First Amendment to the All NEMO Intraday Operational Agreement (ANIDOA)

ANNEX 6

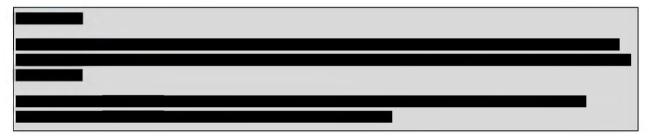
Adapted Annex 11 (NEMO Change Control Procedure)

All NEMO Intraday Operational Agreement (ANIDOA)

ANNEX 11

NEMO Change Control Procedure

Remarks



INDEX

All N	NEMO Intraday Operational Agreement (ANIDOA)	1
1.	INTRODUCTION	4
1.1.	Scope	4
2.	BODIES AND ROLES INVOLVED	5
2.1.	NEMO OPSCOM	5
3.	PROCEDURE DETAILS	6
3.1.	Outline of the NEMO Change Control Procedure	ϵ
3.2.	Process description tables	ϵ
4.	RISK AND IMPACT ALLOCATION	14
4.1.	Categories	14
4.2.	Risks	14
4.3.	Component impact	14
5.	ASSURANCE GATHERING	16
5.1.	Assurance activities	16
5.2.	Scope of assurance gathering	17
6.	CHANGE CONTROL FORMS	18
6.1.	Introduction	18
6.2.	Request for Change form	19
6.3.	Impact assessment form	25
6.4.	Objections form	28
APPENDIX		

1. Introduction

This document describes the process to be applied in case of Changes to Identical NEMO Components or Individual NEMO Components that are used as part of the SIDC operations and that affect all or some of the NEMOs and that, in accordance with Article 11.5.2.1 of the Agreement, fall outside the scope of the IDOA Change Control Procedure. It provides a controlled process so that Changes can be implemented efficiently within the minimum time (taking into account section II of Annex 6 (Technical requirements) and with the least risk.

The Change may be initiated by any individual Party or working group.

The process aims at, tracking any Change, small or large, and aiding the decision-making process. Whilst the majority of Changes are likely to be straightforward operational Changes or small textual Changes, it is still important that the procedure is robust to the processing of more complex Changes.

The implementation of the timings and procedures of the NEMO Change Control Procedure must always be consistent with the relevant provisions set forth in respect of maintenance in the XBID-MSA. Should an inconsistency emerge, the NEMO ID SC or any other body delegated by the latter (as defined below) shall be entitled to approve any deviation from the NEMO Change Control Procedure.

1.1. Scope

Changes which have to follow the NEMO Change Control Procedure

Any Changes related to Identical NEMO Components identified in <u>Annex 2 (Identical NEMO Components)</u> as falling under the NEMO Change Control Procedure must be proposed – via this NEMO Change Control Procedure – through the Modifications or Notifications process.

Changes which might have to follow the NEMO Change Control Procedure

In respect of Individual NEMO Components, pursuant to <u>Article 11.5.2.3</u> of the Agreement, only the Changes that require changes of the Identical NEMO Components falling under the NEMO Change Control Procedure or that impact the functionalities or the operation of the Identical NEMO Components falling under the NEMO Change Control Procedure, are subject to this NEMO Change Control Procedure.

Thus, Changes to Individual NEMO Components might be subject to the NEMO Change Control Procedure (e.g. in case of a Change of a local system, procedure which might influence other NEMO's). The Party which implements the Change is responsible to make the assessment whether or not an RFC should be submitted to the NEMO OPSCOM.

In the event a Party is uncertain whether a Change falls under the scope of this NEMO Change Control Procedure and/or regarding which NEMO Change Control Procedure process should apply, such Party shall request guidance from the NEMO OPSCOM. In case of disagreement, the NEMO OPSCOM will escalate this to the NEMO ID SC.

For the avoidance of doubt, all Changes to the XBID System developed by the XBID System Service Provider fall in the scope of the IDOA Change Control Procedure.

2. Bodies and roles involved

2.1. NEMO OPSCOM

Tasks of NEMO OPSCOM

Under the NEMO Change Control Procedure, the NEMO OPSCOM has the following tasks:

- 1) Maintain and provide the overview of the impact, urgency and priority on any Changes to the Identical NEMO Components and Individual NEMO Components, where applicable;
- 2) Discuss objections or comments received from the NEMOs and provide guidance on any Changes to the Identical NEMO Components and in respect of the Individual NEMO Components subject to this NEMO Change Control Procedure on the impact of such Change for Identical NEMO Components. External experts can be invited to participate in NEMO OPSCOM's discussions;
- 3) Discuss/approve/reject proposed Changes;

Please note that rejections can be made when, e. g.:

- i. Costs exceed benefits (then the Change is raised to the NEMO ID SC and NEMO ID SC makes the decision);
- ii. Development is excessive (then the Change is raised to the NEMO ID SC and NEMO ID SC makes the decision);
- iii. Implementation entails risks which cannot be sufficiently mitigated;
- iv. The Change conflicts with other implementations or with Applicable Law; or
- v. There is a disagreement on the content of the Change.
- 4) Approve/reject proposed order of the implementation of Changes (in case several Changes relate to the same Component or to different Components, but in the same timeframe);
- 5) Assess completeness of the RFC in light of the NEMO Change Control Procedure, request for additional information, budgets and contracts;
- 6) Review RFCs, so a decision can be made on the implementation, i.e. approval, rejection (with reasoning) or need for additional information, before a decision can be made;
- 7) Review objections to RFCs;
- 8) Assess completeness of objections to RFCs in the light of the NEMO Change Control Procedure and request for additional information if required;
- Accept or reject objections to RFCs;
- 10) Escalate issues for decision of the NEMO ID SC as set forth in the NEMO Change Control Procedure;
- 11) Review the appropriateness and efficiency of the NEMO Change Control Procedure at least once a year;
- 12) Review and ratify the cost estimation of RFCs; and
- 13) Notify TSO steering committee in case of any Change.

3. Procedure details

3.1. Outline of the NEMO Change Control Procedure

This procedure is based on a distinction between:

- Notifications
- Modifications

Notifications and Modifications are submitted in the Request for Change form (RFC form, see Section 6.2) and registered in the Request for Change register (see Appendix 1).

3.1.1. Notifications

The Notification process will be used for simple Changes (with a very low and low-risk solution affecting, a small number of assets and only the originating NEMO).

3.1.2. Modifications

All Changes other than those only requiring a Notification (i.e. Changes that are more complex, of a higher risk category, affecting multiple Components or Components that are the responsibility of more than one Party or their subcontractors), are handled as Modifications. This means that explicit approval by the NEMO OPSCOM is necessary.

In case of complex Changes, it may not be possible for the originating NEMO to complete all of the sections of the RFC itself. In this case, contributions to some sections, such as e.g. solution analysis (section B of the RFC), impact assessment (section C of the RFC), and implementation plan (section D of the RFC), will be requested from the appropriate people/Parties that will provide their input using the relevant form(s). This will allow individual responses from several Parties which will together form one single RFC in the case, for example, the solution affects several Components.

Note for RFC that may impact the NEMO Operational Procedures:

When the RFC may impact the NEMO Operational Procedures, this impact will be reviewed by the NEMO OPSCOM and the assessment outcomes will be added in the impact analysis of in the RFC document.

3.2. Process description tables

Introduction

The process description tables in this section describe the overall flow of the procedure in the following cases:

- Notifications
- Modification

Activity and timing information

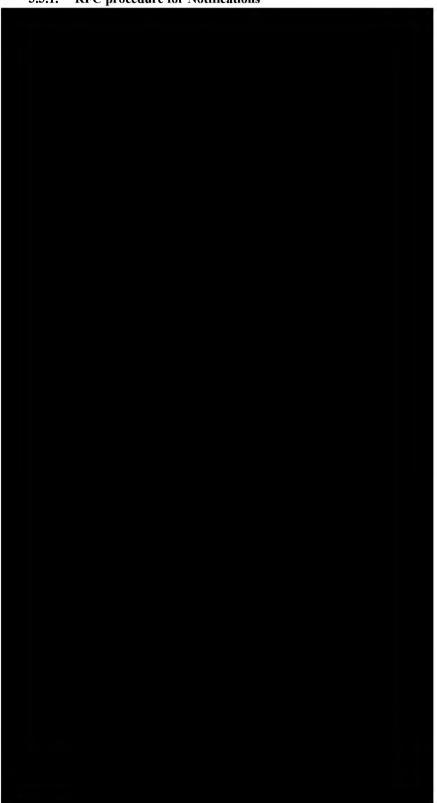
The tables below provide details of the actions to be taken at each step of the procedure and the timeframe within which they should be carried out.

In all cases where there is activity to be carried out by a Party (or its subcontractors if any) the latter shall provide its Best Efforts to implement such activity as soon as practically possible and in line with the agreed timeline. In particular, the NEMO OPSCOM will review the RFC and any supporting documentation within the timeframes set forth herein. The timeframes can be changed, the changes of timeframes are subject to the NEMO Change Control Procedure and will be handled by the NEMO OPSCOM.

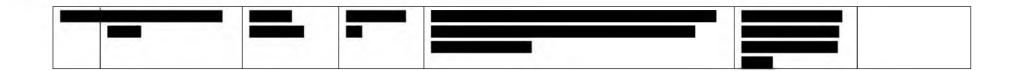
In all cases the processing of Changes will be much faster when the RFC will be as complete and as detailed as possible from the beginning.

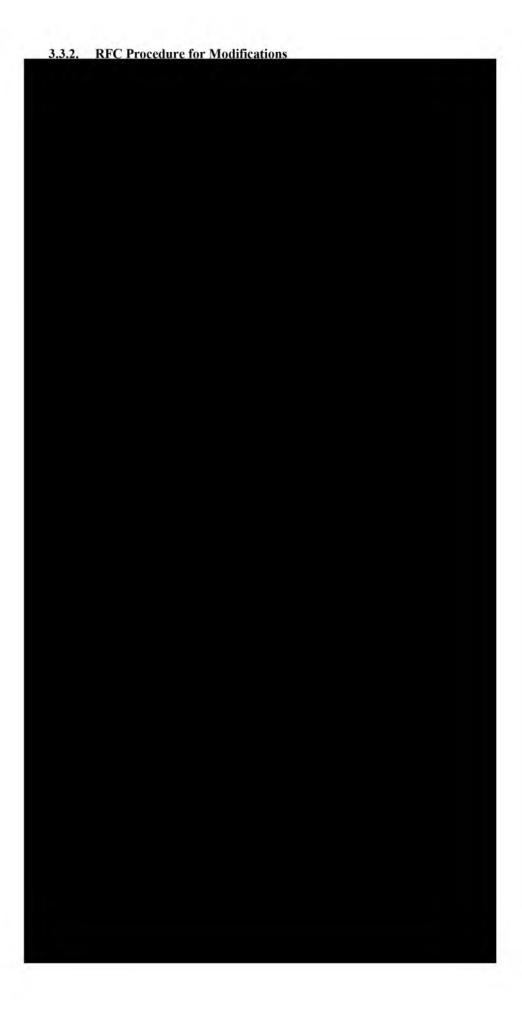
Communications will be ordinarily sent via email, with telephone as back up. The communications with external entities involved or affected by the Change will be performed by the NEMO OPSCOM on behalf of the Parties.

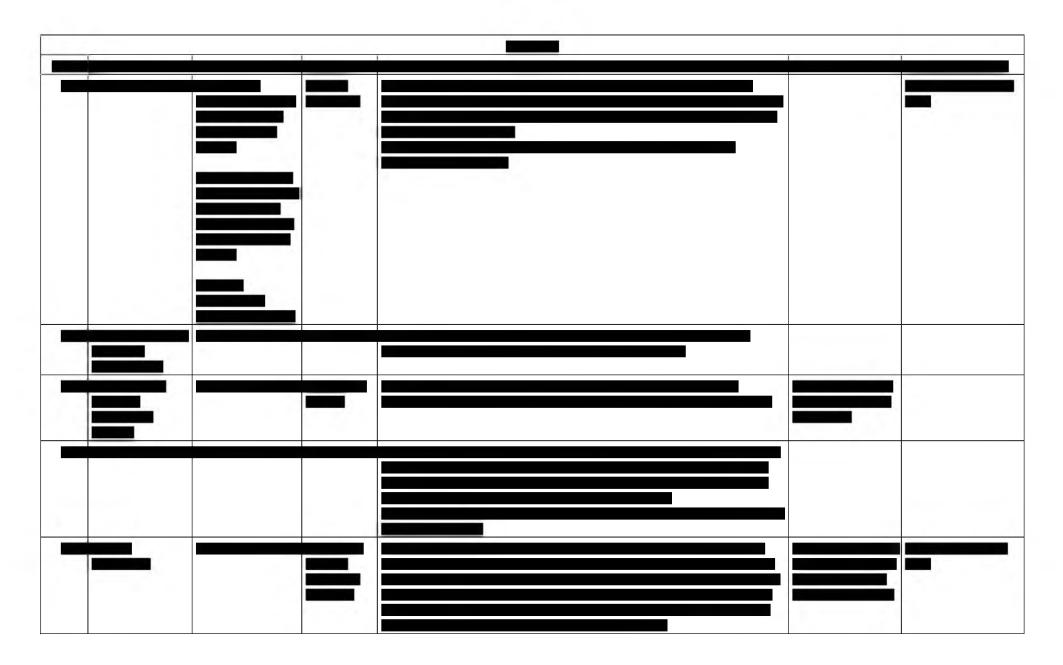
3.3.1. RFC procedure for Notifications

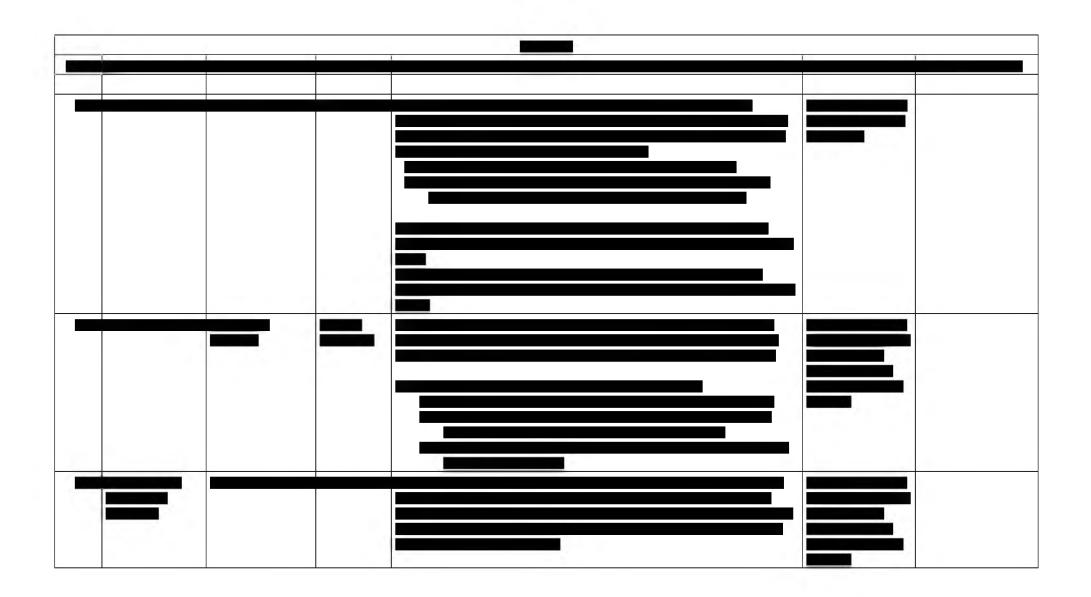


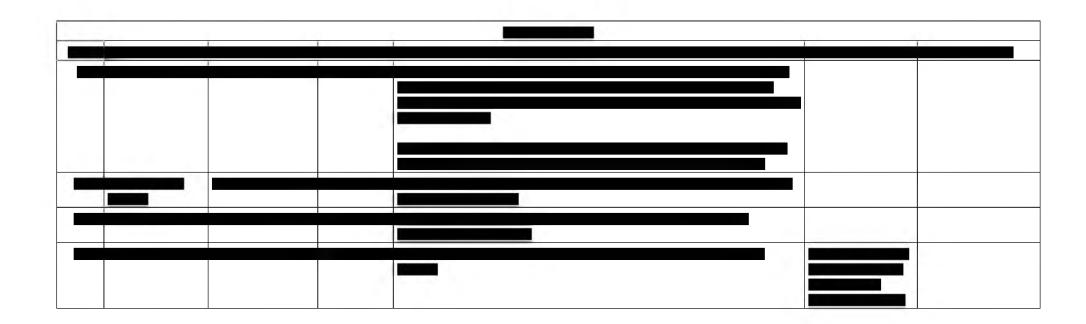












4. Risk and impact allocation

The overall impact of implementing a Change will be defined through the nature of the Components affected and the risk associated with the particular Change that is being carried out. Note that, when a Component is jointly shared by NEMOs, it is treated as if there was just a single Component.

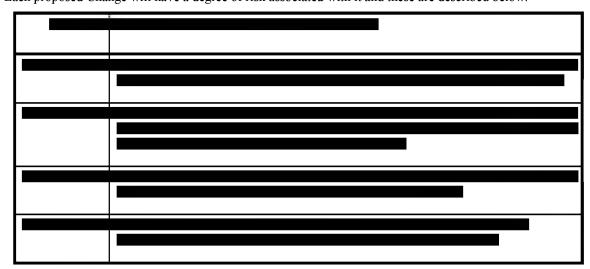
4.1. Categories

The categories for each Component are defined as part of the Component description in the configuration database. The categories are defined below.



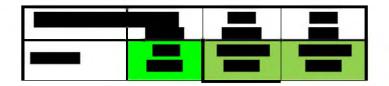
4.2. Risks

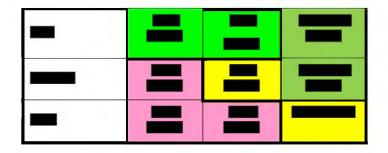
Each proposed Change will have a degree of risk associated with it and these are described below.



4.3. Component impact

For <u>each Component</u> affected by the proposed Change the category and risk are combined to provide an impact for the Component as defined in the table below.





