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# MAJOR SWITCHING INCIDENT REVIEW – RECCO ACTION PLAN UPDATE


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| FOR INFORMATION | Major Switch Incident Review action update. |
| APPENDICES | • Link to RECCo MSI Review Report<br>• Link to I0168 – Clarify & Strengthen CRS Providers Requirements |


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## 1 BACKGROUND - MAJOR SWITCH INCIDENT "INC0216074"

DCC (Data Communications Company) formally closed the CSS (Central Switching Service) system Major Switch Incident (MSI) Priority 1 incident on 12th September 2023, issuing both a Post Incident Report Summary and full Incident Review Report to the REC Code Manager, allowing publication to PAB and to the wider industry via the REC Portal.

Through October & November 2023 RECCo, and the REC Code Manager, completed an end-to-end incident review to identify the root cause, consider the efficiency and effectiveness of the incident management response, assess the improvements required, and identify appropriate actions for risk mitigation. This review confirmed some recommendations RECCo intended to take forward as actions with the aim that their delivery should limit the possibility, or minimise the impact of, any future major switch incidents. To achieve this, they performed a REC Code compliance analysis, gather, and assessed lessons learned feedback on the impacts, impacts felt internally and by key impacted Switching Parties.

This paper seeks to provide an update on the 13 RECCo agreed actions.

The remaining 11 recommendations were agreed as a Performance Assurance Technique (PAT) for DCC to action, for which there have been separate updates.

## 2 OVERVIEW OF RECCO'S MSI REVIEW ACTION PLAN

RECCo has 13 actions related to this plan, progress and the status of these actions are detailed below.

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| Ref | Action required | Status | Current Update |
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| **T009** | **The Technical Response**<br>RECCo should undertake a review of the data captured as part of a Switch, or otherwise, to help prioritise in the event of a Major Switching Incident. | **Completed 3rd Jul 2024** | Progressed in conjunction with IM20.<br><br><u>Our analysis concluded</u>.<br>There are no appropriate data points that would, by themselves, assist in developing a prioritisation of one group of impacted switches over another (either by consumer segment, or volume of energy), without potentially causing inappropriate detriment to another group. In summary;<br>1. Each Switch/New Registration is sacrosanct and should be processed; delaying a particular switch/registration over another is inappropriate.<br><br>2. There is limited information (data) contained in a switch message which the SO/CSS Provider could use to propose prioritisation of one Switch about another when developing an incident resolution plan and approach. Whilst the Domestic Premises Indicator (DPI) might indicate the market, and the MPID might indicate an intracompany switch, what neither do is tell the underlying story behind the switch, or their relative importance to each other.<br><br>Should an event occur in the future, RECCo recommends DCC engages with impacted switch parties (i.e., Suppliers, Switching Data Service Providers, etc) to identify;<br>• Impacts and<br>• Priorities – i.e., individual switches that they believe require prioritised processing, and the rationale why.<br>Through this stakeholder engagement, DCC can consider what the prioritisation it proposes to apply to the proposed resolution. [This pre-supposes that DCC can prioritise individual switches, and that taking this approach might mitigate some detrimental impact].<br><br>We recommend this principles, and process, approach, as however well developed, any matrix would not exhaustively cover the profiles of incident and could have unintended consequences if its adherence is forced. Whereas discussion with parties to identify the impacts, would better inform DCC, and any proposed resolution application approach.<br><br>RECCo will work with RPS to consider the inclusion of this principles and process approach in I0168 MSI Best Practice Guidance. |

