



Change Pack

Customer eligibility model

Northwind, energy supplier

Owner	Head of Customer Operations
Sector	Energy, Great Britain
Regulators	Ofgem (licence SLC 7A), FCA (CONC 2)
Risk band	Elevated, automated decision affecting access
Approved	26 May 2026, board minute 12
Pack reference	NW-CEM-2026-05

What this is

Six extracts from a fourteen document Change Pack. Names, scores and identifiers have been replaced. The structure, citations and signed footer are how the real artefacts read. The full set is built when we run a Pack for your team.

Six extracts inside: AIIA cover, Decision Map, Clause Citations, PRD snippet, Controls Register, signed bundle footer.

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.

Extract 1 of 6

AI Impact Assessment, cover

The first page of the AIIA. It states what is being decided, who is accountable, which rules apply, and what the assessor concluded.

Use case
Customer eligibility model, Northwind, energy supplier

System type
Automated decision system, score plus rules

Affects access
Yes, prepayment and credit terms

Population
Domestic customers, all of Great Britain

Risk classification
Elevated. Automated decision affecting access to a regulated service.

Human oversight
Qualified person reviews any decision flagged at D-01, D-04, D-07 or D-12.

Data scope
Account, payment history, meter type, vulnerable flag. No special category data.

Outcome
Approved with conditions. Re-review in 12 months or on material change.

Approval

Approver	Role	Date	Decision
[redacted]	Chair of risk committee	26 May 2026	Approved with conditions
[redacted]	Data protection officer	24 May 2026	Cleared, DPIA on file
[redacted]	Head of Customer Operations	22 May 2026	Owner sign-off

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.

Extract 2 of 6

Decision Map

Fourteen decision points sit inside the eligibility model. Four are shown below. Every point names its trigger, the rule applied, the route taken when the rule fires, and the human who reviews it.

ID	Decision point	Trigger	Route on flag	Reviewer
D-01	Eligibility score below threshold	Composite score under 40	Hold automated decision, send to human review queue	Customer Operations team lead
D-04	Vulnerable customer flag present	Flag set on account or detected from notes	Bypass automated decline, route to vulnerability adviser	Vulnerability adviser, qualified
D-07	Confidence band C	Model confidence below 0.65	Hold for dual sign-off before any adverse decision	Team lead and qualified reviewer
D-12	Manual override applied	Operator overrides automated outcome	Decision proceeds, override and reason logged to evidence chain	Audit, sampled monthly

Escalation routes, three in total.

Decisions held at D-01 go to a customer operations queue, target response in one working day. D-04 and D-07 cases sit with a qualified reviewer and may not auto-resolve. D-12 overrides do not block the decision; they raise an audit signal that is sampled and reviewed each month.

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.

Extract 3 of 6

Clause citations

Every decision in the Pack is tied back to source clauses. The full register lists 312 cited clauses across four instruments. Four are shown.

Instrument	Clause	What it requires	Tied to
EU AI Act, Annex III	Article 6, high-risk	Systems used to determine access to essential services count as high-risk and carry the obligations in Title III.	AIIA cover, D-01, D-07
EU AI Act	Article 14, human oversight	A qualified natural person can intervene, override, or stop the system. Oversight is designed in, not bolted on.	Decision Map, D-01 to D-12
Ofgem standard licence	SLC 7A, fair treatment	Suppliers must treat domestic customers fairly and have regard to vulnerable circumstances when making decisions.	D-04, Controls Register C-04
FCA handbook	CONC 2.2 and 2.5, conduct of business	Firms must act honestly, fairly and professionally, and assess affordability before any credit decision.	D-01, D-07, Controls Register C-02

<p>312</p> <p>Clauses cited across the Pack</p>	<p>4</p> <p>Instruments tracked, AI Act, SLC 7A, CONC 2, GDPR</p>	<p>14</p> <p>Decision points mapped to clauses</p>
--	--	---

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.

Extract 4 of 6

Product requirements, build-ready snippet

The Pack contains a PRD engineering can pick up the same day. Below is the human oversight section, lifted verbatim from the Northwind document.

4.3 Human oversight

The system must offer a qualified reviewer the ability to (a) inspect every input that contributed to a decision, (b) override the outcome, and (c) write a reason to the evidence chain. Override actions are recorded with reviewer ID, timestamp, prior outcome, new outcome and free-text reason.

Acceptance criteria

1. Reviewer queue surfaces all decisions held at D-01, D-04, D-07 and D-12.
2. Override path is one click from the queue, two clicks from a customer record.
3. Every override writes an immutable entry to the evidence chain within 1 second.
4. Reviewer cannot mark a case resolved without selecting a reason from the controlled list.
5. Daily report lists overrides, reviewer, queue age and decision type, exportable as CSV.

Out of scope, this release

Predictive routing of cases to specific reviewers. Bulk override. Override of decisions older than 30 days, this requires the change request path.

Tied to Article 14 (human oversight, qualified person), SLC 7A (fair treatment), and Controls Register entries C-01, C-03 and C-07.

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.

Extract 5 of 6

Controls register, snippet

The Pack ships a working register with owner, evidence source and review cadence on every control. Five rows from a register of forty-one.

Ref	Control	Owner	Evidence source	Cadence
C-01	Human reviewer can override any automated decision	Cust Ops	Evidence chain, override log	Monthly sample
C-02	Affordability check passes before any credit terms set	Risk	Decision log, score band	Per decision
C-03	Override reason recorded against controlled vocabulary	Cust Ops	Override log, reason field	Monthly sample
C-04	Vulnerable flag bypasses automated decline at D-04	Vulnerability	Routing log, queue ID	Per decision
C-07	Reviewer queue worked to one working day target	Cust Ops	Queue age report	Weekly review

Every control points at a clause and at a piece of evidence. When a regulator asks how the system is kept honest, this register is the answer.

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.

Extract 6 of 6

Signed bundle, footer

Every Pack closes with a signed bundle. It records who approved what, what the bundle contains, and how to verify it has not been altered.

Bundle NW-CEM-2026-05

Customer eligibility model, Northwind, energy supplier

Document	Version	Sign-off
AI Impact Assessment	v1.0	Chair of risk committee, 26 May 2026
Decision Map	v1.0	Head of Customer Operations, 22 May 2026
Clause citations register	v1.0	DPO and Compliance, 24 May 2026
Product requirements document	v1.0	Engineering lead, 22 May 2026
Controls register	v1.0	Head of Risk, 23 May 2026
Vulnerable customer routing note	v1.0	Vulnerability adviser lead, 22 May 2026
Evidence chain handbook	v1.0	Compliance, 23 May 2026
Override and audit policy	v1.0	Head of Risk, 23 May 2026
DPIA	v2.1	DPO, 21 May 2026
Communications pack, internal	v1.0	Customer Operations, 25 May 2026
Communications pack, customer-facing	v1.0	Customer Operations, 25 May 2026
Regulator brief, Ofgem	v1.0	Regulatory affairs, 25 May 2026
Regulator brief, FCA	v1.0	Regulatory affairs, 25 May 2026
Change cutover runbook	v1.0	Engineering lead, 26 May 2026

How to verify this bundle

Probari issues a signed manifest with every Pack. The manifest names each document, its version, who signed it, and a fingerprint that changes if any byte of the file changes. Re-run the check at any time, the bundle is intact if every fingerprint matches.

● Redacted extract. Staged scenario. Names, scores and identifiers replaced for illustration.



See the full set

You have just read six extracts. The complete Northwind Change Pack runs to fourteen documents, all signed, all cited, all build-ready.

EMAIL
ian.c@probari.uk

We will send the full reference set and walk you through how a Pack lands on your team.

Signed

Every document carries owner, version and date.

Cited

Every claim points back at the rule it follows.

Build-ready

Engineering can pick up the PRD and start the same day.

Probari is pre-revenue. We are running pilots with selected teams across energy, water, telecoms, housing and charity sectors. Founding members shape the product.