

CCDG Consultation Response Template

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Respondent information

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Type of company	Supplier		
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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@elaxon.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 Elaxon's MHHS team at CCDGsecretary@elaxon.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, we agree with the CCDG's recommendation.

Rationale: We believe this will help migration. However, from a supplier viewpoint we would request that sufficient consideration is given to the supplier data items, given the problems that have been encountered with the assumptions of the population of the domestic premises indicator in the CSS Systems under the Ofgem Switching Programme.

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, we agree with the CCDG's recommendation.

Rationale: We believe that a data cleanse activity will benefit the programme. However, we would like to receive details on how this will be carried out at the earliest opportunity. We assume that, as a supplier, we will be provided with the relevant data items for our entire portfolio in order that we can verify the data held by Elexon is correct. This information will need to be refreshed periodically at key times (such as after large contract volume start dates, e.g., 1st April) during the period to allow for changes in suppliers' portfolios.

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: No

Rationale: We do not believe that this is necessary in the timescales outlined and could be done over the same time period as the moving of the WC advanced meters, i.e., by October 2024, where possible, as this would allow the successful transition of these MPANs into the MHHS Systems by the start of the migration period. Moving them into Half Hourly settlement by the recommended date of October 2023 puts unnecessary pressure on suppliers to get MPANs, which often have issues, into the half-hour sector for no real obvious benefits prior to MHHS implementation. Also, as for WC advanced meters the moving of CT meters should be encouraged, but not mandated, as some suppliers may prefer to do it as part of the migration of their MPANs into MHHS. Furthermore, customers with multiple various sized supplies may want all their MPANs migrated into the MHHS arrangements at the same time for an easier experience.

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 agree that building a reverse migration capability for a relatively short time period will be too costly and too complex a process to administer for, potentially, very little benefit.

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

Yes/ No or Response: Yes, we agree with the CCDG's recommendation.

Rationale: We believe that all export MPANs should be registered within the new MHHS arrangements to increase settlement accuracy.

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

Yes/ No or Response: No, we do not agree with the CCDG's recommendations.

Rationale: The recommendation mentions profiling over the whole year, with around 140,000 MPANs migrating on average each working day if this was the case. An alternative, and possibly more efficient approach, would be to determine what the maximum number of MPANs the new systems will be able to migrate each day is, to ask suppliers what their migration plans are, and to identify any constraints resulting from these two pieces of information.

Whilst there are dozens of suppliers, the majority of MPANs are registered to a small number of large suppliers, and Elexon co-ordinating with these larger suppliers could work out a plan which doesn't result in an inefficient use of the transition window. There are a number of suppliers with small numbers of MPANs who are unlikely to want to spread their migration out over a long period of time and so these suppliers, if the new MHHS systems allow, could be able to migrate all of their MPANs very quickly, with the potential result being that relatively soon after the start of the migration window many small suppliers could have migrated their whole portfolios leaving Elexon to deal with fewer suppliers with sites to migrate as the migration period progresses.

The new UK Link systems, introduced by Project Nexus, were able to migrate all of the approximately 25 million gas meter points from the old UK Link systems in a matter of a few weeks. Given that these new UK Link systems seemingly struggle to process more than several million meter readings in a day, the fact that the new MHHS systems will have to have the capability to process in the region of 1.5 billion (30 million x 48) reads each day would lead one to assume that the new MHHS systems should be able to migrate at least a million MPANs each day if needed to. Whilst some suppliers' and agents' systems may not be able to handle high migration volumes on a daily basis, it should not be the MHHS central systems that become the limiting factor.

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

Yes/ No or Response: No, we do not agree with the CCDG's recommendations.

Rationale: The CCDG's recommendation is that the current settlement runoff is February 2026, which would result in R3 being cut-off for all dates after July 2025 and the RF would be cut-off for all dates after December 2024, which is only 3 months after the MHHS transition window opens. The recommendation seems to focus on the latest date that would be settled on the R2 run rather than the earliest date.

Whilst we recognise the requirement to minimise costs, the costs of running 2 arrangements for a further number of months is likely to be small in comparison to the potential misallocation of energy between suppliers, and we would suggest that a minimum target is set for the amount of overall energy that is settled on either AAs or actual half hourly data in each month as a criteria for the runoff of the current settlement arrangements.

Given that this date is quite some way in the future, a decision on this can be taken further down the line after full engagement from the industry as to what the criteria should be, rather than an arbitrary date being decided upon which could result in significant amounts of energy being finally settled on EACs.

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 would prefer, at this time, to go for Option 1, which is the creation of a new HH MPAN.

Rationale: We see this as a cleaner option and is the current established industry process for changing NHH unmetered MPANs to HH unmetered MPANs.

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

Yes/ No or Response: Yes

Rationale: We agree with this approach as it will ensure that all current and any new NHH unmetered MPANs will be registered as HH unmetered MPANs prior to the start of MHHS migration activities. However, more detail on the process to be followed should be provided as soon as possible, since currently UMS CoMCs are driven by the UMSO. Suppliers cannot make the change to HH until the UMSO has created a Summary Inventory and/or CMS Control File. We need deadline dates for this (and creation of new MPANs if required) as part of the migration plan, so that all UMS supplies are ready to be migrated from October 2023.

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

Yes/ No or Response: We do not have any additional areas for consideration.

Rationale: Other areas may become apparent as the programme progresses. However, it needs to be ensured that the necessary vires exist within the Programme and / or the BSC in order for the necessary obligations to be placed on parties and for the assurance activities to be undertaken by Elexon.

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

Yes/ No or Response: Yes.

Rationale: There are a number of service providers required to be appointed by Elexon, and it must be ensured that these providers will be in place in sufficient time following any tendering processes, as they are likely to have an impact on the transition activities.