





SPAA Change Proposal (SCP)		Stage of the document in the process?
<h1>SCP 498:</h1> <h2>Delay to the Implementation Date of SCP 472 and SCP 485</h2> <p>20 April 2020</p>		01 – Change Proposal
		02 – Working Group Report
		03 – Draft Change Report
		04 – Final Change Report
<p>SCP 498 seeks to delay the implementation date of SCP 472 ‘<i>Web-based solution for sending customer information securely</i>’ and SCP 485 ‘<i>Consequential amendments following SCP 472</i>’ to 06 November 2020.</p>		
	<p>The Proposer recommends that this Change Proposal should be:</p> <ul style="list-style-type: none"> Treated as an Urgent Change <p>This Change Proposal will be presented to the Change Board on 12 May 2020.</p> <p>The Change Board will consider the proposer’s recommendation and determine the appropriate route.</p> <p>The proposed impact assessment window is 5 Working Days.</p> <p>The proposed implementation date is 04 June 2020.</p>	
	<p>Impacted Parties: All Suppliers</p>	
	<p>Impacted Clauses: SCP 472, SCP 485</p>	

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Indicative Timeline		 020 7432 3005
The Secretariat recommends the following timetable:		Proposer: Paul Bedford (Opus)
Change Proposal submitted to the Secretariat	20 April 2020	 SPAA@electralink.co.uk
Urgent Status request presented to the SPAA Executive Committee	22 April 2020	 Paul.Bedford@drax.com
Urgent Status granted by the SPAA Executive Committee	22 April 2020	 01604 673 256
SCP 498 issued for Impact Assessment	23 April 2020	
Impact Assessment responses due	01 May 2020	
SPAA Change Board Vote	12 May 2020	
Change Report Issued	13 May 2020	
Appeals window closes	03 June 2020	
Implementation	04 June 2020	

1 Summary

What?

SCP 472 and SCP 485 are due to be implemented on 26 June 2020 and requires Domestic Suppliers to use the Secure Data Exchange Portal (SDEP) when sending operational queries and escalations in accordance with the SPAA. In addition, those I&C Suppliers that have acceded to certain elective SPAA Schedules (for example, Schedule 10 “*The Procedure for Resolution of Erroneous Transfers*”) will also be required to use the SDEP when sending operational queries and escalations in accordance with the SPAA. Due to the impact COVID-19 has had on some business’s operations, it may no longer be achievable for all SPAA parties to successfully transition to the use of the system by 26 June 2020.

SCP 498 seeks to delay the implementation of SCP 472 and SCP 485 by four months as a result of the impact COVID-19 has had on businesses, to allow additional time for parties to test and implement internal changes, successfully complete the onboarding process and roll out training to internal teams.

Why?

The impact of COVID-19 has had a significant impact on various businesses, their workforce and business priorities. Examples of the impact include reduced IT capacity and capability for BAU changes and issues; resource impacts due to operational staff being furloughed or working remotely; and business priorities diverting resource to focus on high priority issues, such as the protection of vulnerable consumers and security of supply.

While some businesses may still be able to meet the current implementation date of 26 June 2020, other businesses may not be able to complete the accession process, set up their users and deliver training in the current timescales. As the solution involves two-way communication, this will not work unless the industry as a whole is ready to adopt this from the date it is implemented. We therefore believe it would be prudent to delay the implementation date to allow additional time to plan the onboarding and transition to the new way of working, while accommodating other business priorities.

How?

By delaying the implementation date of SCP 472 and SCP 485 by four months to 06 November 2020.

This would not impact the delivery of the solution, but would delay the date it was made available to Suppliers therefore allowing additional time to onboard and train parties, allow additional time for parties to make internal changes and train staff to transition to the new arrangements.

2 Governance

Justification for Authority Consent

Authority consent is not required as none of the relevant criteria have been met.

Requested Next Steps

This Change Proposal should:

- Be treated as an Urgent Change

This change meets the criteria for urgency as implementing a change as significant as this in the current ambitious timescales, against competing priorities businesses are facing as a result of COVID-19 has a significant commercial impact on parties.

SCP 498 must be treated as urgent and proceed under the proposed timetable to ensure the outcome is agreed with sufficient notice before the current proposed implementation date.

