

SDAC_OTH_05: SDAC Change Control procedure

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Approval

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Final	23/10/2013		JSC	
0.1	28/03/2014		EPEX SPOT	Updated to suit with additional regions go live
0.2	01/10/2014		EPEX SPOT	Updated to suit with SNB and IBWT and to facilitate the integration on future regions
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0.6	31/10/2018		SDAC OPSCOM	Updated RfC template (included new element: impact on monthly operational report)
0.7	31/05/2019		MRC Procedures TF	Adaptations due to new governance structure and MNA alignment
1.0	20/01/2021	Javier Sánchez	SDAC Procedures TF SDAC OPSCOM SDAC MSD ANDOA MSD	By SDAC JSC request, adaptations of MRC Change Control Procedure in line with the provisions from Algorithm Methodology approved by ACER.

Remarks

This change control procedure focuses only on changes impacting on SDAC level. Existing local / regional change control procedures will remain in place. The SDAC level is added on to it.

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1. Introduction

This document describes the Change Control Procedure to be used as part of the SDAC operations. This procedure must be used in order to implement changes in SDAC in an efficient and controlled way with a minimal level of disruption, and with controlled risk. Changes with no/minor impact (“Type I” change) on DA MCO Function assets must be notified to the SDAC OPSCOM but do not need to go through the approval process.

The origin of the change determines the approval process of the change. Changes as a consequence of decisions of competent local authorities are finally approved by these authorities (before or during the change control process) and not by the SDAC JSC.

In such case, the procedure below is developed in order to assess and validate if a change is possible from a technical and operational point of view.

In case the SDAC JSC members cannot come to an agreement concerning the validation of the change request from a technical and operational point of view, the SDAC JSC has to agree on what message shall be transferred to the competent authority.

1.1. Scopes and principles

The process aims at tracking any change which might affect SDAC operations. The change can be requested by the following originators:

1. A party/parties part of the DAOA directly or by external parties involved with parties of the DAOA. In the latter case the change request will be filed through the party which is member of the DAOA.
2. A Local competent authority (this includes changes to features/elements of the price coupling or capacity allocation requirements, constraints or settings initially approved by all local competent authorities within SDAC.
3. European competent authorities (changes to be managed on a European level)

Every request for change must be notified first to the SDAC OPSCOM chair in order to be taken into account at SDAC level. The SDAC OPSCOM will manage this change control procedure.

For the registration and management of all change requests under SDAC, as well as for the management of the Roadmap, Go-Live windows (GLWs), etc., the SDAC Change Request Register will be used. This document will be used by all different SDAC Taskforces involved in any way in the change request management.

The SDAC OPSCOM can decide at any moment to call for a meeting or conference call requesting for additional information of the originator of the change request.

The organization of the implementation of the change request will be handled as a separate project and not as part of the change control procedure.

1.2. Interaction between DAOA CCP, ANDOA CCP and PCR CCP

Once notified about a change which originated either on a SDAC level or on a local/regional level, the SDAC OPSCOM will be responsible for maintaining an overall global test and implementation planning of all the different changes. It is then the responsibility of the SDAC OPSCOM to allocate a test time slot and an implementation timeslot for each notified change.

The request will pass through under ANDOA CCP and/or PCR CCP if ANDOA / PCR assets are impacted, respectively. CCP cascade process shall apply for changes governance.

SDAC OPSCOM will mediate between the relevant parties in case that several changes are scheduled for testing and implementation during the same time slot. If no solution can be found in the SDAC OPSCOM, then the decision will be escalated to SDAC JSC.

1.3. Cost sharing principles

The SDAC JSC shall agree on the costs for doing an impact assessment, the costs for implementing the change and the sharing of those costs. Unless decided otherwise by the SDAC JSC, the Parties benefiting from the change shall pay.

1.4. List of DA MCO Function common assets

- SDAC common system (PMB).
- All SDAC common Procedures.
- SDAC common algorithm (Euphemia).
- All SDAC common contracts.

2. RfC life management flow-interaction between SDAC groups and PCR MSD-ALG

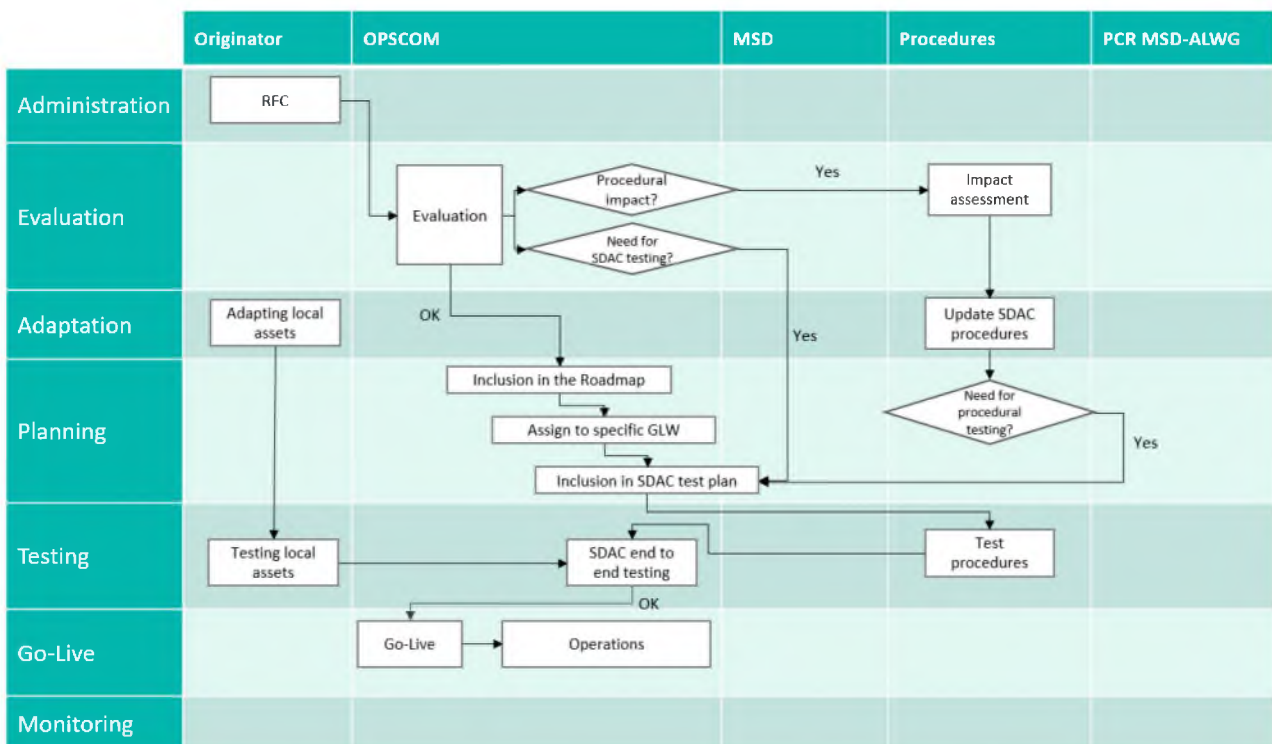
The natural flow every new change request will have between the different SDAC Taskforces (SDAC OPSCOM, SDAC MSD and also PCR MSD-ALG) from the notification to the final Go-Live is contemplated in the following high-level flow charts depending on the categorization of the request for change, which will also be depending on the expected impact of the requested change on the SDAC algorithm performance and on market participants.

Following assumptions are considered for the simplification of the flow charts:

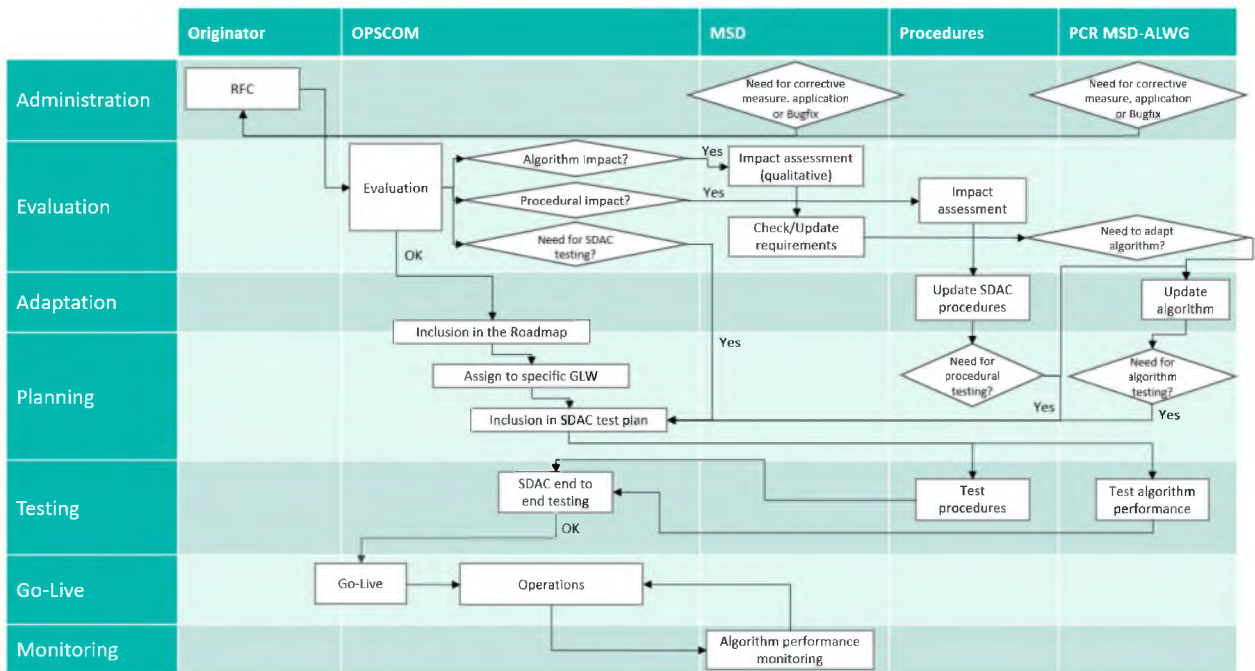
- Only positive branches are included in the flow for the simplification in the overview.
- Timings are not taken into account.
- Several steps are not included (Roadmap process interaction, Go-Live window prioritization,).

