ELEXON

CP Consultation Responses

CP1558 'New Registration data items and processes to support the MHHS transition'

This CP Consultation was issued on 9 May 2022 as part of the May 2022 CPC Batch, with responses invited by 6 June 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Salient Systems Ltd	3	Consultant, MOP Systems Provider, Solutions Provider
Western Power Distribution	1	Distributor
Scottish Power Energy Networks	1	Distributor
Power Data Associates Ltd	1	Supplier Agent
St Clements Services	1	Software Developer
Scottish & Southern Electricity Networks	1	Distributor
Northern Powergrid	1	Distributor
BUUK (The Electricity Network Company Limited)	1	Distributor
Association of Meter Operators	24	Trade body (AMO has 24 members who are Meter Operators or agents for Meter Operators)
British Gas Trading Limited	1	Supplier
Scottish Power	2	Supplier, MEM
UK Power Networks	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?
Salient Systems Ltd	✓	✓	✓
Western Power Distribution	✓	✓	✓
Scottish Power Energy Networks	✓	✓	✓
Power Data Associates Ltd	-	✖	✖
St Clements Services	✓	✓	✓
Scottish & Southern Electricity Networks	✓	✓	✓
Northern Powergrid	✓	✓	✓
BUUK (The Electricity Network Company Limited)	✓	✓	✓
Association of Meter Operators	-	✓	-
British Gas Trading Limited	✖	✓	✓
Scottish Power	✖	✓	✓
UK Power Networks	✓	✓	✓

Question 1: Do you have any comments or suggestions for the initial population and data cleanse that you think the MHHS Programme should consider?

Summary

Yes	No	Neutral/No Comment	Other
10	2	0	0

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Yes	
Western Power Distribution	Yes	We are supportive of the cleansing suggestions provided by our Service Provider for the initial population and data cleanse. We are also supportive of the suggestion that should we have sufficient resource, that an initial cleanse could be undertaken prior to the implementation of CP1558 should it be approved.
Scottish Power Energy Networks	Yes	SPEN are supportive of the recommendations provided by St Clement Services in their response and re-iterated the points below: ○ We would suggest an initial back population of Energy Direction from LLFC Type (J0775) ▪ A & B = Import ▪ C & D = Export ○ Metered Indicator migration Not Required, already implemented for CSS ○ Connection Type: this could be a phased approach with MPRS initially deriving the Connection type (based on Industry mappings, i.e., MC/PC/Meter type) ○ Further work can then be carried out between LDSO/Supplier/Agents regarding further cleansing work to refine the data (if categorisation was enabled to allow focus on key areas) • We would require this CP to provide an agreed mapping of “PC, MC, Meter Type

		and Metered Indicator to Connection Type & Confidence Score" so this can be programmed into MPRS. • Ideally all reporting of Migration progress should be done centrally through EES (ECOES). This is subject to R0032 timings. Reports could be run from MPRS but would need to be aggregated by the MHHS Programme. Clear specification and frequency would be required to ensure that this does not become onerous. A similar method could be used for the Is the Migration approach for Associated Import/Export mpans where addresses could be used in the first instance if there is an exact match, then a review of the outliers by Industry parties to resolve.
Power Data Associates Ltd	Yes	I do not understand why the population of data items is not being managed by the BSC. The population of data items for all 30m+ MPANs registered in SMRS is essential by or shortly after Feb 2023. There will inevitably be ongoing improvement in data into the future as errors are corrected. LDSOs own these data items so when they are notified of *potential* errors, they should satisfy themselves of the corrections prior making corrections. **Connection Type:** The MHHS design has used the codes W, L, H, E. Unmetered connections are whole current and therefore the connection type is W. The use of null or U is inappropriate as it duplicates information and results in the potential of inconsistencies. **Connection Type To & From EFD:** The MHHS is defining all dates as date/time. So this data items must be defined as date time to prevent the need for subsequent changes. **Connection Type From EFD:** How will this be populated for the existing 30m+ MPANs? Will this be using a default value of the Feb 2023 implementation date? **Associated Import/Export MSID:** In a small number of cases there are more than a one-one relationship between MPAN, for example with pseudo MPANs under BSCP550 may have one import and two export MPANs **Meter Indicator:** this does not exist virtually; it is a real data item that is set by the LDSO when the MPAN is created and has been for some years. It needs to be formally recognised by the BSC

