ELEXON

Headline report

Meeting name	Code Change & Development Group – MHHS SCR	Purpose of paper	Information
Meeting number	16	Classification	Public
Date and time	20 April 2021		

Synopsis	**Summary of the sixteenth CCDG meeting and actions arising**

1. Introduction, apologies and meeting objectives

1.1 The Chair introduced CCDG16 and confirmed those in attendance.

1.2 The Chair confirmed that the meeting objectives were to:

- Agree approach to Smart & Non-Smart transition straw man, for further development.
- Discuss initial pass of Cross-Segment transition straw man, for further development.
- Agree transition straw men for Advanced and UMS market segments or identify any further work needed.
- Note update from DCC/SEC discussions and agree approach to ad-hoc read requests on disconnection.
- Note updates on other actions.

1.3 The Chair noted some re-planning in the transition activities:

- The transition consultation is now likely to be issued in July 2021 rather than in May.
- The Friday morning joint subgroup slot has been re-purposed for offline transition working with CCDG members from 16 April 2021 onwards.
- Elexon is still re-planning the impact on legal drafting activities.

2. Updates on other SCR work streams

2.1 As Ofgem was absent in this meeting, Elexon gave a brief update to the members.

2.2 Elexon noted that Ofgem is expected to publish its final Business Case very shortly.

2.3 With regards to the AWG, Elexon added that it is looking at the recommendation and working internally on an additional explanatory example on the recommendation of the driven architecture.

3. Update on Smart & Non-Smart transition straw man

Before migrating Smart & Non-Smart MPANs to TOM

3.1 Elexon clarified that it will be necessary to ensure that registration data flows are ready for migration and that should a non-smart meter is moved data should be populated until the data service understands the load shape.

Elexon also noted that the migration management process is expected to be controlled by the migration manager during the cross-segment transition.

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Reverse migration

3.2   A CCDG member commented that, with regards to reverse migration, customers in the old arrangements could be potentially moved to the new arrangements but should not be able to do the reverse. Elexon explained that once migrated, MPANs would not be allowed to switch back to the old arrangements. However, during the transition phase, MPANs in the old arrangements would still be allowed to switch Supplier and stay within the old arrangements.

3.3   Another CCDG member asked whether there is scope for migration to occur earlier than planned. Elexon explained that this should not be allowed as it will create more complexity. The same CCDG member added that the group's intentions about this should be noted to Ofgem. A CCDG member highlighted that it would be difficult to design and document a reverse migration process that might not be there at the moment and that everybody should be ready by the specified dates or at least have a large proportion of Suppliers ready by a nominated date. The group agreed that this nominated date is to be reviewed if, nearer the time, a significant number of Suppliers advised that they would not be ready by that date.

3.4   The Chair asked whether a SMETS1 back-download will risk customers moving to a limited set of options as competition is concerned. A CCDG member explained that some Suppliers will not be able to take on customers that have been migrated to the new arrangements giving the incentives to Suppliers to be on time.

3.5   Another CCDG member stressed the need to document the group's discussion and intentions with regards to the issue of reverse migration and pass it through Ofgem. He also added that the intention was to write down all the pros and cons and explain those to Ofgem before the policy decision on whether or not to allow reverse migration. The same arguments should also be included in the next CCDG consultation.

Load Shaping Service/Tranches

3.6   A CCDG member asked whether there are any communication issues between Tranches 1 and 2. Another CCDG member confirmed that there should not be any. The group agreed that meters with communication faults should sit in Tranche 2.

3.7   A CCDG member suggested that participants could decide what to migrate and in what order without the need to have Tranches. Another CCDG member added that Tranches might be not be suitable description to use. The group also discussed the timings involved with the two Tranches. In particular, a CCDG member said that once load shapes from Tranche 1 are published then the other Tranche can start; ideally, published load shapes based on actual data should trigger a gate opening time for the meters in Tranche 2. Elexon explained that participants should firstly start migrating meters from Tranche 1. Once actual load shapes are being produced for a particular category (including national load shape where de-minimis threshold is not met in a GSP Group), then participants can start migrating MPANs in Tranche 2 which require that load shape.

3.8   Another CCDG member asked whether it is still the Load Shaping Service (LSS) intention to publish load shapes. Elexon noted that an initial load shape is to be published at day 4 (II run) and then publish a revised load shape at day 15 (SF run).

3.9   The Chair asked whether it should be for the individual participants to work through migrations or whether it should be coordinated centrally. A CCDG member explained that the migration plan should only be prescriptive about the period over which participants can migrate.

3.10   A CCDG member raised some concerns with regards to the capacity of system migration. More specifically, he noted that there are lessons to be learned from enrolment and adoption in this space based on the capacity of the DCC. There is a risk that migration could be left at the very end but it would also be important to allow Suppliers to migrate when they are comfortable to do so. Elexon explained that sensible migration management should control this. Both Elexon and the group agreed that there will need to be a forecast/plan for how to manage this included in the transition consultation.

Other considerations

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3.11   A CCDG member noted that the group should also consider export meters that are not registered at the moment as the SCR is intended to make sure they are all registered. Elexon explained that it does not really matter when they are registered and if registered now that will be under the existing arrangements hence it will not be affecting the migration plan. The same CCDG member added that there needs to be some criteria somewhere in the plan and recognise this as a task. Elexon noted that there is a timing issue with this and that the group shall wait until Ofgem's final Business Case is out in case it mentions something with regards to these meters. The group agreed that Elexon is to consider the pros and cons and get comments back from the group before the transition consultation.

4.   Initial cross-segment straw man for discussion

Milestone 1, 'Release 0' – MHHS Design Baseline and Authority Designation

4.1   A CCDG member asked about the associated governance and whether this has to do with the migration plan and monitoring and with changes in the performance assurance framework for MHHS. Elexon advised that the assurance strand will start at this point but respective techniques will be in place further down the plan; migration monitoring has two strands i.e. the target state assurance and the transitional assurance.

Milestone 2, 'Release 1' – MHHS Enabling via new Regulation data and processes

4.2   Elexon noted their correspondence with St. Clements in that they might want to drop all of the processes at once although this will not be needed.

4.3   A CCDG member said that the import/export indicator relationship could speed up migration. Elexon explained that there is one phase of migration hence the import/export indicator relationship should not be a problem. Elexon also added that Release 1 is not going to unleash a whole rush of migration activities and that migration will not happen that early.

4.4   The same CCDG member noted that the establishment of the messaging communications framework fits into this Release. Elexon agreed that, while new communication methods would not be needed for Distributors to introduce Supplier mastered data items into the Registration Service, but Suppliers would need them in place before they can start populating and maintaining those items.

4.5   The CCDG member noted that the Direct Customer Contract field have the same dependency because the Metering and Data Services cannot populate it until new interfaces are ready, and so it would be best that all capability to interface with Registration are done at once in this release.

4.6   Elexon clarified that the Domestic Premises Indicator should have been implemented by CSS go-live and that the CSS does not hold an EFD; it is making sure that it is available for settlement actors to use it. A CCDG member added that, with regards to the Domestic Premises Indicator, CSS is on contract type and not energy usage. The member also noted that there might be a portion of non-domestic premises that could be using domestic metering methods. Elexon advised that there is currently an open action to identify what counts as physical domestic/non-domestic premises. Elexon also noted that customers with non-domestic contracts cannot opt-out. A CCDG member asked what the impact of this would be on load shapes and Elexon explained that some inaccuracy in load shapes should be expected.

4.7   A CCDG member noted that, regarding the Domestic Premises Indicator and EFD, the sub-group might be doing some work on the consent granularity and the indicator and the route how these are updated for registration. Elexon said that it needs its own EFD from a settlement point of view and that the CSS implementation should sort that out. The same member added that the Domestic Indicator for CSS is a two-way process and the Consent Granularity is another process with the possibility of one getting into the other; he explained that it could be the case of changing one or both to make things work. #

Milestone 3, 'Release 2' – MHHS TOM Services implementation

4.8   A CCDG member suggested that it is worth mentioning something along the lines that Suppliers might need to start developing their migration plans at this point. The member added that 'Release 0' should show a clear

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image of what will be expected of all participants with regards to the enabling Assurance and associated legal drafting. Elexon agreed and noted that it will update 'Release 0' accordingly.

Milestone 4 – Industry readiness and Migration start

4.9 A CCDG member suggested that the group should work out what the pros and cons are for this step. He also asked what happens if the Suppliers are not ready for the migration and whether there should be a rule to enforce that. Elexon explained that the legal drafting will define what the programme decision is, who directs it and the time at which it is declared.

4.10 The same CCDG member also asked whether customers changing Supplier in the old arrangements will remain under the old arrangements. Elexon noted that registering a meter in the new arrangements means that the meter should stay in the new arrangements in its whole life; there will be associated monitoring techniques to look after this as it will not be a seamless reverse migration process and some manual control will be needed as well.

Milestone 5 – Migration end

4.11 A CCDG member suggested that the smart meter reading should give the final read of the transition to the NHH world. Elexon added that individual Suppliers could have finished their migrations by this state.

4.12 Another CCDG member expressed some concerns with regards to the likelihood of some scenarios that could harm legacy meters i.e. disputes, general estimation mistakes and other scenarios making the final read wrong. Another CCDG member suggested that the Suppliers should start migrating if the system they are operating under is stable.

Further discussion

4.13 A CCDG member wanted to clarify the Advanced HH data migration activity. More specifically, he said that if a month's worth data spans the migration date then that data remains in the old world; the HHDC is talking about keeping the same underlying IT system. Elexon explained that the HHDC might be able to migrate this data by changing the DA appointment for the same HHDC and sending data to different places.

4.14 The Chair confirmed that the group agreed with the work so far on the initial cross-segment straw man. Elexon is to add some more detail and document this discussion.

5. Update on Advanced transition straw man

5.1 A CCDG member noted that there are four documents with regards to the Advanced transition straw man that need to be sorted and ideally have all discussions and comments written down. Elexon agreed with this statement and will prepare a final version of this straw man into four reviewable documents that are accessible without having to go back to previous discussions looking to find information.

5.2 Another CCDG member asked how this straw man should be presented to the industry and whether it needs to be shared with Ofgem and tied to the transition plan. He added that it might create confusion about which is the actual transition plan the industry should be looking at. Elexon explained that a distinction has to be made between what the CCDG and what the MHHS can put out there; ideally, the role of the transition consultation provides an opportunity to still see if there is anything missing. The same CCDG member also said that there needs to be a distinction from the DWG consultation on the transition approach. Elexon noted that there seem to be a lot of synergies with the DWG transition consultation.

5.3 A CCDG member remarked that using slides for the transition approach is better than the spreadsheet work as it also fits better with the Ofgem approach. Elexon agreed that the consultation should include a table with steps describing the work carried out instead of spreadsheets attached to the consultation; however, all detailed thinking should be shown within the consultation.

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5.4 Elexon agreed to capture the current discussions and relevant parts of the original explanatory document uploaded to Teams on 8 March into a new live document for review. This document should have version control however this could be figured out closer to the next CCDG meeting.

6. Update on UMS transition straw man

UMS Transition Deliverable

6.1 Elexon noted that it has taken this straw man to the UMSUG for discussion due to the low input from the industry.

6.2 Elexon also noted that the DNOs representative has shared an email from a DNO with regards to their preferences to retaining existing MPANs along with a number of other issues/concerns. A number of CCDG members discussed that there should not be a combination of options but rather one approach should be chosen in the end.

6.3 A CCDG member suggested that the group draws out some of the pros and cons of those options to setting up HH MPANs and end up with one approach.

6.4 The DNOs representative offered to gather some more feedback from additional DNOs with regards to the pros and cons of those options. The Chair confirmed that any feedback should have been received ideally before the transition consultation.

6.5 Another CCDG member asked whether the plan is to create a new MPAN or utilise an existing one. Elexon noted that the current process implies creating a new MPAN.

