

Bulk Change of Agent (P63) – High Level Synopsis of impact on the MRA¹

Service Levels

The MRA requires a Service Provider to process all notifications received in its MPAS system within a defined timescale (Clause 14.3). The intent of this Clause is to provide for the reasonable 'traffic' of updates to MPAS and for the acceptance or rejection of those instructions by MPAS. There is no reference to a limit on the number of instructions that may be sent to the MPAS system. A Supplier wishing to undertake a large volume of updates to MPAS, for example notifying a change of agent, could submit all the updates in a single day and this may adversely impact the Total Daily Processing for that MPAS. If the Total Daily Processing were to fail to complete within the timescales noted in the MRA, this would affect all Suppliers who have sent Registrations or updates to that MPAS on that day (as all messages are processed in order of receipt and therefore it may not be just the additional update traffic that is affected). In addition, the Service Provider could become liable to pay liquidated damages should the number of failures exceed those allowed in a Quarter.

Updates to data items held in MPAS for which a Supplier is responsible

A Supplier is responsible for updating MPAS with any changes to data items within 5 Working Days of the effective date of the change or becoming aware of the change (Clause 24.8). The intent of this Clause was to ensure timely updates but did not envisage large volumes of updates that may require to be sent in a phased manner.

Proposed Changes

A Clause could be added to the MRA covering the submission and processing of bulk change of agent updates to MPAS. Such Clause would allow Service Providers to safeguard against a large volume of updates adversely impacting the Total Daily Processing of MPAS, and also allow for extended processing timescales by recognising that such bulk updates could be processed over a phased period.

In support of this, a MRA Agreed Procedure (MAP) could be drafted covering the interaction between a Supplier wishing to submit more than NNNN (a number to be defined) change of agent notifications, and MPAS. This MAP would describe how the timetable for submission would be agreed. This could, for example, include submitting an agreed number of instructions into processing on a Friday, as a weekend would offer a wider window for completing the processing for the next Working Day. The scope of the MAP would include the notification to MPAS of the new agent details and the Effective from Dates; where appropriate the associated Balancing and Settlement Code Procedure (BSCP) could be referenced.

The processing of large volumes of notifications to MPAS under the MAP would be a chargeable service and would be added to Schedule 8 of the MRA.

The Change Proposals for any changes to the MRA would be subject to due process through Change Control as noted in the MRA.

¹ All terms used within this document are defined in the MRA.