

CCDG Consultation Response Template

Date **17 December 2020**

Classification **Public**

Document owner **Elexon**

Document version **Version 1.1**

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?

Yes

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:

Market Segment

- Based on meter type and connection type – can you confirm if these items are created under CSS and if so what items are they?
- Whole current / CT flag not in SMRS just now. How would with field be created in SMRS and how would DNOs populate?

MDD tables (Page 55)

- Can more detail be provided?
- Measurement class should be listed as “needed to end of transition”
- Market role – Can you provide a clear understanding on how this will work. ScottishPower believe the industry has run out of codes, need to understand how this would work for new roles
- Profile class should be listed as “needed to end of transition”
- SSC – “Frozen and kept until at least 5 years after end of transition”
 - Why is it listed as needed up to 5 years after transition?
 - What is the justification for 5 years?

Can you please provide more detail on the Registration data items?

Customer direct contract data service

- In the document it states set by data service (i.e. DC). Can you confirm this is correct?
- How can this be the case, there is no mechanism to do it now?
- What happens on a CoT, as supplier likely to know before DS so could be left on when incorrect? Contract is at customer level so can make MPAN level usage open to error

Customer direct contract metering service

- Recommend using same term as REC and not creating another acronym that means the same thing
- See comments above on Data Service (DS)

Import / Export relationship

- We recommend CCDG create a new term and not using the word related to avoid the confusion There is currently confusion with this and can be seen on the Faster Switching Related MPAN data cleanse work

UTC = Universal Time

- This needs to be clearly defined, can more clarity be provided.

Can you please provide clarity on the impacts on Network Charging given 15 months lead in for DUoS charges?

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

Neutral

Rationale:

We understand the current process cannot be carried over into the new MHHS world. However, evidence is required to support the assumption that Faster Switching will reduce the number of ET's.

Recommendation

Could ET's for non-smart (i.e. dumb meters) still be allowed the 1kw advance? This could be possible as we still need D0086 or something similar? We would recommend Supplier abilities to recover cost at a Dual Fuel rather than solus level as we are aware this is currently unavailable in Gas.

We accept that the difference between ET timeline and settlement run and makes it very difficult to "**correct**". However, would like to note ETPAB has already recognised there is potential to reduce the ET timeline to 1 year so would recommend this is reviewed at a later date.

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

Response:

There would be no opportunity to correct and/or are unable to bill while incurring settlement costs.

Rationale:

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

It is unclear in the consultation document, if the intention is to discontinue with Related MPANS before Smart Meter installed?

If this is the expectation, SP response would be No to this question, unless a customer has a change of heating/tariff.

Rationale:

Related MPAN flag is a going to be in CSS (and is in SMRS now) so can use this long term if Related MPANs stay.

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:

Can you please provide clarity on the points noted below:

Appointment of agents

- How does this sit with CSS?
- What is the process out with CoS?

MSA / MSS

- What is the process to be qualified market participant?
- Where will it be published?
- What is the timescale to update?
- How will it be populated for go live?

Domestic customer Opt Out

- Has non -domestic customers been considered?
- What analysis has been done on numbers to fitted at a market level?

Registration – Appointments and Confirmation

- How will this work for transition?
- Will it be big bang from the start?
- Clarity on the above points would need to be confirmed soon as possible as key impact for our systems / processes.

Restricting updating MTDs to appointed MOP

- D0312 process currently does not work and has a high % of failures. We would recommendation the CCDG investigates the failure and correction rate before linking settlements processes to this flow.
- D0312 validation will become a key part of the process and we recommend this come this is moved from MPRS validation document and becomes part of a BSCP.
- We would recommend the CCDG learns from the adverse impact the D0312 has had on the allocation of PPM transactions in ECOES. Currently at £35m cannot be allocated and the figure continues to increase despite many changes to the process. Further, the ability for the previous MOP to update via D0312 was left mainly for this reason so removing that functionality will risk increasing the unallocated transaction amount.

Pending Registrations

- With new connections there is a risk that supplier picks incorrect segment, and this is only understood after meter installation. Process as written could mean it stops valid consumption entering process.
- Change of segment process seems to be adding additional steps for unclear benefits.
- Page 32 states suppliers can “**see progress in SMRS**”. This is currently impossible as suppliers do not have access to SMRS. Clarification needed on what this means as assumed supplier would still receive confirmation of meter change / installation via relevant MTD flows

Supply Number

- There will be an impact on bill design, need agreement on this as early as possible
- We would recommend this is considered outside the project to allow Ofgem to consider it at a dual fuel level

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

Yes

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:

Significant changes are required to all the BSC, BSCP and REC documents (including the new data catalogue which is currently being review under the REC consultation).

DCUSA Matrix

- Number of comments that suggest current DCUSA reference is incorrect, have these been flagged for correction?
- Number of blanks for type of change so cannot comment on everything

MRA Matrix

- We disagree with the time and effort spent detailing changes to the MRA, as these are currently under review. A more sensible approach would have been to wait for RECv2.
- The Retail Code Consolidation SCR has already highlighted parts of the MRA to move the BSC, these do not appear to have been recognised / documented
- Retrospective amendments aware the CSS will limit the scope of this and will need to tie in with that work. If there are further restrictions, it could have an impact on CSS and supplier build.

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

Yes

Rationale:

Changes to the use of the meter technical details data flows and the appointment data flows should be used as a driver to review the structure/format of the BSCP documents. There need to be a consideration of the REC documentation that is currently under review.

Question 10. Do you have any other comments?

Yes

Rationale:

We have seen considerable delays to other code programmes as the Covid-19 pandemic continues. We believe this to be a significant factor to be considered when the transition deliverables are submitted to Ofgem and implementation date confirmed.

ScottishPower believes that there are three key reasons that the MHHS Programme should be delayed:

- ⇒ Many market participants will be relying, for many of the elements of each industry change, on the same people to deliver; these key resources should not be expected to deliver MHHS programme and Faster Switching and the many other changes currently in progress concurrently.
- ⇒ MHHS programme has a dependency on Faster Switching as it will utilise some of the processes, this will have an impact on when the MHHS transition can start.
- ⇒ Covid has delayed industry and business projects as well as impacting operations presenting an unprecedented burden on people and businesses

These 3 factors present significant risk to the quality of delivery as well as to the well-being of people in the industry.

Main impacts to other Programmes to be considered:

Faster Switching – The Industry is in the middle of implementing Faster Switching, the programme has already seen delays to the original delivery date and is due to go live August 2022. Industry parties should be given reasonable amount of time to deliver the significant changes that are being proposed in the document.

Smart Meter roll out – The smart meter roll out programme has seen delayed during the lockdown and will continue to see delays related to the re-deployment of the workforce, restrictions on access, increased safety measures which will increase the time taken for each install.

The original completion date of June 2021 has been pushed out until December 2024. There is also the possibility that there will be a change in customer behaviours and less willingness to have a smart meter. These delays will increase the volume of dumb meters which will add pressure when settling within the reduced timescales and will reduce the level of benefit.

We have concerns regarding the current stability of the DCC and would want to see what plans are in place to stabilise and what contingency plans have been made if the DCC ‘falls down’. We would also want the DCC costs to be clear ahead of the final decision as these could outweigh any cost benefits.

It is in our opinion the transition to MHHS should not be any time before April 2025. This would ensure the Faster Switching Programme is fully rolled out and the DCC is stable and reliably coping with the data, smart meter roll-out (or at a significant percentage meters fitted and communicating).

Micro Business Strategic Review programme, we would like to highlight a risk that was brought to light last year during the Faster Switching programme re-planning activity. It was identified that the Ofgem Faster Switching programme and the Micro Business Strategic Review programme were not aligned and this had to be pointed out by supplier attendees to both working groups. This was acknowledged by Ofgem and needs to be considered as part of a successfully programme delivery to ensure MHHS is aligned with other industry programmes.

General comments with regards to the Consultation Document:

- Acronyms have been used without being fully defined, it was hard to understand consultation document
- Metering jobs not carried out by a MOP – specifically RPU? Have these been considered?
- MPRS validation document and becomes part of a BSCP.
- There is a need to clearly define COS reading process, particularly for non-smart meters.