

## 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

**Rationale:** We support the CCDG's recommendation to introduce the required new data items and make use of existing interfaces and dataflows to support migration, in our opinion the proposed additions will generally support the required progression over the new few years to the Target Operating Model (TOM).

We believe that the Distributor master Data items proposed to be utilised in SMRS will fully enable Licensed Distribution network Operators (LDSO) to fully control the data items that influence network charging that are currently directly or indirectly influenced by the Measurement Class (MC). The introduction of the connection type aligns with introduction of the residual charging band allocations which will apply to Distribution Use of System of System (DUoS) charging from April 2022. We perceive that will rightly lead to LDSO's having complete ownership of

the master data that influences LDSO regulated network charging arrangements day to day once the TOM is enabled and the use of MCs is made redundant, therefore we are highly supportive of this part of the proposals as it removes the possibility for errors caused outside of the LDSOs direct control and so improves the LDSOs industry party liable for its regulated activates.

However it is our opinion that further considerations need to be given to ownership of errors that can influence suppliers settlement obligations outside of its control as data the LDSO uses to create the Line Loss Factor (LLF) and in turn the electrical loss values which informs settlement process currently. Although the BSC places requirements on LDSO's to assure settlement accuracy, it places the liabilities of settlement onto suppliers as described in the PSL100 document. With the introduction of the data ownership proposed we believe that this also presents an opportunity to move LDSO's requirements into formal settlement obligations, removing the supplier liability for matters outside of its control assuring that the BSC party that is responsible for informing settlement also holds accountability to the BSC.

We understand that this may be an area already under CCDG's development considerations but would like to highlight that it is our belief that this could be made possible because central systems receiving disaggregated HH metered data may also perform the processes conducted by the Data Aggregator (DA) today to include electrical values into settlement processes given that role will become de-commissioned, with the DA market role being decommissioned under the TOM the LLF arrangements may be conducted between BSCCo and the LDSO exclusively so challenges the notation that LDSO's should continue to be treated as associated supplier/supplier agent in the future.

Working on the basis that the proposals do not propose to remove any of the existing data items that are currently contained with the D0312 dataflow we are generally supportive of the proposed Meter Operator Agent (MOA) / Metering Service mastered data items and agree that the D0312 dataflow provides an appropriate vessel to update SMRS due to its existing use and believe the CCDG's assessment that most of data items can be obtained from existing NHH & HH dataflows.

Notwithstanding our general support we are not clear on what purpose including the Meter Equipment/Service Location (J1025) in the D0312 dataflow updates in SMRS provides to registration services, particularly if it is intended to be utilized across the metered market segments under the TOM due to the J-item being exclusive to today's HH market segment. it is also apparent that it is a non-mandatory data item within the D0268 dataflow as well as a free text field, so we feel it is appropriate to question if whether the value of its inclusion across metered market segments is worth the considerable level effort that introducing this data into registration services over and above the Meter Location (J0419) and Connection Type once the TOM is in place and existing services are decommissioned.

We would also like to seek further clarity on any intentions to change the D0312 over both premigration and migration to the TOM. We agree with the assessment that the data item for meter types (J0483) informs elements of today's data and therefore will form a key part of the proposed data cleanse to allocate Metering system correctly ahead of migration to the TOM, however the various meter types listed under this data item would not be needed in registration services post migration, so we take a view that meter type should be removed from the data in order to prevent data inaccuracies in SMRS post data cleanse, but would welcome further clarity from the CCDG to aide our understanding.

In terms of the proposed Supplier mastered data items and processes mastered data items proposed we are fully supportive of those proposed and agree that the D0205 dataflow is the correct vessel for suppliers' **SMRS** updates given its existing use.

**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 are supportive of the proposal to introduce a period of data cleanse over this time period. As outlined, this will provide appropriate time for the pre-requisite industry changes referred to under question 1 to be developed and implemented into industry systems and organise general readiness activities such as training staff resourcing.

Based on the current timeline we also agree that October 2023 is an appropriate point to prioritise cleansing the data items required for Market Segment allocation we believe that some of the data items proposed for registration services may not be necessary as described in response to Q1. As such we feel that further detail is provided to industry so that its clear what impacted parties' expectations are required to achieve the desired outcome.

**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?**

**No**

**Rationale:** We agree that it is appropriate to consider mandating moving NHH Current Transformer (CT) meters from NHH-HH under a mandate, support CCDG's view that Whole Current (WC) advanced meters should be not be mandated to move to HH settlement under pre-migration activities, endorse that Advanced CT metering systems should be the 1<sup>st</sup> candidates to move to HH settlement by virtue of the condition 12 of the Supplier Licence Conditions (SLCs) and share a similar view to the CCDG insofar as the existing CoMC process is a tried and tested method of moving Advanced CT metering into HH settlement and what readiness for migration to the TOM. However, we have a few concerns regarding CCDG recommendations through moving this segment from MC "A" to MC "E" under a mandate from October 2022 that are less impactful for CoMC NHH-HH into other metered MCs.

Whilst we understand the thinking that Advanced CT meters should be migrated under a mandate from October 2022 given the previous industry efforts to move NHH Profile Classes (PCs) 05-08 metering systems to HH settlement under P272 it's important to understand that it's highly likely that there are suppliers in the market that were not involved in that mandate because chosen customer offerings restricted supplying customers to customers allocated in PC 03-04. We believe that PCs have formed part of a common approach across suppliers to segment Small & Medium sized non-domestic consumers because the Competition & Markets Authority (CMA) definition includes customers PCs in its definition but the Ofgem Microbusiness definition on the supplier licence does not, so means that some non-domestic suppliers may have made efforts to only contract customers on PC01-04 but have portfolio of CT meters for which they would need to prepare for CoMC activity under a mandate.

In addition, Market participants have been required to carry substantial system changes to meet other Ofgem SCR mandates, such as Faster & more Reliable Switching (FMRS) which may have led to system overhauls or new system platforms introduced by suppliers, this may have either removed any CoMC automation that was utilised for the mass CoMC activity that P272 required under that migration mandate. With the reduction in CoMC activity reducing post P272 it is plausible that suppliers and agents need to re-establish System automation to facilitate CoMC across both WC and CT advanced metering in order to achieve the desired outcome. As such we feel it appropriate to question if the lead times proposed facilitate an appropriate period of business readiness to ensure success in moving these customers to HH settlement.

The proposed mandate to commence any CoMC activity from October 2022 does not appear to have taken into account other high profile, Authority directed/led industry reforms through either open or directed and closed SCR's, it's important to note the existence of a key dependency to successfully deliver FMRS requires suppliers to meet a

transition into the Central Switching Service around June/July 2022, with a lot of industry testing and engagement in the run up. Consequently supplier & supplier agent project resource will largely be tied up in developing and delivering the required changes under that SCR. Similarly, we believe that industry resource will be required in order to achieve Ofgem's Access & forward looking charging SCR directions, at this particular stage Ofgem has set minded to decisions on part of the reforms but has yet to inform industry on its minded to decision on the forward looking element of the customer network bill, reforms, with a likely outcome that Ofgem directs those changes around April 2024, indirectly impacting customers around the same time that the migration window to the TOM.

As outlined in response to Q1 the MC indirectly impacts the LLF and that is determined by the Line Loss Factor Class (LLFC) which determines (amongst other things) the network charging arrangements that LDSO's charge customers. Where a CoMC from MC "A" to MC "E" the DUoS tariff applicable to customers rightly changes to site specific DUoS charging, introducing new charge types and obligations on the consumer group upon the HH settlement effective from date, with the most impactful change to the customers Network bill being the introduction of capacity charges due to being a new charge and the requirements for such sites to have direct connection agreements in place with the LDSO.

This requires customers to be accurately informed when agreeing Maximum Import Capacity (MIC) as part of the connection agreement because these customers become newly visible to LDSO's as CT metering connections in SMRS where previously no connection agreement has been needed this should be done prior to the CoMC because if there is no MIC in place it results in excess capacity charges becoming immediately applicable. The penal excess capacity charge is currently in place to disincentivise Customers from breaching capacity limits agreed in the MIC so efforts must be made by industry to prevent these charges materialising in customers' network bills.

Under P272 migration changes were made to the DCUSA to defer the introduction of excess capacity charging into site-specific DUoS charging, whereby the associated modification DCUSA Change Proposal (DCP)161 was moved to cater for the market distortions that P272 taking effect would have caused, so did not get implemented until April 2018 in turn preventing the possibility of penal network charging in customer bills under that mandated migration window.

The migration of PC 05-08 customers also meant that LDSO's could be provided Maximum Demand (MD) meter readings which enabled the LDSO/customer conversation to be better informed for connection agreement purposes, whereas MD information is not shared or available to LDSO's as PC01-04s should not be providing MD reading capability on the metering systems by virtue of the PC definitions. We believe that these factors need a lot more thought to address the implications customers will face moving to HH settlement for which industry will need time to develop data solutions in order mitigate these risks and not unduly cause harm through penal DUoS charges, which could be provisioned for by using a minimum of 1 winter season data to accurately gauge MICs.

Furthermore we urge the CCDG to consider network charging reforms that have been directed by Ofgem under the Targeted Charging Review (TCR) particularly the minded to decision of CUSC Modification Proposal(CMP)343 where the authority has outlined its minded to defer residual charge reforms to Transmission Use of System (TNUoS) charges until April 2023. This will align residual charging over both Transmission & Distribution because equivalent DUoS reforms are taking effect in April 2022 as referred to in Q1, which will play a key factor in the residual charges to be recovered from customers moving from MC "A" to "E" because customers will also move from the LV no MIC to the LV MIC residual charging band by virtue of the CoMC.

Should Ofgem approve CMP343 in line with the minded to decision then it will also remove the impact caused by charging variation between NHH & HH TNUoS charges in place until the point of its implementation into the CUSC. Whilst both are kWh derived the CUSC determines that NHH (MC "A") TNUoS is recovered from consumption slots all year round, whereas HH (MC "E") annual charges are derived from the 3 highest winter peaks in national demand, known as TRIADs. Any early CoMC activity commencing under mandate October 2022 to the 31<sup>st</sup> March 2023 would cause double charging to customers caught migrating in this window because of the TRIAD charging in place for HH recovering all year round despite customers paying part of the TNUoS bill under the NHH TNUoS

charging arrangements. Ofgem's decision announcement on CMP343 is not expected until late August 2021, therefore we strongly recommend that the CCDG considers the implications that this change will have if implemented along with implications the TCR reforms are introducing to the non-domestic market. We believe that there is a strong case to delay mandatory CoMC activity so that it is not before the implementation of CMP343.

We recommend that advanced CT metering systems should not be mandated to CoMC to HH settlement no earlier than April 2023 with a mandatory CoMC period of 12 months to April 2024 because of a mix of complementary and distortive elements that would not act to reduce burdens and complexity associated with the TCR. If mandatory CoMC is introduced before CMP343. This avoids resourcing challenges that organisations are likely to have as project and programme teams cross over with FMRS as it closes down and the new switching arrangements embed across industry. Overall, this allows impacted customers and industry an appropriate period of readiness to prepare for successful NHH-HH pre-migration activity.

In our opinion the impact on the estimated 50,000 NHH CT metering systems could be significantly lessened by removing any possible overlap between the introduction of the above mentioned industry changes, and ultimately improving the perception and benefits case that the impending changes that Mandatory HH settlement will bring to this consumer group. We do not believe that delaying mandatory migration for CT advanced meters would cause any delay to the overall migration plan and migration to the TOM, and therefore urge the CCDG to reassess these proposals as we do believe that these proposals do not balance the customer detriment that would be brought against any benefits a CoMC mandate starting in October 2022 would bring.

