

CCDG Consultation Response Template

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Respondent information

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Type of company	Supplier and Generator		
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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**

Rationale: We agree that it would be sensible to introduce new Registration Data items in advance of MHHS go-live as it will allow the proposed *Market Segment ID* to be populated for each MPAN, and in turn enable Suppliers to better understand the meter cohorts that they will be responsible for migrating to the destination MHHS market segments.

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: Broad agreement

Rationale: As per our answer to Q1, we agree that data cleansing is vital for the success of MHHS as it will significantly de-risk the migration process and support the integrity of future settlement arrangements. However, we would like to see further detail that confirms who is responsible for each data item and how the exercise will be sequenced through to the beginning of migration in October 2024.

Data cleansing is a lengthy and resource-intensive activity which invariably pulls people away from key BAU activities. Therefore, it is critical that any data cleansing activity is shared appropriately across industry rather than with a single cohort of parties. We note that the key new Registration Data items (i.e. Connection Type, Metered Indicator and Import/Export Relationship MPAN) are set to be mastered by the Distributor. We are supportive of this approach as the Distributor will remain constant throughout the data cleansing process whereas the Supplier is liable to change. However, our concern is that the Distributors will defer responsibility for completing data cleansing activity to Suppliers, as recently experienced during the Faster Switching and Targeted Charging Review programmes. We would urge the CCDG to set out industry code changes that ensure that both the accountability and responsibility for cleansing new Registration Service data items sits with the master party.

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, but with concerns around process/timing

Rationale: We agree that it is sensible to move CT Advanced Meters to MHHS early as there are likely to be lengthy and time-consuming challenges in order to ensure remote communication equipment is fitted and working.

Also, the CoMC process is extremely manual and resource intensive as experienced by Suppliers during the P272 migration. As part of a lessons learnt exercise, industry identified that a review of the process was required before the process could be used at scale again. However, we do not believe that such a review has taken place. We urge an industry working group to be convened to review the process and ensure it remains fit for purpose. In the circumstance that it still does remain suitable, 12 months still feels ambitious to complete this activity and we would instead recommend that Suppliers be permitted a minimum of 18 months (i.e. to April 2024) to complete this work.

In addition, we would also call for PARMS reporting to be relaxed following this migration period as it is likely that Suppliers' NHH settlement performance would be adversely impacted by working these higher consuming meters to HHS.

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: No

Rationale: We agree that a 'one-way gate' should be introduced for MHHS as this should provide certainty and eradicate issues experienced during the P272 migration of larger non-domestic customers.

However, we do not agree that the 'one-way gate' should be aligned from the start of the migration period given that this would immediately govern the ability of Suppliers to onboard new customers. It would disproportionately impact non-domestic Suppliers who experience large volumes of change of supply activity at the beginning of October each year. We note that Ofgem's previously outlined position was for the 'one-way gate' to be in place from February 2025, which built contingency into the delivery plan and allowed Suppliers up to 3 months more to be ready to start migration after the beginning of the 12-month period. We believe that Suppliers should be able to onboard new

customers under the existing arrangements up to February 2025, and only after this point be disallowed from registering new customers until all systems and arrangements for MHHS are in place.

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

Yes/ No or Response: Yes

Rationale: We agree that it is appropriate for all export MPANs to be registered for MHHS and agree that 10 working days is an appropriate timescale for legacy registered export MPANs to be migrated following the associated import MPAN. Our response assumes that the notifications following the migration of an import MPAN are to be issued from Central Systems rather than a data flow/other notification issued between Suppliers.

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

Yes/ No or Response: Yes

Rationale: Given that over 31 million meters will be migrated to MHHS in a 12-month period, we agree that this activity should be centrally coordinated, and that flexible guidance should be shared with Suppliers to support the development of individual migration plans.

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

Yes/ No or Response: No

Rationale: We broadly agree with most of the recommended approach, but we believe that the proposed runoff (i.e. R2) would not give Suppliers enough time to identify and rectify any outstanding settlement issues. Therefore, we believe that the runoff for the current settlement arrangements should be extended to a minimum of R3 (i.e. around 154 working days beyond the end of October 2025), particularly as the last meters to be migrated are likely to be NHH MPAN's that remain traditionally metered or are Advanced/Smart with outstanding communication issues. Therefore, Suppliers are likely to need to physically visit these sites in order to secure meter readings that reconcile their consumption under the legacy arrangements.

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: Supportive

Rationale: We are supportive of the preferred approach.

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

Yes/ No or Response: Yes

Rationale: While we have ongoing concerns with the CoMC process (see our answer to Question 3), we agree that the CoMC process should be utilised to migrate the remaining NHH Unmetered MPANs rather than the more challenging and unfamiliar option of requesting new HH MPANs to be created for all (or part) of our Unmetered portfolio.

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

Yes/ No or Response: No

Rationale: We have no further comments.

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

Yes/ No or Response: No

Rationale: We have no further comments.