

## CCDG Consultation Response Template

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### Respondent information

|                  |                                   |                    |
|------------------|-----------------------------------|--------------------|
| Your name        | Kevin Woollard                    |                    |
| Your company     | British Gas                       |                    |
| Type of company  | Supplier                          |                    |
| Contact details  | Email Kevin.Woollard@centrica.com | Phone 07979 563580 |
| Confidential Y/N | No                                |                    |

A webinar on the consultation will be held in early 2021 if you wish to get an overview of the changes before responding.

### Please:

- Email your response to [CCDGsecretary@elexon.co.uk](mailto:CCDGsecretary@elexon.co.uk) by **08:00 (8am) on 2 August 2021**, using the subject line 'CCDG consultation response'.
- Use this Word response form where possible to make it easier for the CCDG to identify and summarise views.
- Provide supporting reasons for your answers to help the CCDG 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 CCDG. However, Ofgem will see all responses in full. We encourage you to provide non-confidential responses where possible, to inform the CCDG's discussions.

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

**Question 1. Do you agree with the CCDG's recommendation for early introduction of the new Registration Data Items and processes using existing interfaces to support migration?**

**Yes/ No or Response: Yes**

**Rationale: No further comments**

**Question 2. Do you agree with the CCDG's recommendation for a period of data cleanse activity of registration data items running from February 2023 to October 2024?**

**Yes/ No or Response: Yes (with comments)**

**Rationale:**

We recommend taking lessons learned from the FMRS data cleanse process. In general the data cleanse activity should have clear oversight and clear rules to ensure consistency in approach across the industry. In particular:

- Domestic Flag – it would be good to have clear guidance reaffirmed for this flag, especially where there is ambiguous or mixed usage on a site.
- Consent Flag for settlement – we look forward to further clarity regarding the usage of this flag to come out of Ofgem’s upcoming consultation on the changes to licence conditions.

**Question 3. Do you agree with the CCDG’s recommendation to mandate the moving of CT Advanced Meters settling NHH to Half Hourly Settlement using the existing Change of Measurement Class (CoMC) process?**

**Yes/ No or Response:** Yes

**Rationale:** No further comment

**Question 4. Do you agree with the CCDG’s recommendation to introduce the “one way gate” from the start of migration (milestone M11 / M12) to prevent MPANs moving back to current arrangements once migrated?**

**Yes/ No or Response:** Yes

**Rationale:**

We support this recommendation, but we note that there could be an associated impact on HH performance without the ability to reverse out non-communicating sites from HH settlement. The PAB should take this into account when deciding on the application of assurance techniques for settlement performance.

**Question 5. Do you agree with the CCDG’s recommendations for the registration and migration of export MPANs?**

**Yes/ No or Response:** Yes (with comments)

**Rationale:**

We support this in the case where both import and export are registered to the same supplier. We would suggest the benefit case is assessed as to whether this requirement should apply to sites where import and export are registered to different suppliers, as this implies overheads with the system and process requirements that would be needed to receive and act upon notifications.

**Question 6. Do you agree with the CCDG’s recommendations for coordinating the migration to MHHS?**

**Yes/ No or Response:** Yes

**Rationale:**

Where suppliers are migrating customers to new CRM/billing platforms during the course of the MHHS migration, the expectation is that there should be no direct or implied obligation to implement changes to legacy systems that will be retired on or before the end of the MHHS migration.

**Question 7. Do you agree with the CCDG's recommendations for the runoff of current settlement arrangements?**

**Yes/ No or Response:** Yes

**Rationale:**

We are supportive in principle with this recommendation. However, we are uncomfortable at the prospect of large settlement errors at grid supply point meters being unable to be corrected, and would like to see proportionate assurance techniques applied to manage the risk of any large impact errors surfacing outside the runoff period.

**Question 8. We would like to know Supplier views on the UMSO preferred approach to using one of the existing NHH MPANs. We would like to understand UMSO views on the system implications of either option.**

**Response:** We prefer the current BSCP520 CoMC process, that requires a new MPAN to be established with a HH measurement class

**Rationale:**

Using an existing NHH UMS MPAN and upgrading it has far more risk associated than creating a brand new HH MPAN and starting from scratch. Viewing the registration history for a new supply removes any possibility of missing the flow showing the supply is upgrading to HH UMS and any human error with appointments etc. and changing them back to NHH which would affect data.

**Question 9. Do you agree with the CCDG's recommended approach for the Unmetered segment?**

**Yes/ No or Response:** Yes

**Rationale:** No further comment

**Question 10. Are there any additional areas that should be considered as part of the next phase of Assurance activities?**

**Yes/ No or Response:** Yes

Where suppliers are migrating customers to new CRM/billing platforms during the course of the MHHS migration, the performance assurance activities should focus solely on the target systems and processes.

To be clear, the expectation is that there should be no obligation to implement changes to legacy systems that will be retired on or before the end of the MHHS migration.

**Question 11. Is there anything else that you think the CCDG should consider for transition?**

**Yes/ No or Response: Yes**

Suppliers will be fully occupied with FMRS up until Q3 2022, which may impact the commencement of activities under the MHHS Programme. Should the timetable move to better consider the impact of FMRS, the proposed transition milestones should also shift accordingly.