#### **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:** E.ON/Npower are fully supportive of the proposals to introduce a one way gate from the start of migration to the new TOM in 2024, we agree with the CCDG's assessment that it would create unnecessary costs and burdens for market participants if the ability to move to the existing market arrangements is made available for activity that would prove to be counterproductive in terms of the desired outcome for the settlement reforms.

Subject to Ofgem's final decision on consumer data sharing for settlement purposes we suggest that the one gate proposal should also be extended to pre-migration CoMC activity within the non-domestic market. We believe that the authority are likely to introduce an opt out option to the domestic market through changes to SLC's towards the end of 2021 which requires the continued ability for suppliers to CoMC HH-NHH in the domestic market but as the non-domestic market will settle HH on a mandatory basis we feel that the opportunity to put in place preventative measures to stop non-domestic CT metering systems having the opportunity to move in the wrong direction, through limiting the continued ability to CoMC HH-NHH.

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

**Response:**

**Rationale:** We understand the requirements outlined to ensure that all Export (including FiT) is registered for the purposes of settlement and are in agreement that the settlement reforms present an opportunity to identify energy flows exported onto the system that are not visible under the existing settlement arrangements and support the approach to register new Export into HH settlement wherever the Import Mpan is also HH, however we have some concerns with the current proposals.

Whilst we agree that NHH Export Mpans should go through CoMC once the import Mpan is also settling HH we are unclear at this point how that is proposed to be co-ordinate and assured, it is clear that a lot more further development is needed to understand how the proposals would in practice. For example, it is difficult for us to quantify support if the 10 Working day CoMC trigger is adequate without understanding how the notifications will be made and by what means and any assurance measures that would be in place should to mitigate failures against that 10 working day notice period.

We also note the existing requirements outlined in BSCP 550 to ensure that HHDC and MOA are aligned where a single meter is providing import & export measurements for settlement purposes, we believe that this will present challenges in so far as each supplier will need to have adequate arrangements in place to ensure such agents can be appointed and support in meeting the associated BSC obligations applicable. This should be considered as part of the proposals as there is potential for delays beyond either of the SLAs to uncaught CoMC to HH or register to HH on registration.

We have deep concerns with the proposals to move export MPAN not currently registered for settlement and the customer is registered with a Supplier for the export energy and so believe this is an area whereby significant further development is needed. Our primary concerns are that the proposal appears to be unpracticable as the lack of an existing Mpan means that the import supplier would likely be unaware that export volumes are present or who the associated supplier administering a FiT scheme is. We believe this a significant flaw with this proposal as its currently described as that prevents any notion to recommend timings for HH export settlement should be registered in the new trading arrangements as there is not any ability today to assure a co-ordinated approach across suppliers.

We take note that Ofgem will consider any licence changes based on props also made by the CDDG to facilitate to movement of unidentified export power into settlement processes, however we believe that Ofgem also needs to consider changes to how the administration of the Deemed FiT tariff and scheme operates and facilitates payments to end consumers also. Under the existing FiT arrangements, customers are paid 50% of the generated power under an assumption that has been exported to the grid, however with the introduction of settlement visibility for actual exports we feel that Ofgem should also consider if such arrangements remain appropriate by virtue of actual metered data being made available in settlement which can also be used for customer payments.

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

**Yes**

**Rationale:** We agree with the CCDG's recommendation to introduce an industry-led migration plan. That plan should balance speed vs settlement accuracy so the proposals to give suppliers migration slots to migrate in over the migration window, with minimum and maximum migration thresholds sets offers suppliers a degree of flexibility to develop migration plans within these constraints.

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

**Response:**

**Rationale:** We recognise the need to ensure that industry costs are minimized by keeping the parallel running of the existing & TOM services to a shortened period. However, we do not support the proposals that cut short the existing settlement around the R2 reconciliation Run in February 2026.



As noted by the CCDG in previous consultation and more widely through the Ofgem's settlement reform SCR consultations, the primary reason for settlement runs being approximately 6 & 14 months in the existing arrangements for R3 & RF respectively is to adequately facilitate NHH settlement processes, whereby meter readings are obtained manually. Whilst it is clear that the mandate to install Smart meters requires suppliers to install smart metering systems on up to 85% of customers base progressively hitting milestones up to the end of 2024, and in turn significantly improving the meter reading process over that time, the assumption that all suppliers meet this mandate means that there is a remainder of 15% non-smart meters left there would still remain millions individual metering systems nationally.

We believe that is a significant number of metering systems that are risk of creating settlement error to manage over the runoff period, and so requires more of step change to reduce the risk of error being crystallised under old settlement arrangements. Conversely, we do not believe that it is appropriate to maintain the 14-month settlement window for the reasons outlined by the CCDG in this consultation. As such we recommend that parallel running should be based on the existing R3 settlement run, with parallel running until around the end of April 2026, we feel that strikes the right balance between industry costs incurred under parallel running and mitigating settlement risks over the run off period.

In terms of the Trading Disputes processes and proposed changes, we acknowledge the CCDGs signposting that this needs further consideration and that is more of specialist consideration that will be developed separately to CCDG. As the current proposals could create a 16 month difference between the RF & DF run types that do not offer the cash flow benefits introduced through shortened fluid settlement reconciliation window within the disputes window as that timeframe is longer than the 14 month window in place today. Therefore, we would like to take this opportunity to reinforce our belief that an additional DF run should be introduced at approx.12 months with staged materiality thresholds for disputes and very much look forward to receiving further information in the future regarding these proposals.

**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:**

**Rationale:** Noting that the previous barriers associated to DUoS charging to align to April (the start of charging year) have been removed from April 2021 as a consequence of DCP268 simplifying the UMS DUoS charging arrangements. In terms of the preferred approach of migrating NHH UMS to HH through mandatory CoMC activity from October 2023 to October 2024 this approach seems sensible in principle, however we do not support the broader proposals.

We fully recognise that by nature the NHH UMS market segment today operates on the basis information informed to and received from the UMSO and thus settlement arrangements are simpler to manage. This carries less risk of settlement occurring when compared to metered provided inventories are properly maintained, and we perceive that the approach CoMC process requiring a new MPAN to move to HH was primarily in place due to DNO constraints which we think likely stems from pre-April 2021 charging arrangements. As such we welcome CCDGs consideration to amend the UMS CoMC process under an existing NHH Mpan.

However, both approaches appear to be fraught with complexity which we do not perceive can be sufficiently aided by any automated system development. Given this, we believe that to facilitate the transition both approaches would need suppliers to facilitate the transition with manual solutions resourced through FTE to manage engagement with

UMSO's and DNO's, HHDC/DA's and Meter Administrators (MAs). These market roles attract often sizeable cost uplifts whilst supplied under HH UMS today.

In the case of HHDCs, there may be need to conduct further system changes because of the proposals to utilise the D0379/D0380 dataflows for NHH UMS once moved to HH settlement, and these may not have been factored into costs. Whilst these are the correct choice of dataflows as they offer the ability to account for settlement down to Watt hour (Wh) these are existing HH datafiles and currently they are only used in the elective HH metered market with the D0036/D0275 provisioning consumption data in the 100KW+ UMS HH market the HHDC will need to develop a systemised solution to differentiate between 100KW+ and sub 100KW HH UMS so that it knows which of the HH consumption datafile should be used under the proposals until migration to the TOM. We also consider that J-item J2207 description should be amended because its naming convention of "Smart metered period consumption". Given this naming convention it is not an appropriate Data item to describe UMS consumption.