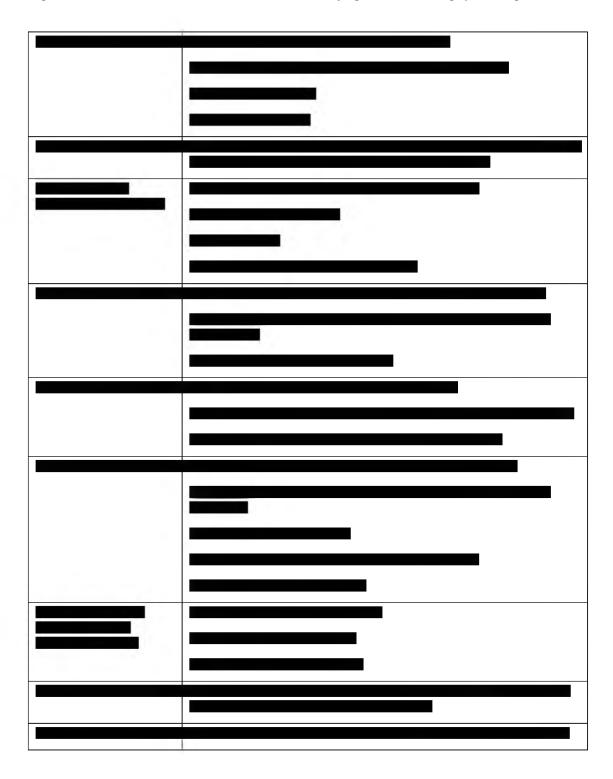
The originating NEMO will provide, if possible, an initial assessment of the applicable category in the RFC. This will be reviewed by the NEMO OPSCOM.

5. Assurance gathering

As part of the NEMO Change Control Procedure it is necessary to provide assurance that the Changes that have been made are correct and suitable for live operation. This assurance gathering can take place using a range of activities as described below. The level of assurance gathering will depend on the nature and scope of the Change.

5.1. Assurance activities

The table below lists some of the assurance activities that might be adopted when Changes have been implemented in order to ensure that the SIDC market is not jeopardized following by such implementation.





Any of these might be used in a particular situation depending on the nature of the Change.

5.2. Scope of assurance gathering

In deciding what assurance gathering should be carried out it is necessary to take into account the scope of the Change and its complexity/risk. The table below provides guidance on the levels of assurance that might be used as part of carrying out a Change. This is not intended to be a rigid definition, but provides guidelines of what might be done for varying types of Changes.



In all cases, some degree of regression testing will be carried out either across the whole market systems for CAT 1 and/or locally for CAT 2 Changes.

6. Change control forms

6.1. Introduction

The Change control forms provide the basis of the information exchanges regarding Changes between all interested Parties with respect to a particular Change.

For complex Changes (i.e. Changes needing a thorough impact analysis, such as impacting several systems, a substantial Change of a Component, etc.) the impact assessment form can be used to gather information from participants.

Objections are raised using the objections form and Changes to Component versions are sent on the Component version update form.

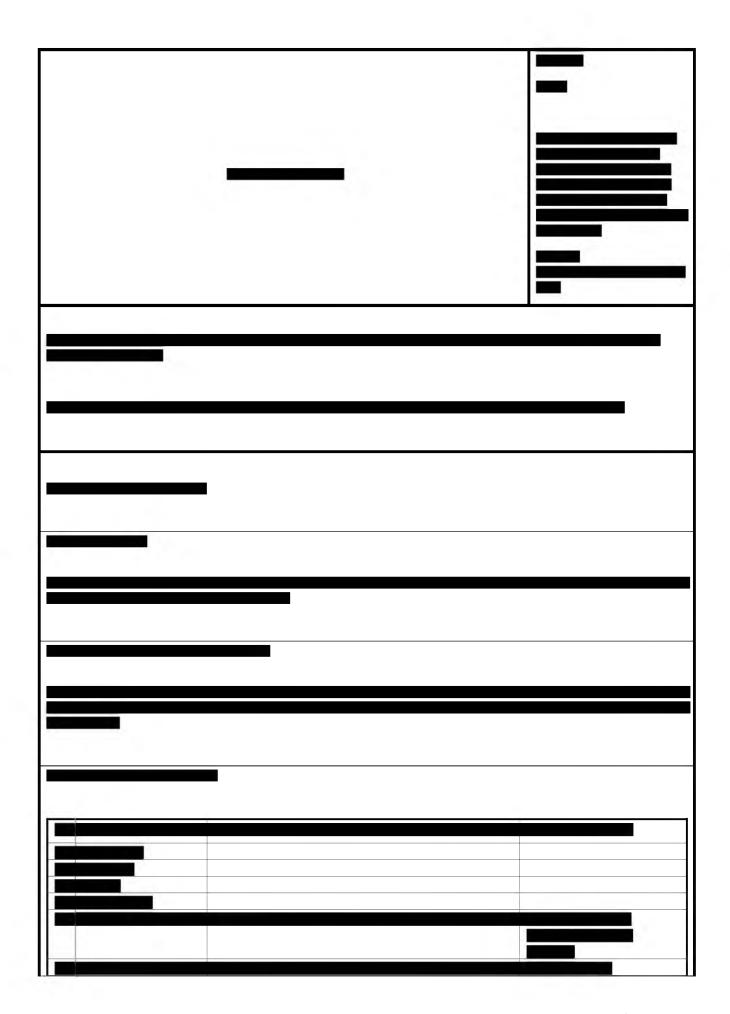
This section provides details of how to complete the forms and the information that is required in each one. The provision of complete and correct information is important for the efficient operation of the overall process. Generally, as much information as possible should be provided at each stage to speed up the process.

