

CCDG Consultation Response Template

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Respondent information

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Type of company	Independent Distribution Network Operator		
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Confidential Y/N	If yes, please indicate which parts of your response are confidential		

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 believe this is a prudent recommendation. However, we note that the timescales between the post-implementation of the Faster Switching reform and the introduction of the new data items is quite short and spans a few months only. This will likely cause conflicts for parties to allocate resources for designing, building, testing and implementing changes to systems and processes to accommodate the data items and activities required post Faster Switching going live.

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: While we support a data cleanse activity, we would question whether this timeline is appropriate given the concerns noted in our response to question 1.

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:

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 a prudent recommendation that avoids potential costs that reverse migration will incur. However, this requires a robust migration approach that eliminates the need for a reverse migration to the highest extent possible.

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

Yes/ No or Response: Yes

Rationale:

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

Yes/ No or Response: Yes

Rationale:

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

Yes/ No or Response:

Rationale:

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: There may be system changes required for the UMSO preferred approach but the costs involved will likely be lower than the overall resource costs incurred for approach 1 due to the pros noted in the consultation. At this time, we have not conducted a detailed assessment of these system implications.

Rationale:

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

Yes/ No or Response:

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:

Rationale:

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

Yes/ No or Response: We would encourage engagement with industry parties, particularly IDNOs, to allow for adequate inputs on the relevant timescales, and proportionality of costs/actions mandated. We have concerns on the overlap between the Faster Switching and HH settlement reform due to the significant amount of resources required to implement necessary systems and processes and believe that early engagement would aid in making the transition more streamlined.

Rationale: