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ASSURANCE DECISIONS SUPPORTING R0180

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FOR DECISION

This paper provides a high-level summary of the proposed assurance options required for I0180.

The PAB is invited to discuss the proposed approach and then determine the assurance approach to be included in response to the I0180 change consultation.

The Code Manager recommends PAB:

- **APPROVE** the Risk Driver Monitoring described in section 3 of this paper to be applied as the assurance technique to be used in implementing the proposed change.

1 BACKGROUND TO I0180 – CLARITY ON USE OF ON HOLD FOR SWITCHING ISSUES, INCLUDING THE OBLIGATIONS OF CSS USERS

I0180 seeks to introduce additional obligations on Central Switching Service (CSS) Users to engage with the Switching Incident resolution process. Within the CSS system, some Switching Incidents are on hold waiting for resolution. The CSS Service Desk team have a process to chase every three days, escalate and make phone calls. However, the incident cannot be closed until confirmation is received from the end-user and information is verified from their systems.

During the initial impact assessment, the Code Manager identified that this change will impact services provided by the Performance Assurance Team. the change proposal has now gone through the solution development phase, and the Code Manager is required to assure the proposed solution options.

2 CHALLENGES AND ISSUES IDENTIFIED

A significant number of switching incidents remain unresolved and on hold, creating operational inefficiencies and potential risks. While the Switching Operator's use of the "on hold" status is an approved business process, this practice is not reflected in the obligations placed on Switching Data Service Providers (SDSPs) or other REC Service Providers, nor is there a defined timeframe for CSS User responses.

This discrepancy between current practice and the REC's defined obligations leads to prolonged ticket lifecycles, significantly exceeding necessary durations. Furthermore, the management of these "on hold" tickets places an unnecessary burden on the Switching Operator's resources, diverting effort from cost-saving or improvement activities. Addressing this discrepancy and improving the timeliness of incident resolution is crucial for operational efficiency, network stability, and resource optimisation.

3 THE PROPOSED SOLUTION THAT DEFINES THE ASSURANCE APPROACH

There are four solution options detailed in the solution development report, however Performance Assurance impact assessment is required for Option 1 and 3 only. For Options 2 and 4, the Switching Operator is required to close the tickets without obtaining assurance from the Code Manager.

Option 1 – Introduce the on-hold concept but do not close the incident for delayed response.

Summary	This option aims to establish an obligation on the Energy Suppliers to respond to on hold messages. This would be achieved by setting out responsibilities for the market participants to resolve and close Switching Incidents. To enforce Energy Supplier participation, the option proposes that the Code Manager subject parties who do not respond to messages after an agreed period to **Performance Assurance Techniques**.
Associated risk	There is a risk that this transfers workload from DCC to the Code Manager, without reducing the overall work, as Parties continue not to respond to requests.

Option 3 – Introduce the on-hold concept and close the incident once the timescale is breached

Summary	This option places the same obligation on Market Participants as option 1 but with an expanded scope. Option 3 puts in place a timescale for Market Participants to provide a positive response. However if this lapses, and the following has taken place, then the incidents can be **closed** by the Switching Operator. • The timescales stated in Appendix A have been exceeded; • An email has been sent to the Market Participant requestion confirmation of resolution and there has been no response; • The Code Manager has been utilised as an escalation route and no update has been received from the Market Participant.

Associated risk	There is the potential for inaccurate or premature closure of incidents due to the defined timescales and lack of response, even if the underlying issue has not been truly resolved. While option 3 addresses the problem of an unresponsive Market Participant, there could be increased complaints from Parties/customers if the issue still persists and the need for assurance could create extra workload for the Code Manager and potentially cause delay in resolving genuine problematic incidents.

4 SUGGESTED ASSURANCE APPROACH

The suggested assurance approach is based on a combination of Market Monitoring and risk associated to the options provided.

Our analysis of the assurance required for the options are as follows:

PAT	Description
Proposal 1: **No Assurance required**	PAB does not require assurance to be provided by the Code Manager as the risk is not significant enough to require assurance action. Parties are responsible for addressing switching incidents. If Parties fail to respond to these incidents after the established outreach process and allotted response time, and the responsible OAM has been contacted to reach out to the Market Participant, then the incidents can be closed in accordance with the relevant text.
Proposal 2: **Periodic Monitoring**	The PAB requires the Code Manager to implement the change, initially escalating non-compliance to the OAM of the involved Parties as part of their standard operating procedure. The Code Manager's intervention will be periodic, triggered by either significant non-compliance reported by Switching Operators or complaints about misuse of the on-hold process and inappropriate ticket closure. This mitigates the risk of the Switching Operator time and resource being wasted where Parties choose not to follow through with the on-hold process and protects Parties' interests in cases of wrongly closed incidents. The Switching Operator is required to report on the incidents involved by using the below supplementary measures: • Total volume of P3 Switching Incidents on hold after the 20-working-day waiting period. • Total volume of P4 Switching Incidents on hold after the 30-working-day waiting period. • Percentage of P3 Switching incidents on hold after the 20-working-day waiting period. • Percentage of P4 Switching incidents on hold after the 30-working-day waiting period.
Proposal 3: **Risk Driver Monitoring**	**[RECOMMENDED]**