With regards to the principles governing change request management not considered, the applicable ones are detailed either on this document or in the NEMO Algorithm Methodology (or 'AM') (Annex I specifically); NEMO Algorithm Methodology sets forth transparent rules and principles for the management (submission, evaluation, decision and implementation) of requests for changes related to SDAC algorithm. The present document summarizes all the information contained in the Algorithm Methodology with regards to SDAC algorithm and change request management on a more practical manner, based on experience, after common agreement by SDAC and ANDOA&PCR taskforces.

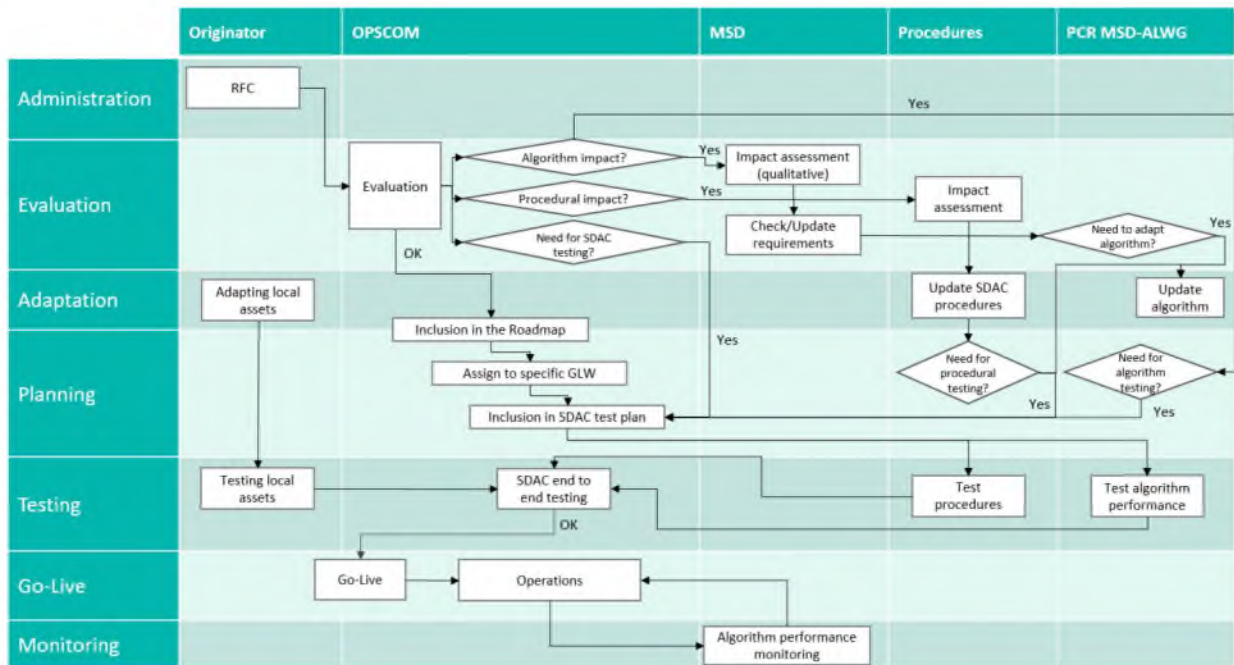
- a) **Non-notifiable change ("Type I change")**: is a change that does not directly affect the MCO function assets, does not cause any detriment to the performance of the relevant algorithm and is not relevant to market participants.



- b) **Fast-track change (“Type II change”)**: is a change that needs to be implemented with urgency. This type includes bug fixes and the application of corrective measures.



- c) **Standard change (“Type III change”)**: is a change that has a potential detrimental impact on the performance of the relevant algorithm and/or market participants. Any request for change not being of type I, type II or type IV shall be considered as type III.



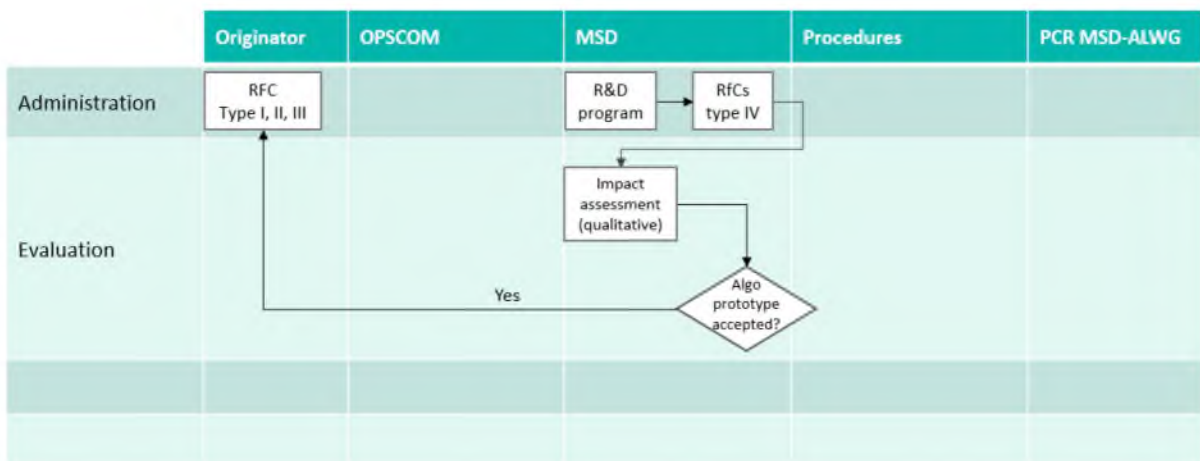
For the particular case of a need to update procedures followed by a standard change request (“Type III” change), according to DAOA Article 25.1 all SDAC Operational Procedural updates necessitate SDAC JSC approval. In principle all procedural changes classify as minor (“Type I” change) does not require JSC approval. If this is not the case, the principle of such change is always approved by the JSC; the adjustment of the procedure is only manual work implementing a change the JSC approved before.

With that, final versions of the documents are sometimes produced very late in the process and so it may complicate the JSC approval process. It was therefore approved by SDAC JSC that, in deviation to what is stated in Article 25.1 DAOA, changes of SDAC Operational Procedures will be approved by the SDAC OPSCOM (and not by the SDAC JSC itself), in line with the process set forth in the present document.

- d) **Research and Development change (“Type IV change”):** is a change aimed at activating the research and development analysis on the specific functionality involved. The assessment is carried out in the test framework according to the relevant research and development. All NEMOs might be required to create algorithm prototypes in order to implement the list of type IV changes.

If the outcome of the research and development is positive and improves beyond the thresholds defined in the Algorithm methodology for accepting the algorithm prototype, then a type II or III change might be issued for implementing the prototyped changes; it is expected that for most change request of type IV, request for changes of Type III will follow.

Before a change request of type IV will finally be transferred to a change of Type II or III, a check is needed to ensure that all needed experiences, assumptions and information from the R&D stream are clear and well described in order to initiate the implementation phase of the respective R&D RFC.



3. General principles for the governance on MCO assets for SDAC

The following listed principles are considered as a basis for a common cooperation between TSOs and NEMOs on the development of the MCO assets. The purpose of this is a complete transparency of new releases development, release preparation and decision-making process. They should allow to get more control on the whole chain of the development process facilitating a more stable and effective (co) operation of the SDAC.

While currently only principles are described providing the basis and direction to head towards, which can already be applied if an early implementation of them is possible in the SDAC CCP. The final set-up should be to reflect these principles also in clear processes & procedures. This will require an update of this SDAC CCP.

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4. Go-Live window concept, principles and go-Live windows mechanism establishment

New change requests will include, as usual, an expected go-Live date.

Article 16 of the Algorithm methodology (AM) treats the concept of Go-live windows (or GLW(s)) for change requests in detail. Some important concepts defined are listed below:

- The assessment of requests for change shall be carried out periodically by all NEMOs in cooperation with all TSOs in go-live windows, **based on the expected go-live date of the request for change**.
- The periodic assessment of a request for change with an expected go-live date within a specific go-live window shall include **all requests for change** with an expected go-live date **within the same go-live window** in such a manner as to allow a **cumulative impact assessment test**.
- DA change control procedure shall define the number of go-live windows in each calendar year. **Additional go-live windows can be introduced** by all NEMOs in cooperation with all TSOs as a new ad-hoc go-live window or by increasing the frequency of regular go-live windows. **There shall be at least two go-live windows in a calendar year**.
- The originator shall send each request for change to the all NEMOs in cooperation with all TSOs by **no later than at the end of the second go-live window prior to the go-live window during which the go-live date of such request for change is expected to occur (AM 16.5)**.
 - If the originator submits the requests for change to all NEMOs before this set time, the requests for change **can be considered validly received** even if they are not reporting all information under AM Article 15.2. Originator will be entitled to submit missing information according to the set time.



- The **assessment process** of requests for change **and the decisions** shall be **concluded within the go-live window antecedent the one in which the go-live date will occur**.
- According to Article 17 of the Algorithm methodology, there are three levels of prioritization for request for changes received with expected go-live dates within the same go-Live window. Level 1 of prioritization is detailed in AM Article 17.7 and below:
 - Type II change.
 - Requests for change in accordance with AM Article 14.2 (direct legal requirement pursuant to the CACM Regulation).
 - Requests for change from the roadmap, received in accordance with Article 10.
 - Other requests for change.
- Other prioritization rules are further detailed within AM Articles 17.8 and 17.9.
- The outcomes of the assessment of requests for change shall be included in an assessment report, containing all the relevant information on the process followed, with all detailed information, according to AM Article 17.12.

Based on these concepts, agreed principles for the management of Go-Lives windows and the establishment of the **Go-Live window mechanism** for a calendar year are the following:

1. Go-Live window proposal for next year shall be set **under SDAC OPSCOM** (NEMOs + TSOs) and sent to SDAC MSD for revision (NEMOs + TSOs).
2. SDAC OPSCOM proposal is, based on real experience, to have shorter Go-Live windows (give more flexibility), 2/3 months. This may be adjusted afterwards. **GLW flexibility:** between the 1-2 month proposed by SDAC OPSCOM and a maximum of 6 months proposed in AM.
3. If a change request fails and needs to be shifted for another Go-Live window, **it will be shifted 1 GLW at least**. To avoid too much delay, Go-Live windows should not be of 6 months to be able to take advantage of the already performed work and tests and re-plan the go-Live closer.
4. **Go-Live date may be changed within the same Go-Live window**, if feasible, not directly postponed for another GLW – more flexible mechanism.
5. Go-Live window mechanism will be much more demanding (in terms of more effort/pressure) from the testing side to achieve all necessary requirements. This needs to be done within the same GLW, same Algorithm version.

