

CCDG Consultation Response Template

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Respondent information

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Confidential Y/N	If yes, please indicate which parts of your response are confidential		

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?

Response:

Rationale:

We do not agree with the timescale being proposed for the early introduction of the new registration data items between November 2022 and February 2023. However, we do agree with the principle of the CCDG's recommendation for early introduction of key data items and appreciate this will aid migration.

Faster Switching go-live date range is June-Aug 2022 (subject to no further delays) and after the go-live, there will be a transition period where we expect some challenges. ScottishPower has a concern about the timing of the introduction of the new data items and operational impacts. As with all Suppliers we will be focused on the successful delivery of Faster Switching until the start of 2023.

The MHHS physical baseline is due to be issued 3 months before Faster Switching go-live date (April 2022). MHHS Programme will require the same Supplier resources and will utilise some of the processes that are instructed by Faster Switching, this will have an impact on when the MHHS transition can realistically start as there is a clear clash of Programmes and resources.

The rules and processes introduced to populate the new data items and their validation and exception management need to be clear and robust and issued to parties sooner rather than later.

We believe the new data items should not be introduced until at least Q1 2023, this will allow for Faster Switching to be embedded for a period before any changes are introduced for MHHS.

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

Rationale:

We agree that a data cleansing activity is necessary to ensure the accuracy of the data items required to identify the new market segments.

We would like CCDG to take into consideration lessons learnt from the Faster Switching project with regards to data cleansing activities, early engagement is paramount to ensure a successful outcome.

For example, the related metering point indicator, was populated for most MPANs in 2019 but sites are now being split up again, this indicator was introduced before it was needed and before the data was cleansed.

The early introduction of both Domestic Premises Indicator and EFD & Consent Granularity and EFD is a concern as it is unclear how these processes will work prior to the implementation of MHHS.

It is unclear how rejections and exceptions will be managed throughout this exercise; more detail is needed.

There is a mention of amending the D0205 'Update Registration Details' this will mean system changes to parties. Any changes to the Data Catalogue or systems will require at least 6 months standard Industry lead time.

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?

No

Rationale:

It is in ScottishPower's opinion that these types of customers should be treated like SMART customers and be settled HH when the time comes to move SMART to HH (**M12 November 2024**). The recommendation to mandate CoMC activities between October 2022 to October 2023 puts unnecessary pressure on Suppliers to migrate MPAN's to HH where there are known interoperability issues.

There are large domestic customers that have CT meters installed and there is a concern that they might struggle to change supplier if these sites are mandated to go earlier than the planned transition of 2024.

This would provide no obvious benefits to migrating these meters any earlier than November 2024. In addition, lessons learnt from P272 should be taken into consideration and sites are only migrated when the provision of HH data is reliable.

A customer's physical meter type should not limit their options to change supplier, tariff or product. There is a potential this will create a problem for this type of customer during any Change of Supplier process. This activity needs to be avoided to ensure that the move to MHHS does not negatively impact any customer experience.

We are aware of a shortage of CT / HH meters by several accredited MOPs and we would welcome CCDG's assessment of this situation and the impact it may have on their timelines / proposals?"

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?

Response

Rationale:

We agree with the recommended approach to introduce a "**one-way gate**" from the start of migration October/November 2024. This seems a sensible approach to take as this will prevent MPANs being transferred back and forth to legacy and the new MHHS arrangements, as this could be messy, complex and costly to the Industry.

However, we would like Customer Switching to be taken into consideration, there maybe an impact to customers who are looking to transfer from a supplier on the **new MHHS arrangements** to a **non MHHS** supplier. This could potentially prevent the customer being able to change to their chosen supplier and possibly paying a higher tariff for example through no fault of their own. More detail is needed on how such a scenario would be managed and to mitigate customer impacts.

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

Response

Rationale:

Recommendation 5:

Where an export MPAN has already been registered for settlement, the export Supplier will be informed when its associated import MPAN has been migrated and will be required to migrate the export MPAN within 10 WD.

We agree 10 working days seems reasonable for the scenarios where the Export MPAN already exist. However, it is unclear what the "**to be**" process will be, how will the supplier be informed (MPAS/Elxon), by what means will this notification be sent (i.e. flow or email), what assurance measures will be in place around the 10WD requirements if there is failure to achieve this timeline by parties.

Where an export MPAN is not currently registered and a Supplier is paying the customer for export energy, then an export MPAN should be registered no later than 30 WD after the import MPAN migrates.

We do not agree with the recommendation where an export MPAN is not currently registered that the export should be registered no later than 30 WD. We do not believe 30 working days is a sufficient timescale to register for a FIT customer where the Export is not registered. The process is reliant on the DNO creating the export MPAN. We have

recent examples of requests being rejected as the DNO requires additional information that we as supplier do not hold. This is something totally out with our control and as such we cannot accept the timeline.

Instead we would recommend that it follows the current MAP24 process, and the requirement starts once the MPAN is created.

There are clear issues with export suppliers becoming aware that a smart meter has been installed on the import meter as there are no industry processes for this. As such the export supplier is reliant on ECOES data to know if a smart meter has been installed or that the site has migrated to HH

We have a real concern with this proposal as under the current arrangements this can take anything between 30-90 days on average to complete.

We would like to note where a customer contact is required for example to inform them, they are moving from a deemed Export payment based on their generation to an actual export payment they might fail to supply the information which has a potential to cause a delay. We believe this part of the proposal needs further development and analysis to understand the impacts and timescales.

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

Yes

Rationale:

We agree in principle with CCDG's recommendations for coordinating the migration to MHHS, this is a high-level view and more granular detail is required to understand impacts on parties, system constraints and cross code impacts.

This will be a very challenging time for all parties and systems involved in the transition to MHHS and it is paramount that systems impacted can handle the increased daily volumes of MPAN's. An overload to systems could cause detrimental impacts to the delivery of the programme.

Elexon will need to take into consideration other large-scale projects that are ongoing such Switching Programme, Smart Rollout, Microbusiness Strategic Review, Energy Governance Reform. Along with any other Industry events such as a SoLR and BAU demand when devising and coordinating their migration plans.

We believe an Industry expert group is needed to provide parties with clear and detailed coordinated plan, cutover plans of what is due to happen before Go Live.

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

Response:

Rationale:

We have a general concern with the CCDG's recommendation that the settlement runoff for reconciliation should be February 2026 as this could pose a material impact on parties. More detail is needed to understand why R2 has been chosen, how the disputes process will work for dates under the old Settlement arrangements and the new condensed timeframe.

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.

No:

Rationale:

We do not agree with the UMSO preferred approach of using one of the existing MPANs. There are lots of MPANs with very small EACs so even accounting for the aggregation of related MPANs it is our belief that the accumulated EAC will still be so small as to not register significantly accurately in any HH period and would provide little or no benefit.

In our opinion, what is needed by the UMSO is a mass aggregation of all MPANs in their portfolio that all have the SAME customer and then create a Single UMS HH MPAN for that Customers entire UMS inventory and manage the process that way.

This will significantly reduce the overall number of MPANs and make the Change of Supplier process easier for Customers and allow MHHS to take place at a quicker rate (fewer MPANs once consolidated).

It is in our opinion, the CoMC process is complex and should be avoided at all costs.

The creation of a NEW clean HH MPAN would be more beneficial, it will reinvigorate the UMSOs relationship with their customer and ensure accurate Inventories and EACs are created and maintained. This would have a positive impact on the Customer, UMSO, Settlements and Suppliers alike.

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

Response:

Rationale:

We agree with the principles of the recommended approach however, more detail is needed to understand the full impacts on the UMSO, Customer and Suppliers. For example, Suppliers are to procure the service with the UMSO under the new arrangements, what commercial agreements would need to be in place.

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

Yes

Rationale:

We would want to be made aware of any additional costs as result of impacts or delays to the programme as soon as possible, these costs need to be made clear and transparent to all parties.

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

Yes

Rationale:

How will the LTV process be impacted by the revised new Settlement timescales.

Industry Engagement/Workshops – Once clear detail has been communicated, we see that there will be a need to engage with all parties and understand their proposed transition plans.

Similar to Faster Switching, Elexon are looking to appoint SI, PMO service and LP Assurance service, it is essential all of these are in place ahead the start of any transitions activities as they will likely have an impact.

We would like to see detailed process MAPs off all changes on a dedicated webpage of Elexon as soon as possible of what is changing.

Lessons learnt from P272 and Faster Switching need to be taken into consideration when planning transition activities, this will allow for any risks previous identified to be factored in.