

CCDG Consultation Response Template

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Respondent information

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Confidential Y/N	N		

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 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 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

We agree with the CCDG's rationale for this recommendation. There are significant benefits to these items being introduced before migration – they are key to driving migration and updates can be made simply using the existing processes (i.e. D0312, D0205).

Existing MOP and Supplier interfaces to SMRS use the DTN (via flows like D0312 and D0205). The full scope of the proposed Event Driven Architecture (EDA) is not yet defined, however; it is possible that those interfaces will transition to the EDA under MHHS. The timing of any such transition is important as it could impact this period of data item introduction and initial population. A new enduring process for updating these items over the EDA could also be required.

Prompt engagement with the SMRS will be essential to meet the ambition of November 2022. Consideration should be given to whether any obligations can be placed on these parties to meet this deadline and even encourage an earlier introduction.

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

We agree with the CCDG's rationale for this recommendation. Advance correction and cleansing means that when MPANs migrate to the TOM these data items should be correct, with the appropriate segment allocated. This has the advantage of supporting migration planning.

Clarity and guidance on how to populate those data items that cannot be derived from existing values needs to be published well in advance of this period commencing. Similarly, the expectations on different participants in this process also need to be clearly laid out, particularly if the process will be subject to some form of assurance activity.

Similar to our comment in Q1, implementation of the EDA could impact the enduring process for updating data items as well as this initial cleansing process.

Following successful data cleanse of the required items, we see no reason why the MHHS segment cannot be formally allocated for an MPAN ahead of migration. As the consultation identifies, this would help with industry planning. Migration to the TOM can then be completed once the TOM Services are appointed and Central Systems begin receiving non-aggregated consumption data for that MPAN.

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

We agree with the CCDG's rationale for this recommendation and make some additional comments below.

If pre-migration CoMC activity is not mandated for WC Advanced, then thought should be given as to how participants can be encouraged to do this voluntarily. For instance, guidance around migrating a customer's wider portfolio if they have a CT Advanced meter that needs to go through CoMC. This would be a proportionate measure to ease migration for this segment.

Any obligation to fit working remote communications should acknowledge that this isn't always technically possible. The focus should then be on proactively monitoring that situation. For instance, creating an obligation to include a signal strength test as part of any site visit (DC or MOP, for whatever purpose) to a premise categorised as "No Comms". Whilst manual collection will always be required in some form, the market is moving to a predominantly remote communications model and the BSCPs should reflect this by creating obligations that ensure participants are proactive in installing and maintaining them.

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

We agree with the CCDG's rationale for this recommendation. Allowing a 3-month period for reverse migration would add significant complications and systems currently have problems with existing similar processes.

If resource for the Qualification process is managed effectively then it should be able to conclude in time for migration start (Oct/Nov 24). Penalties will need to be imposed on any parties that are not prepared by the start of migration, unless it is due to reasons outside of their control e.g. insufficient resource in the Qualification process.

As a general point, migration plans should be consistent with moving forward and not require any reversal. Lessons-learnt from P272 demonstrate the complications of not following plans.

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

Yes

We agree with the CCDG's rationale for this recommendation.

Discussion and output of Issue 91 should be monitored to ensure consistency/compatibility of recommendations.

It is not clear whether the recommendation covers the scenario where the FiT supplier is different to the Import supplier. There would be no mechanism for the FiT supplier to know that the Import MPAN has migrated. Given the sheer number of FiT installations (~800k), an obligation on whoever is processing FiT payments to register them for settlement, or at least create skeleton records with Export MPANs, before the migration phase could be beneficial.

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

Yes

We agree with the CCDG's initial rationale for this recommendation, however; there needs to be more supporting detail.

Migrating 31m metering systems to the MHHS TOM in 12 months will be an unprecedented challenge that requires very careful planning and robust monitoring. A key frustration in P272 was gearing up resource based on supplier migration plans which were then not adhered to or changed at very short notice. Some element of central co-ordination for the MHHS migration would help to avoid this and published guidelines on how to develop a migration plan should highlight the lessons-learnt from P272. It should be made clear that penalties could be applied for missing planned migrations. Further consideration needs to be given as to who and how individual supplier and agent constraints are collated and managed to develop a central overview that is workable.

Whilst the obligations will be on suppliers to migrate MPANs to the TOM, Agents will have to handle migrations across multiple suppliers with competing priorities. Elexon needs to consider what support can be given to Agents to help manage this complicated planning exercise.

Whilst we recognise that the migration process itself will likely be architecture dependent, understanding the step-by-step process for how an MPAN migrates to the TOM, which could be different for each segment, is a fundamental part of transition that has not been outlined here.

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

Yes

We agree with the CCDG rationale for this recommendation.

Allowing all MPANs to complete at least an R2 run strikes the right balance of allowing corrections vs. maintaining redundant systems/processes. The recommendation also provides a natural incentive for early migration as those MPANs will be allowed to run to R3 and RF. Systems cannot be fully retired until the end of the data retention period, so setting this appropriately will be important to minimising costs of run-off.

Elxon may wish to conduct a cost benefit analysis in support of this recommendation to demonstrate its benefits relative to other approaches.

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.

N/A

N/A

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

Yes

Our preference would be to follow existing BSCP520 process for any UMS CoMC activity.

This section outlines the migration and adoption processes for this segment, it would be good to have similar for the other segments documented.

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

Yes

Central Systems are conspicuously absent from the list of impacted parties and should be considered "high impact". Given the importance of their role in settlement overall, we believe it would be appropriate for the new and adapted roles within Central Systems to be subject to some form of qualification and ongoing assurance process. This would help to instil confidence that central roles are being developed within the prescribed timescales initially and then performing as expected thereafter. The existing assurance approach for Central Systems is insufficient and not transparent enough.

Similarly, the CVA market is not subject to sufficient scrutiny under current arrangements. Whilst this market is not impacted by MHHS, moving to the new arrangements could present an opportunity for this to be improved.

Considering the significant increase in settled Export volume under MHHS, separate performance assurance arrangements for Export should be explored. Commercial incentives and customer pressure may be strong enough to ensure performance is satisfactory, however; this needs to be qualified. Any exploration of separate performance standards for Export should also include a review of the applicable estimation techniques.

Consideration should also be given to how the PAF can best utilise their access to non-aggregated consumption data under the new arrangements. This could be to monitor agent performance more closely, proactively manage settlement risks, guide investigations or support the re-qualification process.

The graded impact for qualification (H,M,L); seems a reasonable suggestion to determine that all parties & agents are assessed according to settlement risk impact, especially where new interfaces are required. This would give a starting point for some proportional focus of future assurance processes.

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

Yes

It would be helpful to understand how the migration process for an MPAN in each segment is intended to work. → current roles de-appointed using existing processes? New roles appointed via EDA? Supplier initiates this with a D0205 or via EDA.

We would also like to highlight the urgency of establishing the PMO to ensure that all the recommendations can be implemented as soon as possible. Similarly, so that a design baseline of sufficient detail and quality can be published in April 2022.

Complex Site arrangements – likely to increase prior to MHHS migrations, are there any complications for transition?