

Market Change Request 1219			SPAYG – System & Process Changes necessary to deliver policy		
Status	Approved	Priority	High	Status Date	13/04/2022

Date	Version	Reason for Change	Version Status
06/12/2021	1.0	Initial Draft to facilitate Market Discussion	Final
28/02/2022	1.1	Updated following Technical Working Group	Final
06/04/2022	2.0	Updated version to remove temporary PAYG flag and add in consideration for debt flagging process	Final

Part 1 DETAIL OF DISCUSSION REQUEST / MARKET CHANGE REQUEST	
Requesting Organisation(s)	RMDS
Request Originator Name	Lindsay Sharpe
Date Raised	28/02/2022

Classification of Request	
Change Type	Schema Impacting

Detail of Request
Reason for Request

### Background

The NSMP phase 2 design workshops have been undertaken since early 2021. The scope covered in sessions only considered remote switch functionality for disconnection and reconnection. Throughout the workshops requests to consider design necessary to deliver a viable platform to support smart PAYG policy was raised by various Suppliers over this time. DR1216 was raised by ESNB to manage the remote switch for discon/recon. This functionality within DR1216 only provides a portion of the necessary change to CMS and other systems, processes and operations within the retail market which would be necessary to deliver a viable, consumer focussed thin PAYG solution.

At the prioritisation workshop held by RMDS on the 21.10.21, it was agreed that RMDS would determine how to progress the necessary design that had been requested since early 2021 and how this would be dealt with across industry“

RMDS issued a mail on 22.10.21 where “CRU invites Market Participants to submit any additional DRs it understands are necessary in the context of providing a SPAYG service.”

The reason for this DR, is to cover all outstanding functionality not covered by DR1216, that is necessary to deliver a solution that is required by Smart PAYG policy. It is important that an understanding of how DR1216 and any other DRs will be project managed is established and where governance lies for delivering in September 2023.

The key areas that have been requested for inclusion in DR1216 and will now be dealt with in this DR are:

- Day/Day+1 or D+5 CoS Processing
- PAYG Flag which is available as an identifier pre switch
- Discreet Debt Flag for consumers switching, as a result of debt but no available thick or thin PAYG solution. Policy clarification required.
- CTF algorithm suitability for PAYG service provision (CTF degradation should only be impacted by genuine communications degradation and not MDMS or system issues). Evidenced by issue with mass CTF 4-3 degradation recently and the impact it would have on SPAYG.

- Contingency process for failure in technology chain (day to day and critical/mass failure),
- SLAs and query management between Suppliers (on behalf of customer) and ESN for D2D support. Extend to major tech outages at any point in tech chain (similar to point on contingency process)
- Transition process between SPAYG and Credit for existing customers.

The reason behind each and the proposed design and considerations are included in the next section.

It must be stated that as detailed upstream design continues, possible central market system (CMS) changes may be required. These will either form part of a re-versioned MCR or a separate DR/MCR.

### Proposed Solution

To deliver on SPAYG policy the following changes in addition to those in DR1216 must be implemented.

1. **Day, Day+1 or QH (D+5) CoS Processing – Effective date and Processing date to be the same.**

**Why:** The current Change of Supplier Process is designed for credit pay to credit pay switching. Although an effective date of “Day” can be requested, the processing of this request is only confirmed at a minimum 5 working days later. In reality the average confirmation is between 6-9 days. The CoS is effected on the original request date (or the date of the meter re-configuration – as close to request date for smart meter MCC changes during switch) meaning the date is retrospectively applied and the new Supplier gets registered from a date in the past. This works in a credit based system as billing is performed retrospectively for consumption. DUoS and consumption charges can be managed by retrospectively applying the switch date as the start date and billing forward (usually to a point up to 2 months in advance).

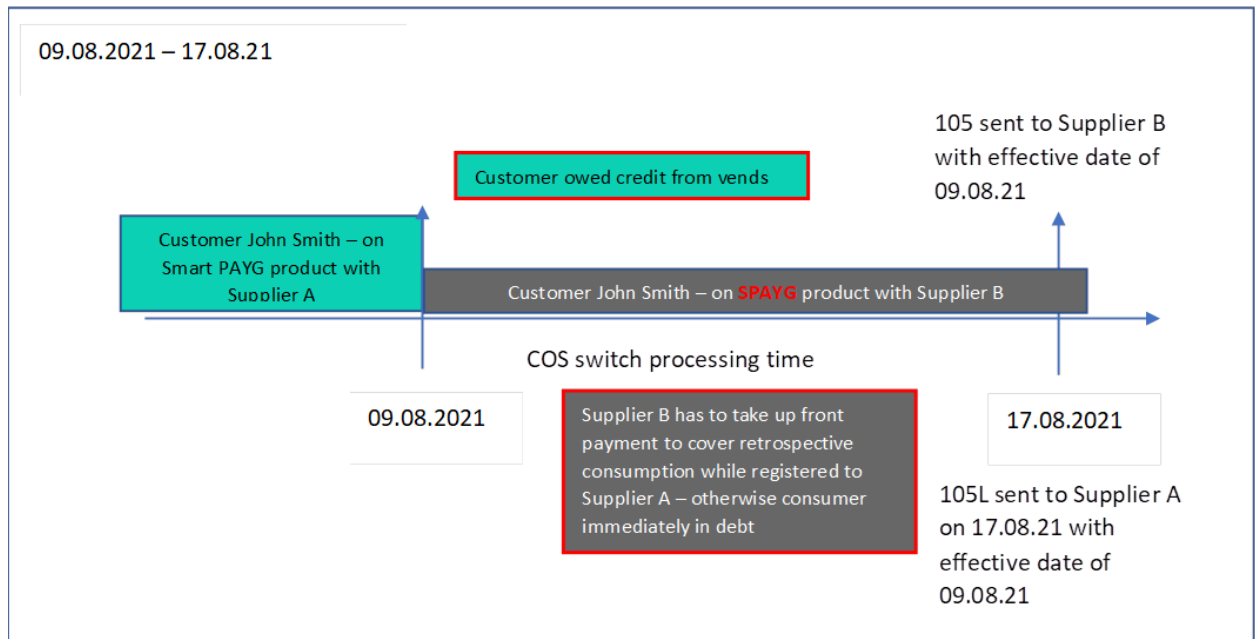
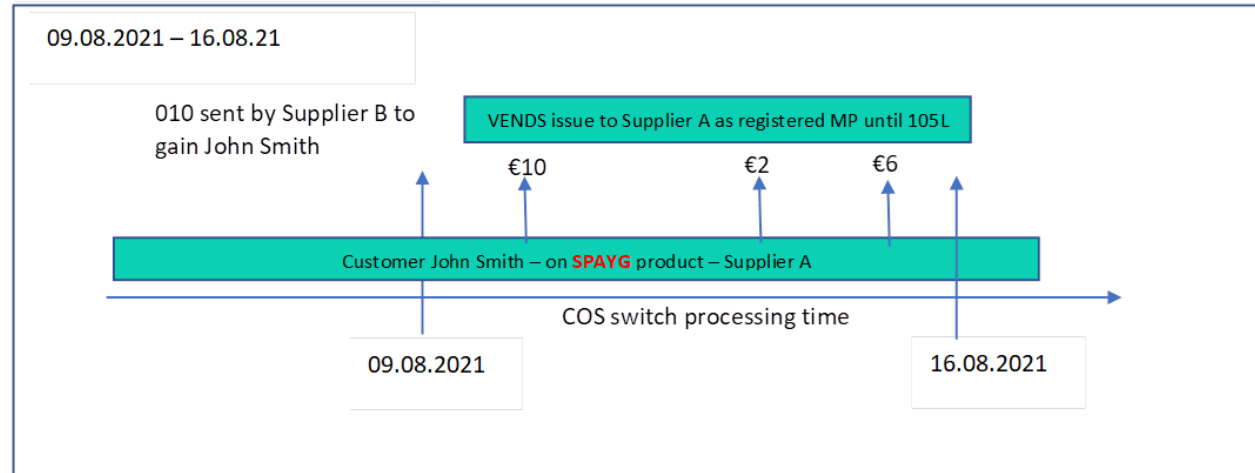
In PAYG solutions, the consumer is actively engaging with the energy bill, in many cases, daily. They are paying for their energy proactively rather than retrospectively. **This means that it is critical to apply events such as CoS, CoLE or Tariff change in as close to real time as possible or to align the processing dates to the effective dates in order to allow alignment of consumer financial status.** Without this, each supplier process will be refunding overpaid energy vended to consumers at all key industry processes. This would be hugely complex, administratively burdensome, costly, open to issues with consumers and repayments, poor consumer journey and experience and many more. It seems critical that the framework on which the Retail Electricity Market operates, can support all services and customers that are mandated through regulation – SPAYG being a clear example. In addition, suppliers will be unable to request re-en during this transition period and this could result in prolonged loss of power for customers even if they have topped up, pointing to a need for central market systems to be updated in the interests of consumer protection.

