

CCDG Consultation Response Template

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Respondent information

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Type of company	Supplier Agent		
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Confidential N	<i>If yes, please indicate which parts of your response are confidential</i>		

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:

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.

No comment

Rationale:

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

No comment

Rationale:

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

Response: Nil

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?

No Comment

Rationale:

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:

Meter Operators would like to access the HH data for specific MPANs (to which they are appointed) to assist with:

Investigation of faults – being able to see when the fault commenced, such as a step change in energy consumption and when actual data stopped being obtained is a useful source of information during fault investigation. This information is currently available to the DC, but not to the Meter Operator. In the MHHS arrangement this consumption data should be available through a data store or similar, to assist Meter Operators to investigate and resolve meter faults in a more timely fashion, particularly as the settlement window is expect to reduce from 14 to 4 months.

Proving – the current obligations for proving metering systems relies on the DC collecting data and comparing it with similar data obtained by the Meter Operator. Giving the Meter Operator access to the data obtained by the DC will allow the Meter Operator to clarify the energy data and to check at more frequent intervals, if they wish, that the energy consumption data is aligned.

Commissioning – currently the Meter Operator does not complete commissioning until the site usage exceeds a certain value. This means that the Meter Operator collects data on an infrequent basis to check the usage at a certain sites. In the MHHS arrangement the consumption data from the DC should be available through a data store or similar, to assist Meter Operators to automate the checks to see if the consumption has exceeded certain thresholds. This will improve the efficiency of the process and allow for timely completion of the commissioning process.

Access to data – the provision of access to consumption data could enable new services to emerge. Currently DCs identify meter and communication faults and after x days report these to Meter Operators. Given access to consumption data (which differentiates between estimated and actual data) the meter Operator may determine to monitor, say high value sites, themselves so they can rapidly respond to large impact meter faults. This will improve the speed of response and associated settlement accuracy, particularly as the settlement window is expect to reduce from 14 to 4 months..

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

No

Rationale:

There is no detail about how participants pass energy consumption data between each other. Most notably the Data Services passing data to Suppliers, Distributors, Settlement, and as described above Meter Operators.

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 – at this stage

Rationale:

Over the years of being involved in the MHHS activity as each level of detail is further defined, the implications for changes in other aspects are revealed. I regard the current set and fit for purpose at this level of detail, but anticipate further opportunities for change/improvement will emerge over the years to come.

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

Yes

Rationale:

Making each BSCP cover a single role will improve the clarity of the obligations and clarify the interactions. For example the BSCP covering LDSO should be distinct and separate from the SMRS, the separate Smart and Advanced Meter Operator role BSCP should be separated. This will ensure the handoffs are explicit and simplify the Qualification requirements.

Question 10. Do you have any other comments?

Yes/ No

Rationale: