

CCDG Consultation Response Template

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Respondent information

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Type of company	Party Agent
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Confidential Y/N	<i>If yes, please indicate which parts of your response are confidential</i>

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 with this recommendation. The scale of the changes seems reasonable for the proposed timescales. Having these data items early will assist in the later stages of the transition.

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: We agree with the recommendation for a period of data cleansing of the key data items in registration. The proposed timing seems sensible. We assume this activity will be primarily data centric rather than requiring site visits to confirm

information, as clearly if the suggestion is data is cleansed using site visits there would be impact on end consumers who would not be expecting these visits and energy suppliers and their agents from a cost and resourcing perspective.

More details of this data cleansing activity is required and to be published as soon as possible. In particular it should be complete by the time the changes in recommendation are published in case the cleansing activities affect how these changes are implemented.

More details on how these activities will be governed and assured to achieve the desired outcome is also required.

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: We agree with the proposal to mandate the CoMC of all CT Advanced meters to HH ahead of the migration to MHHS. Tackling these sites early will help with amount of work required during the one year of migration to MHHS.

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: We agree this proposal will reduce the complexity of the processes that need to be created for the migration to MHHS. As a party agent we appreciate this recommendation has less impact on us than on suppliers.

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

Yes/ No or Response: N/A

Rationale: From a party agent point of view the proposal would work and timings would not seem to be an issue.

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

Yes/ No or Response: Yes

Rationale: As far as the recommendations go they seem sensible, though our view is a lot more detail on how this would work is required. We believe the migration activity will be initiated by suppliers updating registration. We would expect there to be limits on the volumes all involved can handle each day. Account must also be taken with sensible caps on the volume of migration updates supplier agents can process per day.

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

Yes/ No or Response: Yes

Rationale: We believe these recommendations are beneficial to ensure the timely demobilisation of legacy systems. To enable planning for this we will also need further details on any lasting legacy requirement to retain data relating to the existing

settlement 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: N/A

Rationale: We are not a supplier

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

Yes/ No or Response: N/A

Rationale: We have no strong opinion on these recommendations.

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

Yes/ No or Response: Yes

Rationale: Assurance and the interaction of roles within the industry is changing at the moment, e.g. P332 and the move of Meter Operators and Meter Asset Managers – as Metering Equipment Managers (MEMs) into the Retail Energy Code V2.0 effective 1 September 2021. It seems likely changes will be made to how MEMs operate, and we believe the next phase of design for assurance should consider how these changes will impact MHHS assurance in each of the phases. This would need to include:-

- who is responsible for the assurance of each activity, or each part of each activity and
- who is responsible for ensuring these activities are completed?

We need to avoid duplication of assurance – does there need to be a single assurance body for the pre-migration and migration phases?

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

Yes/ No or Response: Yes

Rationale: There are concerns around the timescales to complete and confirm the design baseline. The availability of the design baseline will be critical to all the transition activities. Consideration should be given to how this is drafted and reviewed by industry. We recognise the challenges presented by having to review a large volume of design documents in a short period of time, but suggest there is an absolute need to check consistency between documents if they are released over a long period of time.

A clear plan for delivery of the design baseline is needed to enable us to start to prepare for the volume of work we know we will need to undertake.