3 Why Change?

Background

SCP 472 and SCP 485 are due to be implemented on 26 June 2020 and requires Domestic Suppliers to use the Secure Data Exchange Portal (SDEP) when sending operational queries and escalations in accordance with the SPAA. In addition, those I&C Suppliers that have acceded to certain elective SPAA Schedules (for example, Schedule 10 “*The Procedure for Resolution of Erroneous Transfers*”) will also be required to use the SDEP when sending operational queries and escalations in accordance with the SPAA. The impact of COVID-19 has had a significant impact on various businesses, their workforce and business priorities. Examples of the impact include reduced IT capacity and capability for BAU changes and issues; resource impacts due to operational staff being furloughed or working remotely; and business priorities diverting resource to focus on high priority issues, such as the protection of vulnerable consumers and security of supply.

Issue Resolution

The subject of delaying the implementation date for the SDEP was discussed at IREG on 08 April 2020. Parties at the meeting who made a representation did not believe that a delay was required, however, these parties represented a small group of the larger Suppliers in the market, who may not be as impacted as some smaller Suppliers that were not present or vocal during this meeting.

It was noted at this meeting that there was a concern that COVID-19 has increased the prevalence of emails between parties, meaning a greater volume of unsecured communications are being exchanged. While we recognise that it is important that a solution is implemented to resolve this concern, we do not believe this to be the highest priority for the industry at the moment and believe a short delay is justifiable to ensure the solution can be implemented by all parties without causing undue disruption to the industry.

Part B: Code Specific Details

4 Solution and Legal Text

Legal Text

N/A – proposed to amend the implementation date of an in-flight Change Proposal. No associated legal text required.

5 Code Specific Matters

Technical Skillsets

None required

Reference Documents

- SCP 472 - ‘*Web-based solution for sending customer information securely*’
- SCP 485 - ‘*Consequential amendments following SCP 472*’.

6 Relevant Objectives

Impact of the Change Proposal on the Relevant SPAA Objectives:

SPAA General Objectives	Identified impact
Please tick the relevant boxes. (See Guidance Note 9)	
<input type="checkbox"/> a) Development, maintenance and operation of an efficient, coordinated and economical Change of Supplier process.	None
<input type="checkbox"/> b) Furtherance of effective competition between Gas Suppliers and between relevant agents.	None
<input checked="" type="checkbox"/> c) Promotion of efficiency in the implementation and administration of the supply point administration arrangements.	Positive
<input checked="" type="checkbox"/> d) So far as is consistent with sub-paragraphs (a), (b) and (c), the efficient discharge of the licensee's obligations under this licence.	Positive
<input type="checkbox"/> e) Establishment, maintenance and operation of the Meter Asset Manager arrangements.	None
<input type="checkbox"/> f) Securing compliance with standard condition 12A of the Gas Suppliers Licence [Matters relating to Theft of Gas].	None
<input type="checkbox"/> g) compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

This change will positively impact SPAA General Objective c) and d) as delaying the implementation date will ensure a smooth and co-ordinated transition to the new arrangements whilst allowing parties to focus immediate resources and effort on more pressing requirements under their licence such as protecting vulnerable consumers and security of supply.

7 Impacts & Other Considerations

Does this Change Proposal impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No

Does this Change Proposal Impact Other Codes?

- BSC
- iGT UNC
- CUSC
- Grid Code
- MRA

DCUSA
Other
None

Equivalent Change Proposals have been raised under the Master Registration Agreement (MRA) to amend the implementation dates of Change Proposals (CPs) which are due to be implemented on 25 June 2020.

Consideration of CDSP Impacts

No impact on CDSP

Consideration of Wider Industry Impacts

The delay of the implementation date will allow parties to focus resources on the immediate impact to Consumers of COVID-19 and ensure a seamless transition to the new arrangements that will not delay the resolution of consumer facing issues caused by issues with the successfully onboarding and training of all MRA parties to the SDEP.

Confidentiality

Non-confidential

8 Implementation

Proposed Implementation Date

SCP 498 is proposed to be implemented on 04 June 2020.

9 Recommendations

Change Board Discussions and Determination [Self-Governance]

Insert text here

10 Attachments

No attachments