

CCDG Consultation Response Template

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Respondent information

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Type of company	Managing the secure network for smart meters in GB		
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Confidential Y/N	N		

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@elxon.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 Elxon's MHHS team at CCDGsecretary@elxon.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: Holding the correct Registration System data is a key dependency for a smooth transition to Market Wide Half Hourly Settlements (MHHS). The majority of the items suggested for early introduction do not impact the DCC directly, however from a programmatic perspective we are supportive that these are defined and introduced at an earlier point to support migration and identify where there may be gaps in advance of it becoming an issue that may impact the wider timetable.

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: In line with our response to question 1, the quality of data held within registration systems is important for a smooth migration to MHHS. It makes complete sense for the owners/masters of these registration data items to undertake a data cleanse in advance of the migration. We would suggest some controls are introduced to support proposed data cleanse activities; these should balance ensuring industry focus against what can reasonably be expected of impacted organisations.

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: N/A

Rationale: Outside of DCC remit.

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 support the concept of a "one way gate" for the following reasons:

1. Industry cost of implementing and managing a new process for a relatively short period of time (3 months).
2. Potential data issues that may be created by MPANs that reverse migrate.
3. The new MHHS arrangement fully supports MPANs where HH data is not available and therefore should not be required.

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 are supportive of registering MPANs against small scale generation assets that are currently unregistered. As with the wider introduction of MHHS, registering these export sites is an enabler to a more flexible energy system and add to the Ofgem benefits case. We have no view on the 10WD to register existing MPANs and the 30WD to register new MPANs as this is a matter for suppliers and DNOs to comment on.

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

Yes/ No or Response: Yes

Rationale: We are supportive that migration should be coordinated at a market level and that parties impacted are given some planning flexibility. The market level migration plan should be regularly tested, updated and made available at a granular level to industry service providers like DCC that may be impacted by migration volumes so that we can best manage industry expectations.

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

Yes/ No or Response: N/A

Rationale: Outside of DCC remit.

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: Outside of DCC remit.

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

Yes/ No or Response: N/A

Rationale: Outside of DCC remit.

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

Yes/ No or Response: N/A

Rationale: Outside of DCC remit.

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

Yes/ No or Response: N/A

Rationale: N/A