



ETTOS Change Guideline

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2 Document Control

Version Number	Owner	Reviewer	Date of Issue	Reason for Change
0.1	Sarah Jones	Internal Review	20/05/16	First draft
0.2	Sarah Jones	ETTOS Working Group	23/5/16	Second draft

3 Purpose

This document sets out the ETTOS Change Management process. It provides details of the processes to be followed by the SPAA EC, DCUSA Panel, ETTOS Service Provider and the Code Administrator in order to progress a change to the ETTOS provisions within the SPAA and DCUSA or the ETTOS Contract.

It is recommended that this guideline be read in conjunction with the SPAA and DCUSA change management clauses and the ETTOS Contract. In the event of conflict, the SPAA, DCUSA and ETTOS Contract take precedence.

4 Glossary

The following table defines terms and acronyms used in this document.

Definition	Acronym (if applicable)	Purpose
Code Administrator	-	Organisation appointed by the SPAA and DCUSA to assist with communication relating to issues and implementation of agreed changes to the Codes.

Definition	Acronym (if applicable)	Purpose
Change Lead	-	Individual assigned by the Code Administrator as responsible for an individual CP.
Change Pack	-	A pack containing all the SPAA CPs scheduled for discussion at the next Change Board meeting issued in line with the SPAA Change Calendar.
Change Proposal	CP	A document formally proposing a change to the SPAA or DCUSA Agreements.
Contract Change Notification	CCN	A document formally proposing a change to the ETTOS Contract.
Code Change	-	Change to the SPAA or DCUSA Agreements
DCUSA Panel		Governance Board representing DCUSA Parties.
ETTOS Working Group	EWG	SPAA and DCUSA sub-committee whose role is to support the ETTOS implementation and assess potential changes.
SPAA Executive Committee	SPAA EC	Governance Board representing SPAA Parties.
SPAA Change Calendar	-	A calendar of monthly change dates and release dates for SPAA CPs.

5 ETTOS Change Guideline Overview

Change can come about either through industry developments or through issues that have been identified with the current processes. SPAA and DCUSA Parties who are considering raising an ETTOS related Change Proposal (CP) are advised to discuss this with the Code Administrator first so any potential issues can be resolved before the CP is officially raised.

Changes to the ETTOS provisions within the SPAA and DCUSA are likely to require consequential changes to the ETTOS operational procedures and/or ETTOS Contract. The EWG will ensure that any consequential changes are highlighted and assessed by the ETTOS Service Provider before formal SPAA and DCUSA CPs are raised. The EWG will also ensure that where changes to the ETTOS operational service and/or ETTOS Contract are proposed then any consequential impact on the SPAA and DCUSA is identified and addressed.

Once SPAA and DCUSA CPs have been raised, they will be progressed via the standard change processes. However, the timescales for progressing SPAA and DCUSA CPs will be set to ensure decisions are made regarding both SPAA and DCUSA CPs on the same date.

6 Progression of ETTOS Related SPAA and DCUSA CPs

6.1 Overview of the Process

The ETTOS change process is based on the standard SPAA and DCUSA change provisions. However, in order to implement changes to the ETTOS Schedules which impact the electricity and gas arrangements, changes to the SPAA and DCUSA will need to be drafted, assessed and approved in parallel to ensure the requirements in both Codes remain the same. The timescales for progressing CPs vary between the Codes, although the stages of the process are similar. A summary of the standard processes is set out below:

Step	SPAA	DCUSA
Timescales for raising CP	A Change Calendar is published including the latest date for CPs to be raised before being issued in the Change Pack.	The latest date for raising a CP each month is one week before the scheduled DCUSA Panel meeting when the CP will be presented.
Consideration by Governance Body	New CPs are issued straight out in the Change Pack and not considered by the SPAA EC.	New CPs are presented to the DCUSA Panel for determination on the progression route and timescales.
Assessment Process	A draft CP could be raised to allow further assessment of a draft change or the SPAA EC could establish a Working Group to assess an issue and draft a CP. Once a final CP is raised it will be issued straight out to Parties for comments and indicative voting.	The DCUSA Panel can refer the CP to a Working Group for further assessment or directly to the Code Administrator for the final report phase.
Industry Consultation	Where a draft CP is issued to a Working Group for further assessment the CP would usually be issued for industry consultation. Once the final CP is issued in the Change Pack industry parties have an opportunity to provide comments for consideration at the Change Board.	In the majority of cases, a CP would be issued to a Working Group for further assessment. The Working Group would carry out an industry consultation.
Change Report	Once raised, a CP will be issued to industry parties for comments and indicative voting. A summary of comments received is provided to industry parties prior to the	At the end of the Working Group assessment or as part of the report phase, a Change Report will be produced for approval by the DCUSA Panel.

	Change Board and a Change Report is produced for Ofgem.	
Voting	Parties can provide indicative comments and votes in response to the Change Pack. A Change Board meeting will then be held so parties can vote on the CP.	The Change Report will be issued to all Parties for voting. Votes will be sent to the Code Administrator for collation.
Appeals	Parties can appeal Change Board decisions within 15 Working Days (WDS). Appeals will be considered by the SPAA Forum. Where Authority consent is required, the Change Declaration is issued to the Authority once the appeals window has closed.	No appeals process for Part 1 Matters. The Change Declaration is issued to the Authority once votes have been counted.
Authority Consent	Clause 9.1. specifies the Clauses that require Authority consent. Clause 9.1A includes additional statements regarding Authority Consent which is consistent with the provisions in Clause 9.4 of the DCUSA.	Part 1 Matters require Authority approval. Clause 9.4 defines Part 1 Matters.

6.2 Initial Assessment

It is assumed that any issue with the ETTOS provisions will be assessed by the SPAA EC, DCUSA Panel or an industry working group. Where proposals require an impact assessment from the ETTOS Service Provider, the Code Administrator will request an impact assessment based on the proposed solution in accordance with the process set out in section 7 below. The impact assessment provided by the ETTOS Service Provider will provide confirmation on whether there is an impact to the ETTOS operational service and / or the ETTOS Contract. Where a change to the ETTOS operational service and / the ETTOS Contract is required, then the ETTOS Service Provider will set out the costs and impacts of such a change.

6.3 Raising a SPAA and DCUSA CP

Where a party determines that a change to the SPAA and / or DCUSA is required, it will develop CPs to progress the changes to the Codes. Once raised, CPs will be progressed via the standard SPAA and DCUSA change provisions. Authority consent will be required where a material change to the ETTOS arrangements is proposed. Each CP will be assessed to determine whether Authority consent is required. The decision regarding Authority consent will be consistent across

both SPAA and DCUSA i.e. if Authority consent is required for a SPAA CP then the equivalent DCUSA CP will be a Part 1 Matter.

The DCUSA CP will be presented to the DCUSA Panel at its next meeting. Where the DCUSA Panel is satisfied that DCUSA Parties have been consulted on the proposed change and the legal text then they may determine that the CP be issued directly to the report phase. However, it is assumed that in the majority of cases the DCUSA Panel will issue the DCUSA CP to a working group for further consideration in parallel with the equivalent draft SPAA CP.

The DCUSA Panel will agree a timetable for progressing the DCUSA CP. Where there is an equivalent SPAA CP, the timetable proposed by the Code Administrator will link to the SPAA change process so that voting closes on the DCUSA CP on the day before the SPAA Change Board. The SPAA CP will be issued in the standard Change Pack and a decision made at the relevant Change Board in accordance with the SPAA Change Calendar.

Due to the appeals process in the SPAA, the Change Declarations for CPs requiring Authority Consent will be issued to Ofgem on different days. However, Ofgem could decide to publish its decision on both changes simultaneously.

An example timetable is set out below for information:

DCUSA Change Process						
DCUSA Panel CP raised	Change Report sent to Panel	Panel Approves Change Report	CR issued for voting	Voting Closes	Appeals close	Change Declaration issued
16/09/2015	14/10/2015	21/10/2015	26/10/2015	18/11/2015	N/A	23/11/2015

SPAA Change Process						
CP Submission Date	Change Pack	Closing Date for CIV	CIV Issued	SPAA Change Board	Appeals close	Change Declaration issued
23/10/2015	26/10/2015	09/11/2015	12/11/2015	19/11/2015	10/12/2015	14/12/2015

As shown in the example above, in order for a SPAA and DCUSA CP to be voted on at the same time, the DCUSA CP will need to be raised before the SPAA CP so that it can be presented to the DCUSA Panel. The Code Administrator will produce a progression timetable for SPAA and DCUSA CPs for agreement by the DCUSA Panel. Where the DCUSA Panel considers that an ETTOS related CP requires further assessment it will be referred to a working group who will assess and further develop both a SPAA and DCUSA change.

6.4 Urgent CPs

The standard SPAA and DCUSA provisions for progressing CPs via an urgent timetable will apply to ETTOS related CPs. Proposers should identify within the CP proforma whether they would like a change to be considered as an Urgent CP.

7 Changes to the ETTOS Contract

The ETTOS Contract is a tri partite agreement between the ETTOS Service Provider, SPAA Ltd and DCUSA Ltd. The service provided to SPAA and DCUSA Parties is set out in the ETTOS Contract and the requirements on SPAA and DCUSA Parties are included in SPAA Schedule xx and DCUSA Schedule xx. As parties to the ETTOS Contract, SPAA Ltd and DCUSA Ltd will be responsible for making decisions on how to effect changes to the ETTOS operational service and ETTOS Contract.

7.1 Overview of Process

The ETTOS Contract does not include a change management procedure. However, it does state that changes should be agreed by both parties and confirmed in writing under signature. To ensure that changes to the ETTOS Contract are transparent and robustly implemented, the following procedural steps will be required.

- SPAA and DCUSA or the ETTOS Service Provider may request a change to the ETTOS Contract which they shall initiate by issuing a Contract Change Notification (CCN) to the other parties;
- The Service Provider will assess and document the potential impact of a proposed change to the ETTOS Contract before the change can be either approved or implemented;
- SPAA and DCUSA shall have the right to request further information in relation to a CCN, approve it or reject it; and
- No proposed change to the ETTOS Contract shall be implemented by the Service Provider until a Change Authorisation Note has been signed and issued by SPAA Ltd and DCUSA Ltd.

7.2 Issuing a Change Contract Notification

A CCN can be issued by either the ETTOS Service Provider or the Code Administrator on behalf of SPAA Ltd and DCUSA Ltd. A template CCN form is included in Appendix 1.

If the Service Provider issues the CCN, then it shall also provide an Impact Assessment as soon as is reasonably practicable but in any event within 10 Working Days of the date of issuing the CCN.¹

¹ Note – timescales may be increased following discussion with the Code Administrator

Commented [SJ1]: This may need amending if SPAA and DCUSA want the same set up as TRAS with an ETTOS Contract Sponsor

If the Code Administrator issues the CCN, then the Service Provider shall provide an Impact Assessment as soon as is reasonably practicable but in any event within 10 Working Days of the date of receiving the CCN, provided that if the Service Provider requires any clarifications in relation to the CCN before it can deliver the Impact Assessment, then it will promptly notify the Code Administrator and the time period shall be extended by the time taken by SPAA Ltd and DCUSA Ltd to provide those clarifications. The Code Administrator shall respond to the request for clarifications as soon as is reasonably practicable and the Service Provider shall provide SPAA Ltd and DCUSA Ltd with sufficient information to enable it to understand fully the nature of the request for clarification.

7.3 Impact Assessment

Each Impact Assessment provided by the ETTOS Service Provider shall be completed in good faith and shall include:

- Details of the proposed change including the reason for the change; and
- Details of the impact of the proposed change on the ETTOS service, the Service Provider's ability to meet its other contractual obligations and any variation to the terms of the ETTOS Contract that will be required in relation to:
 - (i) the Service Description and the Service Levels;
 - (ii) the format of recipient data;
 - (iii) details of Service Provider fees of implementing the proposed change;
 - (iv) details of the ongoing Service Provider fees required by the proposed change when implemented, including any increase or decrease in the ETTOS Charges, any alteration in the resources and/or expenditure required by either party and any alteration to the working practices of either party;
 - (v) a timetable for the implementation, together with any proposals for the testing of the change;
 - (vi) details of how the proposed change will be compliant with an applicable Change in Law;

- (vii) other impacts identified by the ETTOS Service Provider; and
- (viii) such other information as SPAA and DCUSA may reasonably request.

The SPAA EC and DCUSA Panel shall review the Impact Assessment². If they require further information from the ETTOS Service Provider, then this will be requested. Where requested, further information should be provided by the ETTOS Service Provider within 10 Working Days of this request being received.

Where the proposed change does not impact the SPAA and DCUSA Codes, the SPAA EC and DCUSA Panel will determine whether to approve or reject the proposal and provide a recommendation to the SPAA Ltd and DCUSA Ltd Boards

Where the proposed change does impact the SPAA and DCUSA Codes, details of the impact assessment will be fed into the assessment of the SPAA and DCUSA CPs as set out in section 6 above. If a CCN is raised and a complimentary SPAA and DCUSA code =change is required but has not yet been raised, then this will be flagged to the SPAA EC and DCUSA Panel. A SPAA and DCUSA CP will then need to be raised by a SPAA and DCUSA Party in order to progress this change.