	PAB requires the Switching Operator to provide monthly reporting to the Code Manager (see supplementary measures stated in proposal 2). This reporting will be used in line with the below: • A risk driver will be created to track the on-hold incidents and monitor performance. • A threshold would be established to identify Parties with an excessive number of incidents. • The Switching Operator makes use of the OAM as the initial level of intervention for encouraging better operational performance from Parties where they notice that the number of incidents is increasing. • The risk driver will be monitored for six months to determine the appropriate point of intervention. • The Code Manager will review the risk driver every 6 months to determine the appropriate intervention based on PAB risk appetite and market conditions.
Proposal 4: **Full Assurance**	PAB requires Performance Assurance follow-up for each incident and non-confirmation in the on-hold bucket. This would require substantial time and resource from the Code Manager and affected Parties depending on the volume of incidents that falls within that category.

5 DECISION REQUIRED

The PAB is requested to discuss the proposed assurance approach and approve the Risk Driver Monitoring described above as the assurance requirements for I0180. This approach is recommended based on the following:

1. The solution is a scalable, cost -efficient approach requiring minimal initial development effort and ongoing maintenance. Its "build once, use many times" nature achieves long-term value.

2. The risk driver will provide a clear historical record of on-hold incidents, enabling effective differentiation between isolated issues and persistent performance problems.

3. By providing regular reporting on on-hold incidents, this approach incentivises improved performance from market participants without requiring additional, resource-intensive Performance Assurance Techniques (PATs).

4. This approach aligns directly with the REC's core objective of resolving issues caused by one Market Participant impacting others or consumers and directly mitigates operational inefficiencies.

5. The risk driver will allow for targeted intervention, focusing on parties exhibiting excessive numbers of on-hold incidents.

This recommendation is made prior to the completion of the full benefits assessment for I0180. Should this assessment indicate minimal benefit from the proposed change, we suggest adopting Option 1 as the appropriate assurance approach. Option 1 requires no additional assurance and aligns with a low-benefit scenario.

PAB may apply any one or more than one of the proposals listed above as they deem appropriate.

PAB DECISION



The Code Manager recommends PAB:

- **APPROVE** the Risk Driver Monitoring described in section 3 of this paper to be applied as the assurance technique to be used in implementing the proposed change.

APPENDIX A: THE INTENDED LEGAL TEXT THAT DEFINES THE ASSURANCE APPROACH

There are four solution options detailed in the solution development report, however Performance Assurance impact assessment is only required for Option 1 and 3.

Option 1

The I0180 would introduce a new clause within Schedule 26, setting out Market Participant responsibilities for the resolution and closure of Switching Incidents. This also includes subjecting parties disengaged with the process to Performance Assurance Techniques. The proposed legal text for the option is below:

A. When an Incident is assigned to a Market Participant where the Switching Service Desk requires the Market Participant to diagnose or confirm resolution of a (P3 or P4) Incident, the Switching Service Desk shall:

(a) engage with the incident party through a Nominated Individual;

(b) set the Incident status to pending; and

(c) assign the activity to the incident party, and the resolution time shall not include the period of time during which the Incident is assigned to the incident party.

B. Where there is an open Incident with the Switching Operator, and the Incident is pending confirmation that the Incident has been resolved, to the reasonable satisfaction of the Market Participant, should be provided in line with the table below:

Priority	**Resolution Time**
Priority 3	a 20 Working Day confirmation of closure of incident
Priority 4	a 30 Working Day confirmation of closure of incident

Option 3

The solution design aim to introduce the below text as a criteria in section 5.4 of the Switching Operator Service Definition or section 5.3 of the Central Switching Service Definition.

A. Where a Priority 3 or Priority 4 Incident has been assigned to a Market Participant and has been set to a status of pending awaiting confirmation of resolution, the Switching Operator may set the Incident status to resolved where:

- The timescales within section 14.2 of the Switching Service Management Schedule have been exceeded;
- An email has been sent to the Market Participant requesting confirmation of resolution;
- A phone call has been made to the Market Participant requesting confirmation of resolution;
- The REC Contract Manager has been utilised as an escalation route;
- No update has been provided for 15 Working Days;
- Is not related to a CSS certificate, switching change or Switching Problem;
- Is not awaiting a data fix; and
- Is not related to a child or parent ticket.