

CCDG Consultation Response Template

Date	17 December 2020	Classification	Public
Document owner	Elexon	Document version	Version 1.1

Respondent information

Your name	Hazel Cotman		
Your company	Eastern Power Networks plc, London Power Networks plc and South Eastern Power Networks plc		
Type of company	SMRS, LDSO		
Contact details	hazel.cotman@ukpowernetworks.co.uk	07875 113028	
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 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?

Yes

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

Rationale: UK Power Networks can understand that having an accurate mapping for all Export MPANs to an Import MPAN would be a useful addition to the Settlement data. Distributors will already hold this for HH MPANs. However, Distributors do not hold this as a complete dataset for the current NHH sites. Is there a proposal for the Central Switching Service to be responsible for populating this dataset, and confirming that it is accurate and fit for purpose?

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

Yes/ No – Not applicable

Rationale: As a Distributor we are not directly impacted by ETs process for correcting the Settlement volume.

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

Response: Not Applicable

Rationale: As per our response to question 3, as a Distributor we are not directly impacted by ETs process.

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: UK Power Networks are not aware of a requirement for new Related MPANs to be created in the target end state.

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?

No

Rationale:

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

Yes

Rationale: Our reading of the design suggests that the proposal would meet the principles.

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

No

Rationale: Under the Targeted Charging Review (TCR) a significant hurdle was faced in the limitations of the volume of LLFCs being available for charging, especially for some IDNOs or DNOs operating across multiple GSP Groups. This is the case even with alpha numeric values now being available. As a result it was believed that MHHS would create an opportunity to separate the tariff charging component from the LLFC (which was originally designed to inform Suppliers about loss adjustment values) and create a new data item. Going forward the work under the SCR for Network Access and Forward Looking Charges which is still being developed, is likely to result in a considerable increase in the volume of charging rates required. UK Power Networks are aware that discussions are on-going with both the SCR's teams.

Secondly as part of the Switching and Retail Codes Consolidation SCRs the Retail Energy Code goes live on 1 September 2021. UK Power Networks would have preferred to view the highlighted changes to the REC whilst removing the code change matrices documents.

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

No

Rationale: The BSCPs remain reasonably fit for purpose.

Question 10. Do you have any other comments?

Yes

Rationale: It is important that Distributors continue to receive the Meter Technical Details (D0150/D0268) data and that they may continue to hold this as a single repository combined with the associated consumption data. This dataset provides Distributors with years of history to utilise and ensures the ability to search by Meter Serial Numbers directly (not just via MPAN). This is critically important for a variety of uses – for example tackling unregistered supplies and for addressing a whole range of data issues and queries. Distributors require more data than is currently held in SMRS as this is quite limited in scope and will remain so even with a handful of new fields being proposed within the consultation. Alongside the Meter Serial Numbers and the dates of installation and removal we will have recourse to the Make & Type, Location, Register Details, CT ratio & Pulse Multipliers, number

of Phases, comments under 'Nature of Maintenance' etc. The Meter Readings (D0010s) data is also critical to retain for Distributors. This data and the kWh per day values deriving can be key to investigating & understanding sites and resolving problems in a desktop context. There can be wider applications such as validation of sites declared as being de-energised – for example whether a nominally de-energised site is experiencing advancing reads. Metering and consumption data aspects will additionally feed into our safety inspection programmes.