






SPAA Change Proposal (CP)		Stage of the document in the process?
<h1>SCP 498A:</h1> <h2>Delay to the Implementation Date of SCP 472 and SCP 485</h2> <p>27/04/2020</p>		01 – Change Proposal
		02 – Working Group Report
		03 – Draft Change Report
		04 – Final Change Report
<p>SCP 498A seeks to delay the implementation date of SCP 472 'Web-based solution for sending customer information securely' and SCP 485 'Consequential amendments following SCP 472' by two months to 21/08/2020.</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. 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 26 June 2020</p>	
	<p>Impacted Parties: All Suppliers</p>	
	<p>Impacted Clauses: SCP 472, SCP 485, SCP 498</p>	

Contents		 Any questions?
1	Summary	Contact:
2	Governance	Code Administrator
3	Why Change?	 email address
4	Solution and Legal Text	 telephone
5	Code Specific Matters	Proposer:
6	Relevant Objectives	Kirsty Dudley
7	Impacts & Other Considerations	
8	Implementation	Kirsty.Dudley@eonenergy.com
9	Recommendations	 07816 172 645
Indicative Timeline		
The Secretariat recommends the following timetable:		
Change Proposal submitted to the Secretariat	27 April 2020	
Urgent Status request presented to the SPAA Executive Committee	N/A - Inherited from SCP 498	
Urgent Status granted by the SPAA Executive Committee	N/A - Inherited from SCP 498	
SCP 498 issued for Impact Assessment	27 April 2020	
Impact Assessment responses due	04 May 2020	
SPAA Change Board Vote	12 May 2020	
Change Report Issued	13 May 2020	
Appeals window closes	03 June 2020	
Implementation	26 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.

Although we understand there may be a requirement for a delay in implementation, we feel the current testing and accession timeline should remain in place and on this basis feel that a two month extension to the implementation date alone would be enough to support business readiness and allow time to train staff that might be returning from furlough.

There also needs to be consideration to wider industry deliverables when it comes to picking a release date; in SCP 498 it requests a four month delay which aligns with major releases for other codes which could put a different pressure on parties. Additionally, there needs to be consideration that any lengthy delay could require Ofgem approval due to the impacts it may have on the REC delivery.

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 have been able to complete the accession process as this should already have been done, nor set up their users and deliver training in the current timescales; this may be due to work forces either being deployed to support the efforts to keep customers on supply or they may have been furloughed and are not there to be trained and be ready for go live.

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.

June 2020 was meant to be the final key release for SPAA so choosing a much later delivery e.g. November 2020 (SCP 498) could have wider ramifications. A delivery in August 2020 assists with additional training time and getting businesses back up to speed but doesn't stop the technical deliverables being finalised e.g. testing, so that will remain on the timeline already outlined.

How?

By delaying the implementation date of SCP 472 and SCP 485 by two months to **21 August 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 manage any internal delays from the COVID-19 Pandemic.

2 Governance

Justification for Authority Consent

Requested Next Steps

This Change Proposal should:

- Be treated as an Urgent Change (as an alternative to SCP 498)

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

There needs to be consideration of how this delay may impact the REC schedule.

We recognise that the Authority could call in both SCP 498 and SCP 498A for decision, however, we believe that a self-governance decision for both changes is efficient, but if it is deemed to impact the SCR it would need an Authority decision (for both SCPs).

3 Why Change?

Background

SCP 472 and SCP 485 are due to be implemented on 26 June 2020 and 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, although there was a lengthy debate regarding timings and potential delays the groups final position was that no delay was required however if parties did feel there needed to be a delay then it has to be as minimal as possible.

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, a short delay could be justified to ensure the solution can be implemented by all parties without causing undue disruption to the industry.

Our belief is that a delayed implementation recognises the challenges which some organisations may face; it is better that all parties are ready to go in a 'big bang' approach and should any parties not be ready or partially ready it may degrade the solution being delivered. Although a delay is not ideal, we support a pragmatic approach.

Note: as the sponsors of SCP 472 and SCP 485 we are supportive of the original implementation date, however, we do not support the November proposal in SCP 498 so we are proposing this as an alternative.

We believe this alternative SCP would meet the needs of parties without them needing a derogation, and therefore all parties can implement on the same date.

Part B: Code Specific Details

4 Solution and Legal Text

Legal Text

The movement of the implementation date from 26/06/2020 to 21/08/2020.

No associated legal text required as this is changing the implementation date only it doesn't not impact any timelines for technical development and testing.

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
<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

The SCP meets the objectives the objectives is because the delay in the implementation date ensures that as a 'big bang' implementation all parties are ready to go at once, the delivery does not work if it is only delivered by some parties and others implementing at different times.

7 Impacts & Other Considerations

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

The amendment of the implementation date could have impacts to the RCC SCR and we recommend Ofgem is made aware of SCP 498 and SCP 498A.

Does this Change Proposal Impact Other Codes?

- | | |
|-----------|-------------------------------------|
| BSC | <input type="checkbox"/> |
| iGT UNC | <input type="checkbox"/> |
| CUSC | <input type="checkbox"/> |
| Grid Code | <input type="checkbox"/> |
| MRA | <input checked="" type="checkbox"/> |
| DCUSA | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |
| None | <input type="checkbox"/> |

Consideration of CDSP Impacts

No UK Link impacts.

Consideration of Wider Industry Impacts

Any delay should be reflective in both the MRA and SPAA changes for SDEP and align the go live dates to ensure a smooth transition.

8 Implementation

Proposed Implementation Date

SCP 498A is proposed to be implemented on the 26 June 2020 (the current intended dates for SCP 472 and SCP 485) and moving the implementation to 21/08/2020.

9 Recommendations

Change Board Discussions and Determination [Self-Governance]

Insert text here

10 Attachments

No attachments