

CCDG Consultation Response Template

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Respondent information

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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@elxon.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 Elxon's MHHS team at CCDGsecretary@elxon.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: As explained in the paper the data items need to be created so that they can be cleansed prior to commencement of migration

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

Rationale: Although the bulk of the cleansing should be completed in the first 6-12 months to ensure the data is as clean as possible prior to migration

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: To ensure the earliest possible gain to settlement accuracy

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: Building processes and/or systems to allow reversion leads to unnecessary extra cost and complexity for a limited timeframe/benefit

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

Yes/ No or Response: No comment

Rationale:

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

Yes/ No or Response: Yes

Rationale: Essential that all the various roles/parties within the industry are able to cope with the volumes of change. Each party in the framework will have a constraint on volumes and this must be co-ordinated to minimise failure

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

Yes/ No or Response: Yes

Rationale: Not a great issue for our role but seems logical. Early migration of UMS will ensure the longest window possible for any backdated inventories to be received and processed.

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: Not applicable

Rationale: We are not a supplier, but in the MA role we simply need an MPAN, whether that is a new MPAN or a change of measurement class for an old MPAN, it makes no difference to us. However, do have concerns how the industry will be able to change an existing NHH UMS MPAN into a HH UMS MPAN and correctly change MO MPID, DC MPID, MC and PC for the former NHH MPAN, whilst also coincidentally disconnecting the redundant Related MPANs. As this is not the current industry defined process it is not clear that systems and/or industry participants will be able to support this.

Equally it is not clear if Suppliers will be able to support the pricing and energy forecasting of the MPAN as it changes from NHH to HH.

It is not clear if changing the state of the MPAN from NHH to HH will prevent the ability for an UMSO to process a backdated inventory which spans the CoMC date. If it cannot then, that will impact customers. That can be mitigated by ensuring customers refresh their inventory as part of the data cleansing activity.

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

Yes/ No or Response: Yes

Rationale: There is considerable data cleansing required. This may also reveal MPANs that should be disconnected as they no longer exist, there are many de-energised MPANs in existence. There are also many IDNO unregistered MPANs that need to be registered and included in settlements. Suppliers and UMSO have many UMS customers for which neither has contact for some years, these will need to be identified to confirm if the UMS equipment still exists, or if not then removed.

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

Rationale: More detail on all of the activities!

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

Yes/ No or Response: Yes

Rationale: It is good to see the proposals and there probably needs to be a series of working groups to progress the discussions with further details and any interim code changes and/or guidance to make these proposals effective.

