RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0203 – CSS RETRY STRATEGY

DOCUMENT VERSION	V3.0
PROPOSED IMPLEMENTATION DATE	08/11/2024
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	CSS PROVIDER (DCC)		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
JAMES HARDY	MAXIME VAN EYSEREN	HELEN FOSBERRY
Click to send an email	Click to send an email	Click to send an email

OVERVIEW

This Change Proposal seeks to amend the legal text in section 2.4 of the Switching Data Management Schedule to reflect the retry strategy which is currently in the Central Switching Service (CSS) system.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 08 November 2024.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 3
3 Impacts 3
4 Cross-Code Impacts 4
5 Proposal plan 4
6 Priority Status and Urgency 4
7 Proposed Solution 5
8 Draft Legal Text 5
9 Risks, Assumptions, Issues and Dependencies 5
10 Business Case Assessment 5
11 Case for Change 6
12 Summary of Consultation Responses 6
13 Summary of Amendments Made Following Consultation 7
14 Appendix 7
15 Glossary 8

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

There is currently a mismatch within the Central Switching Service (CSS) system functionality and the legal text within REC Schedule 24 - Switching Data Management. Within the Schedule the retry strategy is defined as “retry sending the Market Message at intervals of 10 seconds, 20 seconds and 30 seconds from each attempt to send the Market Message. If these retry Market Messages also fail, then the Market Message shall be retried at intervals of one hour up to a maximum of 12 hours; after which delivery of the Market Message shall be abandoned and a Switching Incident raised in accordance with the Switching Service Management Schedule”. However, in response to an incident in 2022, the CSS Provider updated the retry strategy. The changes/updates implemented were made in good faith and have improved the message delivery performance of CSS, but the CSS system is currently out of sync with the REC legal drafting.

The REC Code Manager has engaged with the CSS Provider, the Data Communications Company (DCC), to develop a fully formed solution that will incorporate a legal text change only to update Schedule 24 – Switching Data Management. The DCC have reviewed the proposed legal text solution and confirmed that it is an accurate reflection of how the system is currently set up in terms of the retry strategy currently within the CSS. In addition, the DCC have confirmed to the Code Manager that they now have a system in place to ensure that any future changes to the retry strategy would not happen without a Change Proposal being raised in the first instance.

2 PROBLEM STATEMENT

The CSS is currently out of sync with the REC legal drafting for the retry strategy.

3 IMPACTS

REC SERVICE PROVIDERS
CSS Provider (DCC)

This Change Proposal is a legal text change only that will only impact the CSS Provider, the DCC. There are no impacts to any other Service Providers or REC Parties.

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
No impact on MHHS design.	No Data Specification.	Indirect impact – amendments to Schedule 24 – Switching Data Management.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**01 Sept-24**	**08 Oct-24**
	Business Case Assessment	**Completed**	**Completed**
	Consultation	**Completed**	**Completed**
	Final Determination	**Completed**	**Completed**
Voting		**15 Oct-24**	**15 Oct-24**
	Appeal Window	October	October

The Proposal Plan for R0203 is scheduled to allow for a 08 November 2024 implementation and was approved by the REC Change Panel at their meeting on 17 September 2024.

In line with the Proposal Plan, the Consultation was issued on 18 September and closed on 02 October. The Code Manager reviewed the responses and carried out a final determination that was completed on 03 October 2024. The Final Recommendation will now be taken the REC Change Panel for Voting on 15 October 2024.

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	61

Priority Status	LOW
Change Proposal Type	STANDARD

This is a standard Change Proposal and has been given a priority score of 61, with a low priority status.

RETAIL ENERGY CODE

SOLUTION

7 PROPOSED SOLUTION

Section 2.4 of Schedule 24 – Switching Data Management should be updated to reflect the current retry strategy: 1. a short interval retry sequence of 3 attempts at 20 second intervals 2. a long interval retry sequence of 12 attempts at 1 hour intervals.

The draft legal text red-linings for this proposed solution are documented below:

2.4 Where the synchronous validation set out in Paragraph 2.2 fails, or the associated response is not received, the Market Message shall be re-sent in accordance with the retry strategy. The retry strategy requires the sending System to retry a short interval retry sequence of 3 attempts at 20 second intervals ~~sending the Market Message at intervals of 10 seconds, 20 seconds and 30 seconds from each attempt to send the Market Message~~. If these retry Market Messages also fail, then the Market Message shall be retried at intervals of one hour up to a maximum on 12 hours; after which delivery of the Market Message shall be abandoned and a Switching Incident raised in accordance with the Switching Service Management Schedule. Should a 'retry-after' header be received by the CSS, then it will respect the first three periods specified in the header, but then will revert to the back-off strategy until the remaining number of attempts (to a maximum of 15) have been completed.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0203 can be found here.

9 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues or dependencies have been identified by the Code Manager.

10 BUSINESS CASE ASSESSMENT

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INTANGIBLE BENEFITS	• R0203 will ensure that REC documentation is contains accurate information and is up to date with the latest strategies following by the CSS provider, ensuring an accurate reflection of how the system is currently set up in terms of the retry strategy.
	• R0203 Provides an updated strategy that ensures the DCC will have a system in place to ensure that any future changes to the

	retry strategy would not happen without a change proposal being raised in the first instance.

10.1 COST BENEFIT ANALYSIS

No costs have been identified to deliver the solution for this Change Proposal.

Since the solution for this change is a legal text change only, and as there are no costs associated with the implementation of this change, the cost benefit analysis relies on the intangible benefits that this change facilitates.

11 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers that there is a case for change to implement this Change Proposal on the basis that:

- the proposed solution is fully formed and appropriately resolves the problem statement;
- this change ensures that Schedule 24 – Switching Data Management is an accurate reflection of how the system is currently set up in terms of the retry strategy currently within CSS and ensures REC documents are accurate and up to date; and
- a positive business case can be made, as set out in Section 10 and 11 of this Change Report.
- Market Participants expressed their support for the change during the Consultation, as set out in Section 12 of this Change Report.

12 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 18 September 2024 to obtain views on the Change Report (Consultation). In total two responses were received from an Energy Supplier and Distribution Network Operator. A Consolidated Consultation Response document can be found on the Change Proposal page, here.

The key themes from these responses have been summarised and set out below.

12.1 SUMMARY OF RESPONSES

Both respondents were overall supportive of the change.

12.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

One respondent, whilst agreeing in principle with the proposed solution, provided some further amendments to the proposed legal text for the CSS retry strategy definition. The respondent believed that the second, long-interval part of the retry strategy should be revised to match the

structure of the short-interval section. The respondent argued that, in their view, this would ensure that the CSS retry strategy would be as clear as possible in the Code. However, even with the amendment, the CSS retry strategy functionality would remain the same.

A second respondent noted, that had market participants had an opportunity to impact assess the proposed change made by DCC to the CSS retry strategy previously, a more rounded solution could have been achieved. The respondent provided an explanation of how they would like the retry strategy to function. However, the respondent agreed that the proposed legal text accurately reflects the current CSS retry strategy and agreed with the proposed solution for the problem statement of this Change Proposal.

12.3 FINANCIAL AND OPERATIONAL COSTS

Neither respondent anticipated any financial or operational impacts, or costs, to their organisation as a result of this Change Proposal.

12.4 IMPLEMENTATION DATE AND APPROACH

Both respondents were supportive of the implementation approach and an implementation date of 08 November 2024.

13 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made to the proposed solution, business case, or Code Manager recommendation following Consultation.

14 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

RETAIL ENERGY CODE

15 GLOSSARY

TERM	DEFINITION
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Data Communications Company (DCC)	means the person holding the DCC Licence.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Switching Incident	means an issue that arises with a System or process forming part of the Switching Arrangements that has been working but is no longer working or is not working correctly.