

## CCDG Consultation Response Template

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### Respondent information

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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](mailto: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](mailto: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:** As explained in the paper the data items need to be created so that they can be populated and/or cleansed prior to commencement of migration. Meter Operators will be able to assist in verifying information that Distributors master, such as Connection type and import/export relationships, but it is fundamental that the 'data master' leads the population and cleansing of their 'mastered' items.

Meter Operators will also need to populate the smart MTD, which in the current arrangements will result in a change to the D0312. The validation rules applied by the Registration System will need to be reviewed and adapted to ensure we do not repeat the difficulties encountered last time the D0312 was changed.

**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:** Yes

**Rationale:** It is not clear how Meter Operators will gain visibility to the current information held in the Registration systems during the cleansing period. The ability to obtain regular updates and to be able to provide feedback to the data owner, who acts on the feedback promptly, is a pre-requisite to prevent repetitive work.

Although the bulk of the cleansing should be completed in the first 6 months to ensure the data is as clean as possible prior to setting the segment indicator, and then migration, such that only the 'difficult' cases remain to be cleansed towards the end of the period prior to migration.

**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:** To ensure the earliest possible gain to settlement accuracy. To ensure these sites are actually fitted with Advanced meters and communications equipment (in accordance with the Supplier Licence Conditions). As seen with P272 activity, there are still some 10,000 PC5-8 meters trading NHH, so it will take time, the earlier it is commenced the better.

These CT metered sites are typically the largest consuming sites to gaining the confidence of HH settlement early will de-risk the migration risks.

**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:** Building processes and/or systems to allow reversion leads to unnecessary extra cost and complexity for a limited timeframe/benefit.

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

**Yes/ No or Response:** Yes

**Rationale:** It is important that any export CT MPANs currently traded NHH undergo a CoMC at the same time as the initial CoMC activity for CT import MPANs. This will ensure both parts of the site consumption is accounted for in the HH settlement arrangements.

It is equally important that the whole current export MPANs are registered quickly. The proposal is a pragmatic approach.

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

**Yes/ No or Response: Yes**

**Rationale:** Essential that all the various roles/parties within the industry are able to cope with the volumes of change. Each party in the framework will have a constraint on volumes and this must be co-ordinated to minimise failure

The 'bookable' slots seem a sensible method to further refine and define.

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

**Yes/ No or Response: Yes**

**Rationale:** Not a great issue for our role but seems logical. The early migration of CT metering systems to the new arrangements will give the longest time possible to correct any measurement transformer ratio errors to be corrected.

**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: Not applicable**

**Rationale:**

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

**Yes/ No or Response: no applicable**

**Rationale:**

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

**Yes/ No or Response: Yes**

**Rationale:** More detail on all of the activities! Seek to focus assurance on the actions that the parties are responsible for rather than indirectly via other parties.

This along with everything to do with the MHHS Programme impacting metering companies must be a cross code activity involving the REC.

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

**Yes/ No or Response: Yes**

**Rationale:** It is good to see the proposals and there probably needs to be a series of working groups to progress the discussions with further details and any interim code changes and/or guidance to make these proposals effective.