		Data Cleansing: the CCDG view of the initial population of the Connection Type, Direction of Flow and Import/Export relationships was for LDSOs and Meter Equipment Managers (MEMs) to work together in late 2022 to compare information which can then be populated in Feb 2023. In early 2021 MEMs and LDSO cleansed their CT/VT records so this information will now be better quality (while never perfect). There is *no way* this should extend beyond a few months after Feb 2023. The following suggestions: • **Direction of Flow** – use the existing LLFC to determine import/export. This is already determining the DUoS charges applicable to the MPAN so is probably reasonably accurate • **Connection Type** – assume whole current, except, where the LDSO and MEM can agree that the MPAN is CT. If the MPAN is CT then LDSO records will determine LV/HV or EHV. The LDSO and the MEM should both have good records of CT metered sites. In most cases the LDSO owns the CT/VT equipment in the other cases the MEM is responsible, either way the respective asset records to maintain this equipment will exist and for safety reasons should be accurate. The comment in the paper about PC5-8 being mostly CT is incorrect. Equally the comment about MC=C or E does not imply CT metered. • **Import/Export relationship** – LDSO already have records for the relationship between many import/export MPANs. MEMs will also have a view of the relationships which they could share with LDSOs during the later part of 2022. Any export MPANs which then do not have a related import MPAN then need review by the LDSO to identify their related import MPAN, either through address comparison and/or comparing the MTD which will be common.
St Clements Services	Yes	Proposal for Migration (discussion with Matt McKeon Elexon) ○ Back population of Energy Direction from LLFC Type (J0775) ▪ A & B = Import ▪ C & D = Export ○ Metered Indicator migration Not Required, already implemented for CSS

		○ Connection Type, envisaged as a three stage process, starting with an MPRS derived value based on Industry Defined mappings. MPRS will apply a confidence score to indicate the accuracy of the Connection Type (the greater number of conflicting data items lowers the accuracy). The LDSO will then make manual updates to the connection types with a MED or LOW score. Any correction from the LDSO will automatically update the score to HIGH. The remaining pool of MED and LOW will then be shared with Suppliers and MEMs for correction. LDSOs will update the Connection Type based on Supplier and MEM Findings. Overview: ▪ MPRS will Back Populate using Industry Defined Mappings of MC, PC and Meter Type • A confidence score of LOW, MED, HIGH will be applied indicating the confidence in accuracy of the Connection Type Assignment ○ Example of High: MC G = WC ○ Example of Medium MC G with a Conflicting Meter Type = WC ○ Example of Low: MC = A, PC = 1, Metered Indicator is FALSE (Unmetered), No Meters at site. = U • Mappings to be provided by industry ▪ LDSO cleansing of MED, LOW based on Asset Data • Where the Rating was MED or LOW and a LDSO has made an update to the Connection Type the rating will change to HIGH ▪ Supplier Cleansing of remaining pool • Remaining pool will be MED and LOW where the LDSO has not made a change to Connection Type. Comments: • We require this CP to provide an agreed mapping of “PC, MC, Meter Type and Metered Indicator to Connection Type & Confidence Score” so this can be programmed into MPRS. • Ideally all reporting of Migration progress should be done centrally through EES (ECOES). This is subject to R0032 timings.