The best way to illustrate the issue with the current mismatch between CoS effective dates and processing dates, is through examples. Using Customer John Smith and Supplier A and Supplier B, three examples will be used to explain the issue.

1. SPAYG to SPAYG
2. SPAYG to Credit
3. Credit to SPAYG

**Example 1: SPAYG to SPAYG**

**SPAYG - SPAYG**

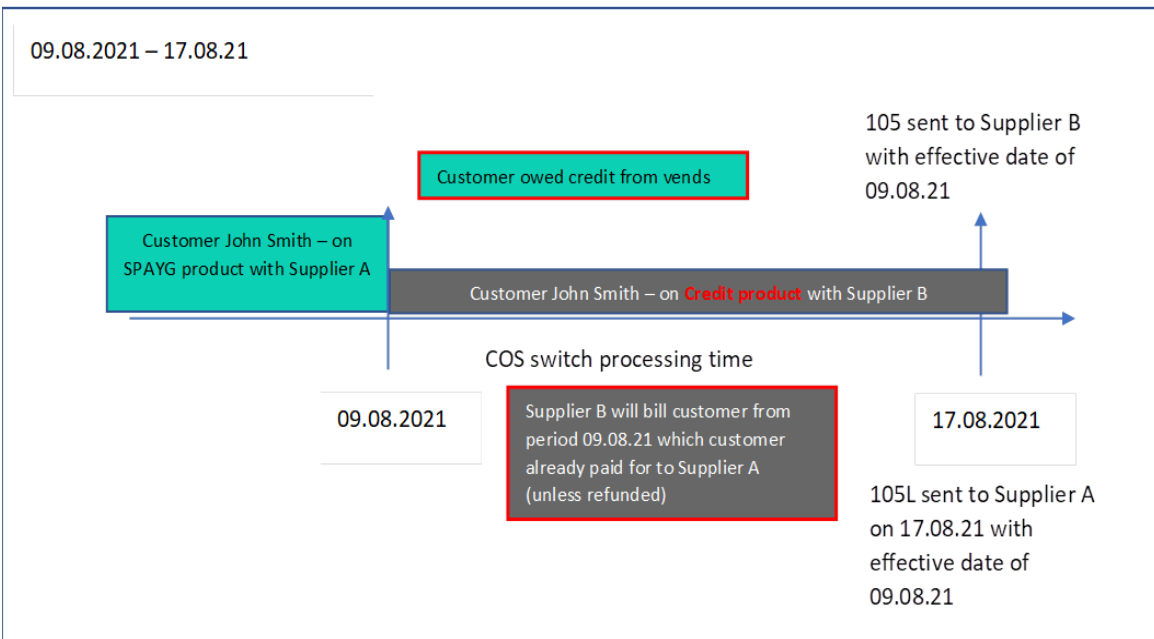
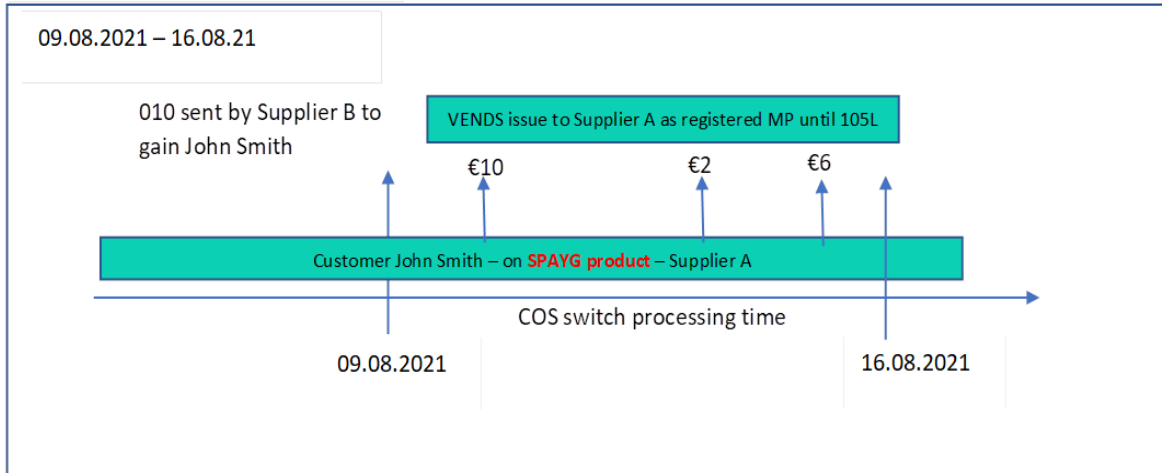


