ELEXON

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?

Yes

Rationale: The detailed design provided within consultation paper is consistent with the preferred operating model.

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: Registration Service Considerations

1 - A new data item or role code may need to be included within SMRS itself and issued to DCC to distinguish between a MSS or MSA service type that replaces the traditional MOP service (M).

2 -The Smart Data Services and/or Meter Data Retrieval Agent (SDS/MDR) MPID will need to be included within SMRS itself and issued to DCC to allow validation for access to smart meter data.

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

Yes

Rationale: The Ofgem Switching Programme will deliver a more reliable switching process and should reduce the number of ETs within the market. SMETS 1 metering types are unlikely to retain HH data after the initial data extract so may not be available if the same time period is required subsequently by a different supplier.

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

Response: N/A

Rationale: N/A

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

Yes/ No N/A

Rationale: N/A

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:

1 - The consultation states *'It is also worth noting the smart Meters have the ability to store up to [3] months of half-hourly export data and have a single export register.'* For SMETs 1 meters, three months of data is unlikely to be available.

2 – Change of Market Segment / Disconnection. It's likely that service requests to the DCC will be batched for efficiency. If a Supplier intends to disconnect a meter or move meters to a different market segment, the supplier may need to request separate service requests to coincide with disconnection time and extract relevant HH data for that settlement day.

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

Yes

Rationale: We support the CCDG assessment of how the detailed MHHS TOM design meets Ofgem's Design and Development 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:

We support all changes proposed by the CCDG / TABASC.

Additional documents that will need to be considered for change under the SEC modification process:

- SEC Section A.1, Definitions. Updated description of 'Meter Operator' and 'Registered Supplier Agent' / MDR will need to be introduced.
- SEC Section E2, Provision of Data. Additional requirements will need to be added to this section for the new/amended registration data items, including the MDR role information.
- Requirements for 'Provisioning MHHS specific Service Requests (SR) for the new User Role' may also require updates to:
    - SEC Appendix AD – DCC Use Interface Specification
    - DCC User Gateway Interface Design Specification

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

Yes/ No N/A

Rationale: N/A

Question 10. Do you have any other comments?
Yes
Rationale: The MHHS programme requirements for the SEC/DCC must be clear and support the development of an efficient model for HH data retrieval from smart meters. Central to this is an understanding that predictable, scheduled smart data retrieval will avoid excessive industry costs.