Notwithstanding the improvements to settlement data accuracy that would be introduced to UMS created by the MA calculating settlement period level data based on the inventory information and control files, we are deeply concerned that under both CoMC proposals suppliers will be required to appoint MAs to all NHH UMS inventories and subsequently HH Mpans as part of pre-migration activity. We are of the opinion that the cost associated with appointing and utilising an MA to calculate Wh HH consumption data will be a significant increase in the cost to serve UMS customers.

Regrettably we do not support the proposals to migrate UMS to HH under today's HH UMS market arrangements are not appropriate for extremely low consuming customers on this basis, we believe that both proposals are unduly complex and question if the value that calculated data from the MA brings enough benefit to justify significant change, cost and customer disruption over the period running up the migration to the TOM, particularly given the current and future benefits that HH settlement data is very limited within the UMS market segment. We believe that the Multi-Mpan relationships that are currently in place should be addressed so that on UMS inventory means one supply number, however a much simpler, cost effective method of migrating UMS NHH to HH should be considered. This could lean on the same principles of refined or new common consumption profiles that are proposed to be developed and move these Mpans into the TOM in the same fashion proposed for moving non-smart meters into the TOM. This would reduce cost, complexity and burdens on customers and market participants whilst maintaining a simpler settlement regime which is appropriate for this market segment if plausible.

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

**No**

**Rationale:** Please see our response to Q8.

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

**Yes:**

**Rationale:** Under the existing HH settlement arrangements, Advanced Metered customers are likely to have a requirement to contract with its own supplier agents, especially Meter operator agents because of increased ongoing costs created to HH settlement under the existing BSC arrangements. This has formed common place in traditional HH I&C markets and considering the Advanced metered market segment under the TOM continues to be supplier



responsible, so is set to continue over the transition meaning such customers would want longer terms contracts and supplier agents would want to facilitate that.

Whilst this is specific to commercial arrangements between suppliers and customers, we feel that it important to highlight that such contracts will need to be changed, with existing HH customer contracts varied and new customer contracts prepared so that they take into account the transitional arrangements that have been consulted on in the new TOM. Therefore, we believe it's important that the CCDG considers this as an activity that suppliers and supplier agents need to manage through their customers relationships within the timelines proposed to ensure that the customer and settlement requirements can be appropriately facilitated. We believe that customer choice will be an important factor within this, and that this could impact on suppliers CoMC pre-migration.

Mandating obligations in the BSC to ensure that remote communications are fitted and working for CT Metered MPANs by October 2023 and for all Advanced Meters by October 2024 will require further thinking and considerations. As a principle we are supportive, however as this forms part of existing SLCs we are concerned that this could lead to overly burdensome obligations being placed on suppliers. Further efforts should be made to ensure that any obligations do not duplicate the SLC obligations with the BSC to ensure that regulatory requirements placed on suppliers are effective and thought through in the round.

In addition, Meter Operator Agents (MOAs) responsibilities will largely move into the Retail Energy Code (REC) shortly as they transition in the Meter Equipment Managers (MEMs) and become REC parties, as opposed to BSC party agents. The responsibility for rectifying and maintaining communications also moves, by virtue of the faults resolution process currently detailed in BSCP514 being incorporated into REC governance. This poses an additional layer of complexity when assuring metering obligations linked to maintaining BSC derived obligation on suppliers and also translates to an appropriate requirement on MEMs in the REC. On this basis we recommend that the CCDG gives due consideration to this through cross code working activities in the future as this changes the way the industry structures itself, challenges today's supplier hub model and so should ensure that appropriate governance and assurance arrangements are in place across the industry and applied through the code managers rules.

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

**Yes**

**Rationale:** We feel that this consultation has not contained much information towards the transitional arrangements for the Smart metered segment. Whilst we note there are several plausible reasons as to why this may be the case, the vast majority of the electricity market would ultimately transition into the this segment and so holds the highest dependencies should the conclusion of the settlement reform programme prove to be a success. With this mind we would urge CCDG to release further information and consult industry further on these arrangements prior to its final consultation on industry code legal drafting planned in Q1 2022.