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CHANGE PROCESS IMPROVEMENT WORKSHOP OUTCOMES

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1 PURPOSE

This document provides the Technical Expert Panel with an overview of the near-term improvements agreed at the recent Change Process Improvement Workshop held by the Code Manager.

2 BACKGROUND

The REC change process went live on 01 September 2021 and introduced a new process for managing changes to the REC. Under the REC, the Code Manager is responsible for prioritising, developing, and delivering change to the Code. This differs from traditional code governance models, whereby these activities were primarily the responsibility of industry representatives.

The change process has initially focused on immediate priorities following the conclusion of Retail Code Consolidation (RCC) and transitional issues carried over from previous codes; consequentially, the full potential benefits of the new principles have not been realised yet. However, early operation of the change process has identified some potential improvements to the process.

The Code Manager invited views from stakeholders to gather feedback on the change process in November 2021 and held an internal workshop on 09 December 2021 to consider improvements that could be made, given early experiences and feedback from stakeholders.

The Code Manager embeds a culture of continuous improvement and will regularly be reviewing its processes to continue to identify and implement improvements.

3 OUTCOMES AND PROPOSALS

During the workshop, several actions were agreed to implement near-term improvements to the change process:

3.1 SPEED OF THE CHANGE PROCESS

The REC change process was designed to be flexible, allowing the Code Manager to set out a reasonable timetable for each Change Proposal based on its complexity and priority. Whilst this is broadly working for more complex issues, the process is perceived to be lengthy and onerous for simpler, fully formed Change Proposals.

There are several improvements that can be made over time to improve the speed and efficiency of the change process, but two actions were identified as near-term improvements that could have an immediate impact on this.

3.1.1 IMPROVEMENTS TO THE CODE MANAGER'S INITIAL ASSESSMENT PROCESS

When a Change Proposal is submitted, the Code Manager completes an initial assessment of the issue and drafts an Initial Assessment Report and Change Proposal Plan to summarise the Change Proposal and the plan for progressing this.

Various activities are required as part of the initial assessment process, including engagement with Service Providers, the Cross Code Steering Group (CCSG) and RECCo. Currently, different functions within the Code Manager have specific responsibilities in relation to the initial assessment, to ensure the impact against all aspects of the REC Change Proposal are considered in the assessment.

The Code Manager is working to streamline the internal assessment of the Change Proposal to reduce the timescales required to complete the initial assessment.

3.1.2 REMOVE RESPONSIBLE COMMITTEE REVIEW OF PRELIMINARY CHANGE REPORTS FOR SIMPLE OR URGENT CHANGE PROPOSALS

The REC does not require the Code Manager to present the Preliminary Change Report to the Responsible Committee prior to issuing this for consultation. However, this is currently included in the process. The intention of this is to ensure that the Change Proposal has been sufficiently developed to proceed to industry consultation, for a decision to be made on whether this should be approved or rejected.

We believe this review is still useful where the Code Manager has completed additional analysis, development or assessment of the solution as part of the Change Proposal Plan. However, where a Change Proposal is sufficiently developed or of sufficient urgency to proceed immediately to consultation, there is limited value in the Preliminary Change Report being returned to the Responsible Committee for review before the consultation is issued, as the plan for consultation will have already been approved by the Change Panel. This can add a delay of between two to four weeks for simple changes.

We propose to remove this requirement from the process, where it is agreed in the Change Proposal Plan that the Change Proposal should progress immediately to consultation.

3.2 ACCESSIBILITY AND TRANSPARENCY

There were several comments received from stakeholders regarding the accessibility and transparency of the change process. Some comments focused on how stakeholders can engage in Change Proposals in a way similar to the traditional methods of attending panel or workgroup meetings. It is still the intention that the REC does not use workgroups or panels as a default method of engagements and adopts a more digital method of engagement through the REC Portal and Energy Market Architecture Repository (EMAR). There are longer term improvements being considered for both systems to improve engagement in the process, which are being taken forward separately to these actions.