- Customer John Smith registered to Supplier A on a **SPAYG product**.
- Customer wishes to switch to Supplier B on **SPAYG product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21
- All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.
- While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A. Supplier A is responsible for DUoS and all terms of supply until such time as 105L is issued and CoS is effected with switchover in retail systems.
- The customer has right to energy during the CoS Processing period and as on a smart PAYG product continues to vend to keep the lights on.
- Note a switch could take much longer than 6-9 days to process depending on technical/other issues.
- In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier A both indicating the effective date of the switch is the 09.08 as requested.

- Supplier A is now left having received vends for the service during the CoSCoS processing period and would be required to reconcile and refund the customer for the vends.
- Supplier B must ensure sufficient credit is taken up front for the CoS Processing period to ensure the customer is not immediately in debt once Switch effected (for the period 09.08 – 17.08)

**Example 2: SPAYG to Credit**

**SPAYG - Credit**

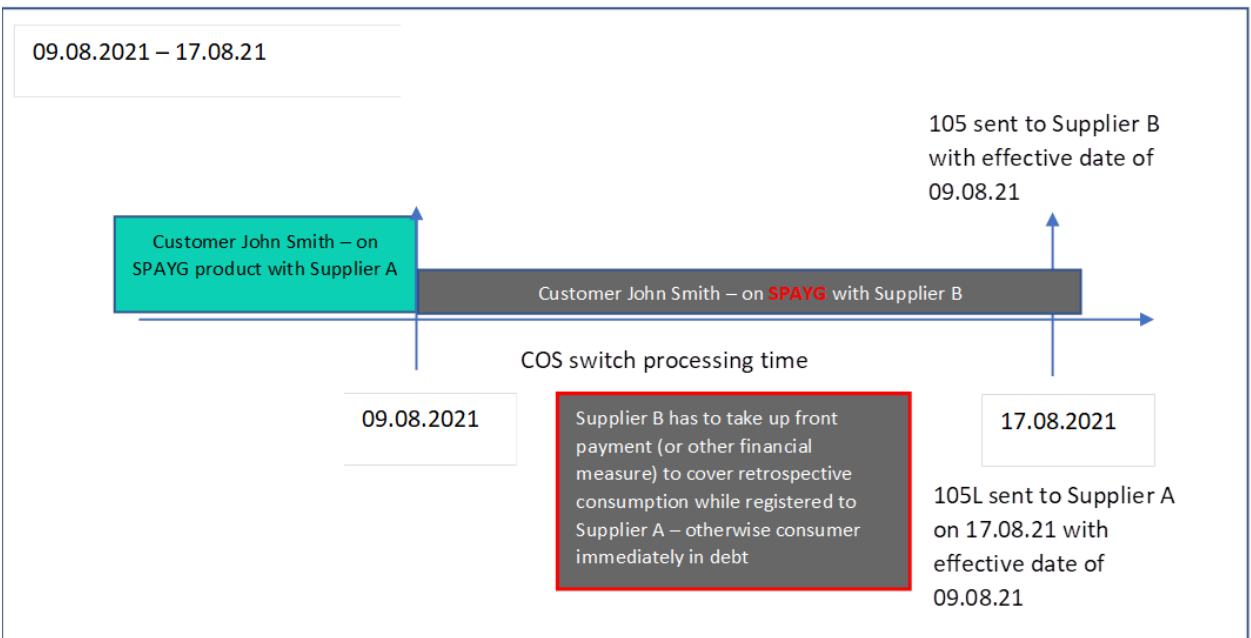
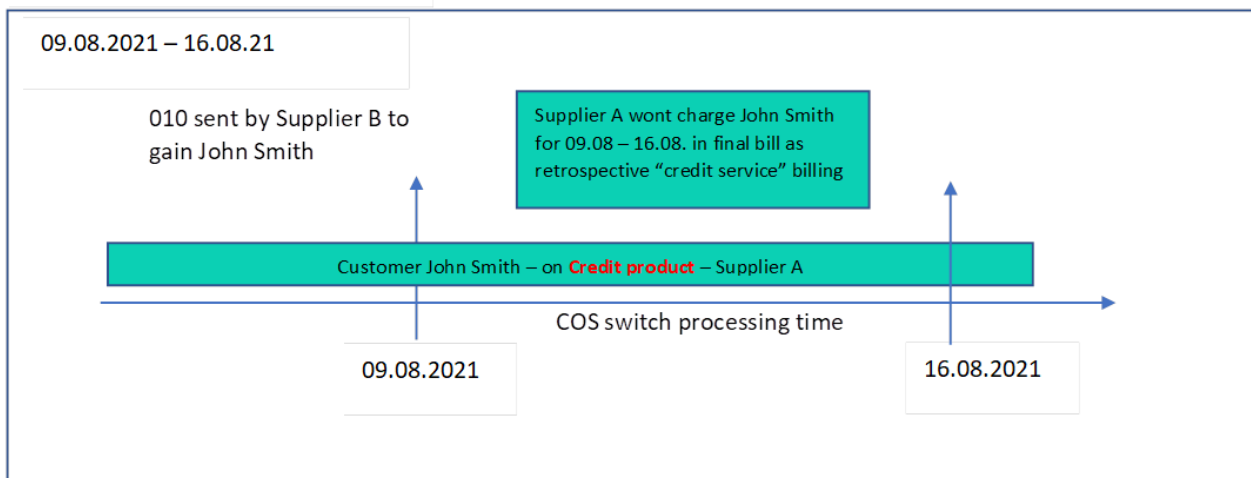


- Customer John Smith registered to Supplier A on a **SPAYG product**.
- Customer wishes to switch to Supplier B on a **Credit product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21
- All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.
- While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A. Supplier A is responsible for DUoS and all terms of supply until such time as a 105L is issued and CoS is effected with switchover in retail systems.

- The customer has right to energy during the CoS Processing period and as on a Smart PAYG product continues to vend to keep the lights on.
- Note a switch could take much longer than 6-9 days to process depending on technical/other issues.
- In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.
- Supplier A is now left having received vends for the service during the CoS processing period and would be required to reconcile and refund the customer for the vends.
- Supplier B will bill customer on a credit tariff from the 09.08 which unless refunded by losing supplier A, will be paid for twice.