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| **IM020** | **Impact on Licences and Codes**<br>RECCo, working with the DCC, in its role as the CSS Provider and Switching Operator, should consider the potential to identify and prioritise certain customer groups impacted by a Major Switching Incident, for approval by the PAB. This should be clearly communicated to industry when approved. | **Completed**<br>**3rd Jul 2024** | This requirements of this action were assessed alongside T9.<br><br>Please see T9 above for further information. |
| **IM021** | **Impact on Licences and Codes**<br>RECCo should consider the appropriateness of the current arrangements and provide a clear recommendation to Ofgem on the contractual arrangements and governance required to effectively manage the CSS Provider and Switching Operator. | **Completed**<br>**25th July 2024** | On 25th July 2024 RECCo submitted a response to Ofgem's current 'DCC Review Phase 2: Governance and Centralised Registration Service' consultation. We are engaging with Ofgem, to help clarify and expand upon our answers as required by Ofgem, and apply all relevant governance change required in line with Ofgem's consultation decision and direction once published. |

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| **T007** | **Compliance Technical Solution & the Response**<br>RECCo should raise a change for the DCC in its role as Switching Operator to provide information on the root cause identified of incidents, as soon as possible, once it has obtained a reasonable understanding. | **In progress**<br><br>Target to transform issue I0168 into R0168 change via agreement from the September 2024 Change Panel.<br><br>Target Implementation Date - February 2025.<br><br>Proposed Implementation date due to be set when I0168 becomes R0168. | The REC Change Proposal (CP) is progressing as REC Change Issue 0168[1], after being promoted into the new REC Change Issue Group (CIG) and discussed at its first two meetings.<br><br>Through feedback, a REC Category 3 MSI Best Practice Guidance document has been developed, refined, and shared with CIG for comment. It currently encompasses text covering 5 actions in its report, there is a new proposal to include the conclusions for a 6th action (IM19) the document establishes the roles and responsibilities of the Switching Operator during and after a Major Switching Incident, to help reduce the impacts, and ensure an appropriate good practice and solution are applied. The document will function as guidance for the Switching Operator, and other REC and Non-REC Parties. The report has also been presented to the cross code working group for their input and comment and will encompass any actions needs by other codes if they have a role to play in any future incident.<br><br>At the beginning of September, responses will be assessed by the Code Manager, appropriate amendments will be made, and where a divergence of views is present, these will be both acknowledged in the Change report, and discussed further with the next CIG.<br><br>Barring any major objections at CIG, the Code Manager will draft the first Change Proposal Plan and Change Report, publishing for the September Change Panel consideration. Once the Change Report is accepted, this Issue can transform into a Change.<br><br>Once the Issue enters the change process, REC legal drafting will be prepared to enshrine the requirements to follow the best practice in the event of a prolonged MSI and set out the proposed implementation date. The extent and specificity of the legal text is still to be determined, especially as the initial round of feedback indicates a divergence of views on how prescription or principled basis this should be. REC Code Manager will seek further discussion and feedback through the Issue and Change process to inform the preparation of a draft. The views and discussions will be reflected in the change report.<br><br>RECCo, as the invested sponsor of I0168 will monitor, and engage with, the progression of I0168 through to decision.<br><br>DCC are actively engaging with RPS in this change development and attending CIG, and so far have expressed broad comfort with its aims and drafting. |

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| **T011** | **Confidence in managing Technical Incidents**<br>RECCo should review samples of downgraded tickets, or tickets reassigned to different organisations, and their rationale to identify if this indicates issues with capability or REC compliance | **In progress**<br><br>Target decision on next steps Fri 31st August | Considering the aims of this action with its corresponding review conclusion. RECCo have developed a proposal that RPA carry out an Assessment of the Incident Management Process. To assure priority rating appropriateness, validate the population of downgraded tickets, and enable a quality, independent assessment, to provide confidence in the capability and controls in place.<br><br>DCC have challenged the proposed scope of analysis, route to provide required information, and ability to provide the required resource within the proposed timescales. In answer, RECCo have developed an alternate approach, and asked DCC to confirm the scope of analysis they will assist with. If we have not reached agreement with DCC by Friday 23rd August, we will have a tri partite session between RECCo, DCC and RPA to discuss areas of disagreement, with the aim to overcome areas of disagreement and agree the scope of the assessment.<br><br>Once a decision is reached, RPA will work with DCC to reagree a plan and target delivery date. RECCo will share the assessment conclusions and any resulting recommendations with PAB. We will confirm the proposed target date at the September PAB. |

[1] I0168 currently includes drafting for T007, T009, IM015, IM017,COM022. RECCo and the Code Manager are actively seeking to explore how to include drafting for actions T009, IM019, IM019, to allow discussion with CIG and DCC.

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| **IM015** | **Impact on Energy Businesses**<br>RECCo should propose a change to code to clarify the DCC as Switching Operator's broader obligation to assess an incidents impact on the wider Switching Arrangements, with the purpose of ensuring the most effective, efficient overall Switching industry solution is promoted and implemented. | **In progress**<br><br>Target to transform issue I0168 into R0168 change via agreement from the September 2024 Change Panel.<br><br>Target Implementation Date - February 2025.<br><br>Proposed Implementation date due to be set when I0168 becomes R90168. | This requirements of this action are being progressed as REC Change Issue 0168.<br><br>See Ref T007 above for further information. |
| **IM016** | **Impact on Energy Businesses**<br>RECCo should propose the development of a cross-code working group to consider the cross-code implications of a future Major Switch Incident and whether any proactive adjustment to code governance provisions across UNC, BSC, and DCUSA , might better assist energy industry parties fix consequential issues/effects across the wider industry end-to-end Switching landscape. | **In progress – 31st Oct 2024.** | We have mobilised a REC Cross Code Steering Group discussion on this issue and confirm if the group agree and set in motion further work.<br><br>As the current REC CCSG terms of reference might not cover the ability of the group to fulfil the full requirements of this action, RECCo are exploring the need for us to set a session with the impacted codes directly to have a conversation and ascertain what is needed to better prepare what may be needed; code change or guidance, or acknowledgement of the risks of impacts to their code or their code parties, in event of a future Major Switch Incident. |

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| **IM017** | **Impact on Licences and Codes**<br>RECCo should propose a change to the REC to clarify that if a Major Switching Incident is not going to be resolved within defined Service levels, then the DCC in its role as Switching Operator should determine the impact on compliance with the REC end-to-end Switching Arrangements, and work with Ofgem, and the Code Administrators for BSC, UNC and DCUSA, and RECCo, to identify the cross code impacts/impacts on other Codes when managing an incident and developing an appropriate solution for industry, with least negative impact to end-consumers. | **In progress**<br><br>Target to transform issue I0168 into R0168 change via agreement from the September 2024 Change Panel.<br><br>Target Implementation Date - February 2025.<br><br>Proposed Implementation date due to be set when I0168 becomes R90168. | This requirements of this action are being progressed as REC Change Issue 0168.<br><br>See Ref T007 above for further information. |
| **IM018** | **Impact on Licences and Codes**<br>Following the above code change resulting from IM017.<br><br>RECCo should provide guidance to DCC, on the responsibilities for ensuring appropriate guidance and instruction is given, when working with Ofgem, the Code Administrators (for BSC, UNC and DCUSA, and RECCo), when managing an incident and determining the impact on compliance of the respective organisations within the scope of the REC. | **In Progress**<br><br>Target to transform issue I0168 into R0168 change via agreement from the September 2024 Change Panel.<br><br>Target Implementation Date - February 2025.<br><br>Proposed Implementation date due to be set when I0168 becomes R90168. | Before the end of August, RECCo and the Code Manager are exploring how the requirements required for this action might be added to the existing cross code drafting that is a part of the I0168 draft Category 3 REC MSI Best Practice. |

