

CCDG Consultation Response Template

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Respondent information

Your name	Terri Hamilton		
Your company	Scottish and Southern Electricity Networks (SSN)		
Type of company	DNO		
Contact details	terri.hamilton@sse.com	Phone 07747 559270	
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@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

Rationale: SSEN agrees it may be beneficial to introduce new data items early in the programme however to do this in November 2022 could cause conflicts with the Faster Switching Programme. Both MHHS and Faster Switching require changes to MPRS and to attempt further changes so soon after Faster Switching go-live could introduce risks to both projects. As the design is not due to be completed until April 2022 the timeline to have the new data items by November 2022 does not leave much headroom for development and implementation of a new version of MPRS.

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

Rationale: SSEN agrees that a data cleanse will be necessary for the programme but we would like to see the start date pushed to the right to ensure Faster Switching is complete and bedded in and a new version of MPRS is installed into a production environment to start the data cleanse. We seek further clarification on the mastering of data items, which party is going to rectify, the optimal order and the amount of effort that will be required to carry out the data cleanse.

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: SSEN agrees that following the existing CoMC process is the best solution. There may be a need to clarify expectation where the installed meter is not an advanced type!

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: This is the most pragmatic way forward and will assist in reducing costs and resources. SSEN suggests this change is impact assessed to avoid negative outcomes. This will require additional changes to systems and processes.

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

Yes/ No or Response: Yes

Rationale: Whilst we agree with the recommendation, further understanding is required on how DNO's are expected to identify and support the creation and migration of export MPAN's. As there is a significant volume of FIT unregistered exporting customers that will require export MPANs created by the DNO, the timeline of registering an export MPAN 30 WD's after the migration of the import MPAN, is a risk that cannot be mitigated until proper understanding the process all parties are taking as part of the migration process as well as the impact to downstream systems.

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

Yes/ No or Response: Yes

Rationale: As with any large migration this needs coordinating from the centre to ensure no Industry party is put under duress with too many industry flows at one time which could impact other processes.

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

Yes/ No or Response: Yes

Rationale: Ideally the runoff should continue for the full 14-month reconciliation period. However, that being said, as a Distributor we are subsequently neutral to any inaccuracies inherent by not following the full 14-month reconciliation process as any deficit or surfeit of revenue will be corrected through the recovery process. Individual Suppliers however may lose or gain depending on their portfolios and the accuracy of the settlements profiles and the accuracy of EACs vis a vis AAs in representing their customers consumption.

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: Yes, with implications as below.

Rationale: For SSEN CoMC option would result in additional monetary costs in order to ensure our system can carry out the migration, dependant on the tranche process agreed. As well as increased staffing levels during the transition period so BAU activities are not impacted. In both instances SSEN feel that our current database would allow for either option to be carried out once consultation had taken place with our system provider.

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

Yes/ No or Response: Yes, with implications as below

Rationale: SSEN agree with the need to migrate NHH MPANs as early as possible with in the timescale set out. One concern SSEN do have is the indication within the document that if the current CoMC arrangements are followed, the customers' existing energy supplier would appoint themselves to the new HH MPAN. However, customers may be in the process or have agreed a new energy contract with a different supplier, from the date of migration or just afterwards. Leading to the risk of incorrect energy supplier being appointed. SSEN further feel that the Tranches of MPAN approach as described within the consultation document may lead to customers becoming confused with the process as some will have wide ranging EAC value inventories, meaning that not all their inventories will be updated at the same time. SSEN's preference is to reuse existing MPANs for this process.

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

Yes/ No or Response: Not at this time however SSEN would like any assurance activity to be proportionate to any risk associated.

Rationale:

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

Yes/ No or Response: Yes

Rationale: The project needs to be mindful of other future changes to systems and processes e.g. Ofgem's Access and Forward-Looking Charges SCR.