

## CCDG Consultation Response Template

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### Respondent information

Your name	Danny Byrne		
Your company	Utilita Energy		
Type of company	Supplier		
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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:** Utilita agree that the detailed MHHS TOM design is consistent with the Design Working Group's preferred Target Operating Model.

### 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**

**Rationale:** We do not have any comments on the proposed set of detailed data items or associated transition requirements set out for the MHHS TOM.

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

**Yes**

**Rationale:** Utilita agree with the CCDGs assertion that the processes currently in place for correcting Settlement volumes associated with ETs are not widely used across industry and therefore do not need to be replaced with a new process.

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

**Response:** We do not believe the lack of a process to correct ET Settlement volume will significantly impact our organisation.

**Rationale:** Current processes to correct Settlement volume after an ET are not widely used and the implementation of Faster Switching should see a reduction in ETs. The speed at which the Old Supplier will be able to re-register the customer following an ET after Faster Switching is implemented will be greatly improved and should make any erroneous Settlement volume less for the New Supplier.

**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:** Utilita do not expect to create new Related MPANs to be created in the target end state.

**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:**

- 1) Utilita agrees that any data received after the Final Settlement Run will not be process unless it is associated with a Trading Dispute. Understanding the impact and contingency/resolution within the Market-wide Data Service (MDS) of any system outage is important.

- 2) Section B details the approach for allocating Load Shapes to Non-smart Meters with Switched Load capability, however it does not sufficiently cover the processes for allocating Load Shapes to E10 and 8.5 Hr White Meter customers.

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

**Yes**

**Rationale:** Utilita agree that the detailed MHHS TOM design meets Ofgem's Design and Development Principles.

**Question 8. Do you believe that all the major changes to the Industry Code documents required to deliver the MHHS TOM have been identified?**

**No**

**Rationale:** Half Hourly MPANs are outside of the scope of MAP 10 (*The Procedure for Resolution of Erroneous Transfers*) and this has not been amended in the current drafting of the REC, which will supersede the MAP in September 2020. This is not covered in the consultation and must be amended to ensure that customers being settled half hourly are covered by the ET process.

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

**No**

**Rationale:** Currently the scope covers all areas we would expect. It is worth noting that a number of proposed process changes, for example processes around Meter Technical Details are planned to be moved over to the Retail Energy Code (REC) and will be outside of the scope of the BSC.

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

**Yes**

**Rationale:** We would like clarification on the CoS read process for meters that are not Half Hourly capable, as this is not covered in the consultation. The MRA Code Change Matrix states "*Will the D0086 still be used to send opening/closing meter readings?*" but it is not clear how this information will be sent to Suppliers if the D0086 is removed.