Near-term improvements identified are:

3.2.1 DOWNLOADABLE VERSION OF CHANGE PROPOSAL FORM

Stakeholders have reported that the absence of the functionality to download a copy of the Change Proposal Form, submitted by the Proposer on the REC Portal, prevents them from engaging relevant experts in their business at an early stage. Feedback suggests that accessing a downloadable version of this would allow early internal engagement on the Change Proposal so any issues or concerns could be identified and highlighted to the Code Manager.

The Change Proposal Form does not accurately reflect the solution that will be taken forward, as it focuses solely on the issue the Proposer is trying to resolve. It is subjective to the Proposers views prior to review by the Code Manager. However, we recognise that being able to circulate a downloadable document internally at an early stage will be of benefit to both industry stakeholders and the Code Manager if this encourages engagement in the Change Proposal.

Therefore, we will be making a downloadable version of the Change Proposal Form available for each Change Proposal on the Change Proposal page of the Portal. This will include a cover page with context that the solution has not been assessed by the Code Manager and is subject to change.

3.2.2 CHANGE TEMPLATE COVER PAGES AND DESCRIPTION

As described above, stakeholders have reported that they do not fully understand the different stages of the change process and the associated report published. For instance, it is not fully clear that the Change Proposal Form and Initial Assessment Report do not necessarily contain the final solution; and that the Preliminary Change Report being published means an Alternative Change Proposal can no longer be raised.

A simple approach to this is to add a cover page to the change templates, showing which stage of the process the change is at and explaining the purpose and context of that document. This will make it clearer to readers how the document should be interpreted.

3.2.3 ENGAGEMENT WITH INDUSTRY GROUPS AND SME'S

The intention of the REC change process is to ensure that the Code Manager is responsible for developing the solution to ensure the best outcome for all parties and consumers is considered. However, the intention is not to remove any engagement with industry experts who can offer valuable insight into the assessment of issues and the development of solutions. The Change Proposal Plan allows the Code Manager to consider if targeted engagement with relevant industry groups or experts is required for the development of a Change Proposal.

Currently, this is considered on a case-by-case basis and there is no standard approach for identifying and engaging with industry experts. It was noted that an enduring approach should be considered for how this engagement should be managed in the future. This is separate from general engagement with impacted parties, which is considered to be a different activity to engaging with relevant Subject Matter Experts (SMEs).

3.3 SERVICE PROVIDER SYSTEM CHANGES

A number of early REC Change Proposals have focused user experience improvements to REC Services, such as the Electricity Enquiry Service (EES) and the Secure Data Exchange Service (SDES). While many of these proposals appear to be sensible suggestions, we do not believe these suggestions being considered individually as formal Change Proposals is the most efficient way to take these forward or to manage the overall change process.

The intention of the REC change process is to move away from a "piecemeal" approach to addressing industry issues to allow longer term tactical solutions to be considered that deliver better outcomes and value for money.

We will be considering if an alternative approach should be used for stakeholders to raise issues or propose changes to the REC Services, to allow these to be triaged, grouped, and prioritised before formally entering the change process.

3.4 CATEGORY 3 CHANGES

Category 3 products are products that do not form part of the REC but are required by or relevant to the REC, requiring oversight and transparency of changes being made to these documents. This includes certain operational documents and non-mandatory guidance.

There are some existing Category 3 products that can have material impacts on stakeholders where changes are made, as they describe interfaces or specifications used by stakeholders to fulfil their obligations in the Code. The two main products of concern are the Performance Assurance Report Catalogue (PARC) and the EES API Technical Specification. Stakeholders have raised concerns that the Category 3 change process does not allow sufficient consideration, industry engagement or notice of implementation when changes are made to these products, considering the impact.

There are also some Category 3 products that have limited impact on stakeholders but require the Code Manager to publish several change notifications each time a change is made.

Stakeholders have reported that they do not want to receive excessive notifications about changes that do not impact their business.

The Code Manager has submitted a Change Proposal (R0028 – Review of Category 3 documents in the REC Baseline Statement) to amend the PARC and EES API Technical Specification to Category 2 products, and to review other Category 3 products to consider if they should be amended or removed as well.

4 COMMITTEE ACTIONS

Committee Members are invited to take the following actions:

- **NOTE** the contents of this paper.