

CP Consultation Responses

CP1589 ‘Change the number of characters used to specify Market Participant Role Codes in the Market Domain Data’

This CP Consultation was issued on 13 November 2023 as part of the November 2023 CPC Batch, with responses invited by 8 December 2023. An extension was added to the Consultation, giving participants an additional 5 WDs to submit responses. The consultation therefore subsequently closed on 15 December 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Stark	1	Supplier Agent
IMServ	1	
ESP Electricity Limited	1	Distributor
Siemens	1	Supplier Agent
UKPN	1	Distributor
British Gas	3	Supplier Agent, Supplier, Virtual Lead Party
SSE Energy Supply Limited	1	Supplier
Northern Powergrid	1	Distributor
ENGIE	1	Supplier
EDF	1	Supplier
BUUK	1	Independent Distributor
Scottish Power	1	Supplier

Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
Stark	✓	✓	✓	✓
IMServ	✗	✗	✗	✗
ESP Electricity Limited	✓	✗	✓	✓
Siemens	✓	✓	✓	✓
UKPN	✓	✓	✓	✓
British Gas	✗	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✓	✓
Northern Powergrid	✓	✓	✓	✓
ENGIE	✓	✓	✓	✗
EDF	✓	✓	✓	✓
BUUK	✓	✓	✗	✓
Scottish Power	✓	✓	✓	✗

Question 1: Do you agree with the CP1589 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	2	0	0

Responses

Respondent	Response	Rationale
Stark	Yes	None Given
IMServ	No	<p>We feel this requirement should seek to minimise the impact on legacy systems such as HHDC/DA/MO etc. by avoiding introducing new role codes, for example in order to support MHHS Migration. If new role codes are going to be introduced for migration, it would be highly beneficial to know exactly which flows would be being sent to/from each legacy role. We don't believe such information has been shared yet, therefore we feel it makes sense to implement this change as part of MHHS under a CR rather than implementing a change beforehand.</p> <p>We don't believe any change is required before MHHS is implemented. It would have been very useful to have further detail on how many role codes are currently in use, how many are being retired and how many new role codes are needed (and for what purpose), to establish when or if this change is needed.</p> <p>A comment of '...it is highly likely that there will be a need for new Role Codes to be allocated before then' doesn't really justify this change being made now.</p> <p>We believe that R0043 will not now require any new role codes based on the information available (Section 9.1 of RECCo's final report).</p>
ESP Electricity Limited	Yes	None Given
Siemens	Yes	Role code is a key data item and as there are no new permutations of role code in the fields current format and the options to remove existing role codes

		unavailable the only other option is to expand from Char(1) to Char(2) characters.
UKPN	Yes	We are happy with moving to char(2), and not using upper and lower case alphas or special characters, so long as the existing one character role codes are unchanged (which appears the case as currently drafted).
British Gas	No	<p>We would support the alternative solution mentioned in the consultation. i.e. Using lower-case and upper-case versions of the same letter (e.g. 'a' and 'A') to represent different Market Participant Roles for the following reasons:</p> <p>Char 2 will require changes to MDD flows so this will impact all parties that process this flow.</p> <p>Char 2 will impact parties who used fixed format even if they are not involved in any flows to/from any new 2 char role.</p> <p>Use of lowercase has no impact on MDD flows.</p> <p>Parties that have issues with using lowercase role codes due to their system design will only be impacted if they need to send/receive flows from the new role(s) which may be never.</p> <p>Use of lowercase will remove the need for changes to the MDD/ISD design which could have had a knock on impact to MHHS.</p>
SSE Energy Supply Limited	Yes	None Given
Northern Powergrid	Yes	None Given
ENGIE	Yes	The proposal as outlined seems reasonable and does address a real issue with insufficient codes.
EDF	Yes	None Given
BUUK	Yes	None Given
Scottish Power	Yes	None Given

Question 2: Do you agree that the draft redlining delivers the CP1589 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	1	1	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Stark	Yes	None Given
IMServ	No Comment	Not reviewed as we don't believe this CP is required
ESP Electricity Limited	Yes	None Given
Siemens	Yes	None Given
UKPN	Yes	To avoid widespread system change the existing single character roles codes must remain unchanged.
British Gas	Yes	None Given
SSE Energy Supply Limited	Yes	None Given
Northern Powergrid	Yes	None Given
ENGIE	No	There are a number of references to Market Participant Role Code in the draft BSCP509 where the number of characters referenced is 1. This should be checked to ensure it is correct.
EDF	Yes	None Given
BUUK	Yes	None Given
Scottish Power	Yes	None Given

Question 3: Will CP1589 impact your organisation?

Summary

High	Medium	Low	None
1	7	3	1

Responses

Respondent	Response	Rationale
Stark	Low	System code changes will be required to facilitate processing of the new role codes
IMServ	Medium	<p>We have based our assessment of impact as being low upon the comment that:</p> <p>“in the header of all Market Messages sent across the Data Transfer Network (DTN) to define the sender and the recipient – but this would only impact those DTN Users using the ‘Fixed File’ format.” since IMServ use Variable and Pool formats. We further assume that none of the existing role codes are changing and that this CP simply enables new role codes to be introduced.</p> <p>Should this assumption be incorrect, then the impact to us is ‘Medium’ based on the following factors:</p> <p>For each role we operate, here is a count of the number of flows impacted due to the change in the role code in the header:</p> <p>HHDC Received 25 Sent 21 HHDA Received 15 Sent 16 MOP Received 41 Sent 26</p> <p>We have spent many years refining our internal business logic based on rulesets referencing the role code of the incoming/outgoing flow. To spend time re-working these in what are soon to be legacy systems is frankly ridiculous, particularly given this knock-on risk to delivery of all the MHHS systems we are currently developing.</p>

		To re-iterate, if the limit is indeed going to be breached due to requirements coming out of MHHS, this CP should be raised by the MHHS programme and align to programme requirements. This would minimise impact on all parties.
ESP Electricity Limited	No	Work will be required for service provider
Siemens	High	Market Participant Role Code is a key field heavily referenced in systems and processes. This all assumes that the current codes will remain unchanged, if the reference points change then the corresponding downstream references will need aligning too further increasing the work required.
UKPN	Low	Only for storing standing data from MDD and to the extent that any existing messages we use will refer to 2 character role codes.
British Gas	Medium	Multiple changes to systems to change fields to accept CHAR 2
SSE Energy Supply Limited	Medium	None Given
Northern Powergrid	Yes	Although CP1589 does not impact our internal infrastructure us at this time, when a 2 character role code is introduced that we are required to process, there will be significant impact to our infrastructure which will require a minimum 6 months implementation window and associated costs.
ENGIE	Medium	As the impact of the change is so wide, affecting every DTN flow, it has to be categorised as at least medium impact. In particular we will need to confirm absolutely with our Service Provider that their Gateway configuration can accommodate the change, understand the impact of the change on databases in which the J0001 is stored, and assess the impact on back office systems that are linked to our market interaction software.
EDF	Yes	This change will have impact on a number of our systems which use the fixed format. Cost for this is still to be determined.
BUUK	Yes	Software providers C&C and SCS will oversee necessary systems changes.
Scottish Power	Medium	We have not fully impacted assessed this change within the timescales given, however, we do anticipate we will have to make system changes and changes to downstream processes.

Question 4: Will your organisation incur any costs in implementing CP1589?

Summary

High	Medium	Low	None
2	4	5	1

Responses

Respondent	Response	Rationale
Stark	Low	Ongoing costs attributed to any system code changes required to facilitate the new role codes
IMServ	Low	Again, making the same assumption that no existing role codes are changing, and this just enables new codes to be created.
ESP Electricity Limited	Low	None Given
Siemens	High	Yes, Siemens will be heavily impacted and this will incur large costs to align both systems and processes to meet CR1589.
UKPN	Low	System changes for storing standing data from MDD and to the extent that any existing messages we use will refer to 2 character role codes.
British Gas	Medium	None Given
SSE Energy Supply Limited	Medium	Yes, we will incur one-off costs to make the system changes for the two characters.
Northern Powergrid	High/Medium	<p>We won't incur costs as a result of implementing this change however, when we are required to operationally implement Char (2) roles we will incur significant cost due to the infrastructure changes required.</p> <p>Each change will need to be fully assessed.</p> <p>In addition, we understand that data flows/the Data Transfer Network (DTN) will be replaced at a future date by the Data Integration Platform (DIP) and therefore need to ensure any changes take this into consideration, before embarking on any DTN changes, to ensure we get value for money.</p>

ENGIE	Low	Although we believe our main gateway software should be able to accommodate the change, we could incur costs in making the necessary changes to other systems that use the J0001 code,
EDF	Yes	Yes, full cost for this is still to be determined.
BUUK	None	Subject to existing contractual arrangements.
Scottish Power	Medium	None Given

Question 5: Do you agree with the proposed implementation approach (November 2024 BSC Release) for CP1589?

Summary

Yes	No	Neutral/No Comment	Other
9	3	0	0

Responses

Respondent	Response	Rationale
Stark	Yes	None Given
IMServ	No	We believe this change should be part of the MHHS programme since the need for further codes seems to be being driven by MHHS requirements. This CP is light on detail as to why new codes are required by November 2024.
ESP Electricity Limited	Yes	MHHS implications – the code freeze commences 1st November 2024 and then SIT regression commences.
Siemens	Yes	Nov 2024 is achievable; this is a huge piece of work though and ideally will be the only change due Nov 2024.
UKPN	Yes	It provides both a lead time and readiness.
British Gas	Yes	A minimum of 6 months would be required for a change as significant as this
SSE Energy Supply Limited	Yes	None Given
Northern Powergrid	Yes	None Given
ENGIE	No	We do not at this stage feel that the impact of this change on all systems (not just the Gateway) has been fully assessed and would prefer a later implementation date, for example February 2025.
EDF	Yes	N/A
BUUK	Yes	*Subject to confirmation that this is feasible with minimal MHHS implications due to this coinciding with both the code freeze and then SIT regression.

Scottish Power	No	Our preference would be February 2025 implementation for the reason stipulated in our response to Q7.
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Question 6: Which DTN Gateway configuration do you use? Fixed File format, Variable File format or Pool File format?

Summary

Fixed File	Variable File	Pool File
5	9	8

Responses

Respondent	Response	Rationale
Stark	Pool File	None Given
IMServ	Variable File / Pool File	Variable and Pool depending on the flow
ESP Electricity Limited	None Given	None Given
Siemens	Variable File	None Given
UKPN	Fixed File/Variable File/Pool File	For the MDD files (D0269 and D0270), we use Pool Format (v1.4). However, a combination of all three of the configurations (Fixed File/Variable File/Pool File) will be used for other files (including those that use data specified in the MDD).
British Gas	Fixed File/Variable File/Pool File	None Given
SSE Energy Supply Limited	Fixed File	We use the fixed file format
Northern Powergrid	Variable File/Pool File	None Given
ENGIE	Any	We believe our Gateway can accept flows in any of these formats and we do not believe there would be an issue with accepting the additional character in the J0001. We are however awaiting final confirmation from our Service Provider that this is the case.
EDF	All	Our DTN Gateway configuration uses all the formats listed above.
BUUK	File/Variable	None Given
Scottish Power	File/Variable File/Pool File	None Given

Question 7: What would the impact of implementing CP1589 in February 2025 be to your organisation?

Summary

High	Medium	Low	None
1	1	5	4

Responses

Respondent	Response	Rationale
Stark	None Given	None Given
IMServ	Medium	A delay to Feb 2025, although potentially useful, is still not the correct approach since we believe this change should be part of MHHS.
ESP Electricity Limited	None	None but this may impact MHHS timelines as this would be after the code freeze and after SIT regression testing completes.
Siemens	High	<p>The impact will be the same as outlined in question 3, question 4 & question 5 but with the advantage of more time to allow for these changes to be implemented.</p> <p>Assuming Feb 2025 is an alignment to the closest to MHHS migration commencing and the change will be implemented into current and MHHS systems for migration requirements.</p>
UKPN	Low	System changes for storing standing data from MDD and to the extent that any existing messages we use will refer to 2 character role codes.
British Gas	Medium	None Given
SSE Energy Supply Limited	None	An implementation date of February 2025 would not negatively impact us, and would give more time to make the necessary changes to our systems.
Northern Powergrid	None	None Given
ENGIE	Low	This would be our preference to enable an adequate impact assessment of the change and allow time for any subsequent system development that may be necessary.
EDF	Low	We require a minimum of 6-9 months' notice prior to change implementation.

		The implementation date should be confirmed as soon as possible to allow for delivery planning.
BUUK	None	Subject to our concerns already raised in response to Question 5.
Scottish Power	Low	This would be our preference, as November we will be in the middle of implementing MHHS changes.

Question 8: Have you identified any alternative solutions to this issue, other than those described in CP1589?

Summary

Yes	No
1	11

Responses

Respondent	Response	Rationale
Stark	No	None Given
IMServ	Yes	Raise an MHHS CR. In fact, we understand that all MHHS flows will differentiate between upper and lower case so an extra digit would not need to be introduced and industry participants will be building their systems with this in mind.
ESP Electricity Limited	No	None Given
Siemens	No	None Given
UKPN	No	None Given
British Gas	No	None Given
SSE Energy Supply Limited	No	We have not identified any alternative solutions.
Northern Powergrid	No	None Given
ENGIE	No	N/A
EDF	No	No – Other than suggested in the proposal.
BUUK	No	None Given
Scottish Power	No	We agree moving to Char (2).

Question 9: If you use the Fixed File Format for DTN headers, will your systems service provider be able to implement the changes in the specified timescales?

Summary

Yes	No	Neutral/No Comment	Other
3	1	8	0

Responses

Respondent	Response	Rationale
Stark	None Given	None Given
IMServ	No	We don't use Fixed File Format
ESP Electricity Limited	None Given	None Given
Siemens	None Given	We do not use fixed file format.
UKPN	Yes	Our external and internal system service providers will be able to implement any required changes for the specified time scale (February 2025).
British Gas	None Given	None Given
SSE Energy Supply Limited	Yes	We believe we can implement the changes in the specified timescales.
Northern Powergrid	N/A	None Given
ENGIE	N/A	We do not believe we are reliant upon the fixed format (and as far as we are aware have not been contacted by Elexon as such) but are awaiting final confirmation of this from our Service Provider.
EDF	Yes	None Given
BUUK	N/A	None Given
Scottish Power	Yes/No	We do not use fixed file format.

Question 10: Would your system be able to process uppercase and lowercase version of the same letter to represent different market participant role codes?

Summary

Yes	No	Neutral/No Comment	Other
3	7	2	0

Responses

Respondent	Response	Rationale
Stark	Yes	Our system would accept upper & lower case changes with some code changes , however we do not consider this to be the viable option and would not be our preference.
IMServ	No comment	This question has no relevance to us as development would be required regardless of the change being 2 digit, 1 digit with upper and lower case or implemented as part of MHHS, the development effort is likely to be less if implemented as part of MHHS with less potential for re-work.
ESP Electricity Limited	No	MPRS system is not designed to treat Role Code as case sensitive
Siemens	Yes	None Given
UKPN	No	This would require more complex change across a number of systems
British Gas	Yes	None Given
SSE Energy Supply Limited	No	Our system will not be able to process uppercase and lowercase versions of the same letter without making system changes.
Northern Powergrid	No	Our systems are not designed to treat role codes as case sensitive.
ENGIE	No Comment	We have not yet validated this point with our service provider.
EDF	No	Not without significant changes to all systems. We disagree with this solution option as we believe this change is more error prone and may result in the parties incorrectly populating the information resulting in data flow and process failures.

BUUK	No	None Given
Scottish Power	No	This would not be possible without functional changes being made.

Question 11: Do you prefer the original proposal of Char(2) or the use of upper/lower case letters?

