

## CCDG Consultation Response Template

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### Respondent information

Your name	Euan Campbell		
Your company	Bulb		
Type of company	Supplier		
Contact details	Email <a href="mailto:ewan@bulb.co.uk">ewan@bulb.co.uk</a>	Phone	
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@elaxon.co.uk](mailto:CCDGsecretary@elaxon.co.uk) by **08:00 (8am) on 26 January 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 Elaxon's MHHS team at [CCDGsecretary@elaxon.co.uk](mailto:CCDGsecretary@elaxon.co.uk) with any questions. More information can be found on the [CCDG webpage](#)

### Question 1. Do you agree that the detailed MHHS TOM design is consistent with the Design Working Group's preferred Target Operating Model?

Yes/ No

Rationale:

### Question 2. Do you have any specific comments on the proposed set of detailed data items or associated transition requirements set out for the MHHS TOM

Comments can be in relation to any or all of the areas set out by the CCDG under Section A.

Yes/ No

Rationale:

**Question 3. Do you agree that the TOM should not include a process for correcting Settlement volumes associated with ETs?**

**Yes/ No:** No

**Rationale:** Whilst we agree that processes to correct ET settlement volumes aren't widely carried out, we believe that this cost is not equally borne across suppliers so would welcome a process (perhaps outside settlement) to allow the financials to be reconciled.

As ET gain scenarios are a function of growth, whilst ET loss scenarios are a function of portfolio size, small-but-growing suppliers lose out in this situation, whilst large-but-stable suppliers benefit. This differential is not negligible so we would welcome a provision for reconciliation.

**Question 4. What impact would the lack of a process to correct ET Settlement volumes have on your organisation?**

**Response:** Whilst we agree that processes to correct ET settlement volumes aren't widely carried out, we believe that this cost is not equally borne across suppliers so would welcome a process (perhaps outside settlement) to allow the financials to be reconciled.

**Rationale:** As ET gain scenarios are a function of growth, whilst ET loss scenarios are a function of portfolio size, small-but-growing suppliers lose out in this situation, whilst large-but-stable suppliers benefit. This differential is not negligible so we would welcome a provision for reconciliation.

**Question 5. Are there any non-Settlement reasons why your organisation would require new Related MPANs to be created in the target end state?**

Yes/ No

Rationale:

**Question 6. Do you have any specific comments on the proposed detailed processes, or associated transition requirements, set out in Section B for the MHHS TOM?**

**Yes/ No** Yes

**Rationale:** We agree that ensuring more export is registered will have most impact to reduce export usage going unsettled. However, in a scenario where the supplier loses communication with the meter, or cannot setup communication with the meter, some provision to still enter data would benefit Bulb. We'd welcome more information or detail on alternatives for the supplier in these situations.

**Question 7. Do you agree that the detailed MHHS TOM design meets Ofgem's Design and Development Principles?**

**Yes/ No**

**Rationale:**

**Question 8. Do you believe that all the major changes to the Industry Code documents required to deliver the MHHS TOM have been identified?**

**Yes/ No**

**Rationale:**

**Question 9. Do you think there are any drivers for changing the scope and/or structure of the BSCPs impacted by MHHS?**

**Yes/ No**

**Rationale:**

**Question 10. Do you have any other comments?**

**Yes/ No: Yes**

**Rationale:** Re: page 32, export MOP issue proposal.

The suggestion of forcing appointment of an incoming import MOP as an export MOP during an import switch, as well as notifying the export supplier, would help the export switching process. Fundamentally, the actual services provided by the MOP is different for import and export suppliers: export suppliers' primary use is the provision of dataflows with the import supplier expected to use the traditional MOP services (installation, maintenance, fault fixes etc.). If setting up export MOP contracts could be avoided completely for the export supplier, this would enable export suppliers to register and switch export MPANs with more ease. Any action to minimise the dependency between an export-only supplier for a given meterpoint and it's MOP would be welcomed and would increase the amount of export which is registered successfully.