

CCDG Consultation Response Template

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Respondent information

Your name	Terri Hamilton		
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Type of company	Network Operator		
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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?

Yes

Rationale: SSE agrees in principle that the target operating model is consistent and has been evaluated against the DWG's preferred solution which has been provisionally approved by Ofgem.

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: SSEN agrees with the connection type indicators as part of the market segment identifiers however, we believe that smart and non-smart meter types should have separate codes. Also, should there be a SMETs 1 and SMETs 2 code?

Adding the additional data items to the D0312 flow (MTDs) will require some development work to MPRS. This will need an impact assessment in due course.

SSEN believes with the forming of industry standing data there may be an opportunity to add further attributes making them visible to industry e.g. Maximum import and export capacity and other key attributes identified for the Access and Forward-Looking Charges SCR.

Under Ofgem approved DCUSA change DCP326 the required switch load patterns to maintain diversity in a load managed area are defined using specific MDD items (SSCs and TPRs) the development of ISD must ensure this is maintained. SSEN would like further clarification on the proposals for load managed areas. There may be impacts on non-load managed areas if GSP group codes are aligned to a single switching load regime which could impact load diversification.

Other than the above comments SSEN is in agreement with the proposal.

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

N/A

Rationale: SSEN believe this question should be responded to by Supplier parties.

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

Response: None

On the basis that ETs are likely to improve after faster switching.

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: Related MPANs are a data item owned by Suppliers.

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: Pending Supplier registrations in SMRS will require development work and will need to be impact assessed in due course.

LDSO changes connection type. SSE believes the proposed approach may lead to customer complaints. If the existing MPAN is disconnected and a new one raised the customer will need to go through the registration process for the new MPAN.

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

Yes

Rationale: The MHHS TOM is in-line with Ofgem's policies and 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?

Yes

Rationale: At this time, it appears all major changes have been identified to the Industry Code 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: With the amount of Industry change currently happening SSEN can see no driver at this time to change the scope and/or structure of the BSCPs. This could be reviewed later.

Question 10. Do you have any other comments?

No

Rationale:

