

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?

No

Rationale:

We would like to avoid changes to SMRS for at least 6 months post Faster Switching go-live, and potentially longer if any major issues occur with that go-live. There must be a period of time between these two significant industry wide projects to allow parties to fully embed the Faster Switching changes before considering MHHS changes and associated design and development work.

With regard to MOA data and in particular the GUID for smart meters, in many cases the current MOA will not be the installing MOA, and so will not have that data. Back populating this data will require co-ordination across industry that is likely to be better done outside of SMRS updates. EDF has previously suggested adding this data item to

meter technical data flows used by industry, and still believe that is where this data should be held and transferred. Our view is this data still should be mastered outside of SMRS by the MOA, and that this data does not need to be held in SMRS in order to facilitate MHHS.

In terms of Supplier data, as CSS holds domestic premise indicator, interfaces already exist between SMRS and CSS exist for CSS to provide updates to SMRS. It would seem logical to use this as the update process for this data and not require changes be made to the D0205 and replicate the CSS update process into D0205. Our view is that no information regarding consumer consent should be stored in SMRS as there is no legal reason for this personal data to be held in that system. Obtaining consent for use of data for settlements would have to be part of any new Supplier's onboarding journey. They must agree with a customer for its use and any arrangement with a previous Supplier cannot be used in that discussion, so the data would need to be re-populated on every switch and could not be 'carried over' to the new registration. This would be same process for any Change of Tenancy for a MPAN owned by a Supplier, the previous tenant's choices would no longer be relevant.

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?

No

Rationale:

We agree that a period of data cleanse is required but feel this should be initially carried out outside of SMRS. Data should be added to SMRS probably no earlier than February 2024, and this is when changes to SMRS could be then made, or one year after commencement of data cleanse activities. We feel that until this data is of a sufficiently high quality it should not be added to SMRS – there is no point in holding poor quality data in SMRS and cleaning it there. This will also avoid the need to send high volumes of updates to SMRS which could have an impact on other BAU SMRS processing (switches, settlement updates) if the current daily processing limits in SMRS are going to remain in place.

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

Rationale:

We have no specific concerns with this recommendation overall but would note that it would be useful to apply lessons learnt from previous changes (specifically P272) when considering the timescales and scope for this mandate.

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?

No

Rationale:

We can only agree to the introduction of a “one-way gate” where this results in all suppliers being ready to operate under the MHHS arrangements at the same time. If the implementation of a “one-way gate” prevents customers from switching supplier (from an MHHS supplier to a non-MHHS supplier) then this would be unacceptable. Changes to the settlement arrangements must not prevent customers from exercising their right to change their supplier or create any other barriers to switching.

This “one-way gate” is only required as current TOM makes significant changes to current data, systems and processes, not because they are needed to facilitate MHHS, but for other reasons. These changes have failed to take account of customers and processes that impact customers, especially switching. The proposed TOM remains lacking in that aspect.

We have consistently stated that any MHHS changes must have no detriment to any customer and their rights to choose their suppliers. We would prefer a design where movement back to current settlements is not only possible but easy to maintain customer choice during transition period.

Question 5. Do you agree with the CCDG’s recommendations for the registration and migration of export MPANs?**No****Rationale:**

There is no rationale for an export MPAN to be forced into MHHS processes as a by-product of the associated import MPAN moving. It must be current export Supplier that determines when it is appropriate to use MHHS arrangements and not the import Supplier. Just because data is being provided to link import and export MPANs this does not form any logical basis to suggest both must follow same settlement regime, suggesting a potential further gap in TOM and associated processes.

It is also not clear how the proposal that where an export MPAN is not currently registered for settlement and the customer is registered with a Supplier for the export energy (e.g. Fit), that an export MPAN should be registered in the new trading arrangements within 30 WD of the import MPAN migrating. Until the export supplier seeks to create the export MPAN they are unlikely to have visibility of the associated import MPAN. It is impossible for an export supplier for an as yet unregistered export site to know that the associated import MPAN had migrated, and that the 30 WD period had started. As noted above, it is down to the export supplier to decide when to register their MPAN ahead of the mandated deadline for doing so.

We disagree with the proposal and consider it complex with little benefit.

Question 6. Do you agree with the CCDG’s recommendations for coordinating the migration to MHHS?**No****Rationale:**

We recognise that migration to another operating model and set of systems and processes is a highly complex undertaking which requires in-depth planning to ensure effective management of resources. We support the proposal to standardise the migration approach and coordinate it centrally. We believe it introduces efficiency and rapid progress.

We agree that from the outset a determination of the objectives and high-level principles should be made. Whilst we support the principle-based approach, we would like to have sufficient flexibility to develop and implement our own

internal migration plan. The migration approach must have sufficient flexibility to manage volumes for unexpected market activities, such as sales trades and SoLR events.

Whilst we support the approach in principle, we would like to share our comments regarding the Principles outlined in the proposal:

- **We partially agree with the Principle 1: Migration will need to balance speed and settlement accuracy.**
 - We recognise that any delay to the migration could result in the additional cost to the overall programme and industry.
 - We recognise the need for the milestones to be determined centrally to allow for a successful migration.
 - However, we disagree that penalties should be introduced for failing the migration targets – there is currently no clear evidence or justification for such penalties based on the detriment caused to the market.
- **We partially agree with the Principle 2: Migration should follow a “controlled start >> ramp up >> volume migration >> ramp down” sequence.**
 - We recognise that the migration should start with “working” MPANs, however we would like to note that in order to successfully execute the plan, a prior data cleanse activity will be required to ensure any impediments preventing migrations are removed prior to the migration.
 - We believe a set of success and exit criteria should be established for the data cleanse piece alongside milestones to monitor its progress.
- **We partially agree with the Principle 2: Migration should not leave a “rump” of broken MPANs to be migrated at the end of the 12-month period.**
 - We agree in principle that the migration should not leave a rump of “broken” MPANs at the end of the migration period. We do, however, recognise based on our experience of migration initiatives that there is a strong likelihood that a small percentage of MPANs will remain unresolved.
 - We believe that a percentage target should be set for the industry to achieve which should be regularly reviewed at specified intervals throughout the course of the migration activity.
 - A resolution plan should be agreed towards end of the migration plan for the remaining MPANs.
 - We would like to highlight the need for data cleanse to optimise successful migration and reduce the likelihood of broken MPANs at the end of migration.
 - We feel that data cleanse should be a standalone activity completed prior to the migration commencing.
 - The data clean-up effort should include all impacted stakeholders (e.g. MAP, suppliers, DCC etc) all of whom will need to contribute to meeting the data cleanse success and exit criteria referenced above.
 - It should be recognised that the data clean-up could have its own “rump” of broken MPANs that cannot be migrated, this rump of pre-migration exceptions should be counted and monitored in the same way as broken MPANs that fail during migration.
 - We would also like to note that the proposed period of 12 months, feels like a very aggressive plan. Our experience of migration for smaller initiatives suggests that 12 months to migrate over 31.5 million import MPANs is insufficient and it needs to be extended, especially - as stated in the proposal - any delays to the migration may result in additional costs to parties.
 - As stated previously, we would like to highlight the need for sufficient flexibility in the migration approach to ensure that suppliers can plan rapidly and adjust to external factors such as unexpected market events (including SoLR events).
 - We agree that migration should be planned on weekly basis, however we disagree with the proposal to allocate the weekly slots per suppliers.
 - We disagree that penalties should be incurred by suppliers where a slot was not utilised. We believe that the slot allocation should be flexibly distributed and coordinated centrally., i.e. if a slot is not fully used, this should be centrally coordinated to ensure all slots are populated fully. We feel that this is where the approach requires further flexibility in planning and central coordination.
 - We would like to note the need for developing relevant monitoring to enable monitoring centrally as well as at party level. We believe the requirements definition should be done collaboratively with the impacted parties.

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

No

Rationale:

The proposed truncation of the Settlement timetable to R2 based on an arbitrary cut-off date rather than a de-minimis level of (functioning) Smart penetration presents a risk to Settlements. To expect even a small percentage of legacy meters, which are likely to sit with the least engaged customers, to be successfully read five times a year is unrealistic and would effectively render legacy metered customers financially unviable – especially with cost per field read likely increasing as demand diminishes. Without performance and GSPGCF replacement definitions it is very difficult to envision the level of error, and taking a share of such error, likely brought by legacy and non-functioning Smart being at an acceptable level this early in the process.

A phased reduction starting with the current RF/DF timescales which then tapers down to R3 and eventually R2 based on achieving agreed levels of Smart penetration, Settlements performance and proof of Load Shaping benefits on estimates should be considered to minimise the impact on Settlements accuracy. This would also have the benefit of no perceived barrier to migration for non-Smart meters and possibly earlier shutdown of legacy systems.

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: Following the current BSCP520 CoMC process is preferred.

Rationale: Setting up a new HH MPAN is our preferred option as this will not complicate the system in terms of overlaps and bottlenecks that could potentially occur when changing existing NHH MPAN properties held in systems. This is the process used for the recent exercise for moving 100kw

Using existing NHH MPANs could lead to timing issues and system bottlenecks, as the communication channels from the Supplier system through to the appointed market agents (MOA, Data Collectors) could be delayed as the Supplier system could see errors when changing existing NHH MPANs to HH ones in the first instance. Creating new HH MPANs will enable a more efficient and much cleaner cutover.

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

Yes

Rationale:

However, without details of the UMSO's system requirements and thoughts, it is difficult to make specific suggestions.

In addition, considerations of the commercial implications and contractual agreements with customers need to be considered as to any changes and disruption the customer could potentially face from this approach.

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

Yes

Rationale:

Without the detailed definition of the activities of the new agents and the output of the sub group with PAB involvement it is difficult to make specific suggestions for additional areas.

However, as detailed in the response to Q7, the definition and details surrounding Settlement Performance, PARMS, Supplier Charges, timetable and Error Sharing/GSPGCF (during migration and its replacement) require further definition to enable us to make judgements on Assurance activities.

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

No

Rationale:

We do not have any further comments on transition.