Summary

Char (2)	Upper/Lower Case	Neutral/No Comment	Other
9	2	1	0

Responses

Respondent	Response	Rationale
Stark	Char (2)	We agree with views of original proposal of expanding the Market Participant Role Code to Char(2) as this would be the more practical & robust option, more readily acceptable with minimal impact to Participants.
IMServ	Neutral	No preference
ESP Electricity Limited	Char (2)	<p>The use of a Char 2 code will result in a significantly lower impact and cost and represents the best option for our connected systems.</p> <p>There are technical issues that will make any proposal to use lower-case and upper-case versions of the same letter (e.g. 'a' and 'A') to represent different Market Participant Roles very difficult and costly to implement.</p> <p>Use of any case sensitivity within a 2 character format will also cause significantly higher impact to this change, for example;</p> <p>AB = "Apple" Ab = "Pear"</p> <p>In order to reduce impact, both examples above (AB & Ab) should equal the same meaning.</p>
Siemens	Upper/Lower case	The size of the change is significantly reduced going down the case sensitive approach than the field size increase. Testing will also be reduced as result of this option being taken too.
UKPN	Char (2)	This is the simplest solution to deliver the outcome in the required timeframe. The use of upper and lower case would be costly to implement and could result in errors in using the wrong role code, e.g. I send a message to AB when I should have used Ab, and that could have a data protection implication.

British Gas	Upper/Lower case	None Given
SSE Energy Supply Limited	Char (2)	We prefer the original proposal of Char (2) as the use of upper and lower case is likely to lead to confusion and errors being made and it could lead to significantly more instances of incorrect role codes being sent. The use of Char (2) is much more resilient and fool-proof.
Northern Powergrid	Char (2)	<p>We and our service providers prefer Char (2) with no case sensitivity.</p> <p>There are technical issues that will make any proposal to use lower-case and upper-case versions of the same letter (e.g. 'a' and 'A') to represent different Market Participant Roles very difficult and costly to implement.</p> <p>Use of any case sensitivity within a 2 character format will also cause significantly higher impact to this change, for example: AB = "Apple" Ab = "Pear"</p> <p>In order to reduce impact, both examples above (AB & Ab) should equal the same meaning.</p>
ENGIE	Char (2)	This solution would appear to offer more potential codes.
EDF	Char (2)	This solution allows for a streamlined data item format.
BUUK	Char (2)	Excessive technical and resource constraints on case sensitivity makes Char (2) preferable.
Scottish Power	Char (2)	Char (2) is our preferred solution option.

Question 12: Do you think there may be an alternative solution to CP1589?

Summary

Yes	No	Neutral/No Comment	Other
1	9	1	0

Responses

Respondent	Response	Rationale
Stark	None Given	None Given
IMServ	Yes	This should be raised as a MHHS CR since it's need is being driven by MHHS and this would mean only one co-ordinated change is needed
ESP Electricity Limited	No	None Given
Siemens	No	None Given
UKPN	No	None Given
British Gas	No	None Given
SSE Energy Supply Limited	No	None Given
Northern Powergrid	No	None Given
ENGIE	No	N/A
EDF	No	N/A
BUUK	No	None Given
Scottish Power	No	We are comfortable the proposed solution of changing Char (2) as this will address the issue and increase the number of available role codes.

Question 13: Do you have any further comments on CP1589?

Summary

Yes	No
4	7

Responses

Respondent	Response	Comments
Stark	No	None Given
IMServ Ltd	No	None Given
ESP Electricity Limited	Yes	This change would benefit significantly from having examples of the new codes that would be proposed under each option. Without these the wording is ambiguous and open to interpretation.
Siemens	Yes	Are there plans to change the original codes to populate the new format. E.g. Role Code A becoming 0A or AA? If there are no changes to existing codes, can it please be explicitly stated/confirmed that the original role codes will remain unchanged?
UKPN	No	None Given
British Gas	No	None Given
SSE Energy Supply Limited	No	None Given
Northern Powergrid	Yes	We've made an assumption that the MDD versions will remain at 2 and 4 in our Impact Assessment.
ENGIE	Yes	Given the ubiquity of the J0001 and the risk of unintended consequences from a sweeping change of this nature, we would recommend that there is a second consultation on this change to enable consultation responses to be shared and further input to be gained from industry prior to moving to acceptance of the proposed solution.
EDF	No	N/A
BUUK	No	None Given
Scottish Power	No	None Given

Insert CSD Here

Respondent	Location	Comment

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Respondent	Location	Comment

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Respondent	Location	Comment