

CCDG Consultation Response Template

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Respondent information

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Confidential Y/N	If yes, please indicate which parts of your response are confidential	

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@elaxon.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 Elaxon's MHHS team at CCDGsecretary@elaxon.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

Rationale: We do feel that there would be benefits in identifying the difference between single and 3 phase supply's this data is already captured in the D0268 however not traditionally used in the D0149/D0150.

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

Yes

Rationale: We agree there is no requirement for correcting ET volumes as all consumption will be based on actual data. How this is apportioned between Suppliers can be mutually agreed.

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

Response: The Impacts will be dependant on the Solution which should be captured under the MRA / REC

Rationale: Any solution for resolving ETs should be captured under the appropriate REC schedules once they transfer from the MRA. Like the current process if the volume is below a pre agreed value then I foresee that parties will accept the volumes. For larger volumes I suspect a way for parties to mutually agree payments between themselves similar to the Debt Assignment Protocols.

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:

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: There is currently no requirements of Reactive Power within the BSC, following the Network charging SCRs there maybe a requirement to identify this power element for associated costings by market segment.

This should be a validated data item and it needs to be considered for where the governance of this element is captured and enforced.

The requirement to populate the 3 phase field on the D0268 which is mandatory. The initial population during the transition could result in Supplies being incorrectly identified if assumptions are made regarding the site.

It is also worth noting that J2251 (Currently not in use) which is the Domestic indicator is set to be derived from the Profile and Measurement Class. These elements are set to be removed as part of the transition so this J-Item would have to be derived via a different route.

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

Rationale:

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

No

Rationale: The scope needs to ensure consistency between codes and where new definitions are being used in MWHHS these need to be translated into the legacy BSC documents that remain.

We would also like to outline that the DCC has a 2 working day SLA to resolve any communication issues. This needs to be facilitated within the revised Performance Assurance Framework but Suppliers and parties cannot be penalised for failures outside of their control.

Question 10. Do you have any other comments?

Yes

Rationale:

Industry Programme Dependencies

Section E highlights a number of dependencies on other industry programmes, including those being delivered by the DCC. Based on previous experience, the DCC has a considerable history of over-commitment and under-

delivery on its critical industry programmes. On this basis it is reasonable to expect that the DCC's Re-procurement of the Data Services Provider (DSP) will also fall victim to re-planning and delay. It is unclear how significant such a delay would be to the SDS and scheduling of meter reads.

While Section E makes reference to the Faster Switching programme, no reference is made to the DCC's Transitional Change of Supplier (TCoS) to Enduring Change of Supplier (ECoS) programme. This DCC programme is expected to deliver significant changes, including replacement DCC systems and the deployment of specific credentials to operational Smart Meters in the 2022/23 time period. Based on updates to relevant BEIS and SEC industry forums, this DCC programme appears to be at an early stage, and while a DCC LC13 plan has been developed and baselined, the risk of delay and re-planning is significant.

Smart Energy Code (SEC) Changes

A range of changes to the SEC required to support the delivery of the MWHHS TOM have been identified in conjunction with the SEC Panel and the relevant SEC sub-committees. However, we support the SEC Panel position that detailed work to assess the resulting impact of these changes on critical DCC Systems remains to be completed. Given that these DCC systems currently support delivery of services to energy consumers, plus the installation and operation of SMETS1 and SMETS2 meter installations, it is critical that the impact assessment on DCC Systems is completed efficiently and to the appropriate level of detail.

We understand that changes to the SEC will be delivered by Ofgem through its powers set out in the Smart Meters Act. To avoid unintended consequences, we believe that the SEC Panel and the SEC sub-committees should have an opportunity to input to the development of these changes.

Potential Impact to DCC Operational Services

The implementation of the MWHHS TOM relies on the successful deployment revised configurations to Smart Metering Systems, notably to ensure they provide Half Hourly (HH) data. These revised configurations must be developed, fully tested and deployed in such a way that prevents disruption to critical services supported by these Smart Metering Systems. We remain specifically concerned that a poorly executed configuration or its deployment could impact our ability to accurately bill energy consumers or deliver other critical services on which our energy consumers rely upon. E.ON are aware that the SEC TABASC group have offered to support further work with Elexon and Ofgem to identify and address any residual risks in this area. Given the potential energy consumer impacts, E.ON believe it is imperative that this work progresses at pace and that any remedial actions are prioritised for design and implementation.

COVID-19

Additionally, we feel that the recent CV-19 delays to the SMART Roll-out could impact the performance levels of the overall market as less HH data would be available.