

## CCDG Consultation Response Template

Date	17 December 2020	Classification	Public
Document owner	Elxon	Document version	Version 1.1

### Respondent information

Your name	Tracey Pitcher/Simon Yeo		
Your company	Western Power Distribution		
Type of company	DNO		
Contact details	Email tpitcher@westernpower.co.uk	Phone 01752 502220	
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@elxon.co.uk](mailto:CCDGsecretary@elxon.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 Elxon's MHHS team at [CCDGsecretary@elxon.co.uk](mailto:CCDGsecretary@elxon.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 consultation is based on the previously released TOM

### 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:** The Access and Forward Looking Charges SCR has yet to conclude and that may require different data items to enable Network charging. As such it would be best to keep modelling/specification as flexible as possible at this stage.

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

**Yes**

**Rationale:** The rationale is set out in the consultation document on page 30 and we agree with this rationale.

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

**Response:** none

**Rationale:** Duos billing would continue as now and not make any adjustment for ET's – this for the suppliers to agree between themselves

**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:** Smart Meters replacing the current Radio Teleswitched Meters may require two Meters if the smart Meter variants are unavailable and where NHH arrangements are still in place. If this is the case related mpans will still be required. Also the current DCUSA network charging methodology includes related mpan tariffs so that would need to be amended (potentially)

However our Duos billing system would not require any changes as it already accommodates the billing of HH related mpans

**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?**

**No**

**Rationale:**

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

**Yes**

**Rationale:**

**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 - We believe so**

**Rationale: However it may be prudent to consult with each effected code body to confirm**

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

**No**

**Rationale: We consider your assumption that industry's familiarity with the existing BSCPs means parties will have a preference for keeping the existing scope/structure is correct.**

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

**NO**

**Rationale:**