7. Update from discussions with DCC/SEC

7.1 Elexon informed that there are four outstanding questions that still need clarification:

- What data should be pulled through the MDR role?
- What should the frequency of the register reads pulled for registration services be?
- Does MDR need an ad-hoc access when meters are removed?
- How should data be collected on disconnection or meter replacements?

7.2 Elexon noted that there was no meeting since the last CCDG. It added that there are still discussions looking to raise a modification for SEC changes. A CCDG member noted that the modification is looking at the frequency validation and the fact that the more the reads then the more the cost. Elexon agreed to keep the CCDG updated when more information is available.

7.3 Elexon advised CCDG to continue the respective discussion on the MS Teams CCDG space and arrange for a wrap-up meeting at a later stage to conclude.

8. Updates on other actions

Actions 05/09 & 14/05 (network charging requirements)

8.1 Elexon clarified that data flows should be classified in terms of high, medium and low priority and that this process could be lengthy. A CCDG member suggested that it should be made clear to participants what data they can provide, receive and how.

8.2 Elexon also added that regarding D0010 flows it will still be up to Suppliers to provide these. A CCDG member asked what D0010 flows are used for in the case of distribution charging; he also noted that the CCDG has no visibility of what has been discussed previously. Elexon explained that D0010s are needed for general network planning. The same CCDG member added that Distributors mainly require access for HH data from MPANs and that at the moment they receive a lot of data that it is no use to them. Elexon confirmed that it is trying to work on this to identify what data Distributors should be accessing.

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8.3 The Chair noted that the detailed requirements for network charging are still worked through as Ofgem is reviewing the detailed access framework. He added that Ofgem is considering a new requirement that might prompt a BSC Change Proposal to require DCs to provide files to LDSOs of HH meter data in order to allocate settlement data to the meters and hence allocate meters to those charging bands; this is where the meter does not have an agreed capacity with the LDSO. A CCDG member commented that when it comes down to the banding exercise then Distributors might get more information than they need and ultimately having access to all this data for their purposes. The Chair explained that there is currently a question mark over what the best solution would be for giving Distributors access to the data – they currently receive HH metered data for measurement classes C and E but since classes F and G are using HH meter systems with no EACs they will need consumption data in order to allocate these measurement classes to the correct bands when there is not an agreed capacity. Another solution is to collect and aggregate data and provide them with one-off reports when they are needed. The Chair continued by saying that the Access SCR should have provided a solution for the overall current and future charging requirements for meter and registration data however this SCR is on hold at the moment.

8.4 Elexon agreed with the group that this action is ongoing. Elexon and the CCDG are to narrow down what the impacts and requirements are for Distributors requesting data.

Action 14/11 (Load Managed Areas)

8.5 The CCDG noted the update with no further comments.

Action 15/11 (Non-Domestic/Domestic Indicator)

8.6 The CCDG had already discussed this in the section above with regards to the initial cross-segment transition straw man.

9. Summary, next steps and AOB

9.1 A CCDG member noted that there is an ongoing discussion on the group's MS Teams chat about the Supplier register reads. Elexon explained that the discussion will continue in that forum however this is not something that will feed the transition consultation as it is more likely to be part of an enduring solution. Another CCDG member said that this should be looked at in the future and also work on any associated issues.

9.2 The group discussed that there are a number of actions within the Actions Log that need to be attended and updated accordingly. Elexon agreed to look at those along with the sub-group actions and review the Actions Log internally in time for the next CCDG meeting in May.

9.3 A CCDG member asked whether non-settlement items (e.g. customer billing under a change of Supplier or comparison websites working without EACs) are being discussed with the relevant bodies. Elexon confirmed these items are currently being discussed with the REC.

9.4 A CCDG member (Terry Carr) informed the group that he will be leaving the CCDG due to a change in his role. Terry noted that his last CCDG meeting will be in May and that a replacement will be sorted out by that time. The Chair, Elexon and the CCDG expressed their gratitude for the work Terry has provided during his membership.