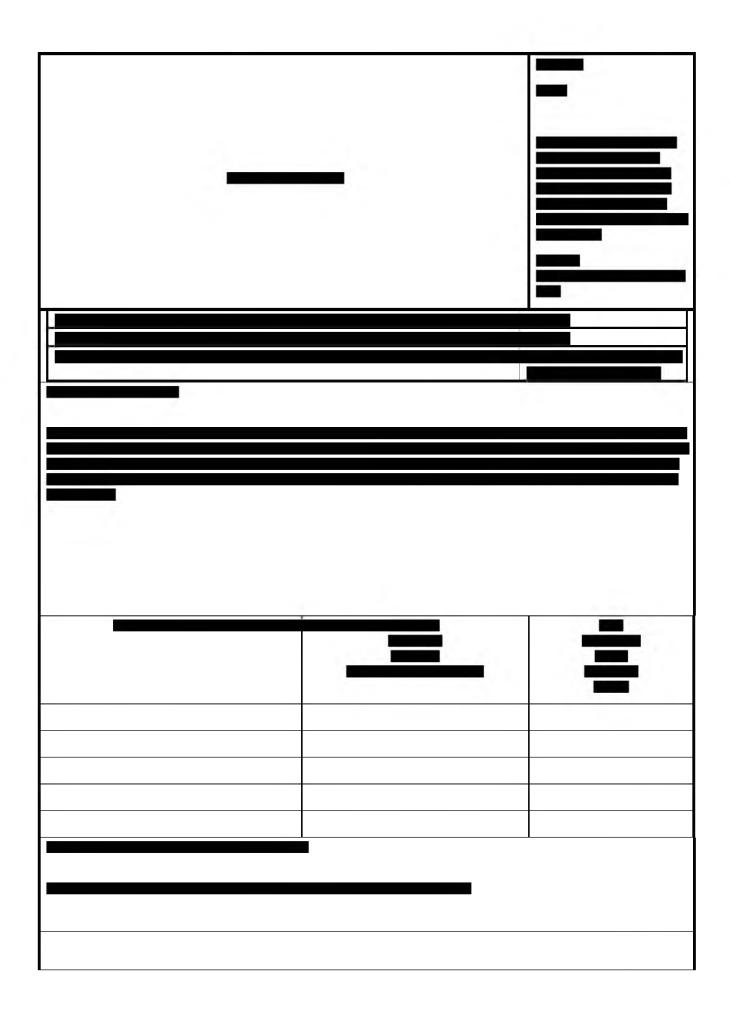
NB. The full set of Change control forms is attached to this procedure. However, since this NEMO Change Control Procedure has a limited scope, some of the Change control forms might not be applicable.

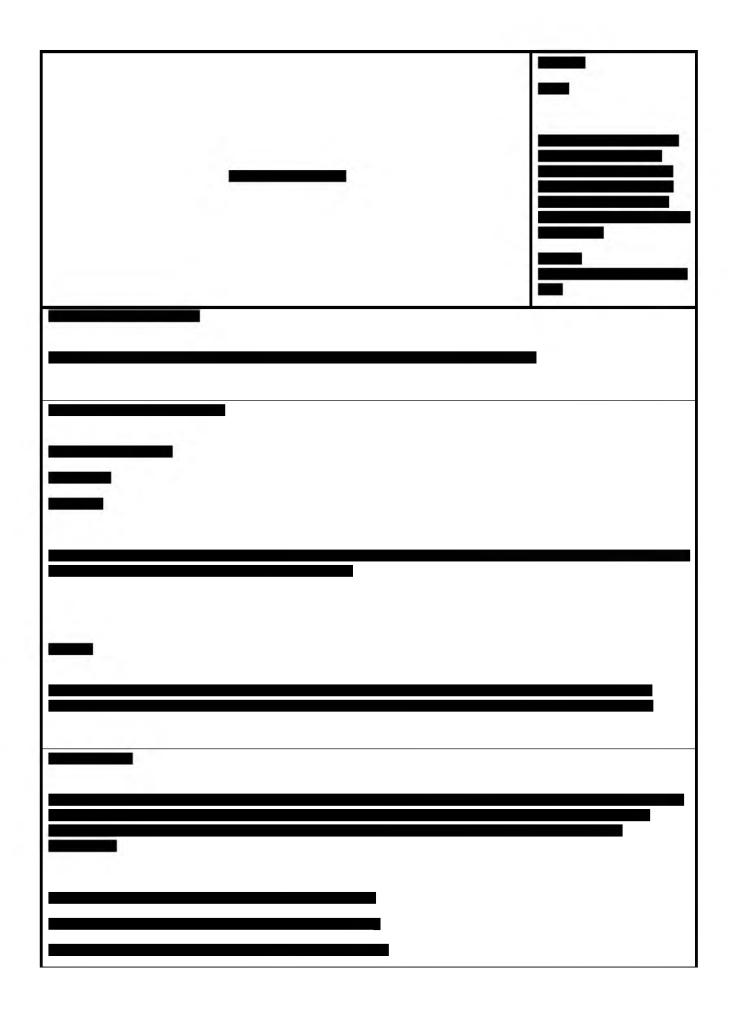
6.2. Request for Change form

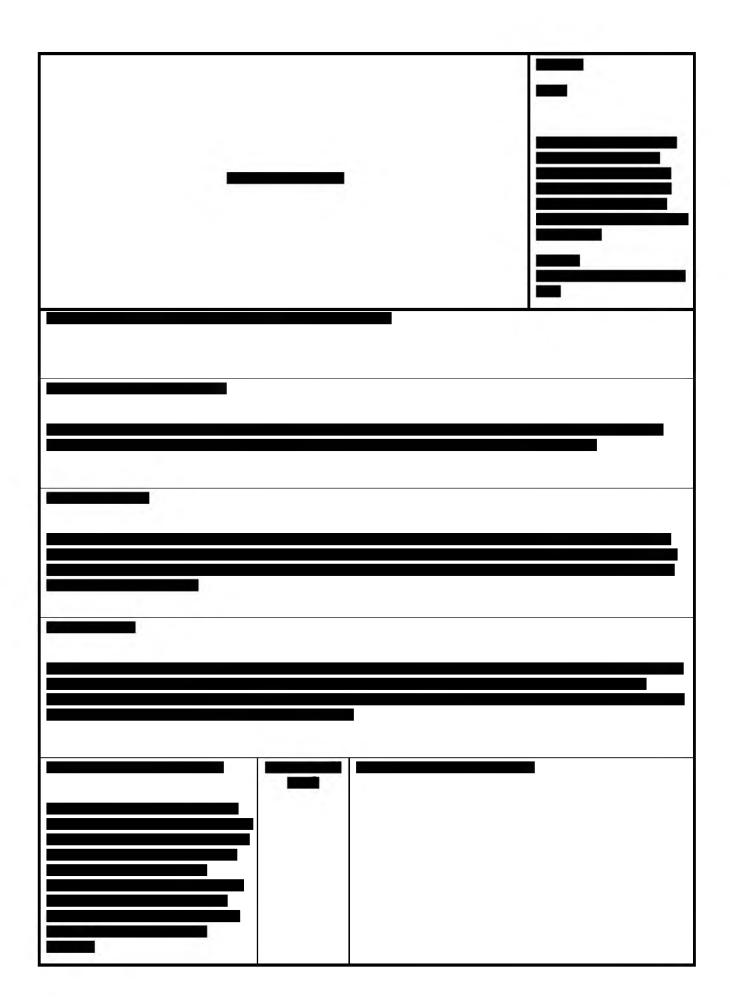
The originating NEMO shall fill in the sections of the RFC.

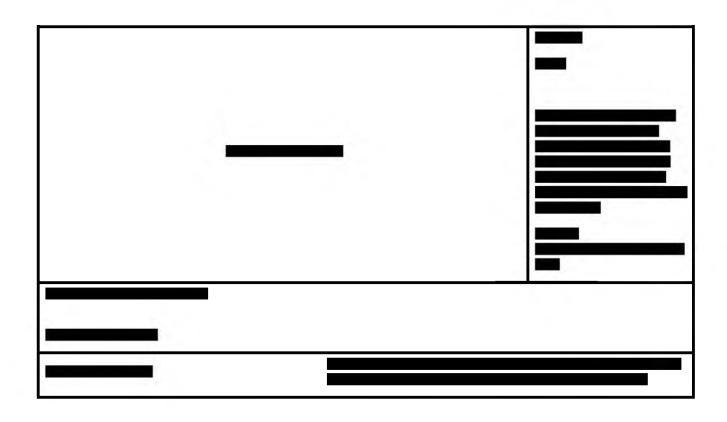
Please note that all fields are mandatory to fill in, except for the ones marked with a "*".



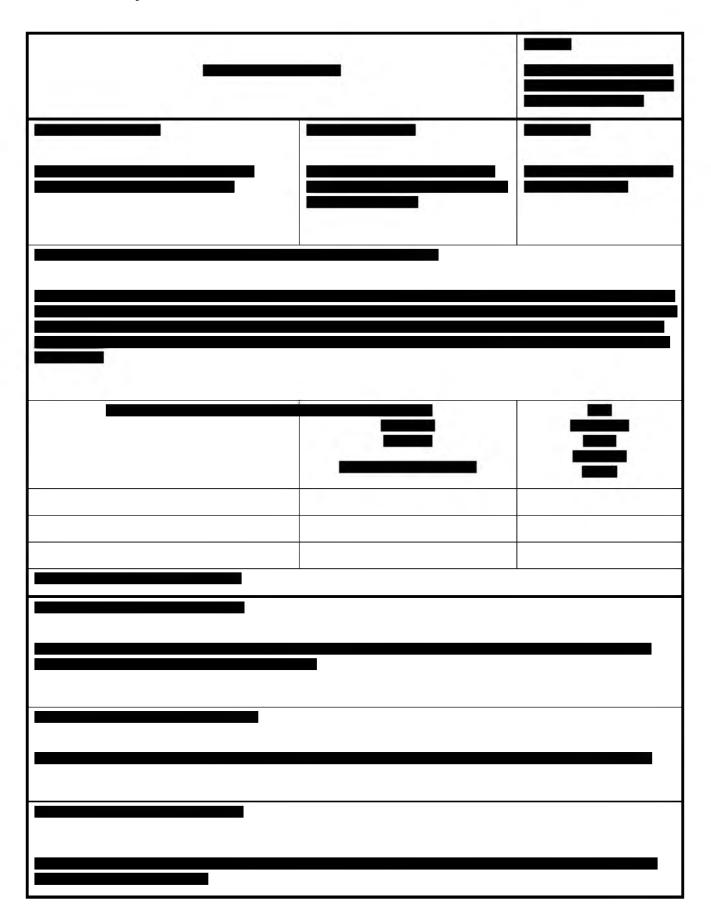






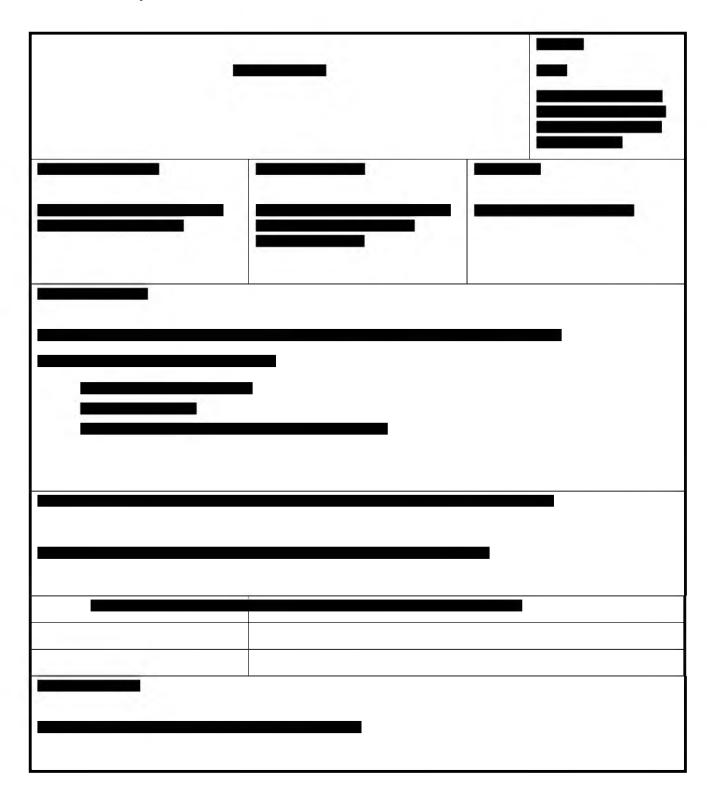


6.3. Impact assessment form



 4: 	

6.4. Objections form



Appendix

• Appendix 1: Request for Change register

See ProjectPlace here: https://service.projectplace.com/pp/pp.cgi/r1490936292