		Reports could be run from MPRS but would need to be aggregated by the MHHS Programme. What information would be required in these reports? Is there a suggested Migration approach for Associated Import/Export? Could Address data be used to automatically back populate the Associations?
Scottish & Southern Electricity Networks	No	Please refer to ST Clements Services response for the impacts on MPRS.
Northern Powergrid	Yes	
BUUK	Yes	We support the MPRS Service Provider's proposal for migration approach: ○ Back population of Energy Direction from LLFC Type (J0775) ▪ A & B = Import ▪ C & D = Export ○ Metered Indicator migration Not Required, already implemented for CSS ○ Connection Type, envisaged as a three stage process, starting with an MPRS derived value based on Industry Defined mappings. MPRS will apply a confidence score to indicate the accuracy of the Connection Type (the greater number of conflicting data items lowers the accuracy). The LDSO will then make manual updates to the connection types with a MED or LOW score. Any correction from the LDSO will automatically update the score to HIGH. The remaining pool of MED and LOW will then be shared with Suppliers and MEMs for correction. LDSOs will update the Connection Type based on Supplier and MEM Findings. Overview: ▪ MPRS will Back Populate using Industry Defined Mappings of MC, PC and Meter Type • A confidence score of LOW, MED, HIGH will be applied indicating the confidence in accuracy of the Connection Type Assignment ○ Example of High: MC G = WC ○ Example of Medium MC G with a Conflicting Meter Type = WC ○ Example of Low: MC = A, PC = 1, Metered Indicator is FALSE (Unmetered), No Meters at site. = U

		• Mappings to be provided by industry ▪ LDSO cleansing of MED, LOW based on Asset Data • Where the Rating was MED or LOW and a LDSO has made an update to the Connection Type the rating will change to HIGH ▪ Supplier Cleansing of remaining pool • Remaining pool will be MED and LOW where the LDSO has not made a change to Connection Type. We concur with MPRS Service Provider that: • We require this CP to provide an agreed mapping of "PC, MC, Meter Type and Metered Indicator to Connection Type & Confidence Score" so this can be programmed into MPRS. • Ideally all reporting of Migration progress should be done centrally through EES (ECOES). This is subject to R0032 timings. Reports could be run from MPRS but would need to be aggregated by the MHHS Programme. What information would be required in these reports? • Is there a suggested Migration approach for Associated Import/Export? Could Address data be used to automatically back populate the Associations?
Association of Meter Operators	Yes	MEMs will know the Meter Technical Details of Meters that they are appointed. They will also know the relationships between import and export MPANs. This then could be an aid to the LDSO to ensure that the data cleansing is as robust as possible. It would be desirable for MEMS and LDSO to work together on data cleansing for CT sites and import / export relationships
British Gas Trading Limited	No	
Scottish Power	Yes	Whilst we recognise the value in ensuring that the industry has sufficient time to cleanse and populate the additional data items required to facilitate MHHS migrations, we would like to highlight that the MHHS Programme is currently engaged in a major replanning exercise that will not be completed until Q4 2022. There is therefore no certainty that the activity to populate these data items will commence, or be completed, within the timelines referenced in this consultation. This means that there is a very real possibility that these changes will be rushed through by the industry and will lie dormant until the MHHS Programme is ready to start the activity to populate the data items. We think that this underlines our view that the changes

		covered by this CP should be delivered by the MHHS Programme to ensure that their implementation is fully aligned with any changes to the Programme plan.
UK Power Networks	Yes	• UK Power Networks supports the principle that where items are currently being derived in ECOES from other items (for example, Energy Direction from the Line Loss Factor Class (J0775), such items should be fed directly from an appropriate source system. • We also support the approach proposed by St. Clements Services, for MPRS to derive the Connection Type based on industry defined mapping • All DNOs require this Change Proposal (CP) to provide an agreed mapping of “Profile Class (PC), Measurement Class (MC), Meter Type and Metered Indicator to Connection Type & Confidence Score” so this can be programmed into MPRS. • Ideally all reporting of Migration progress should be done centrally through EES (ECOES). This is subject to R0032 timings. Reports could be run from MPRS but would need to be aggregated by the MHHS Programme. However, it would need to be specified what information would be required in these reports? • An appropriate working group in the MHHSP (the Migration working group or the Data working group?) should review and confirm the approach suggested by St Clements (including the points referenced above). • It would also be useful if the MHHSP Migration or Data working group could create/provide a comprehensive view of all industry/common systems, which currently receive data items that are in the scope of the initial population and cleansing activity, as suggested in this CP.

