

AWG Consultation Response Template

Date	21 April 2021	Classification	Public
Document owner	Elexon	Document version	Version 1.0

Respondent information

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Confidential Y/N	N	

Please:

- Email your response to awgsecretary@elexon.co.uk by 08:00 on 24th May 2021, using the subject line 'MHHS AWG Consultation Response'.
- Use this Word response form where possible to make it easier for the AWG to identify and summarise views.
- Provide supporting reasons for your answers to help the AWG understand your response.
- Identify clearly which, if any, aspects of your response are confidential. We will not publish any information marked as confidential or share this with the AWG. However, Ofgem will see all responses in full. We encourage you to provide non-confidential responses where possible, to inform the AWG's discussions.

Email Elexon's MHHS team at awgsecretary@elexon.co.uk with any questions. More information can be found on the [AWG webpage](#).

Question 1. Do you agree that the business and non-functional scope as set out is consistent with Ofgem's business case, target operating model development principles, the agreed TOM and subject areas considered by the CCDG?

Yes / No

Rationale:

I was a participant in the AWG/CCDG subgroup so am directly familiar with the work. As stated in the consultation this was seeking to be a high level activity primarily to determine the volume of data and interactions. Further work will be required to refine the data item definitions and interactions.

Question 2. Do you agree that data integration is the appropriate architecture style to realise the MHHS TOM requirements rather than a more process centric architecture such as process automation or centralised business rules processing? If not, why not and what would be the most appropriate architecture style?

Yes / No

Rationale:

I was a participant in the AWG/CCDG subgroup so am directly familiar with the work. It would be possible to change every industry data flow to use the new RA, but the scope of MHHS is to make MHHS operate, not to reinvent the

whole industry. Therefore we focused on the aspects that needed to change, and leave alone other aspects that did not need to change to implement MHHS. Other aspects may change in the future triggered by future changes.

Question 3. Do you agree that Event Driven Architecture is the most suitable data integration style to realise MHHS and should be taken forward to the next stage of design? If not, why not and what would be the most suitable data integration style to realise MHHS.

Yes / No

Rationale:

I am not familiar with EDA so it is not easy to comment. In principle it sounds logical, but the edge cases are always difficult in this industry. So, the ability of the required information to be received by the correct recipients is a concern.

The only industry participant with a complete set of settlement data will be the BSC central systems. I have long argued that making a central consumption data store available to authorised participants would be a design opportunity, yet this has not been proposed or considered and discounted.

The podcast suggested an adapter to support legacy systems. This may not be suitable for the new business processes which are typically seeking new or different data items from the historic data flows. As highlighted in response to Q1 the legacy data flows which are unchanged, remain in the DTN format.

Adapters would be a commercial design decision and should be commercially procured.

Need to make clear that all new dataflows will need to be included in the REC EMAR which is the enduring repository for dataflows.

Question 4. Do you agree that a new data integration service is required to satisfy the data volume and frequency requirements mandated by the MHHS TOM? If not, why not?

No

Rationale:

The MHHS arrangements lead to two very distinct sets of data. The Settlement Period (SP) data emerging from the Data Services (DS) is large volume. The interaction between the Registration Service and other participants is lower volume, as is the distribution of ISD information. It is not clear from the AWG documents that this distinction has been considered.

The continued or expanded use of the DTN is not appropriate for these new interactions. The Registration and Data exchanges need to be near real time and the consumption data exchanges are substantial increases in data volume.

The Registration service interactions are similar to the interactions being developed by the Faster Switching activity. Therefore, it may be appropriate to build on the systems currently being deployed to support this arrangement. An API process may be suitable, the rationale for discounting has not been clearly stated.

One of the AWG recommendations is to minimise cost on industry. It would therefore be unwise for the energy industry to 'reinvent the wheel' by developing a whole new communications infrastructure with associated procurement, security, data access, audit and access controls, when an established infrastructure could be utilised. Creating an additional infrastructure will lead to additional costs for industry to satisfy the implementation and ongoing security assurance activities.

Question 5. Do you see any other benefits to industry of having an EDA for data integration available?

Yes / No

Rationale:

To enable the messaging to operate correctly it will appear to require all messages to pass over the RA. Currently some participants exchange messages within their own organisation, or even within their own IT solution. Making all messages transparent over the RA will enable better consistency of system design and subsequent audit of industry participants.

Question 6. Do you have any other comments?

Yes / No

Rationale:

The provision of the service should be near 24/7 – could not find this as a requirement anywhere.

There is no explanation of the commercial aspects of the RA. How is the RA going to be procured? By whom? How does the on-going funding of the RA happen? How is the service going to be procured? By who? There is nothing in the published Ofgem plan for this phase of activity. Why were some of these aspects not considered during the evaluation stage?

The Recommendation Fig 3, does not show consumption data reaching the DNO – this will need to be included to enable the DNO to receive equivalent data to today.