4.1 Roadmap elaboration principles

Every year all NEMOs in cooperation with all TSOs shall agree on a multi-year roadmap incorporating all requests for change related to:

- a) new releases of the SDAC and SIDC algorithms;
- b) amendments of requirements of the SDAC and SIDC algorithms;
- c) outcomes of the research and development activity, according to Article 11;
- d) major amendments in the usage of the existing functionalities; and
- e) future requirements as defined in the Annex 1 and 2 of the Algorithm methodology.

This roadmap shall be updated at the end of each year and shall include requests for change with the expected go-live dates for at least next 24 months. [REDACTED]

All NEMOs in cooperation with all TSOs shall elaborate a feasible calendar for the implementation of each request for change. In order to include a request for change in the roadmap, the originator shall prepare and submit the related requests for change, which shall include at least information under AM Article 15(2), letters a), b), c), d), e), i), j), k) and l).

Requests for change included in the roadmap process shall be preliminary assessed by all NEMOs in cooperation with all TSOs by the end of the next go-live window, in accordance with Article 17(3).

The requests for change in the roadmap shall have a specific priority according to Article 17(7), under the condition that the complete set of information requested under Article 15(2) is received before the time requested under Article 16(5). Once the information is completely received, the request for change shall be assessed according to Article 17.

5. Corrective measures - Algorithm performance management

In case all NEMOs detect an unanticipated degradation of the DA algorithm performance below the thresholds defined in the algorithm methodology due to an overall effective usage higher than the usage range, all NEMOs in cooperation with all TSOs may decide to apply specific corrective measures with the aim to maintain an adequate performance of the SDAC algorithm. Corrective measures shall be applied also in cases when the algorithm performance is expected to be degraded by a request for change, which cannot be rejected or postponed.

PCR Algorithm TF will setup the monitoring process according to the Algorithm monitoring indicators; afterwards, SDAC MSD will analyze the information. The monitoring task is expected to be done once every month. Monitoring algorithm indicators and thresholds are already defined within the Algorithm monitoring methodology.

In the event that the monitoring shows the need for the application of corrective measures due to degradation of the DA algorithm performance, SDAC and PCR Algorithm groups will discuss and propose possible options of application which shall in any case be decided and approved, before its implementation, by SDAC JSC (Legal TF shall be consulted and part of the application and decision process).

Once a measure is decided, a type II or a type III change request will be triggered to implement this future change. SDAC OPSCOM will follow-up the performance in Operations, in order to verify the effective effect of such corrective measure, in parallel to the continuous monitoring by Algorithm TFs.

6. Monitoring Algorithm performance - Operations

All NEMOs in coordination with all TSOs, shall monitor the performance of the SDAC algorithm in compliance with the CACM regulation and the Algorithm monitoring methodology (AMM). The principles for the monitoring are set out in the AM and AMM and in the associated monitoring procedures.

For the purpose of monitoring the SDAC algorithm the performance indicators described under Annex IV – Title 3, 4 and 5 of the AMM shall be used.

- **Title 3 – Indicators on SDAC algorithm performance:**
 - Indicators on algorithm ability to maximize economic surplus.
 - Indicators on SDAC algorithm repeatability.
 - Indicators on algorithm scalability.
- **Title 4 – Indicators on SDAC algorithm usage:**
 - Indicators to describe the usage of SDAC products.
 - Indicators to describe the geographical extension of the SDAC.
 - Indicators to describe the network constraints.
- **Title 5 – Indicators on the SDAC algorithm output:**
 - Indicators to describe the output of maximization of economic surplus.
 - Indicators to describe the status of orders.
 - Indicators to describe the IT calculation process.

The algorithm performance shall be measured, therefore, against the thresholds specified in the Annex IV (“DA monitoring”) of the AM. The 2 main reasons that may trigger the application of corrective measures are:

1. **Unanticipated degradation of the algorithms’ performance** below the thresholds referred to in Article 3(3) of Annex 4 of AM.
 - a. In this situation, a request for change Type II (“Fast track change”) will be raised.
2. **Non-compliance with an implemented functionality** is detected according to Article 3(3) of Annex 4.

In the event of a need to apply corrective measures due to degradation of the performance of the DA algorithm, needed actions will be carried out under management of SDAC MSD, including a logical order of measures to be explored (from a small change in an Algorithm parameter, to a limitation of a product type or the limitation of its usage), from the total amount of indicators of SDAC algorithm.

With this, there should be an assessment by SDAC MSD on the selected option(s) to be applied as corrective measure. On the application of such corrective measures, the algorithm performance shall show effective evidence on the expected improvement.

Once the situation will become stable in terms of performance by the algorithm, indicators shall be restored to the original (previous) values in a way that the thresholds specified in the Annex IV of AMM will be respected all along the process.

7. Procedure

Change requested by SDAC parties or by external parties involved with SDAC parties (Standard change, Type III change)

This procedure describes the Change control procedure life-cycle for a standard change requested by a party/parties part of the DAOA directly or by external parties involved with parties of the DAOA.

The life-cycle procedure will be detailed for standard changes ('*Standard change*', Type III change according to AM) which shall cover logical cases and relevant taskforces interactions; those will mostly be part at some stage of the other categories of change requests (Type I, II and IV).

In case of a request from an external party, the change request will be filed through the party which is member of the DAOA, being responsible to provide all needed information on due time.

