

CCDG Consultation Response Template

Date	5 July 2021	Classification	Public
Document owner	Elexon	Document version	Version 1.0

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 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, but with concerns – please see Rationale below

Rationale: We do agree with the introduction of early registration data items. However, we have concerns regarding the timetable of November 2022. This is not long after the scheduled CSS go-live window, and implementing change for another major industry programme presents a risk given potential resourcing conflicts across the industry.

In order to meet this date, the data catalogue and processing rules would need to be locked down as soon as possible. It should also be noted that in addition to changes to SMRS across 28 (I)DNOs, there are downstream (I)DNO systems that also require changing to master the data i.e. the Import/Export indicator.

The use of existing interfaces (i.e. the DTS) to populate the 28 SMRS does give some cause for concern given that every MPAN will require updates from Metering Equipment Managers and Suppliers. In addition to potentially significant data charges over the DTS, it could cause additional stress on Market Participant systems. Alternative approaches for bulk transfer processes should be given further consideration. For example, as part of the CSS programme of works, there was a requirement to master Meter Technical Details in SMRS rather than in ECOES. C&C Group extracted the data from the ECOES system and made available over secure transfer to the respective (I)DNOs to load into their SMRS via a specifically designed, developed and tested process. Every meter was successfully migrated over the course of one weekend to each of the 28 SMRS with zero data exceptions.

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: The Switching Programme has experienced a lot of issues with the data cleanse of Related MPANs, with the data quality deteriorating at times rather than improving, as customers switched. Any lessons that can be learned from that process should be considered within this cleanse exercise.

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:

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

Yes/ No or Response: Yes, but with comments on consultation wording – please see Rationale below

Rationale: We feel that the wording of the recommendation is potentially confusing, as the use of the term 'Registration' within the scope of SMRS implies a Supplier registration to an MPAN (i.e. an initial registration or switch). Our understanding is that what is intended by the recommendation is that microgeneration sites which may or may not have enjoyed FiTs subsidies will be assigned new MPANs with an Export Indicator against them.

(I)DNOs are very unlikely to have the information required to be able to identify the sites and create MPANs. Suppliers - where they have the information - will need to make the request to the 28 (I)DNOs. There is an existing process within ECOES that allows for the request of MPANs to be made, which should be considered as a recommended approach and is one that would facilitate oversight and reporting of the process from a central source.

Once the (I)DNOs have generated the MPANs, Suppliers will need to generate initial registration requests via the CSS.

It would be helpful if a timetable for when this is expected to take place is provided, as we feel that adding c.870,000 new metering points into the ecosystem via the CSS (shortly after go-live) is a risk.

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: Yes

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: Please see rationale below

Rationale: From a systems perspective, HH & NHH MPAN types are each managed quite differently in UMS systems. Examples include:

- Requirement for Equivalent/Sub-Meter for HH
- Different Associated Parties - Data Collector vs. MA
- Different style of inventory, with additional CMS attributes for HH
- Different characteristics for an NHH MPAN, e.g. MC/Profile Category/SSC/TPR

This means that the 'Approach 2 - change an existing MPAN' conversion is not necessarily straightforward and will require some pre-planning and guidance.

The process steps would likely include the need to:

1. Clear the Inventory (EACs) from the (1-4) Related MPANs in the NHH portfolio, and generate D0052 flows indicating that the NHH EAC is now zero from the EFD.
 - *Note: This step should be completed first, to avoid having EAC attributed to a Disconnected MPAN.*
2. Ensure that the supplier removes any MPAN relationships in MPRS between related MPANs (prior to disconnection).
3. Disconnect the NHH MPANs that are no longer needed.
4. Change the MC of the remaining MPAN to HH in both MPRS and UMS systems, with Supplier submitting a D0205 flow to MPRS.
5. Appoint the MA, HHDC and HHDA, by Supplier.

6. Provide the CMS and Non-CMS Sub-Meter(s) for the retained MPAN in the UMS system.
7. Receive the Inventory from Customer again, with any CMS References/Controllers which would not have been presented for NHH inventory.
8. Re-load the inventory against the correct Sub-Meters (CMS/Non-CMS).
9. Provide CMS Control and Inventory Summary Files (or the new equivalent 'UMS Inventory' DTC flow) to MA for EFD.

The process steps above are included here to illustrate that the conversion is not necessarily much easier than those required to generate a new MPAN, whereas retaining an MPAN requires careful synchronisation of changes to the MPAN between related systems (MPRS and UMS particularly).

The resulting Customer portfolio will contain disconnected NHH MPANs (with Profile Categories) and one retained and converted HH MPAN. Currently, without significant work, this would break any historical reporting which would normally be available to parties using the UMS systems.

As a system provider, we feel that a far cleaner approach would be to leave the NHH portfolio as it was (with the history intact and attributable to the appropriate MPANs), and to generate a new HH MPAN as a new start (Approach 1).

Additionally, we disagree with some of the 'Pros' quoted of using existing NHH MPANs:

- *"No need for the UMSO to establish and agree new connection agreements with customers"*

In our experience the Connection Agreement is independent of a specified MPAN so could be transferrable. The Connection Agreement generally relates to a site/inventory rather than a specified MPAN.

- *"By retaining the first profile category MPAN displayed on the current NHH Certificate and changing this to a HH profile, it would still allow a customer to arrange for any change of Supplier they may wish to carry out"*

A change of supplier could be carried out on a new MPAN too, so we do not feel this is a neutral statement.

- *"For UMSOs the existing inventory could be retained under the existing customer's portfolio, making it easier to locate historical documentation"*

We believe that leaving the original NHH portfolio as it was better supports the ability to report history. Converting one MPAN to HH loses the ability to associate it with the historical NHH profile category. UMS systems have never expected mixed NHH/HH portfolios before, and reports have been built for either NHH or HH, and not a mixture of both.

- *"Less manual activity required by the UMSO"*

The level of UMSO activity is similar considering the suggested steps above.

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

Yes/ No or Response: Yes, but with comments – please see Rationale below

Rationale: We do agree with the introduction of the new DTN flows to pass CMS Control file and Summary Inventory information to the MA (UMSDS), as this formalises the email data transfer to the MA, which was always subject to interpretation.

However, our preferred approach to consolidating UMS MPANs would be Approach 1 (i.e. requiring a new MPAN). Furthermore, this process and functionality is available for use now (as defined in BSCP520), meaning UMS CoMC activity for MHHS could start immediately without the need to raise a modification.

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

Yes/ No or Response: Response, please see Rationale below

Rationale: Will the CCDG consider assurance at a system/product level and then a 'lighter touch' approach for Market Participants who use those products, rather than each participant testing the same system E2E?

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

Yes/ No or Response: Response, please see Rationale below

Rationale: Based on our experience of the Switching Programme, we feel that if the CCDG has specific expectations on "environments" that parties are expected to provide as dedicated to the programme, then this should be stated as soon as possible. This includes SMRS, UMSO and any CSS Adaptor environments.