

## CCDG Consultation Response Template

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### Respondent information

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Confidential Y/N	No		

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/ No

**Rationale: Nothing in this consultation is inconsistent or changes the DWGs preferred TOM. There is still a lot of detail needed in terms of the business processes before we are able to understand what changes we will need to make.**

### 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/ No

**Rationale:** We take these details as the current view, but appreciate that changes/additions maybe required as details of the processes are refined.

It is not clear what to expect for non-settlement elements of MDD, currently MDD holds items that are not used for settlement, e.g. roles code for Green Deal. We would welcome clarification as to whether it is intended that ISD continues to do this or will these be moved into a separate MDD? This may be beyond the scope of MHHS.

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

Yes/ No

**Rationale:** As ETs do not have a direct financial impact on us as a party agent we do not feel we can comment of whether the TOM should include a process for correcting settlement volumes associated with ETs. However, we recognise the difficulty and complexity of doing this in HH data compared to the current NHH process.

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

**Response:**

**Rationale:** Not applicable, as we are not directly financially impacted by ETs.

**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

**Rationale:** Not applicable, we do not believe this question is relevant to party agents.

**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/ No

**Rationale:**

**Defaulting** – It is not clear why a load shape will be calculated for UMS AE (appendix A).

**Demand Control Events** – for the actual volumes for the disconnection event won't the load shapes be an average of the affected and unaffected mpans dependent on the geographical area the disconnection event covers? Therefore estimates based on load shapes (or other methods) for the affected MPANs will still show consumption during the disconnection event and MPANs with estimates in the unaffected by the disconnection event may show lower consumption.

**Registration** – The diagram is confusing – is SMRS the registration service? At the level described it is not clear what details a supplier would be requesting about existing services from the SMRS or why? Is this an optional part of the process? If one of the new services rejects the appointment how is the other service notified of the rejection/updated with the correct new service – do they just receive a new appointment when the replacement appoint is received from the supplier?

**Change of Segment** – Change of Connection Type, this isn't clear, is the recommendation that WC to CT is possible or that the MPAN should be disconnected and a new MPAN created. We would welcome clarification on this point.

**Exception Reporting** – from the detail here it is unclear what or where the "Technology implementations" are; as such it is hard to comment on whether these are reasonable assumptions.

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

**Yes/ No**

**Rationale:** It is not clear that Development Principle 2.1 has been met yet, in as much as there is no record of "where and how the non-aggregated data is stored", or "Consideration should also be given to the potential future uses for this data". It is not clear how this has been passed as a TOM requirement to the AWG to include in its analysis.

**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/ No**

**Rationale:** Although many changes have been identified it is not clear if where consequential changes such as alignment of billing reads on CoS have been recorded. It seems further changes may be identified as additional detail in the new settlements processes is determined.

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

**Yes/No**

**Rationale:**

The current BSCPs are largely structured by market role, although this makes it straight forward to look at what one role has to do it is not so easy to see complete processes involving multiple roles. There must be modern techniques for documenting processes once for all the involved roles but allowing viewing of only the steps relevant to a single role or group of roles. This would make documenting the new processes cleaner with less risk of mis-alignment between BSCPs. It should also make them easier to maintain in the future.

However this would presumably require new skills to author and review so perhaps introduces new risks. Keeping the existing styles may also make it easier for industry to see the changes.

We understand this is something being looked at for the REC documentation.

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

**Yes/ No**

**Rationale: No.**