

CCDG Consultation Response Template

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Respondent information

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Confidential Y/N	N		

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@elxon.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 Elxon's MHHS team at CCDGsecretary@elxon.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

In order for this work to ensure the accurate and timely population of the items, processes and timescales for the population activities must be set on a more granular level. Whilst the population of data items which are derived from other sources are more straight forward to generate, those which are newly introduced will require to be explicitly defined. AIMDA would like to fully understand those which our members will be required to participate in to generate in order that the required system changes and processes can be implemented well in advance.

Also, from the detail provided it is currently unclear if there will be two processes which need to be accommodated. Will there be one for the population and data cleanse and then a second for the new business process and the interface with the EDA?

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

There must be defined processes agreed and shared on a much more granular level to assure the accurate and timely population. AIMDA note that this is not documented as thoroughly as we would expect in order to ensure that all parties have a broad understanding of the anticipated process. We agree that a period of data cleanse in advance of the migration is not only sensible but a pre-requisite to ensure the extremely tight timescales of the project are met.

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?

Partially

De-risking the transition by moving HH-settlement capable meters into current HH arrangements ahead of transition from HHDC to ADS appears sensible.

However, the argument to mandate early HH settlement for CT Advanced meters whilst making WC advanced meters optional is weak. In the current NHH Settlement arrangements, the number of WC Advanced meters far outweighs the number of Advanced CT meters. Therefore, the overall settlement risk from the population of WC Advanced meters must be comparably higher.

As a reason not to transition the WC Advanced meters, the assertion that some of the WC advanced meters could be replaced with smart meters before MHHS transition is also very weak. Most Advanced meters are locked into MAP arrangements that act as a barrier to early replacement, and energy suppliers have their hands full installing smart meters in place of traditional meters.

AIMDA do think however, that part of the transition planning should be to assure that all CT metered sites do have Advanced meters installed.

Moving onto the obligation to ensure that all Advanced meters have working remote communications. This has merits in terms of risk management and settlement accuracy, but ultimately is not practical. There are a number of existing HH sites where remote communications are either not technically possible or commercially feasible. Local interrogation of metering is an option, with ongoing viability, and this does provide a financial incentive to establish working communications. As a counterpoint, despite the billions of pounds invested in smart metering, this communications network is not 100% universal.

A potential compromise in this area would be to encourage review on Advanced meters without communications. Perhaps when remote communications are not technically viable, any site visit (MOP or DC) should include a signal strength check? This would encourage a proactive approach to improving the prevalence of remote communications.

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

Most of the currently active Suppliers and Supplier Agents went through the P272 project; the project was rife with MPANs moving into and out of HH during CoS activities, this was often only realised when expected MTDs arrived in an unexpected format (D0268 instead of D0149/D0150 and vice versa), adding unnecessary pressure, particularly on the Supplier Agents concerned. Having closely reviewed Ofgem's Transition Timeline, the three-month period between MT10 and MT6b was picked up by all members of AIMDA as a point of concern.

We would also like reassurance that once all activities have been completed, there will not be a requirement to revert the old Settlements beyond the run off period; this point refers to the recent Elexon article 'Clarification of criteria for Non-Domestic SVA Metering Systems to be allocated to Profile Classes 3 or 4' published in June 2021 which now allows PCs 05 to 08 to be reclassified as PC 03/04, some years after the P272 deadline, 4 years before all supplies head into MHHS.

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

Yes, although challenging to execute

Consideration should be made of managing the registration and migration of export MPANs when considering the detailed design of the registration interfaces and the changed operation of SMRS to make the addition of the export MPANs easy for the industry to manage.

For example, one of the main problems for current import/export MPANs is keeping the meter operator aligned across the import and export supplier. An opportunity to improve this, both for this migration and ongoing, can be taken by building in better process support for import/export MPANs into the registration service. The data held in the registration service about the import/export MPAN relationship enables logic to be created to help facilitate this transition: ensuring that the same meter operator is appointed by both the import and export supplier; tracking the suggested 10WD /30WD obligations.

Pre-work should be done on the 870k FIT-related new MPANs to ensure a smooth transition: new MPANs created ahead of time; notified to all affected parties (including the unregistered FIT supplier); the relationship to the import MPAN created in the registration service. All of which would ease the transition process and create less potential for mistakes and errors.

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

Yes

We agree with the CCDG's initial rationale for this recommendation, however; there needs to be more supporting detail.

Migrating 31m metering systems to the MHHS TOM in 12 months will be an unprecedented challenge that requires very careful planning and robust monitoring. A key frustration in P272 was gearing up resource based on supplier migration plans which were then not adhered to or changed at very short notice. Some element of central co-ordination for the MHHS migration would help to avoid this, however; it is important for Suppliers and Agents to retain a degree of MPAN-level flexibility in their plans. Penalties for missing planned migrations should also be incorporated. Further consideration needs to be given as to who and how individual supplier and agent constraints are collated and managed to develop a central overview that is workable.

Whilst the obligations will be on suppliers to migrate MPANs to the TOM, Agents will have to handle migrations across multiple suppliers with competing priorities. Elexon needs to consider what support can be given to Agents to help manage this complicated planning exercise.

Whilst we recognise that the migration process itself will likely be architecture dependent, understanding the step-by-step process for how an MPAN migrates to the TOM, which could be different for each segment, is a fundamental part of transition that has not been outlined here.

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

Yes

Yes, though the process and parameters for both migrating and closing the old arrangements need to be clearly defined.

AIMDA can already foresee issues with deemed reads for traditional metering. With the migration of Smart/Non-Smart (M12) starting in November 2024, it is easy to believe that the non-Smart not-easily read (location/access etc.) will be weighted towards the end of the migration period resulting in a high probability of deemed reads being used to complete the as-yet-defined migration process. Will Suppliers and Supplier Agents receive a steer from the Programme Management regarding which sites to transfer first to increase the 'correction' period for deemed reads?

The closing of the old arrangements will need to be thoroughly defined and finite, if the view is that once the old arrangements are closed the Supplier will need to deal with any consumer consumption corrections 'in-house' without the assistance of the Supplier Agents, then it needs to be made clear to suppliers that any consumer refunds will come directly from the Supplier and will not be regained through Settlements.

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.

N/A

N/A

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

Yes

We agree with the CCDG's rationale for this recommendation

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

Yes

Central Systems are conspicuously absent from the list of impacted parties and should be considered "high impact". Given the importance of their role in settlement overall, we believe it would be appropriate for the new and adapted roles within Central Systems to be subject to some form of qualification and ongoing assurance process. This would

help to instil confidence that central roles are being developed within the prescribed timescales initially and then performing as expected thereafter. The existing assurance approach for Central Systems is insufficient and not transparent enough.

Similarly, the CVA market is not subject to sufficient scrutiny under current arrangements. Whilst this market is not impacted by MHHS, moving to the new arrangements could present an opportunity for this to be improved.

Considering the significant increase in settled Export volume under MHHS, separate performance assurance arrangements for Export should be explored. Commercial incentives and customer pressure may be strong enough to ensure performance is satisfactory, however; this needs to be qualified.

Consideration should also be given to how the PAF can best utilise their access to non-aggregated consumption data under the new arrangements. This could be to monitor agent performance more closely, proactively manage settlement risks, guide investigations or support the re-qualification process.

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

Yes

Not specifically but we would like to highlight the urgency of establishing the PMO to ensure that all the recommendations can be implemented as soon as possible. Similarly so that a design baseline of sufficient detail and quality can be published in April 2022.