

## CCDG Consultation Response Template

Date **17 December 2020**

Classification **Public**

Document owner **Elexon**

Document version **Version 1.1**

### Respondent information

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Your company	Centrica		
Type of company	Supplier		
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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](mailto: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](mailto: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:** Based on the evidence reviewed in the consultation document, the detailed MHHS TOM design is consistent with the preferred Target 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:** We are in broad agreement with the proposed set of data items and note the following:

Measurement Classes - welcome the transition approach;

Registration Data Items – would recommend that the new items are reviewed as part of the programme, and incremental updates are made as appropriate;

Meter Technical Details - would suggest that further industry engagement is required to impact assess and develop the framework to progress.

Meter location – welcome the opportunity to improve existing practices.

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

**Yes**

**Rationale:** We support the rationale and note that Option 1 has the potential to be overly complex for a perceived declining number of events.

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

**Response:**

**Rationale:** We note that there are no current processes in place to manage ETs in the Half Hourly market and envisage that each ET identified under the new arrangement would be managed on a case by case basis with the other Supplier. A bilateral arrangement would be required to proceed and would suggest that a cross code workshop is instigated to set out industry principles.

**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**

**Rationale:** We are of the view that a limited number of new Related MPANs would be required in the target end state where multiple MPANs are associated for DUoS billing purposes. Agreed Supply Capacity and associated DUoS charges are applied across multiple MPANs and should the association NOT be in place, there will be a detrimental impact on customer billing, since the charges may be levied to a Supplier or Suppliers incorrectly.

**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 – would suggest that further industry engagement is required to impact assess and develop the framework to progress.

Non- smart meters with switched load – we welcome the suggested support for customers with switched load who have not yet had the opportunity to have a smart meter installed. Would suggest that the CCDG review the time limited approach to ensure potentially vulnerable customers are not disadvantaged by the new arrangements.

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

Yes

**Rationale:** The Target Operating Model is in-line with Ofgem's 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:** Based on the materials reviewed, the priority changes have been noted against the Industry Code documents.

We would suggest that this review is conducted on a regular basis throughout the programme to identify further changes as appropriate.

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

No

**Rationale:** Based on the information to date, would recommend that the scope remains constant. The amount in change in flight across the industry at present means that consistency is preferable/

**Question 10. Do you have any other comments?**

No

**Rationale:**