Changes requested by local competent authorities or European competent authorities will follow a similar process; if a change starts as a Research and development change ("*Type IV*" change) as part of an R&D program, and it's decided, after evaluation with qualitative assessment in SDAC MSD, to be included on a new algorithm prototype, then a type I, II or III (mostly expected) change request shall be raised; from that moment on, the normal request for change process shall be carried out for the implementation of the change.

As a **high-level summary**, that will be elaborated in the next section, and without too many details related to time obligations, the **basic process-flow** for a new standard change will be the following:

- **Steps envisaged to be done long in advance the Go-Live (prior GLWs) – Submission phase**
 - An originator will raise a new change request by the need to implement a change in SDAC.
 - Together with the request for change form or later the originator needs to submit all other material needed to assess the change, such as the test data with the correct format, expected impact on different DA MCO Function assets, if new developments are required, etc.
 - The change request content will be evaluated in SDAC OPSCOM, the test data and requirements will be analyzed under SDAC MSD; once those are validated the change request will be **accepted** to proceed with the implementation, taking for granted that the RfC inputs are validated: at this stage, go-Live date is expected to be in the {current GLW + 2} or later.
- **Steps envisaged to be done during the antecedent Go-Live window – Algorithm assessment**
 - Algorithm tests and simulations shall be completed (validated), with positive outcome.
 - Decision-making for implementation based on the assessment on the material (data) content.
- **Steps envisaged to be done during the Go-Live window which the go-Live date will occur – Tests**
 - Test phases (NEMOs, regional, joint NEMO-TSO) related to PMB system new functionalities/requirements with the algorithm(s), under management by different SDAC WGs, including regional preparation for changes, procedural changes and any other envisaged preparation due to impact on DA MCO Function assets for the production go-Live.
 - Once all tests are successfully completed, with RfC ready to go-Live, official SDAC JSC approval will be asked during the last JSC meeting previous to the implementation of the change., where tests are expected to be finalized; if that's not the case, SDAC OPSCOM will ask for approval in case no controversy happens until the complete test phase is finalized.
 - Latest technical preparations for the go-Live, communications and Operational preparations.

General overview of the procedure for a standard request for change

NB. SDAC OPSCOM can always decide to implement a change faster than the normal timings described in the procedure.

Note: As an important remark and guidance to understand all below needed steps and the process to perform those and so to be able to implement a new request for change under SDAC, the following list shall not be considered as a rigid sequential order of needed steps for it but just a general approximation on the usual steps that shall be part of the life-cycle for all kind of standard change requests. With that, chronological order of the steps is considered as a guidance and not completely as an obligation, some steps may be parallelized, some may need a step-back and reconsideration/re-evaluation, depending on each particular case, so timings are only considered as a rough approximation, where SDAC WGs will be in the lead for the process based on their expertise role.

Step 1. A Party or parties involved in SDAC (NEMO / TSO) **identify** the need for a change and submits the Request for Change to the SDAC.

A quick check is done to know if the change concerns a DA MCO Function common asset or not.

Step 2. Preliminary impact assessment (qualitative) of the change is done by requestor (see impact assessment section), following change control procedure in accordance with contractual structures. The conclusion of this preliminary assessment will end up in one of the following options:

a) No / minor impact on MCO common assets → Type I change request needed, shall be notified to SDAC OPSCOM (PMO, Chairman).

- In this case, no SDAC JSC validation is required, but the SDAC OPSCOM will be responsible for the allocation of a dedicated testing time slot according to the global SDAC test planning.

b) Impact on MCO common assets → notify SDAC OPSCOM (PMO, Chairman). **Go to step 3.**

Step 3. If impact, requestor shall notify SDAC OPSCOM (PMO, Chairman) on the change including the preliminary impact assessment. As much information and details as possible should be provided to facilitate decision taking in SDAC JSC/SDAC OPSCOM and to accelerate processing the change, including all the **material** included in Article 15.2 of the Algorithm Methodology and considered mandatory:

- The purpose of the request for change, according to Article 14(1) of the AM and the general description of the request for change;
- Indication of the type of request for change according to Article 14(3) of the AM;
- Originator;
- Issuing date;
- Expected go-live date;
- Fully specified technical requirement;
- Input data for the simulations;
- Estimated effect on other processes or systems (**qualitative**);
- Risk assessment;
- Bidding zones, scheduling areas or NEMO trading hubs affected by the implementation of the request for change;
- Specification of the cost categorization in accordance with Article 80(2) of the CACM Regulation.

All NEMOs in cooperation with all TSOs can decide at any moment to contact the originator with the purpose of requesting an additional information on the request for change. The originator is always entitled to receive all relevant information regarding the status of its request for change.

The originator shall send each request for change to SDAC by no later than at the end of the second go-live window prior to the go-live window during which the go-live date of such request for change is expected to occur, according to Article 16.5 of AM.

If the material provided for the assessment (Article 15.2 of AM) is considered **incomplete** (determined at least by SDAC OPSCOM and SDAC MSD), the change can be considered validly received, but with the following conditions:

- a) Requestor/originator shall provide the list of considered options and the magnitude of new products or network elements (or constraints) to be added to the algorithm;
- b) The missing information shall be provided to SDAC on time for the evaluation (Article 16.5 of AM).

Step 4. SDAC OPSCOM records the receipt of the request for change and allocates a **unique number** to this request. This will be the next number in sequence. This number will be used to reference the change from this point onwards.

Step 5. Evaluation of the content of the change request at SDAC level (SDAC OPSCOM, SDAC MSD), making accessible all the material, including (Article 17.3 of AM):

- a) Correct indication of the purpose and type of the request for change, according Articles 14(1) and (2) of AM;
- b) The originator of the request for change and impacted parties;
- c) Potential prioritization criteria to be applied according to this Article 15.7 of AM;
- d) Whether or not any development is required in the algorithm for the request for change, in accordance with Article 17.13 of AM;
Whether or not any development is required in the PMB for the change.
- e) Assignment of the go-live window according to timings set out in Article 16 of AM and of the timeline to be followed during the assessment;
- f) Whether it fulfils the objectives of Article 3 of the CACM Regulation.

The data provided for the simulations will be forwarded in the required format to the SDAC MSD (and subsequently to ANDOA MSD) that will validate it.

In case multiple requests for change have been received with the expected go-live dates within the same go-live window, the prioritization and sub-prioritization detailed in Article 17 (7, 8 and 9) of AM shall apply.

Remark: some of the following steps (**6 to 9**) may be parallelized (not fully-sequential), when possible.

Step 6. If the previous evaluation by SDAC parties and SDAC groups turns out **positive**, a **go-ahead** for the change by SDAC OPSCOM will follow with next conditions to be taken into account:

- a) All NEMOs in cooperation with all TSOs shall approve and implement type I changes within 30 days.
- b) **Assessment on the SDAC algorithm performance** (tests) as set out in Article 18 of AM and the thresholds defined in the AMP.
- c) In case of a type III change, and provided that the combined impact assessment in accordance with AM Article 17.3 of all the requests for change within a particular go-live

window has a positive outcome, all requests for change in such go-live window shall be approved. All NEMOs in cooperation with all TSOs might, nevertheless, decide to carry out a case-by case qualitative assessment on individual requests for change considered in the **combined impact assessment** in case they collectively induce an excessive variation on the algorithm performance, even though it is below the combined acceptance criteria. SDAC OPSCOM will, therefore, expect this **individual assessment** for every change request from SDAC MSD in respect to the chronological order.

- d) All inputs from Article 19 from AM with respect to negative outcome of combined/individual impact assessment for change requests.
- e) A consultation of preliminary decision on a type III change may be decided prior to making a final decision (aimed for exceptional situations only). Decisions will be timely communicated by SDAC to the originator.
- f) In case of failure of the decision-making process, the escalation process shall be triggered according to the relevant provisions set forth in the operational contracts.
- g) **Assessment on the PMB (tests).**

The outcomes of the evaluation of requests for change shall be included in an **assessment report**, containing all the relevant information on the process followed (Article 17.12 of AM and objectives set out in Articles 3 and 37 of the CACM Regulation).

For the decision to allow the go-live of requests for change, all assessments for requests for change and the version of the respective algorithm that shall be used in the evaluation process **shall be the same like the one that is expected to be used in the implementation of the request for change**. If a version of the algorithm is not timely available, an alternative version of the algorithm (preceding version or prototype) can be used (e.g., for performance evaluation) if this is considered as acceptable by the relevant assessment body (SDAC OPSCOM, SDAC MSD, ...).

The assessment process and the decisions shall be concluded, at the latest, within the go-live window antecedent the one in which the go-live date will occur (Article 16.7 of AM).

Step 7. Review of the evaluation & assessment done by SDAC parties and **decision-making** for the implementation of the change.

All NEMOs in cooperation with all TSOs in SDAC shall decide on the request for change and shall issue for each assessed request for change one of the following possible decisions:

- a) **Accepted:** the request for change is ready to be used in production and the request for change shall be implemented up to {current GLW + 2} or later, depending on go-Live plan schema organization by SDAC OPSCOM;
- b) **Rejected:** the implementation of the request for change is not compatible with the security of operation, adequate performance criteria, resource constraints or does not fulfil the objectives of the CACM Regulation;
- c) **Postponed:** the implementation of the request for change could be compatible to security of operation and adequate performance criteria, but it is necessary to postpone the go-live date or due to resources constraints; or
- d) **Amended:** the request for change as submitted is not fully compliant with security of operation and/or adequate performance criteria or demands disproportionate resources compared to its benefits, but could be compliant and accepted if appropriate amendments of it are carried out.

Step 8. SDAC OPSCOM will request SDAC JSC **approval for implementation of the change** with impact at SDAC level, usually in the next SDAC JSC meeting including all material showing the impact of the change at SDAC level and decision-making process made (if needed).

- The SDAC JSC may object to the implementation of the change with duly motivated reasons and inform the originator of the change request accordingly. If on the contrary SDAC JSC approval is given for the implementation of the change, **continue to step 9**.
- At the end of the assessment process, usually end of the previous Go-Live windows, a public report shall be issued by SDAC after the decision on all the request for changes indicating the decision, the reason for the decision, the principles behind the decision and the assessment report as referred to in Article 17.12 of AM, in order to ensure transparency on the change request process.

Step 9. Organization of the implementation of the change. The SDAC OPSCOM needs to coordinate with the impacted parties the implementation of the change, i.e., planning (considered in the previous assessment but may be updated by need closer to the date), complete testing (SDAC OPSCOM will allocate dedicated testing time slot according to the global SDAC testing), etc.

The implementation of a change should be handled as a separate project, whereas this step shall happen, according to AM, within the go-live window which the go-live date will occur not limited to antecedent go-live windows.

Step 10. Once all tests are successfully performed (RfC will be in status “*ready to go*”), **RfC is ready for go-live; approval from JSC** is asked, if not yet done, at the last JSC before the go-live, hoping that all tests are already ended; if not we ask for an approval in case there are no controversy.

Preparation of the go-live (all tests considered already performed): production configuration preparation (SCF) and organization of the go-live date according to the calendar (Go-Live sequence).

Step 11. Monitoring, communication (all parties/groups involved in SDAC) and **decision-making** for the project **until the go-Live** by SDAC working groups, including after the change is finally implemented.

8. Impact Allocation

The overall impact of implementing a change and the assessment whether the change has material impact on SDAC level or not depends on the following criteria:

1. Does the change request by the originator lead to changes in systems / procedures of other SDAC parties?

If this is the case, the change is material for SDAC. However, if the change can be dealt with locally, then it might not result in a change for SDAC.

2. Does the requested change require integration testing at SDAC level?

If this is the case, the change is material for SDAC.

3. Does the requested change require regression testing at SDAC level?

If this is the case, the change is material for SDAC.

4. Does the change have an impact on the market results, i.e. does the implementation of the change materially affect the price coupling calculation?

If this is the case, the change is material for SDAC.

5. Does the failing of the change implementation cause the SDAC MC Coupling not to work and lead to full decoupling?

If this is the case, the change is material for SDAC.

9. Request for Change Form

Below is the change request form to be used when notifying the SDAC OPSCOM of a change, including the SDAC impact assessment.

Request For Change			RFC No: RFC/ [The RFC number will be filled in by the SDAC OPSCOM. This will just be the next number in sequence.]
Originating Company [This box contains the name of the originator raising the RFC and, if necessary, their role in this instance.]	Name of Originator [Name of the person completing the RFC.]	Name of CR Owner Name of the person who has ownership of this submitted CR	Date Raised [Date the RFC was raised]
Title of Change [The title of the change is simply a header giving some indication of the nature of the change and which may be used to refer to the change.]			
Section A: Reason for change			
Description of Reason for Change/Problem/Issue: [This should provide a description of the reason for introducing the change, whether it is some new user requirement, a change of functionality, a bug fix, whether the change is driven by a third party, etc. The impact of not doing the change should be described, particularly if it is a bug fix or some other remedial action. This will allow the cost of the change and the risk of doing the change to be compared to the cost/risk of not doing it. It should provide as much detail as possible so that any proposed solution can be defined to resolve the problem or issue in the best way. If a solution is being proposed then the description of the problem/issue may be less detailed in this section.]			

Request For Change	RFC No: RFC/ [The RFC number will be filled in by the SDAC OPSCOM. This will just be the next number in sequence.]		
Section B – Solution Analysis			
Proposed Solution			
[This describes how the proposed solution resolves the problem/issue identified. It should address all the aspects of the change/problem/issue described in Section A.]			
Risks Associated with Proposed Solution			
[Any risks associated with the development. Implementation or operation of the proposed solution should be identified. If there are specific risks associated with individual Components that are not covered in Section C these should be detailed here. Also indicate the risk caused if the change is not implemented.]			
Assessment of the delivery of the change			
[This section must describe the approximate timescale by when the change must be implemented, what is the urgency of the change request, is there currently a work around or not, how long can we continue with this work around in production etc.]			
Section C – Impact Assessment at SDAC level			
Impact at SDAC level			
[This describes the impact implementing the proposed change at SDAC level, i.e. impact on other SDAC Party's systems or procedures, will the RfC impact the Algorithm & PMB and thus requires a new release of a DA MCO asset, need for testing at SDAC level, etc. (to be indicated in the table below). Furthermore, the SDAC OPSCOM Chair will indicate here the dedicated test time slot for the Change.]			
#	Impacted element(s)	Impact description	Organizational body to be involved
1	Procedures	Not applicable	SDAC OPSCOM
2	Contracts	Not applicable	SDAC Legal TF
3	System	Not applicable	SDAC MSD
4	DA MCO Function Asset <ul style="list-style-type: none"> • Algorithm • PMB • Other 	Not applicable	SDAC MSD

Request For Change			RFC No: RFC/ [The RFC number will be filled in by the SDAC OPSCOM. This will just be the next number in sequence.]
5	Performance	Not applicable	SDAC MSD
6	Shared Configuration File	Not applicable	ANDOA Procedures TF
7	Monthly operational report	Not applicable	SDAC OPSCOM
8	Other	Not applicable	To be decided after discussion in SDAC OPSCOM
9	No impact at all	Not applicable	SDAC OPSCOM
⇒ Need for testing?			Yes / No
⇒ Rollback Solution in place?			Yes / No
⇒ Are costs expected to be borne by others than the originators of the RfC.			Yes / No (if yes, by who else and what is the amount?)
Delivery of Change to SDAC [This section describes the preferred plan/agreement on when the change can be implemented in production, e.g. on a weekend day, or a week day, a specific hour, roll back possibility needed etc. The dedicated implementation time slot will be allocated according to the global implementation planning.]			