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| **IM019** | **Commercial Impact on Licences and Codes**<br>RECCo should review the terms of reference of the Switching Change Advisory Board (SCAB), as well as its membership, so that it could be convened to make decisions on similar incidents, should they occur in the future. As part of the review, consideration is needed around the SCAB role when agreeing the right resolution, with change impacts to multiple SDSPs and market participants.<br><br>How to convene an emergency Change Advisory Board should be included in any incident plan updates.<br><br>Once concluded and changes are made, clear guidance and information should be communicated via REC communications channels to market participants | **In progress**<br><br>Target to transform issue I0168 into R0168 change via agreement from the September 2024 Change Panel.<br><br>Target Implementation Date - February 2025.<br><br>Proposed Implementation date due to be set when I0168 becomes R0168. | The code manger has reviewed the SCAB Terms of Reference and provisions for its ad-hoc convention, if required to consider a Major Switch Incidents resolution proposals, and concluded the terms were ft for purpose. The attendance is appropriate for its role, as is the ability afforded to the chair to flex the attendance, as required.<br><br>The Code Manager recommends that the new REC Change Issue I0168, Major Switch Incident Best Practice Guidance includes guidance, to provide transparency and clarity, for the Switching Operator and REC Switching stakeholders, around the role of SCAB for prolonged major switch incidents, when considering/determining the proposed resolution activity to take.<br><br>RECCo & the Code Manager (RPS I0168 Change Lead) are progressing an amendment to the current draft MSI Best Practice Guidance, to include the requirements of this action, and enable discussion on this proposal with the DCC and CIG. . RECCo, as sponsor for I0168 will monitor, and engage with, the progression of I0168 through to decision. |

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| **COM022** | **Communicating the right message**<br><br>RECCo should raise a change to the REC Schedule 26, Switching Service Management, to provide additional direction on a requirement not just to develop a Category 3 procedure, but for DCC in its role as Switching Operator to periodically review, reissue and maintain a:<br><br>• Switching Incident Management Policy, including defined roles & responsibilities (i.e., RACI)<br>• Switching Service Management Policies & Procedures<br>• Procedure for the review and updating of contact lists for CSS Users, SDSP's and other interested parties.<br>• Annual testing of Incident Management Policies, procedures, processes, and RACI<br>• RACI clearly setting out hierarchy of needs dependent of Priority of Incident.<br>• clear communications strategy included channels and cadence of meetings in addition to ongoing SOF.<br>• DCC in its role as Switching Operator should complete annual testing of the incident responses processes for incident management. | **In progress**<br><br>Target to transform issue I0168 into R0168 change via agreement from the September 2024 Change Panel.<br><br>Target Implementation Date - February 2025.<br><br>Proposed Implementation date due to be set when I0168 becomes R0168. | This requirements of this action are being progressed as REC Change Issue 0168.<br><br>See Ref T007 above for further information. |

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| | • A Major Switching Incident run book. | | |
| **COM024** | **Communicating to the right people**<br>RECCo should consider a "tell us once" contact principle; for example, a single authentication and contacts service to make the process of providing contacts to REC Services simpler and more effective. | **In progress**<br>Target 31st Dec 2024<br>Discovery Work | For an enduring solution RECCo are exploring internally via a discovery project to ascertain,<br>• What technical solutions are out there<br>• If this fits with existing in-flight work confirmed via both the RECCo Strategy, but also our annual Forward Work Plan. To accommodate where there are appropriate synergies.<br>In parallel RECCo will explore if there are any helpful interim solutions we might put in place to assist parties. |

## 3 NEXT STEPS

RECCo are continuing discussions with DCC to finalise the scope for our proposed Assessment of Incident Management (T11), to reagree a scope and plan which RPA can mobilise. We will provide PAB with continuing progress updates, until the assessment is complete.

RECCo will continue to work with DCC, RPA, RPS, CIG and CCSG in the progression of activity to fulfil all "In Progress" and "Planned" actions the subject of our review, and provide further detail at the September PAB. Namely T007, T011, IM015, IM016, IM017, IM018, IM019, COM022, COM024.

## 4 PAB ACTIONS

PAB Members are invited to note the above.

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