST			
Requesting Organisation(s)	Bord Gais	Originating Jurisdiction	Rol
Request Originator Name	Ger Hartnett		
Date Raised	10/03/2021		

Classification of Request			
Jurisdictional Applicability	Rol	Jurisdictional Implementation	Rol Specific
If jurisdictional implementation is for one jurisdiction only – is the other jurisdiction required to effect any changes?	N/A	Co-Ordinated Baseline Version No.	No Impact
Change Type	Non-Schema Impacting		

Detail of Request
Reason for Request

Background

CRU confirmed in 2019 that a decision in relation to reverting to MCC01 as a standard option within the market design was not to be supported. The COS process and technical design caters for cooling off legislation to be effected through the COS cancellation process (MPD 03). There is no technical capability to automatically cancel and re-instate original status of meter point for COLE (MPD 25) or change in tariff through COCD (MPD 24) or COLE with re-energisation (MPD 10).

There is no technical mechanism to reverse a COCD or COLE (Standalone COLE or COLE with Re-energisation) in the industry systems. This was raised to ESNB within the query log in 2019. ESNB deferred to the CRU about how industry should handle the cooling off period as a result of the MCC reversion decision.

This was raised with the CRU in early 2020 who agreed to engage with RMDS in terms of workarounds. The CRU Policy Log in Nov 2020 states that "In case the customer has chosen to begin their contract but wishes to cancel it, there are no regulatory barriers that prevent a supplier from offering the customer a flat-rate tariff on either MCC. Alternatively, suppliers can manage their own cooling off periods and only submit the 013MM after the time has elapsed".

There is no mechanism on the change in tariff (013) to request a change date or in effect backdate a tariff change hence negating the operation of the proposal of holding back the tariff change until the end of the cooling off.

For suppliers who do not offer a virtual 24hr tariff, there is no mechanism to reverse a move away from a MCC01 through market systems. For those who offer a virtual 24hr tariff, a consumer can be placed on the 24hr tariff in terms of unit rate charge but data will continue to flow as day, night, peak bimonthly. Pursuing this route requires a supplier to decouple the tariff it sells from its underlying cost base, something which has long been recognised as being unacceptable for commercial stability reasons (hence MCC02 for Day/Night etc.)

As per DR1209, the bimonthly day, night, peak data is not considered personal and has in fact been supported by CRU in DR1209 to be gathered by suppliers as a unilateral measure if suppliers saw a benefit to this. There is no mandate for suppliers to have to commercially decouple from their cost base, meaning that options to facilitate cooling off in COLE, COLE with re-eng and COCD (tariff change) must be supported.

To hold a COLE or COCD in all cases of SDS change would mean a significant regression in process for the consumer (i.e. Put back the process for c.14 days). It would also mean having to backdate the COLE and COCD in all cases which is not supported for tariff change.

In cases where erroneous tariff change or COLE takes place OR where tariff change/COLE has progressed and cooling off is requested, a manual workaround to notify ESBN to manually revert to MCC01 is required.

It is expected that the incidence of cooling off in COLE, COLE with Re-energisation and Tariff change will not be as frequent as cooling off in COS which tends to be invoked through competing supplier win back. As there is no competing supplier involved in these scenarios it is expected that the incidence of cooling off cancellation would be lower than in the COS Process.

As no technical, automated solution was agreed to during design, it is suggested that a manual workaround be facilitated through a working practice. On the basis that it is not expected to be a high-volume transaction, a manual option is feasible for allowing consumer cooling off rights to be met.

Proposed Solution

A manual work around in the form of a working practice perhaps initially facilitated through a central ESBN email address would be viable. It is suggested that pre mass Primer issue for the 250k, the working practice is fast tracked and introduced to prepare for higher volumes in the coming months. Since this proposal is non technical, it is requested that approval is fast tracked and the solution implemented as soon as feasible.

Suppliers would use the working practice for erroneous MCC01 to MCC12/MCC16 transfer during COLE, Re-energisation with COLE and COCD tariff change as well as a consumer right to evoke cooling off during these transactions.

The process would involve a supplier providing details to the central email of the manual reversion that is required. All information supporting the manual reversion would be provided. A SLA would need to be in place to ensure ESBN processed the manual reversion in time to allow consumer to reprocess their opted tariff with the supplier.

If ESBN wishes to automate with a web portal or SharePoint, this could also be considered. The working practice should be provided with all necessary details on how this will work. If the incidence of cooling off / erroneous transfer is significant, an automated solution may be considered down the line.

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 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 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 at present

Market Message Implementation Guides

ROI	Yes/No	NI	Yes/No
	N/A	No Impact	Y

Comments

We raised this concern during design phase. The request is to have the workaround in place and agreed asap as volumes of these will increase as volumes of tariff change/smart product sale increases. This is likely to align with large supplier mass primer issue for the 250k meters (up to 6 months to issue from 1st March).

ROI - Market Process Diagrams – MPDs		
Market Procedure	Affected	
MPD01 - Change of Supplier NQH	Y	
MPD02 - Change of Supplier QH Metered	Y	
MPD10 - Re-Energisation	Y	
MPD24 - Change of Customer Details	Y	
MPD25 - Change of Legal Entity	Y	

NI - Market Procedures		
Market Procedure	Affected	
No Impact	No Impact	

ROI Guidance Documentation		
Document	Version	Affected
No impact		No Impact

RoI Briefing Document		
Briefing Document	Affected	
No Impact	Y	

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 / CRU Approval		
Approved by	ReMCoSG	CRU
Comments		