Question 2: Do you agree with the CP1558 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	2	2	0

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Yes	
Western Power Distribution	Yes	We believe that all concerns raised have been addressed.
Scottish Power Energy Networks	Yes	We are supportive of the intention of this CP
Power Data Associates Ltd	N/A	
St Clements Services	Yes	Our queries were addressed in the previous consultation responses.
Scottish & Southern Electricity Networks	Yes	The proposed solution meets the requirement for the Programme to implement half hourly settlement in line with Ofgem's objectives.
Northern Powergrid	Yes	
BUUK	Yes	We agree with the proposed solution, with the request that further MHHS consequential changes are coordinated more closely with the MHHS Programme in future. We believe the changes proposed here are relevant to the MHHS Programme Design & certainly the System Build phase & so should be examined in tandem with the Programme.
Association of Meter Operators	N/A	
British Gas Trading Limited	No	We believe it is too early to consider changes to dataflows given the delays to completion of the final baselined design
Scottish Power	No	Scottish Power does not agree that this solution has been raised outside of the

		MHHS Programme and is not aligned with the MHSS implementation timelines to be implemented in 2024/2025. Proposing that this solution is delivered from Feb 2023 to facilitate all CT AMR meters to be Settled HH by Oct 2023 would potentially result in additional significant IT costs and a constraint on already limited resources working across multiple industry changes. In addition, we do not believe that any technical design proposals should be proposed and raised outside the MHHS Programme governance of the baseline design. Finally, we see little of no benefit to the industry in 'going early' with this activity.
UK Power Networks	Yes	We agree with the proposed solution as specified in the change. We would like the relevant MHHSP advisory and/or working group to baseline/confirm proposed values of the new fields (e.g. Connection Type Indicator), prior to the start of any population and cleansing activities.

Question 3: Do you agree that the draft redlining delivers the CP1558 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	5	3	

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Salient Systems Ltd	Yes	
Western Power Distribution	Yes	Although the redlining as drafted delivers the proposed solution within the BSCP 501 and BCSP 515, there are considerable system changes that will be required to support this change.
Scottish Power Energy Networks	Yes	
Power Data Associates Ltd	N/A	
St Clements Services	No	Will BSCP604 (REC 3.0 version) be updated to include these new Data Items to allow for Manual Correction during the Migration/population period?
Scottish & Southern Electricity Networks	No	There appear to be outstanding CPs to be approve and potential changes required to BSCP604 and the REC re manual data items. (see response from ST Clements Services).
Northern Powergrid	No	Will BSCP604 (REC 3.0 version) be updated to include these new Data Items to allow for Manual Correction during the Migration/population period?
BUUK	Yes	We would appreciate clarity on whether BSCP604 (REC v3.0) will be updated to include the new Data Items to allow for Manual Correction during the Migration/population period.
Association of Meter Operators	N/A	

British Gas Trading Limited	N/A	
Scottish Power	No	Please see response to Q1 and Q2.
UK Power Networks	No	Will BSCP604 (REC 3.0 version) be updated to include these new Data Items to allow for manual correction during the Migration/population period?

Question 4: Will CP1558 impact your organisation?

Summary

High	Medium	Low	None	Other
5	1	1	1	4

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Low	Changes to MO systems to support the D0312 flow changes
Western Power Distribution	High	There will be considerable system changes and testing required to support this change. In particular our Service Provider has advised: Modifications to the DB01 (Metering Point Creation) and DB02 (Metering Point Update) interfaces to add new Data items (CT & EDI) Creation of a new DB Flow and user interface for creation of Import Export Relationships Modification to the Incremental and Full ECOES extracts to include new data items We are also cognisant that there will be a significant piece of work to populate and cleanse these data items which, although not part of this BSC CP, needs to be taken into consideration to ensure sufficient resource is available to undertake this work.
Scottish Power Energy Networks	High	We see no significant change since the First Response: SMRA: Changes will need to be made to MPRS system to:

		Modify the DB01 (Metering Point Creation) and DB02 (Metering Point Update) interfaces to add new Data items (CT & EDI) Creation of a new DB Flow and user interface for creation of Import Export Relationships Modification to the Incremental and Full ECOES extracts to include new data items. Process changes – internal processes will require update as a result of this change, including an exercise to train staff in the changes LDSO: Internal changes to other internal systems to accommodate the following data: Connection type – the additional field required are not currently held in any internal system that interfaces with MPRS, development time and cost will be required to assess the correct source of this information and solution to make available. At this point this assessment indicates that more than 1 system will be required to be impact assessed for changes. Process changes – internal processes will require update as a result of this change, including an exercise to train staff in the changes. Internal data cleansing will also impact our business, as the requirements are not yet fully defined, some of this may be able to be carried out via a back population using derived data, however there will be elements that fall outside of this remit that will require manual investigation and liaising with other parties.
Power Data Associates Ltd	None	There are errors in SMRS systems for Metered Indicator, but these need cleansing.
St Clements Services	High	No change from previous response
Scottish & Southern Electricity Networks	Medium	New code implementation and changes to systems and processes.
Northern Powergrid	High	The core MPAS system MPRS will require a number of changes to incorporate the new data items. This

		will in turn impact a number of our internal DNO interfacing systems and processes which will need changes to store and transfer the data items in to MPAS, including initial population, cleanse activity and ongoing maintenance.
BUUK	Yes	Yes the change will impact us through changes to MPRS in addition to our specific LDSO systems & processes.
Association of Meter Operators	Yes	The change to mandate MEMS to be appointed to both import and export on the same site will clarify the situation for MEMs and MEMs will need to prepare for this change.
British Gas Trading Limited	Medium/High	We have not completed a full impact assessment on the changes but believe the impact would be medium to high.
Scottish Power	High	Due to the volume of current industry changes with limited resources to complete the current milestone dates we would not be in a position to resource this activity.
UK Power Networks	Yes	We have not completed a full impact assessment, but believe we will be impacted by the need to implement and test the following system changes: • MPRS and related reporting (Business Objects) system: Updated and new DB message flows • Modifications to ECOES file extracts to include new data items • Changes to downstream systems and data stores that currently receive impacted data items / modified data flows. We have not assessed the full level of effort required to conduct the required back-population and data cleansing activities, once the technical change is implemented, as we await details from the MHHSP on the cleansing requirements and approach.

Question 5: Will your organisation incur any costs in implementing CP1558?

Summary

High	Medium	Low	None	Other
6	1	1	1	3

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Low/None	
Western Power Distribution	High	We will incur one off costs from our Service Provider to deliver the MPRS software, together with our own system and document changes. In addition costs will be incurred to resource the population and cleansing of these data items.
Scottish Power Energy Networks	High	We are unable to quantify the costs at this stage, however this process will impact on a number of our internal systems (LDSO/SMRS/UMSO) and across a number of processes. It will require full test and delivery of functionality delivery/change across the range of systems and key interfaces. This will involve associated Project/technical/testing/cleansing resource across multiple systems.
Power Data Associates Ltd.	None	
St Clements Services	High	No change from previous response.
Scottish & Southern Electricity Networks	Medium	A new version of MPRS needs to be tested and implemented and further changes to downstream systems and processes.
Northern Powergrid	High	Our initial analysis estimates the costs to be in the region of £600k to £1m in one off costs. These costs include changes to our MPAN Generation, LDSO and Unmetered Supplies systems; changes to our batch scheduling tool and a share of the DNO MPRS development costs and implementation in to our environments.

		Costs are also incurred in terms of technical resources; project management, testing and data cleanse activities. Please note, the costs assessment is based on a number of assumptions and there may be impacts to other internal systems and a detailed impact assessment will need to be carried out by our service providers. In addition, please note that costs could further increase if the timeframe we have to develop, build and test is condensed.
BUUK	Yes	Yes we will incur costs however these will be largely dependent on the requirements placed on our MPRS Service Provider & the costs required for them to implement & maintain the change.
Association of Meter Operators	N/A	
British Gas Trading Limited	Medium – High	We have not completed a full impact assessment but believe the costs would be medium to high
Scottish Power	High	Yes, there would be one off cost to implement supporting IT changes but would require an impact assessment to determine the level of cost. Due to the volume of current industry changes we have limited resource and would not be in a position to resource this activity.
UK Power Networks	Yes	We have not completed a full impact assessment, but we believe we will incur one-off costs as follows: • Technical service provider(s) costs to design, test and implement changes to systems used by us. This would need to include any middleware integration changes. • Internal costs of our staff who will work with our technical service providers to validate/test/implement system changes. This would include updating any internal procedures and change management activities (e.g. Training) • Cleansing costs: This could involve a range of internal resource or technical service provider costs to derive and/or populate any new data items, based on the yet to be defined MHHSP cleansing requirements

Question 6: Do you prefer February 2023 or June 2023 for the implementation approach for CP1558?

Summary

February 2023	June 2023	Neutral/No Comment
2	8	2

Responses

Respondent	Response	Rationale
Salient Systems Ltd	No preference	
Western Power Distribution	June 2023	We would be supportive of a June 2023 implementation approach for this CP1558.
Scottish Power Energy Networks	June 2023	Our preference is for a June 2023 implementation. This will allow for the MHHS physical design to be baselined, reducing the risk of change to the stage 0 requirements and any further rework. This timescale also allows any high priority issues following 'Faster Switching go-live' to be resolved and the potential post go-live change requests to be implemented.
Power Data Associates Ltd.	February 2023	The CCDG recommendation was Nov 2022 to implement this change. This has already slipped to Feb 2023, it should not slip again. The use of this data is key to the effective implementation of P432 to identify all CT metered sites. It will have a minor role in P434 where the Meter Indicator may be incorrectly set.
St Clements Services	June 2023	Prefer June 2023. This will allow for the enduring MHHS physical design to be baselined, reducing the risk of change to the stage 0 requirements. It will be further from the Faster Switching go-live date allowing for any priority issues to be resolved and the potential post go-live change requests to be implemented.
Scottish & Southern	June 2023	SSEN is reliant on the new version of MPRS to be implemented and need the

Electricity Networks		baseline design to be complete to ensure no further changes are raised either to the MPRS code and/or downstream systems and processes. Without the MHHS baselined design being released and the MPRS changes being known SSEN's internal project will inevitably be delayed not leaving sufficient time for a February 2023 go-live.
Northern Powergrid	June 2023	We prefer a June 2023 implementation approach. The MHHS design will be nearer to the baseline version in June, reducing the risk to changes in CP1558 requirements. A June implementation will provide us with the opportunity to focus on Faster Switching go-live and deal with any post go-live changes. The proposed changes are significant and impact a number of our internal systems and processes which will take time and resources to design build and test and a February implementation date would not give us sufficient time to implement without risk.
BUUK	June 2023	A June 2023 implementation is preferable to allow for the enduring MHHS physical design to be baselined, reducing the risk of change to the stage 0 requirements. It will be further from the Faster Switching go-live date allowing for any priority issues to be resolved and the potential post go-live change requests to be implemented.
Association of Meter Operators	February 2023	The initial recommended date was Nov 2022. This has already slipped to Feb 2023, there is not a compelling reason for it to slip further
British Gas Trading Limited	June 2023	We would question the planned introduction of data flows by February 2023 given there is a proposed delay to the delivery of the physical baseline to July 2022.
Scottish Power	N/A	Given the current replanning activity that is currently under way in the MHHS Programme we don't believe that it is possible to define an appropriate implementation date for these changes until the new MHHS plan, including the date when the data population/cleanse activity will start, has been published. Any decision to go-early should be aligned with the MHHS Programme and timelines of the business case. This lack of certainty with the MHHS plan means that implementing these changes outside of the Programme

		runs the risk of rushing them through, potentially increasing costs to achieve an accelerated delivery, long before the Programme is ready to initiate the data population/cleanse activity. This underlines our view that these changes should be delivered by the MHHS Programme in conjunction with any other changes that need to be made to the registration systems to support the delivery of the MHHS processes.
UK Power Networks	June 2023	• A June 2023 implementation date gives us sufficient time to implement and test changes to downstream systems prior to the implementation of this change. • A June 2023 implementation date also allows for the enduring MHHS physical design to be baselined, reducing the risk of change to the Stage 0 requirements, as defined by this CP. • A February 2023 implementation presents a number of challenges to our technical Service Provider and there could be a period when we have to simultaneously design, build and test the November Faster Switching maintenance release, the development/testing of changes related to this CP and the MHHS enduring solution development.

Question 7: Can you deliver CP1558 in February 2023?

Summary

Yes	No	Neutral/No Comment	Other
2	8	2	

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Yes	If change is approved, then we can make the necessary system changes to accommodate
Western Power Distribution	No	This implementation date should be delayed (possibly to June 2023). By utilising a delay it reduces overlap with the faster switching programme (early life support). During this period of early life support priority must be given to resolving any faster switching issues. A delay in the proposed implementation date would also ensure that the necessary resources are available for us to carry out the necessary system changes and to fully test a robust solution. It is possible that the physical baseline will require changes to the stage 0 design (CP1558/R0032/R0010) resulting in late change and rework to MPRS. Therefore, delaying CP1558 would reduce the risk of late change being demanded.
Scottish Power Energy Networks	No	We are of the view that the timescales to deliver for a February 2023 implementation date are too short, this change involves the development and testing of the core MPRS product by our service provider and the subsequent test and implementation of the release into our internal infrastructure. In addition to this there are a number of associated Industry changes that require to be implemented at the same

		time as this one, and we are concerned that they are not yet at consultation stage and it would be inefficient to implement multiple releases for each of these.
Power Data Associates Ltd.	N/A	
St Clements Services	No	Even assuming this CP is approved shortly, there is insufficient time to make the changes to MPRS and for DNOs/iDNOs to implement the code within their production environments by February 2023. To make the stage 0 changes as efficient is possible it is essential that all the appropriate industry changes are approved for the same implementation date with sufficient time to develop. None of the following changes are at industry consultation stage yet: • REC R0032 MHHS Early Changes to support transition to HH • REC R0010 DTC CP3580 Addition of new SMETS2 Meter Types • REC R0040 - CSS Switch Synchronisation to ERDA at SecuredActive • REC R0044 SEC MP162 'SEC changes required to deliver MHHS' (Meter Data Retrieval role)
Scottish & Southern Electricity Networks	No	Please refer to ST Clements Services response. Without the new MPRS code SSEN is unable to meet a February 2023 go-live date.
Northern Powergrid	No	We do not believe that there is sufficient design stability in order to progress with the impacts of this change and due to the number of consequential changes to our internal systems making those changes by February 2023 would be at risk.
BUUK	No	There is insufficient time to make the changes to MPRS and to implement the code within our production environments by February 2023. To make the stage 0 changes as efficient is possible it is essential that all the appropriate industry changes are approved for the same implementation date with sufficient time to develop. None of the following changes are at industry consultation stage yet:

		• REC R0032 MHHS Early Changes to support transition to HH • REC R0010 DTC CP3580 Addition of new SMETS2 Meter Types • REC R0040 - CSS Switch Synchronization to ERDA at SecuredActive • REC R0044 SEC MP162 'SEC changes required to deliver MHHS' (Meter Data Retrieval role)
Association of Meter Operators	N/A	
British Gas Trading Limited	No	We have not completed a full impact assessment but believe it is too early to implement CP1558 in February 2023
Scottish Power	No	As per previous responses.
UK Power Networks	Yes	Yes, but only if that is mandated (as the only option). However, this will be with additional risks that would be easier to mitigate with a June 2023 implementation date. And also subject to the caveat that our technical service provider can support the implementation of the following changes with potentially overlapping timelines: • Faster Switching Maintenance release • Stage 0 requirements, as defined under this CP • Enduring MHHS Programme requirements (as defined by the Physical Baseline due to complete in July 2022)

Question 8: Do you have any further comments on CP1558?

Summary

Yes	No
7	5

Responses

Respondent	Response	Comments
Salient Systems Ltd	Yes	As per previous response, shouldn't the version number of the D0312 flow change from 002 to 003?
Western Power Distribution	Yes	This MHHS stage 0 change is dependent on other industry changes to be coordinated (CP1558, R0032, R0010, stage 0 migration) and developing code for each change in isolation will be inefficient and potentially have an impact on each of the other industry changes. All these changes should be assessed together leaving sufficient time to develop and implement these changes. We are also cognisant that there will be a significant piece of work to populate and cleanse these data items and whilst we are supportive of the suggested initial population and cleansing it still needs to be taken into consideration to ensure sufficient resource is available to undertake this work. We will require timelines for Migration Activity, imports into MPRS and then then updating ECOES with this information.
Scottish Power Energy Networks	No	
Power Data Associates Ltd.	Yes	It is disappointing that the development of this CP has taken so long since the CCDG recommendations were accepted by Ofgem in Sept 2021. Implementation of this CP will increase the quality and accuracy of data held in

		settlement systems and improve the quality of DUoS charging particularly where the whole current/CT metering is incorrectly identified.
St Clements Services	Yes	Are there any restrictions on the number of times a Connection Type can be changed once the Migration/Initial Population is complete?
Scottish & Southern Electricity Networks	No	
Northern Powergrid	No	
BUUK	No	
Association of Meter Operators	No	
British Gas Trading Limited	Yes	We agree with the concerns raised by SSE Energy Supply Limited in the previous CP1558 consultation as follows: “We have concerns regarding any proposals that relate to MHHS, including CP1558, which are raised within any Industry Code, but are outside of the MHHS Programme. There is a significant risk that should changes be raised and reviewed in isolation of the Programme that the intent of the proposals will be changed dependent on the audience that reviews them. The MHHS Programme should develop proposals against its agreed plan to ensure that at the point of consequential industry code changes, there will be minimal amendments required to implement them.”
Scottish Power	Yes	Can you please clarify what the derogation process, if we are not in a position to complete this activity as proposed. If the D0312 is to be decommissioned as part of MHHS then we do not see any benefit to making major changes to a flow that has a shelf life, if it is to be retained we still have concerns in adding 3 new data items to a data flow that already causes major data quality issues via D0312 rejections. Although this has always been an issue, when the data flow was sent to ECOES previously there was the option to amend manually, now this has been removed with the move to MPAS and the MAP04 (Retrospective amendments) process was never updated. Data quality will not improve

		until the volume of current rejections is resolved.
UK Power Networks	Yes	It would be useful to get a confirmation from the MHHSP that the proposed timelines for CP1558 changes, do not clash with the planned timelines for DNOs to implement additional MHHSP changes on the same impacted systems. Alternatively, if the timelines overlap, the MHHSP should explore and propose an appropriate release strategy and implementation plan, which mitigates any potential clashes.

BSCP501

Respondent	Location	Comment
Power Data Associates Ltd.	3.2.1	Inclusion of the Connection Type EFD and Connection Type ETD

BSCP515

Respondent	Location	Comment
Power Data Associates Ltd.	3.3.1	Inclusion of the Connection Type EFD and Connection Type ETD
Power Data Associates Ltd.	3.6.1	Inclusion of the Connection Type EFD and Connection Type ETD