

CCDG Consultation - OVO Response

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Respondent information

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Confidential Y/N	No		

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?

Response:

Rationale:

OVO are supportive of implementation of MHHS as soon as practicable. In order to meet the Programme Plan we need to see the detailed data design proposed as soon as possible, to enable us to assess the work and identify if there are any gaps in information needed. If new information (new data flows, new data items), not captured in a defined way today, is required we would welcome swift action from CCDG to publish this information. To avoid delays to the proposed timelines.

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?

Response:

Rationale:

The principle of data cleanse is sound. The issue is what is to be cleansed and when. OVO are keen to see the detailed data design and cleanse requirements to understand and assess the impact of the work and the timescales expected. To understand if these are achievable.

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?

Response:

Rationale:

OVO understands the rationale for this, noting it marries up with the requirement to ensure all domestic sites with a CT meter are advanced (AMR), are supportive and believe it is achievable.

We recommend further consideration is made;

- where there are practical physical exceptions (where not all will have operating communications). As the move poses questions around management of AMR Capable sites, that have no working comms or cannot get signal. These are BSC CoP5 to CoP10 defined meters, where we need to establish the approach to managing these non-communicative MPAN sites (CT or other).
- to develop specific load shapes for domestic AMR. To avoid inadvertent, inappropriate skewing. To represent the very different circumstances and needs of the Advance Market Segment; ranging from large Domestic, small Non-Domestic to large Non-Domestic.
- around appropriate new data items. i.e. those to identify non-operating AMR, so it is clear to all affected "Service" parties that this is a site where remote reads are not possible and the application of Load Shapes will be necessary.

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?

Response

Rationale:

We are supportive of the recommendation to introduce a one-way gate.

Allowing MPANs to move back and forth between the existing settlement regime and the new MHHS settlement arrangements, would add unnecessary complexity, requiring clear, additional, temporary, new processes to develop, fund and manage. An unnecessary distraction for parties and the BSC Code Administrator managing governance.

We understand this recommendation would shorten the Qualification period for Suppliers and "Non-Smart/Smart" Suppliers and service agents by 3 months. As we have expressed in other consultation responses, we recommend that the Programme Transition Plan is revisited not only in October 2021, but also after the full design is determined in the Spring 2022, where parties can appropriately impact assess and confirm the proposed Plan is achievable. Where any qualifications under BSC and SEC, required to be able to enter the migration slot given to you by the programme, will have completed.

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

Yes

Rationale:

OVO is supportive of this recommendation, we believe registration of metered export will result in a material increase in settlement accuracy and will help enable innovative technologies in the future.

We recommend further consideration is made on an appropriate, clear, regulatory framework (rules, data, smart communications);

- where there are practical physical exceptions (where not all will have operating communications).
- when a customer refuses to have, or pay for, operating CT metering communications.
- to ensure the underpinning Smart Energy Code provisions are fit for purpose, where used, for export, including the right data granularity/type.

to avoid the issues faced by other projects (like BSC P272) and that these are tested ahead of any decision on when to mandate a phased period of implementation.

We recommend that consideration is made to the impacts on Feed-in-Tariff (FiTs) & SEG to ensure incentives & systems are aligned.

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

Rationale:

OVO agrees with the recommendation.

We recommend more work is carried out to develop an appropriate approach and plan, once the detailed design is consulted on and an informed impact assessment by Programme Participants is carried out, for confirmation that the plan is achievable. We anticipate work to develop this will be via the new Programme Implementation Group and look forward to the opportunity to engage with these developments.

We eagerly anticipate a detailed migration plan proposal consultation. For a proposal which takes into account realistic capacity limits for all parties involved (e.g SMRS, DC/DA, CSS, DCC, Supplier) and ensures that the migration stays on track.

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

Response:

Rationale:

OVO recommends a cost benefit analysis is completed, for an informed decision. To demonstrate the benefit of stopping at R2 from an overall costs perspective vs that amount that would be over/underspent by inaccurate allocation and DC/DA costs.

We can see that allowing changes to pre-migration data up to R2 after the last migration date has the following benefits/disbenefits;

Pros -

- enables suppliers to replace incorrect / inaccurate migration reads - however they have occurred (e.g. E.T, confirmed theft).
- includes a large number of non-smart/non-operating smart sites that will have an estimate instead of an actual migration read.

Otherwise could result in: inaccurate settlement and large positive/ negative advances in the new world, which will continue to impact settlement through inaccurate estimation

Cons -

- costs of continuing existing services for NHH DC/DA.

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: N/A

Rationale:

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

Response: N/A

Rationale:

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

Response:

Rationale:

OVO agrees that additional areas should be considered as the next phase of Settlement Assurance activities.

OVO recommends consideration

- of evidence based PA levels for each market segment, through migration and upon initial migration (for a period).
- of appropriate interim levels of performance
- of a period of grace as the regime beds in. For example for the "Non-Smart/Smart" Market Segment, making evidence based adjustments for the operating Smart customers when there is consistent, proven delivery of HH Profile data in time, across the country.
- if, for the non-operating meters in the "Non-Smart/Smart" Market Segment, a mix of actual reads and load shapes will create the appropriate level of Settlement accuracy, without an unnecessary burden.
- balancing appropriate performance assurance, with reasonable costs of meeting the proposed targets and the benefit to Settlement.

OVO believes that the design should not create inappropriate, unachievable, resource intensive targets for non-communicating meters, at a detrimental cost to consumers.

OVO believes ardently in the principle that whatever Assurance is put in place does not create any perverse incentives, penalties or unintended consequences to any Programme Party. Examples include;

- those Suppliers given an early migration slot under the coordinated central plan; should not be penalised if their initial RF % under the current arrangements drops below 97%
- or Suppliers left on the old regime should not be penalised if those going early find an extraordinary performance achieved,

since neither can benefit from the other's circumstances.

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

Response:

Rationale:

OVO recommends preparation of a guides/overviews, ahead of next years consultation on the final design, on the current draft CCDG proposals/position on;

- Load Shapes; how many will be created nationally, how will these cover all customer circumstances/types (should there be different load shapes for and within different market segments, avoiding skewing shapes by vastly different loads and usage patterns), how frequently could a Supplier/Agent change a Customers Load Shape, if their usage will differ wildly (i.e. 2nd/holiday homes),
- How Settlement rules and Performance Assurance will treat meters where the input into Settlement will remain a single, billing reading taken at site (i.e. those where there the remote meter will have no operating communications, without HH Profile being recorded & no way to retrieve HH Profile data at site.

and present these at stakeholder events, to allow Programme Parties to build their understanding of how the design and the assumptions being made about how Settlement arrangements will work in practice; existing, transition and final.