**Example 3: Credit to SPAYG**

**Credit - SPAYG**



- Customer John Smith registered to Supplier A on a **Credit product**.
- Customer wishes to switch to Supplier B on **SPAYG product**, contacts them and supplier B sends an 010MM on the 09.08.21 to switch with required date of 09.08.21
- All processes correctly, 102 is sent to Supplier B and 110 sent to Supplier A.
- While CoS processes (on average see as 6-9 days), customer is still registered to Supplier A. Supplier A is responsible for DUoS and all terms of supply until such time as 105L is issued and CoS is effected with switchover in retail systems.
- The customer has right to energy during the CoS Processing period but because on a credit product, is unaffected. Their final bill will cover any alignment of CoS Processing dates.
- Note a switch could take much longer than 6-9 days to process depending on technical/other issues.
- In this scenario, the CoS completes and the 105 is sent to the gaining Supplier B on 17/08 and 105L to the losing supplier B both indicating the effective date of the switch is the 09.08 as requested.
- Supplier A will now final bill customer to 09.08 and will not charge for energy consumed during 09.08 to 17.08.
- Supplier B must ensure sufficient credit is taken up front for the CoS Processing period to ensure the customer is not immediately in debt once Switch effected (for the period 09.08 – 17.08)

The requirement is

- **To align the event processing date with the CoS effective date as far as possible to reduce the need for refund and reconciliation.**
- For the gaining supplier to choose whether to offer the customer a PAYG tariff

Following feedback from Market Participants a consensus to proceed with a D+5 processing and effective date was agreed.

- **D + 5 (Working Days) processing and effective date for a PAYG customer**
  - The proposal is to populate a required date of D+5 (working days) where the new Supplier is offering a PAYG tariff whereby the effective date in these scenarios will be D+5 (working days) and processing will align to the effective date. The key issue is the alignment of switch and processing.
  - MM010 (change of supplier request) should be populated with a required date of D+5 (working days) where the new Supplier is offering a SPAYG tariff to the Customer. The CoS will complete to an effective date of D+5 (working days) and the CoS completion messages will be sent once D+6 is reached.
  - This option would also require disconnection code D05 and reconnection code EO5 to be allowable during the period between 010 issue and 105 date to allow any existing PAYG services to continue (subject to Customer Protection implications that would require CRU approval).
- **Change of Smart Data Services as part of a CoS to facilitate SPAYG**
  - The proposal is to populate a required date of D+5 (working days) and also request a change to Interval Data services. The effective date in these scenarios will be D+5 (working days) and processing will align to the effective date. The key issue is the alignment of switch and processing.
  - ESNB would reconfigure the Meter from Non-Interval data services to Interval data services on D+5 (working days) and the CoS completion messages will be sent once D+6 is reached
  - The customer would be registered to the gaining Supplier as an Interval customer.

## 2. PAYG Flag

CRU has considered the proposals included in DR1219 as well as the feedback received from Market Participants in relation to the ask for a PAYG flag as part of the Smart PAYG solution. Consumer choice is key to an open competitive retail market. The CRU is cognisant of potential unintended consequences for the customer in having this identifying characteristic available to suppliers. The CRU has therefore decided to reject the inclusion of a permanent PAYG flag in DR1219.

**3. Debt Flag for switches away from Suppliers with no PAYG facility**

CRU has confirmed its position that there will not be a debt flag or identifier for Smart PAYG.

**4. CTF algorithm suitability for SPAYG service provision**

DR1222 has been created to look at CTF algorithm.

**5. Contingency process for failure in SPAYG Technology Chain**

DR1221 has been created to look at contingency process for failure in the SPAYG technology chain.

The debt flagging process will be examined to provide clarity in relation to how it operates and ensure it continues to work effectively as per existing policy.

**Scope of Change**

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

**Market Messages**

Message No.	Message Name	ROI
No Impact	No Impact	No Impact

**Data Definitions**

No Impact

Data Codes

Market Message Implementation Guides	
Message Guide	Yes/No
Meter Works	Yes
Meter Registration	Yes

Market Process Diagrams – MPDs			
Market Process Number	Market Procedure	Affected	
MPD 1	Change of Supplier Non Interval	Yes	
MPD 2	Change of Supplier Interva	Yes	
MPD 9	De-Energisation	Yes	
MPD10	Re-Energisation	Yes	

Guidance Documentation		
Document	Version	Affected
No impact		No Impact

Briefing Document		
Briefing Document		Affected
No Impact		Yes

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

Comments



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

<b>Approved by</b>	<b>CRU</b>