

CCDG Consultation Response Template

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Respondent information

Your name	Dan Fittock		
Your company	Corona Energy		
Type of company	I&C Supplier		
Contact details	Email dan.fittock@coronaenergy.co.uk	Phone 07769 285306	
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: Yes

Rationale: We agree with the early introduction of the new Registration Data Items and processes, however we believe some further consideration and clarification is required. It appears that these new data items would only be updated upon a CoS event, and so if a CoT event occurred which included a change from Domestic to non-Domestic or vice-versa within the same Supplier (e.g. with no associated CoS), it is not clear how these data items would be updated centrally. Additionally, although we are generally supportive of the early introduction of these data items, it is not clear from the consultation how these data items will specifically impact MHHS.

We also require greater clarity on how Consent Granularity will be introduced, and whether this will link to any newly drafted SLCs. Although we are an I&C Supplier, we would need to be aware of any changes to SLCs in this area to ensure we remain fully compliant.

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: Response

Rationale: While we agree that a data cleanse activity is required, we feel that the proposed timetable is extremely ambitious. With the introduction of these data items, every MPAN within a Supplier's portfolio will require cleansing with the introduction of these three new data items. We would also like to ask whether Elexon has taken learnings from the data cleanse activities being undertaken as part of the Switching Programme? And whether the MHHS data cleanse activities could be bundled with the data cleanse activities being undertaken by the Switching Programme? As this will significantly reduce the resource requirements for these two projects running in parallel for smaller industry 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: We support the recommendation for moving CT Advanced Meters settling NHH to Half Hourly Settlement using the existing CoMC process as these meters are unlikely to require a site visit. However, noting the point further in this consultation regarding the possibility of leaving a 'rump' of 'broken MPANs' till later in the process, we believe that undertaking a CoMC earlier in the migration for these 'quick win' meters will inevitably lead to an increasing number of 'broken' MPANs being left toward the tail end of the process. Taking lessons learned from P272, we would have expected to see Elexon deciding to leave these 'quick wins' until later in the migration to allow for these meters to be relatively quickly migrated to MHHS closer to the end of the transition period, if there is sufficient concern that a 'rump' will be an issue at the end of the period.

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: No

Rationale: Although we appreciate the rationale for the implementation of a 'one way gate', we believe that this would create an impasse for any meters that fell off the migration CoMC pathway. For example, there may be instances when a CoS event intersects the MHHS CoMC process. In lieu of open and timely communication between Suppliers, which we believe is unlikely, the gaining Supplier should have the choice to CoMC the MPAN back to NHH and then reinitiate the MHHS CoMC to HH. This would result in minimal disruption to the customer as well as allowing the gaining Supplier to meet MHHS migration targets. We would welcome further clarity from Elexon for an alternative resolution pathway for such events in the event that the 'one way gate' is implemented, however no such process has been detailed in this consultation.

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

Yes/ No or Response: Response

Rationale: We agree in principle with the recommendation, however it is not clear to us how or from whom a notification would be received. Would this be from Elexon, or would this be from the other associated Supplier?

Additionally it is not clear from the consultation document whether small-scale micro-generators will be required to install export meters. Many microgeneration sites (typically rooftop solar PV) have an import meter, but no way of measuring export – rather they are paid total generation FiT payments as well as deemed export FiT payments, which assumes that a high proportion of the total generation is exported to the grid. It is unclear whether MHHS enforces the export to be metered after the existing NHH import meter is upgraded as part of MHHS migration as this suggests that a new export MPAN will be required. If this is the case, does the obligation to generate this new export MPAN sit with the import Supplier?

We also require clarity on the implications of not meeting the 10WD or 30WD SLA, and how this SLA would be monitored as part of the Performance Assurance measures.

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

Yes/ No or Response: Response

Rationale: We understand the rationale behind this recommendation, however we are concerned that Elexon does not appear to be taking into account the currently bloated regulatory change pipeline. It is not clear whether Elexon will take into account other large scale industry projects (such as the Switching Programme, Smart Rollout, Microbusiness Strategic Review, Energy Governance Reform) as well as BAU Supplier activities as part of its migration coordination, and we have concerns that although this recommendation seeks to support a flexible approach, it is not clear on how much flexibility will be afforded to Suppliers and their agents. Small and medium sized Suppliers will require confirmation that these concerns have been taken into consideration as their often smaller Regulatory and Operational Teams are unlikely to have sufficient resource to manage the MHHS migration in addition to the existing requirements under other industry reforms. We also wish to reiterate that Elexon does not appear to have taken into account the lessons learned from P272, and the setting of 100% take-up deadlines which are not achievable.

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

Yes/ No or Response: Response

Rationale: We would like to make it clear that due to the complexity and technical nature of this recommendation, we are unable to offer a full and considered response and would welcome a consultation question which is written at a much less technical and a more principled basis. From what we could manage to ascertain from this proposal, it suggests that legacy systems for NHH settlement will be switched off from a certain date as part of migration to MHHS. If this is the case, we do not agree to this approach as this recommendation seems to assume that MHHS will have an uptake of 100%. As previously detailed, due to infrastructure issues around remote reading (amongst other issues), there is no way that MHHS will achieve a 100% uptake, and the legacy NHH settlement arrangements will still be needed.

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: N/A

Rationale: N/A

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

Yes/ No or Response: N/A

Rationale: N/A

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

Yes/ No or Response: Response

Rationale: Further detail on the Performance Assurance measures would be required for us to provide any additional areas of consideration. Where MHHS will be heavily reliant on Suppliers working with their third party metering providers, Suppliers will not be able to guarantee that they can meet their targets. Additionally, without a provided methodology on how these targets are calculated (be that a calculated methodology, an industry average or a continuous improvement approach) and how the performance assurance regime will cement its vires (be that code, legislation or SLC?), we are unable to give a more substantial view on the recommendations.

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

Yes/ No or Response: Response

Rationale: We believe that there are a number of areas that need to be considered as part of MHHS:

- Are metering agents upskilled to be able to deal with the material increase in HH meters from NHH?
- Are metering agents being engaged as part of the MHHS programme? Or does the MHHS programme assume that this is a requirement on Suppliers?
- Is there a sufficient supply chain for the provision of the required additional HH capable meters, especially in light of the global pandemic?
- With the migration of positively contributing NHH (such as AMR) being migrated to MHHS sooner than legacy meters, is the existing 97% BSC performance assurance threshold going to be revised? As based on the plan detailed in this consultation there will be an inevitable drop in Supplier performance once these early migrations take place.
- What are the explicit consumer impacts of MHHS?

