

PARTY IMPACT ASSESSMENT RESPONSE

R0178 – IMPROVEMENTS TO CSS BUSINESS PROCESS LOGIC

DATE ISSUED	17/04/2025
RESPONSE DEADLINE	12/05/2025

LINKS

- [Change Proposal Page](#)
- [Change Report](#)

The completed response document should be uploaded to the REC Portal. On the Impact Assessment Page click 'Add Response' to upload the completed document.

Responses can be submitted as:

- **Non-confidential** – the full response plus the submitting organisations name and category will be published; or
- **Confidential** – responses will only be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders. Details of the response will not be referenced in any Change Report; or
- **Anonymous** – the full response will be published, but will omit the name of the submitting organisation (organisation category will be published). Details of the response will be referenced in the Change Report, and the organisation name will be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant).

Organisations can submit the whole response as non-confidential, confidential or anonymous, or flag each question separately as they wish.

All responses will be treated as non-confidential unless indicated otherwise.

The Code Manager recommends that only financials or other commercially sensitive information is submitted confidentially, and that anonymous is used for all other cases where the submitting organisation does not wish to be identified, as this allows the details of the response to be seen in the Change Report and for the Code Manager's comments to the response to be published.

RESPONDENT'S NAME	David Addison
RESPONDENT'S ORGANISATION	Xoserve
RESPONDENT'S ORGANISATION CATEGORY	Other - please specify (type here)
RESPONDENT'S EMAIL ADDRESS	David.addison@xoserve.com
RESPONDENT'S TELEPHONE NUMBER	
RESPONSE CONFIDENTIALITY	Non-Confidential

QUESTIONS

<p>1. Do you have any comments on the proposed solution? If so, please provide details.</p>
<p>There is very limited information provided in the report related to the solutions proposed. We surmise from the report that:</p> <p>Scenario 1:</p> <ul style="list-style-type: none"> - Where the RMP is Dormant, then the Registration should continue with the original Registration Date. It is unclear from the information provided what transactions that will be provided to support the original Registration Date being retained. - Where the RMP is Terminated then the Switch should not continue. It is unclear from the information provided what transactions will be provided to support this Registration being cancelled. <p>Scenario 2: CSS will reject any deactivation requests that contain a cancelled Registration identifier.</p> <p>Scenario 3: CSS will reject any OFAF Switch Requests that contain multiple MPxNs.</p> <p>With respect to Scenarios 2 and 3, we anticipate that the GRDA and GES Services will be unaffected by these scenarios. We would expect the rejection of such flows to be managed between CSS and Suppliers – and these will not generate any transactions to the GRDA (and GES). Whilst the GRDA do undertake some Registration activities under Transporter Initiated Registrations these will not use OFAF (Scenario 3) and are not deactivation requests (Scenario 2).</p> <p>Of the detail provided for Scenario 1, we cannot assess the solution as no solution information has been provided.</p> <p>We would speculate that the solution option selected should ensure that the GRDA and GES have no functional changes to make.</p> <p>For Terminated RMPs, then the GRDA should receive notice of Cancellation of the Registration. For Dormant RMPs, then we anticipate that a number of solution options could be undertaken to achieve the stated intention of retaining the original Registration Date so cannot speculate about</p>

the option that might be proposed by CSS – and will need to IA the options proposed when a sensible level of detail is provided.	
RESPONSE CONFIDENTIALITY	Non-Confidential

2. Do you agree the proposed solution addresses the problem statement? If not, please provide details?	
We cannot comment as the scenario that we are interested in does not provide any solution information with which to offer an opinion.	
RESPONSE CONFIDENTIALITY	Non-Confidential

3. The CSS Provider will be inviting parties to participate in testing this solution, would you be interested in volunteering to take part in the testing activities?	
We will need to make this assessment once we are made aware of the solution options considered for Option 1. We would expect that there will be a further IA when these options are defined.	
RESPONSE CONFIDENTIALITY	Non-Confidential

4. Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999;	
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- C) Between £10,000 and £49,999;
- D) Between £50,000 and £99,999; or
- E) more than £100,000.

We are unable to comment on the impacts to the GRDS or the GES as there is insufficient information provided.

RESPONSE CONFIDENTIALITY

Non-Confidential

5. Do you foresee any technical challenges or integration issues with your current systems should the solution be implemented? Is there a specific lead time which would be required?

We are unable to comment on the impacts to the GRDS or the GES as there is insufficient information provided.

RESPONSE CONFIDENTIALITY

Non-Confidential

6. Do you identify any benefits to your business (e.g. FTE savings or improved timescales for processing messages) through the implementation of this functionality? If so, please provide details.

Scenario 1 is the leading cause of missing messages from CSS. But experience has proven that we will need to continue to run the processes to monitor at Gate Closure instances of missing messages so as to minimise the Operational Impacts when these arise.

So no operation resource savings or changes to our processes are envisaged.

RESPONSE CONFIDENTIALITY

Non-Confidential

7. Do you believe there are any risks or issues relating to the proposed solution?

We are unable to comment on the risks / issues as there is insufficient information provided.

RESPONSE CONFIDENTIALITY

Non-Confidential

8. Do you have any other comments relating to this Change Proposal?

I am concerned that there are multiple references to the instances where scenarios are not defined in 'Business Data Validation Rules'. It is unclear to me who takes responsibility for authorship / approval and review of this document and where this document is governed.

Could you please share the details of this please?

RESPONSE CONFIDENTIALITY

Choose an item