7.4 SPAA and DCUSA Determination

The SPAA EC and DCUSA Panel shall consider the Impact Assessment and shall recommend to the SPAA Ltd and DCUSA Ltd Boards one of the following:

- Approve the proposed change;
- Reject the proposed change, in which case the Code Administrator will provide the ETTOS Service Provider with a written explanation of the reasons for rejection³; or
- Request further information. The ETTOS Service Provider shall provide such further information to the Code Administrator within 10 Working Days of such a request⁴.

² Note – this activity could be delegated to an industry working group if required

³ SPAA Ltd and DCUSA Ltd shall not reject any proposed change to the extent that the change is necessary for the Service Provider or the ETTOS services to comply with any changes in law, and SPAA EC and DCUSA Panel are satisfied that the associated costs are reasonable and justified.

⁴ Note – timescales may be increased following discussion with the Code Administrator

A response should be provided by the Code Administrator within 20 Working Days of receiving the Impact Assessment, or such later timescale as agreed with the ETTOS Service Provider.

For the avoidance of doubt, the SPAA EC and DCUSA Panel shall not recommend approval of a CCN which consequentially impacts the SPAA and DCUSA Codes unless a complimentary SPAA and DCUSA CP has been approved.

7.5 Change Authorisation

If the change is approved, then the Code Administrator shall inform the Service Provider within 5 Working Days. The ETTOS Service Provider shall prepare two copies of a Change Authorisation Note which it shall sign and issue to the Code Administrator. A template Change Authorisation Note has been included in Appendix 2.

Both copies of the Change Authorisation Note shall be signed by 2 SPAA Board Members and 2 DCUSA Board Members and one copy shall be returned to the ETTOS Service Provider. Once signed, the Change Authorisation Note shall constitute a binding variation to the ETTOS Contract.

7.6 Implementation

Changes to the ETTOS operational service and / or the ETTOS Contract will be implemented in accordance with the timescales set out in the Change Authorisation Notice. The Code Administrator will assist the ETTOS Service Provider where required and regular updates will be provided to the SPAA EC and DCUSA Panel for information.

8 Appendices

8.1 Appendix 1 – Contract Change Notification Template

This form should be used by a party who wishes to raise a draft or a formal CCN.

Please complete this form and submit to ETTOS@electralink.co.uk.

Document Control	
CCN Status:	Draft/Final
For Issue To:	SPAA/DCUSA/ETTOS Service Provider
CCN Number*:	ETTOS XXX
Title of Change:	
Date Raised:	
Version Number:	
Attachments**:	

* Assigned by Change Control Administrator

** Redlined changes to the ETTOS Contract should be included where possible

Originator details	
Party Name	
Party Change Administrator:	
Telephone number:	

Email address:	
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CCN Details	
SPAA and DCUSA Parties believed to be impacted:	Gas Suppliers / Large Transporter / Small Transporters / Electricity Suppliers / Distribution Network Operators / Independent Distribution Network Operators / All
Proposal to Change:	[Specify which section of the ETTOS Contract/ Contract Schedules will be impacted]
Summary of Change:	[Provide a high level summary of the proposed change] [Detailed changes to the contract wording should be added as an appendix to this CCN]
Impact Assessment	[Specify whether an impact assessment is required or has been provided]
Related SPAA and DCUSA CPs:	[Specify whether changes to SPAA and DCUSA are required/ have been raised]

Proposed Solution:
[Provide a more detailed description of the proposed change if required]

Proposed Implementation Date:
[Highlight any dependencies which should be taken into account when determining the implementation date]

Business Justification for change:
<p>[Explain the rationale for proposing the change]</p>

8.2 Appendix 2 – Change Authorisation Note

CCN NO:	TITLE:	DATE RAISED:
IMPLEMENTATION DATE:		
DETAILED DESCRIPTION OF CONTRACT CHANGE:		
[Description]		
PROPOSED ADJUSTMENT TO THE CHARGES RESULTING FROM THE CONTRACT CHANGE:		
[Charges]		
DETAILS OF PROPOSED ONE-OFF ADDITIONAL CHARGES:		
[One-off charges]		

SIGNED ON BEHALF OF DCUSA (1)		SIGNED ON BEHALF OF DCUSA (2)	
Signature:		Signature:	
Name:		Name:	
Position:		Position:	
Date:		Date:	

SIGNED ON BEHALF OF SPAA (1)		SIGNED ON BEHALF OF SPAA (2)	
Signature:		Signature:	
Name:		Name:	
Position:		Position:	
Date:		Date:	

SIGNED ON BEHALF OF SERVICE PROVIDER	
Signature:	
Name:	
Position:	
Date:	