

CCDG Consultation Response Template

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Respondent information

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Confidential Y/N	If yes, please indicate which parts of your response are confidential		

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

In our response to Ofgem's IA we outlined why we felt the DWG TOM was not the optimal way to implement MHHS and referred to the proposed alternative model submitted by AIMDA. Upon review, we believe that the CCDG's recommendations in this consultation are compatible with both the DWG TOM and the alternative put forward by AIMDA.

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

Yes

Measurement Classes

We understand that there may not be a requirement for Measurement Classes within Market Wide Half Hourly. However, it is difficult to provide valuable comments on their potential removal when alternative approaches to performance management and data for network charging are yet to be defined. It is important for the PAF, Parties and Agents to have a shared definition of the sites that are most material to settlement and apply the necessary performance targets and service levels. The Measurement Classes are a simple way of doing this and systems/processes across all participants have been built around them.

We would therefore support a rationalisation of the Measurement Classes to align them with the TOM Design rather than remove them entirely. Equally, we would also support any alternative approach that achieves the same outcomes for performance management. Clarity on this is required before any transition begins.

Registration Data Items

The inclusion of the "Direct Customer Contract" indicator could reduce the number of unnecessary CoAs that we as an Agent currently experience, however; we anticipate that this will be difficult to regulate effectively. Further detail on how this would be governed and by who is required.

It appears that a "Data Service ID" item is missing, which would be required. A separate "Meter Data Retriever" ID may also be required for the Smart segment so that the DCC can validate they are receiving service requests from the correct entity for a particular MPAN.

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

Yes

Considering the total settlement volumes associated with ETs, introducing a new process to deal with them could be disproportionate. Customer billing issues related to ETs can be resolved separately to Settlement.

If an ET is of sufficient materiality there is the Trading Dispute route for correction of settlement volumes.

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

Minimal

The impact to us would be minimal. The impact to our customers could be greater, however, as highlighted above this is likely to be immaterial to settlement and resolvable, from a customer perspective, through alternative means.

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

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

Non-Smart Meters with Switched Load – Please could ELEXON provide more clarity around the treatment of more complex metering arrangements (more than 2 rates and related MPANs) to ensure there is no misunderstanding about how these legacy arrangements are settled under MHHS.

Data quality issues on Connection Type – in our view this data as currently unreliable, which will lead to settlement errors, segment errors, and excessive numbers of forced change of segment processes.

Exception Reporting – Removing exception reporting on the basis that data discrepancies across participants will disappear because of the new TOM design lacks credibility. Whilst there should definitely be improvements more consideration is needed in this area. It will also place increased onus on the audit and assurance regimes to ensure that potential exceptions are not being missed by the Data service due to insufficient validation processes.

Generally, there are some omissions in the detailed design, such as a description of how network billing will operate under the new arrangements. Therefore, the design is incomplete.

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

No

Please refer to the response from AIMDA, however, for clarity we have noted it below.

We have varying views on a subset as to whether they meet Ofgem's Design and Development Principles therefore we have provided detail below on these items only

Design principles

- **Data retrieval and processing** – We do not agree that the MHHS TOM promotes a relatively simple model. We see that the one process which has been removed and moved to Central Systems in theory is slightly simpler however this is not taking into account where we are currently. In removing one role we have added in newly defined roles which will require qualification which is yet to be defined and considerable (re)development of systems and processes in order to accommodate this. There are still too many items to be defined and designed that we do not agree that this can be defined as meeting Ofgem's Design Principles.
- **Change of Measurement Class** – We do not agree that the Comment addresses the Detail. The Comment states that the TOM work should address the transition including an effective and efficient CoMC process however we believe the Comment addresses the enduring CoMC process and there is little detail on the transition therefore we do not agree that this meets Ofgem's Design Principles.
- **Transition** – We do not agree that the MHHS TOM has met Ofgem's Design Principles as we do not believe that there is enough detail on this yet and there is reliance on delivery by the CCDG in 2021.

Development Principles

- **Potential central data store of Half-hourly data** – We do not agree that Ofgem’s Development Principles have been met as whilst the CCDG agreed with the principle to deliver third-party access this is within the AWG’s remit and has not yet been defined.
- **Data and communication standards** – We do not agree that Ofgem’s Development Principles have been met as whilst the CCDG agreed with the principle to deliver standardised storage, data and communications as this is within the AWG’s remit and has not yet been defined. Our perspective on the MHHS TOM is that there are inefficiencies with the transfer and storage of such large amounts of data where MHHS could have been achieved much quicker and simpler without the need for the transfer of dis-aggregated data. AIMDA have proposed an alternative TOM which makes suggestions in ways which deal with inefficiencies in the DWG Preferred TOM.
- **Security Standards** – We do not agree that Ofgem’s Development Principles have been met as whilst the CCDG agreed with the principle to deliver Ofgem’s Data & Security Principles and this is within the AWG’s remit and has not yet been defined.

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

Most high-level changes to Industry Codes required to implement MHHS have been identified.

However, we believe the scope of required changes to the SEC are broader than implementing an MDR User Role. For instance, there should be specific MHHS performance measures for the DCC and some form of accountability to the BSC. This is the most significant external dependency of MHHS and the lack of BSC control over it is a cause for concern.

All major changes to the MRA and DCUSA appear to have been identified correctly.

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

Yes

The potential impact of REC v2.0 on the BSCPs should be closely monitored. Though this is currently limited to BSCP514, if this becomes wider then there could be drivers for altering the scope/structure of the BSCPs.

Question 10. Do you have any other comments?

No

Rationale: