

CCDG Consultation Response Template

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Respondent information

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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@elexon.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 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 that the detailed MHHS TOM design is consistent with the Design Working Group's preferred Target Operating Model?

Partially

Rationale: If the work presented in this presentation is the "detailed MHHS TOM design", then this work is consistent with the DWG's TOM, but as a body of work the detailed MHHS TOM design is incomplete, and therefore it cannot be said that it is fully consistent.

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

Rationale:

Generally, the proposals are well thought through, although IMServ has the following comments to make.

Measurement Classes – lack of detail on proposed arrangements for Performance Management and Network Charging in place of Measurement Classes, makes the detailed MHHS TOM design incomplete. Premature to decide that measurement classes are not required when it has been identified that the data item is used in these areas when no alternative approach has been proposed.

Connection Type Indicator – agree with the principle and use of the indicator but concern over data quality in this area and the impact this will have. Currently, there are sufficient errors in the information received by meter operators to indicate that data accuracy at the data source is problematic. This will lead to metering points being allocated to the incorrect market segment and require unnecessary change of market segment activities.

Industry Standing Data – Valid set of load shape categories seems to be missing entries to support non load-switched active import metering points.

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

Yes

Rationale: Agree with the CCDG view that it is unnecessarily complex to operate for the benefits

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

Response: Simplification due to the removal of the current NHH ET settlement process

Rationale: Simpler process to operate

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

No

Rationale: Agree with the view that the current single-meter, multiple MPAN arrangements for switched load can be facilitated by single meters/MPANs.

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

Rationale:

Non-Smart Meters with Switched Load – Generally understand with the principles outlined and the settlement treatment is clear for 2-rate meters. For more than 2-rate meters, more detail and clarity is required with worked examples. Is there a link to Related MPANs, and how legacy arrangements in this area should be settled under the new TOM?

Related Meters – linked to non-smart Meters with Switched Load, what is the settlement treatment for any legacy metering in this area that makes its way across to MHHS?

Domestic Customers in the Advanced Segment – TOM design does not show load shaping data being made available to the ADS for the purposes of load-shaping domestic customers with advanced meters who have opted-out of providing their HH data for settlement. Is this required?

Market-Segment Edge Cases – Where there are netting arrangements with meters in different segments (advanced and smart), how will this work across the ADS/SDS?

CT connection but no Advanced Meter fitted – no definition of “very low” numbers is provided but it is IMServ’s view that there are likely to be thousands of these across the industry at the implementation point. Is this sufficient volume to warrant a solution to this edge-case in advance?

LDSO changes the connection type/Wrong Meter is Fitted – Clearer guidance would be appreciated as to what process the industry will follow. It is not an uncommon occurrence to attend site to discover that a different type of meter is actually required (advanced or smart) due to an error in the standing data for the existing metering. It is not correct to say that the wrong meter is fitted. It is more likely to be that the data describing the meter point is wrong. The market segment should be changed to match the meter fitted. Perhaps this exception process could be explicitly defined.

Exception Reporting – Completely accepting that the TOM design will reduce data discrepancies across participants, but the proposals in this area are very light on detail. Data integrity is not guaranteed just because of advances in technology and exception reporting should be considered as part of the design not as an afterthought.

Export Metering Systems – changes to BCSP502 may be required to bring it into alignment with the thinking here for export estimation.

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

No

Rationale:

In certain areas there is insufficient detail or work done to say that the detailed MHHS TOM design meets Ofgem’s Design and Development Principles.

Notably, these areas are absent:

Data Retrieval and Processing – Determination as to how the role codes and MDR-access to DCC works is outstanding

Data estimation – Lack of consideration of large data defaulting processes in event of a large-scale disruption to the processing services

Change of Measurement Class – Absence of detailed consideration of the transitional arrangements means that it is unknown if the data migration to MHHS will be cost and time effective.

Network Charging – No work done on the future network charging regime and how it is supported by the detailed TOM designs

Transition – Little to no work done on the transition and how it is supported by the detailed TOM designs

Potential central data store of Half-hourly data – Lack of consideration of the potential future uses of this data. This topic appears to be actively avoided by the CCDG. Work on data stores has been handed off to AWG without any business requirements being set or included within this consultation.

Qualification - No work done on future qualification requirements and how it is supported by the detailed TOM designs

It is also noted that other key elements of the design have been handed-off to the AWG who have not yet consulted on their work.

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

Rationale: It looks like a sufficiently comprehensive list

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

No

Rationale: Not specifically due to MHSS and familiarity is useful. It will be interesting to see what impact REC 2.0 has on the BSCPs and whether this influences the debate in splitting BSCPs by role.

Question 10. Do you have any other comments?

Yes

Rationale: As this consultation is taking place with a partially completed design, consideration should be made whether this step should be repeated when the full design is completed, so that the design can be reviewed in its entirety.