

## CCDG Consultation Response Template

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### Respondent information

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Type of company	Supplier		
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Confidential Y/N	The entire response is non-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](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**

#### Rationale:

We welcome the early introduction of this subset of data items on existing interfaces, especially Smart Device ID (GUID) and the Import/Export relationship items as these would be beneficial to the industry under current market arrangements. As well as this data items such as MSMMTD (Effective from settlement date for MTD update) and the import/export relationship would assist in the progress of data cleanse activity by providing accessible data to parties.

However, we would like to be sure that the processes built around the new data items, as well as the validation, is robustly designed with exception management considered. Especially the validation of the GUID needs to take place at an industry level as well as a supplier level to ensure the accuracy of data both the DCC and SMRS.

**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**

**Rationale:**

We agree data cleanse activity is necessary prior to the migration to new MHHS systems to ensure the accuracy of data entering into any new system as well as the accurate assignment of market segments, hopefully this will reduce/remove the exceptions and delays in migration.

It is important that whilst looking at the assurance for the data cleanse activity that learnings are taken from the Switching Programme, for instance if early industry engagement is not achieved across all parties, those who took up the data cleanse from the start will continue to inherit data issues despite their efforts through customer churn.

**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**

**Rationale:**

We can see that the early transition to HH settlement through a change of measurement class for all advanced meters (WC & CT) is a 'quick win' for the MHHS programme as well as supplier parties, especially where some advanced meters may require reprogramming to enable them to function as HH meters. This will make the advanced market segment easier to migrate to MHHS systems due to HH consumption and data processing already being used.

**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**

**Rationale:**

Due to the associated costs in running both old and new settlement systems at the same time, a one-way gate to reduce this time frame is the best option, and implementing this measure from the start of migration will be the most effective means to reduce this cost. However, we would ask that the programme works closely with participants in case of exceptions during migration, as any issues will have to be amended within the new MHHS systems.

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

**Yes**

**Rationale:**

We agree the given timescales for the migration and registration of export MPANs in both cases are acceptable. However, where there are separate suppliers for import and export at one site there must be a mandated timeframe for the notification to the export supplier that the import MPAN has been migrated to ensure that they can take benefit of the full window provided.

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

**Yes**

**Rationale:**

The recommendations for the coordination of the migration to MHHS are at a very high level at this point, however we are broadly supportive of the principles laid out in the recommendations.

It is also paramount that cross code work is considered within the recommendations made for coordination, especially where a lot of change will take place, such as in the REC. This is to ensure that code managers have the support from the MHHS programme that is required to create robust processes, and the advancement of these changes are monitored by the MHHS programme. The progress of change within other industry codes impacts party readiness, therefor needs to be considered for the readiness of the programme.

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

**Yes**

**Rationale:**

Our rationale for agreeing with this recommendation is the same as in our answer to question 4; the reduction in the time operating both old and new settlement is more cost effective.

**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:**

We have not answered questions relating to unmetered supplies as we do not supply any of these, and as such are not best placed to comment.

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

**Response: No comment**

**Rationale:**

We have not answered questions relating to unmetered supplies as we do not supply any of these, and as such are not best placed to comment.

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

**Yes**

**Rationale:**

We agree that the areas laid out in the recommendation are appropriate. However cross code work should also be considered in the next phase of assurance, the rationale for this is laid out in our answer to question 6.

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

**Yes**

**Rationale:**

In constructing the timelines for transition full consideration should be given to the resources available within organisations, especially regarding the areas which are already working on large industry programmes (i.e., SMETS2, E&A, The Switching Programme). CCDG should look at these existing programmes and identify areas/times of high activity and plan around these, this will allow for the most successful delivery.