

Market Change Request

Number	Title	Priority
MCR 0169	Addition of Vulnerable Customer data deletion flag on 102	<i>Medium</i>

Date	Version	Reason For Change
08.10.2008	1.0	Market Change Request raised containing no changes from the associated Discussion Request.
20.05.2009	2.0	Changes made due to DPC requirement to have opt out option for life/non life support customers in terms of display of this data on the extranet. Changes only made to part 2 of the MCR and highlighted in yellow.

CHANGE REQUEST:		
Name of Requesting Organisation	RMDS	
Contact name	Jessica Gregory	
Date Change Request Raised	08th October 2008	Originating Discussion Request
		DR 0157

Detail of Discussion Request
<p><u>Background</u></p> <p>CER produced a directive in December 2005 which required electricity and gas providers to safeguard the provision of supply where a customer was deemed vulnerable (vulnerable customer being defined by CER as those reliant on electrical life support equipment, the elderly and the visually/hearing/mobility impaired). The directive was translated into various Network and Market system changes and additions during 2007. There are still a few changes which will come into effect during the next schema change.</p> <p>There are currently 10 coded vulnerable customer attributes:</p> <ul style="list-style-type: none"> 0001 Visually Impaired 0002 Speech Impaired 0003 Hearing Impaired 0004 Elderly 0005 Language Difficulty 0006 Learning Difficulty 0007 Mobility Impaired 0003 Life Support 0004 Non-Life Support 0005 Medical Institution <p>All of these flags besides Life Support and Non-Life Support are displayed on the Extranet. The data protection commission explicitly forbade the display of these two attributes. The display of these items was also under debate during the writing of this DR. The outcome of discussions with the Data Protection Commission resulted in Part 2 of the DR being written (see below)</p> <p>ESBN relies on the supplier providing vulnerable customer data. The implications to processes are as follows:</p> <ol style="list-style-type: none"> 1. <u>Change of Supplier (CoS)</u>: Networks does not pass the vulnerable codes on to a new supplier during a CoS. The onus is on the supplier to gather this data from their new customer. The supplier can be alerted to vulnerability (if an existing customer changing supplier at a site) by looking at the extranet which displays 8 of the 10 codes.

Detail of Discussion Request

2. The Change of Legal Entity (COLE): The COLE process deletes all existing attributes associated with the MPRN and customer. The assumption here is that a new customer is moving in to a site and thus would not maintain the same vulnerable flags as the previous customer. We will not maintain the attributes on the previous customer for future use. Again, the onus is on the supplier to always provide these attributes when doing a change of legal entity.
3. Change of Customer Details (COCD): The COCD process is the mechanism for a supplier to add or remove a vulnerable attributes during the lifecycle of the customer.

Proposed Change – Part 1

The DR arose out of the concern that the vulnerable customer data for life support and non life support is not transferred to the new supplier during a change of supplier process. That is, Networks is not allowed due to data protection legislation, to pass this data between suppliers during the CoS process.

The concern is that this critical data may not be gathered by the new supplier which would result in the data being lost from the Networks system. This data acts as a marker in the system which alerts users to the customers condition as well as being used within system processes to prevent certain events occurring (for example de-energisation).

The proposal is to alert the new supplier during the CoS process to the fact that this data (life support or non life support) did exist on the customer record in Networks system. The alert will be in the format of a flag on the 102 message which indicates that some vulnerable data has been removed from the record.

It is suggested that the flag be named something like "VC attribute deleted". The data values would be Y or N.

The logic would work as follows:

The flag on the 102 MM would be marked as Y when:

- an 010 was received and COLE is marked as **N AND**
- there was a life or non life support marked on the existing BP **AND**
- there was no life or non life support sent by supplier and consequently not added to the BP after full CoS process.

Since the change involves a new code and field being added to a message it will necessitate a schema change to the 102 MM.

It must be noted that if the life/non life is to be added after the 102 is received, it should be added once the 105 has been received.

It will also necessitate a change to the CoS workflow. The change would involve including a check step which performs the above logic and populates the outbound 102 message with the new code.

This code and field will not be included in the Change of legal entity process or in the change of customer details process.

Proposed Change – Part 2

Discussions have been held with the Data Protection Commission (DPC) to decide on whether the life and non life flags can be displayed on the extranet. The reasoning behind this, is to provide more transparency to suppliers of the critical data which should result in fewer cases of accidental loss of life/non life support data during CoS.

The outcome of the discussion was that the DPC agreed to the life/non life data being displayed on the extranet on condition that all relevant customers were notified of this intention. Subsequent to this decision and release of MCR 169 v.1.0, further clarification was sought from the DPC to establish whether customers should be allowed to opt out of the display of the data or not. The DPC confirmed on the 05.05.09 that customers must be given the choice to opt out and refuse display of the life/non life

Detail of Discussion Request	
<p>status on the extranet.</p> <p>ESB Networks will run a notification exercise which will involve notifying all life and non life customers of the intention to publish their status on the extranet. They will be made aware of the limited viewership of this data and that the reason behind the display is to provide better customer service to these customers. It is aimed at flagging the status to a new supplier ensuring that this data is not lost which may result in negative consequences to the customer. The notification letter will give the customer the option of not having the data displayed on the extranet. ESNB will manage the update of the data dependent on customer response. If the customer has not objected to the display of the data within a certain period, it will be assumed that it can be displayed. This will be indicated on the notification letter.</p> <p>The decision to allow the customer an opt out option for display of life/non life data on the extranet into the future has resulted in the need to change a few market messages, the schema and the ESB Networks back-end system.</p> <p>ESB Networks will manage the data storage according to customer preference of the existing life/non life customers. Once the initial notification exercise is completed by ESB Networks, the responsibility will fall to the suppliers to establish whether the life/non life data can or cannot be present on the extranet.</p> <p>The logic behind this is that the supplier is the first and often only point of contact with the new life/non life customer. The supplier will be gathering all relevant data on this customer. The supplier will need to ask the life/non life customer whether they wish to have the life/non life support data flag displayed on the extranet. The supplier should make it known to the customer that it would enable better customer service to the customer if the data flag was present on the extranet. There are 2 outcomes to the Display on Extranet question:</p> <ul style="list-style-type: none"> • Y • N <p>A new field will need to be created on the 016, 013, 017, 010 message. The suggested segment is Medical equipment special needs segments of the relevant messages. The segments are as follows:</p> <ul style="list-style-type: none"> • 013 Medical Equipment Special Needs – 013 Message • Medical Equipment Special Needs – 016, 017, 010 Message <p>This field will map directly to a field in the central market system which either allows or prevents the display of the field on the extranet.</p> <p>The actual display of the life/non life flag on the extranet is a relatively small change. The display will be determined depending on whether the customer wishes the flag to be displayed or not.</p>	
Reason for Discussion Request	
<p>To provide more detail to suppliers in order to support and enhance their business processes. To ensure customers who may be using life or non life support are marked as such during the CoS process.</p>	
Market Design Documents impacted by Request	
<p>Retail Market Participant Extranet Website.doc</p> <p>Market Design 6.1 – MCR Part 1 – 102 Message, MCR Part 2- Messages 010, 013, 016 and 017</p>	
Date of IGG where discussed	<i>18th September 2008</i>
Change Request xref (if applicable)	<i>N/A</i>

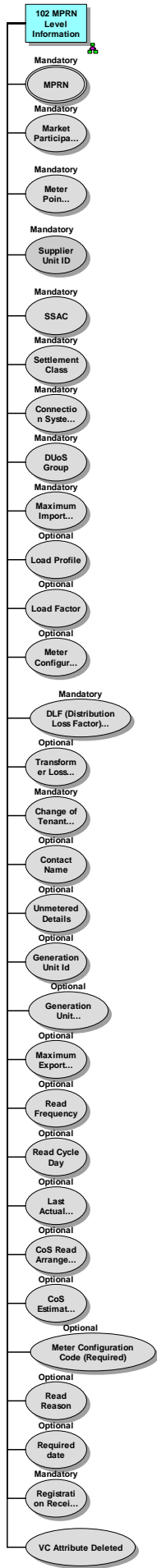
PART 2 MARKET ASSURANCE:				
Applicability				
ESB Networks	Suppliers	TSO	SSA	Generators
X	X			
Scope of Test				
Connectivity	DTT	MSA	IPT	Other
			X	
			No. Of Scenarios	

PART 3 RESPONSES AND MODIFICATIONS:
Collation of Impact Assessment (from Form C)
<i>Not Applicable</i>
Modifications Included
<i>Not Applicable</i>
Reason for Modifications
<i>Not Applicable</i>

PART 4 ASSESSMENT & RECOMMENDATION:
Part 4(a) ASSESSMENT
Summary of Impact Assessment
Recommendation on Implementation Plan

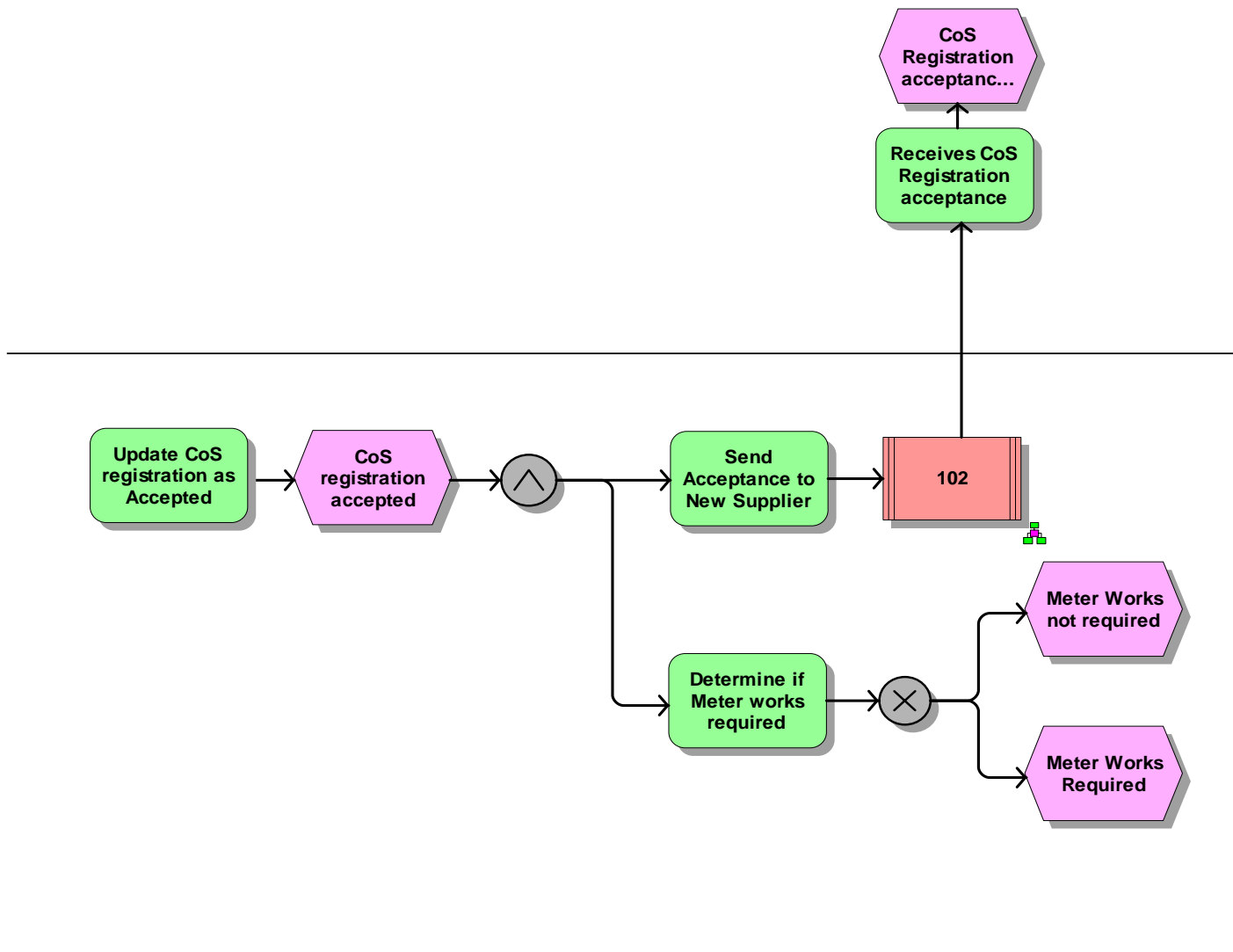
Part 4(b) RECOMMENDATION			
ACCEPTANCE	REJECTION	NO RECOMMENDATION	COMMENT
Reason for Recommendation			
Date of Recommendation			

Appendix 1 – New field on 102 message (102 MPRN Level Information)



VC Attribute Deleted

APPENDIX 2 - Relevant section of MPD1:



Appendix 3 – Sample 013 message with new 'Display on Extranet' field

