

4CCDG 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@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/ No or Response:

No

Rationale:

Although we agree with the overall approach to introduce the new data items early and to retain the current interfaces as it reduces risk, and allows for a more gradual implementation. We have a number of concerns with the proposed timescales.

The design baseline is April 2022 and the planned introduction of the new data items is November 2022.

Currently, parties require at least six months for a standard data flow change. The changes being introduced are significant in comparison and we don't believe that a seven month window is sufficient time

to develop the proposed changes.

Once the MHHS Design has been finalised, the SMRS design will need to be developed, approved and built. Once the SMRS design is approved we will then need to design our internal interfacing systems and then build activities will need to be completed.

Experience from the Faster Switching Programme tells us that there will be design queries to clarify which should also be factored into the timescales.

In addition, the current planned go-live of the Central Switching Service (CSS) is June to August 2022. This is a clear overlap with the proposed timescales and any delays or unexpected design changes to the CSS go-live will impact delivery of the MHHS system development and interfacing system considerations as the same resource will be utilised for both of these programmes. CSS hyper-care requires those resources to be available and our understanding is that the Faster Switching Programme would be the priority creating a risk to the MHHS Programme timescales.

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:

We are supportive of data cleanse activity and recognise the importance of ensuring accuracy of data in advance of the end delivery MHHS programme date.

We are generally comfortable with the Distributor mastered data items but may require support from Suppliers in relation to identifying legacy import/export associated sites, and would suggest a mechanism/process is implemented to facilitate cross party working.

The assurance monitoring associated with the data cleanse activity is essential to ensure parties are adhering to the requirements, although they should not overburden parties.

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:

Although we are supportive of the recommendation, we do note that there may be added considerations for systems and infrastructure, in order to operate two parallel settlement processes with new and current data items and extra complexity for migration.

Due to the unknown design detail the impacts are difficult to assess fully at this stage.

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:

Yes, we agree it makes sense to stop the return of migrated HH arrangements to NHH, in order to reduce risk and complexity.

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

Yes/ No or Response:

Yes

Rationale:

On the most part we believe this question is best answered by Suppliers however, we would like clarification on one point.

Is the expectation that all small generation sites would need an individual MPAN and therefore we would see an increase in Export MPAN requests, utilising the current request process?

If this is the case, we have concerns that we may receive high volumes of requests from multiple Suppliers which may add risk to suppliers achieving the 30 day timescale. To mitigate this risk we would suggest a controlled and managed approach with clearly communicated volume restrictions and timescales.

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

Yes/ No or Response:

Yes

Rationale:

We agree with a centralised coordinated approach to MHHS migration and see the benefits of planned and controlled windows of migration allocated to parties, as with the recent Targeted Charging Review (TCR) and associated LLF change activity which worked well.

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

Yes/ No or Response:

Yes

Rationale:

We recognise that there may be additional settlement runs and corrective activity at the end of the programme but system impacts and continued party awareness should be considered.

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:

As an UMSO Party we have a preference for retention of existing NHH MPANs.

Rationale:

We see the retention of an existing NHH MPAN to be more beneficial than the creation of a new HH MPAN.

We have provided detailed feedback to the CCDG via our Distribution representative but in summary, the creation of new HH MPANs creates significant work for UMSOs, impacts customer service and introduces a risk to the timescales of MHHS as customers will be required to sign a new UMS Connection Agreement and a new Supply Contract. If customers are unable or unwilling to participate in the transition arrangements the new MPAN cannot be created and/or registered in a timely manner and the existing records will remain NHH.

The system changes required to support this would require (at a minimum) six months development time from the process being documented in the Balancing and Settlement Code.

The recent change to mandate HH trading for UMS customers over 100kw only impacted 26 inventories (each with multiple MPANs) and we still have six inventories (23%) outstanding four months after the deadline. If this was extrapolated across all NHH customers nationally the impact would be significant.

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

Yes / No or Response:

No

Rationale:

We agree with approach of the early migration of the Unmetered segment but as set out in our response to question 9, we do not agree with the CoMC process due to the timescales involved and risk to customer experience. If the CoMC is taken forward the proposed timescales may need extending.

We support the data cleanse requirement and have already begun working with Suppliers with varying degrees of success. We believe an obligation on all parties in relation data cleanse activity is necessary to support the requirements.

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:

We recognise that CSS / Faster Switching activities are not expected to be part of MHHS assurance but should be considered and referenced for any data cleansing and implementation requirements.

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

Yes/ No or Response:

Yes

Rationale:

We appreciate that the MHHS Programme has moved to the right to accommodate CSS Go Live but there is still a risk that Faster Switching Programme delay or issues with transition and CSS Go Live may impact the MHHS Programme.

We would ask that the MHHS Programme team work with the Faster Switching Programme team to consider timelines and impacts to each programme.