

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.

Yes/ No

Rationale:

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

Yes

Rationale:

The emphasis of industry stakeholders should be to minimise the causes of ETs.

The complexity of resolving ETs is significant.

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

Rationale:

The need for Related MPANs should reduce dramatically. Smart and Advanced Meters can provide a set of HH data for settlement irrespective of individual billing registers.

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:

As the UMSDS will expand to include all the unmetered customers, to improve settlement accuracy it may be appropriate to require the UMSDS to utilise a PECU array for all customers in the GSP Group. This would not mean each customer having their own PECU Array, but would require the UMSDS to have a generic PECU Array in each GSP Group. This will aid the settlement profile for photocell controlled equipment to reflect the actual sunset/sunrise on each day rather than using default timed offsets.

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, new activities dependent on the granular settlement data.

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:

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, similarly UMSO & UMSDS 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: