

CCDG Consultation Response Template

Date **5 July 2021**

Classification **Public**

Document owner **Elexon**

Document version **Version 1.0**

Respondent information

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

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 comment

Rationale:

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: No comment

Rationale:

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: We agree with the principle of moving CT Advanced Meters to Half Hourly Settlement earlier than the 12-month migration window outlined in Ofgem's MHHS Transition Timetable, but this is subject to some considerations outlined in the following 'Rationale' section.

Rationale: Under the recommendation to use the existing Change of Measurement Class (CoMC) process, we note that sites with CT Advanced Meters will become Measurement Class E or F.

Following the previous industry programme relating to large scale CoMC activity (P272), the CUSC was modified to amend TNUoS charging arrangements for sites that underwent a CoMC during the TNUoS charging year. This was largely driven by the fact that a change from NHH to HH settlement within a charging year would normally result in Suppliers being liable for TNUoS for part of the year as NHH and also being subject to HH charging. For sites that were NHH or Measurement Class E-G at the start of the charging year, these were charged TNUoS using the NHH methodology.

From 1 April 2017, the same principle has been applied to measurement class F and G sites but this will come to an end under the current CUSC rule on 31 March 2023. For clarity, measurement class E sites are subject to the HH methodology. This means that currently, and during the period of the CCDG recommendation, sites that undergo a CoMC within the charging year from a NHH measurement class to Measurement Class E would be charged under both the NHH and HH TNUoS methodology.

The CCDG recommendation spans the end of the current time-bound charging arrangement, and as such we believe that it may be appropriate for this to be extended. We understand that this may require both a CUSC and BSC modification.

It should also be noted that we expect changes to come into effect under the transmission demand residual (TDR) in April-23. This means that the NHH/HH distinction will still be relevant to TNUoS charging, but only be applicable to the demand locational element.

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 comment

Rationale:

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

Yes/ No or Response: We welcome the registration of export metering to improve the overall accuracy of settlement and availability of data, but we have no specific comments on the CCDG's recommendations in relation to registration/migration timings and processes.

Rationale:

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

Yes/ No or Response: Yes

Rationale: We are supportive of the recommendation for a migration plan to be set at market level and to be centrally coordinated. We would like to request that the ESO has visibility of the market level plan with DNO area granularity to support forecasting and tariff setting activities.

It is important that we have visibility of how and when volumes will move from NHH to HH settlement to provide an improved forecast of HH/NHH revenue to support TNUoS tariff setting.

Given the recommendation to begin migration of CT Advanced Meters from October 2022, it would be beneficial to begin central planning from this point. To inform TNUoS tariff setting, we would need an industry migration profile, split by DNO area, by December 2021.

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

Yes/ No or Response: We believe this recommendation requires more detailed consideration.

Rationale: We are supportive of the principle of avoiding unnecessary cost and complexity associated with operating two settlement systems in parallel, but we believe more detailed consideration is required. It would be helpful to understand what the approximate costs could be and what level of settlement accuracy at the R2 reconciliation run would be deemed acceptable.

Truncating reconciliation runs to R2 would impact BSUoS and TNUoS charging as both are reconciled at the RF run. A CUSC change would be required as part of the implementation of this recommendation as although the ESO receives R2 data, the CUSC specifies the run type that should be used for the reconciliation of charges.

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: No Comment

Rationale:

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

Yes/ No or Response: Yes

Rationale: As per our response to Question 3, we are supportive of the principle of bringing forward the migration of subgroups of metering to support the overall success of MHHS implementation.

Under the TDR, unmetered sites will be charged TNUoS based on a p/kWh arrangement irrespective of whether they are settled NHH or HH. We anticipate this to go live in April 2023.

The demand locational element will still use a different approach for NHH/HH measurement classes and so our response to Question 3 is still relevant for unmetered sites. The modifications to the CUSC following P272 did not specifically recognise measurement class D, but this may be something to be considered due to the TNUoS charging implications if sites undergo the CoMC process midway through the charging year.

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

Yes/ No or Response: No comment

Rationale:

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

Yes/ No or Response: Yes

Rationale: We think that throughout the transition period it is important for the programme to recognise links to other industry programmes running in parallel. For example, the two key charging Significant Code Reviews have interdependencies with MHHS.