
Wholesale Retail Code Change Proposal – Ref CPW045

Modification proposal	Wholesale Retail Code Change Proposal – CPW045 – Service Management Interface Updates
Decision	The Authority has decided to approve this change proposal
Publication date	20 November 2018
Implementation date	3 December 2018

Background

The service management interface forms part of the Central Market Operating System. It acts as an access point for Trading Parties and the Market Operator (MOSL) to initiate and carry out a number of processes set out in the market codes, such as raising service requests and managing incidents.

The Market Operator's service provider (CGI) provides a shared service to MOSL, which uses the Remedy incident management tool. Remedy is a widely adopted service management platform which deals with the management of incidents in a way regarded as "standard custom and practice". However, not all of the services that the market codes envisaged would be delivered through the service management interface can be delivered through the Remedy incident management tool. As a consequence, some of the processes which were originally intended to be delivered through the service management interface but which cannot be delivered through Remedy are being delivered through an alternative solution employed by MOSL.

The issue

The main issue is that there are a number of processes set out in the market codes as being delivered through the system management interface which are being delivered through alternative solutions provided by MOSL.

The process solutions have been identified, and fall into three categories.

Firstly, there are provisions in the market codes which are delivered by alternatives to the service management interface, rather than through the service management interface itself, as set out in the market codes. There are four instances when this happens. These are:

- The submission of non-transactional notifications from the market operator to Trading Parties (such as system downtime, or non-availability of reports). These notifications were originally envisaged to be processed using the service management interface. However, non-transactional notifications are currently being sent by the market operator to Trading Parties using e-mail (and text messaging as back-up).
- The system management dashboard was originally intended to give a real-time overview of CMOS. However, the system management dashboard is not used.
- The management of digital certificates was originally intended to be operated through the service management interface. However, digital certificates are exchanged by e-mail using a pro-forma document produced by the market operator.
- The service management interface was intended to be the storage location of the market operator documentation. However, the current operation is that the location for the publication of documentation that the market operator is required to maintain is the market operator's website.

Secondly, there is a provision in the market codes about performing anomaly detection for High Value Interface transactions, which is not used. The requirements for trading parties using the High Value Interface to notify the market operator of anomaly detection thresholds, and for these to be compared with actual transaction volume, has been found to be unnecessary.

Thirdly, there are detailed workings of the service management interface set out in the market codes, which would benefit from being redrafted to align with the way in which Remedy operates.

It has been recognised that alternative solutions to those set out in the market codes have been necessary. As these processes are a departure from the original system design, and as they are as effective, or in some cases, more effective than the original design, the market codes need to be amended to recognise the alternative solutions that have been put in place.

One option that was considered as a solution to the issue was for MOSL to request that CGI purchase or develop a different incident management tool that provides all of the functionality envisaged by the market codes under a single solution. However, CGI may not have a facility to supply such a tool on the shared infrastructure. The

option to complete a rebuild of an incident management tool which integrated all of the functionality that is reflected in the market codes would be costly, time-consuming, and have minimal benefits.

The modification proposal¹

The proposed solution is to amend the market codes so that they align with the alternative arrangements to the service management interface currently used. This recognises that the market codes, as currently written, do not reflect the inability of the service management interface to operate in exactly the way the market codes originally envisaged.

The modifications proposed address issues identified in the three areas where issues arise.

Firstly, for those processes where alternatives to the service management interface are currently being delivered, there are four proposed modifications to reflect the alternative process used:

- The submission of non-transactional notifications from the market operator to Trading Parties (such as system downtime, or non-availability of reports) was originally envisaged to be processed using the service management interface. However, non-transactional notifications are currently being sent by the market operator to Trading Parties using e-mail (and text messaging as back-up). E-mail is handled by Mailchimp, the market operator's e-mail distribution solution. Mailchimp is more flexible and can be customised in Mailchimp, and the transaction process is simplified. It is proposed that the market codes are amended to reflect this.
- The system management dashboard, which was originally intended to give a real-time overview of CMOS, is not available. There are considered to be security risks attached to its use. System availability and status is currently notified to trading parties directly by e-mail (and text messaging as back-up) and only by exception. It is proposed that the market codes are changed to reflect the way system availability and status is made available.
- The management of digital certificates was originally intended to be operated through the service management interface. However, digital certificates are exchanged by e-mail using a pro-forma document produced by the market

¹ The proposal and accompanying documentation is available on the MOSL website at <https://www.mosl.co.uk/market-codes/change#scroll-track-a-change>

operator, which is regarded as more efficient. It is proposed that the market codes are changed to reflect this.

- The service management interface was intended to be the storage location of the market operator documentation. However, the current operation is that the location for the publication of documentation that the market operator is required to maintain is the market operator's website. It is proposed that this change of location is reflected in the market codes.

Secondly, the requirements for trading parties using the High Value Interface to notify the market operator of anomaly detection thresholds and for these to be compared with actual volumes of transactions, as set out in the market codes, is not used. Instead, it is proposed that the market operator will continue to monitor the use of the High Volume Interface, and the requirement on trading parties to average expected volumes of transactions and for the market operator to perform a comparison of submitted volume data with actual volume data will be removed. It is proposed that the market codes are amended to reflect the change in approach.

Thirdly, on the detailed workings of the service management interface which set out the daily operational workings at a granular level, it is proposed that the codes be aligned to the way in which Remedy currently operates. This involves setting out how users log in, and how users access archived reports, and how particular types of request are handled.

Industry consultation and assessment

The Panel did not consult on this Change Proposal. This is because the Change Proposal covers the provision of a series of updates to the service management interface in order to fully reflect the functionality available through the interface, and to ensure alignment between the existing systems and solutions provided by the market operator, and those described in the market codes.

We agree that it would not be proportional to have a consultation on the current proposal.

Panel recommendation

The Panel considered this change proposal at its meeting on 25 September 2018. It recommended, by a unanimous decision, that the Authority approve this proposal on the basis of improving the principles of efficiency, transparency, simplicity, cost-

effectiveness and security. The recommended date of implementation is 3 December 2018.

Our decision

We have considered the issues raised by the modification proposal and the supporting documentation provided in the Panel's Final Report. We have concluded that the implementation of CPW045 will better align the market codes with existing operational processes, and therefore facilitate the Principles and Objectives of the Wholesale Retail Code detailed in Schedule 1 Part 1 Objectives, Principles and Definitions and is consistent with our statutory duties.

Reasons for our decision

We set out below our views on which of the applicable Code principles are better facilitated by the modification proposal.

Transparency

The proposed change will clearly state the process by which the market operator will deliver the obligations related to the service management interface, whilst at the same time will provide clarity to trading parties on the services accessible to them and through which mechanisms.

Efficiency

The proposed changes will enable the market codes to fully reflect the functionality available through the service management interface. The proposed changes will ensure alignment between the existing systems and solutions provided by the market operator and those described in the market codes, providing clarity to trading parties on certain processes.

Simplicity, Cost-effectiveness and Security

The changes provide clarity on how certain market processes operate, eliminating cases where inefficient processes or practices are followed. The proposed changes will clearly set out the enduring mechanisms for delivering a number of the market operator's obligations, creating visibility and clarity on the provisions contained in the market codes.

Decision notice

In accordance with paragraph 7.2.8 of the Market Arrangements Code, Ofwat approves this change proposal.

Emma Kelso
Senior Director, Customers and Casework