

## CCDG Consultation Response Template

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### Respondent information

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Your company	Association of Independent Meter & Data Agent (AIMDA)
Type of company	Trade Association
Contact details	
Confidential Y/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](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

In our response to Ofgem's IA we outlined why we felt the DWG TOM was not the optimal way to implement MHHS and proposed an alternative model that sought to achieve the benefits of increased accessibility to disaggregated data whilst also ensuring the settlement arrangements remain optimised for cost and efficiency. Upon review, we believe that the CCDG's recommendations in this consultation are compatible with both the DWG TOM and the alternative put forward by AIMDA. Whilst there is minor variation in which entity would utilise a particular data set or process under the alternative model, the substance of the CCDG's recommendations would remain unchanged and are still applicable.

**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**

**Measurement Classes**

We understand the view that in pure settlement terms, there may not be a requirement for Measurement Classes when the entire market is Half Hourly. However, it is difficult to provide valuable comments on their potential removal when alternative approaches to performance management and data for network charging are yet to be defined. It is important for the PAF, Parties and Agents to have a shared definition of the sites that are most material to settlement and apply requisite performance targets and service levels. The Measurement Classes are a simple way of doing this and systems/processes across all participants have been built around them.

Similarly, many MOP and DC obligations and processes are defined by Measurement Class. Equivalent obligations and processes under the new arrangements need to be defined if Measurement Classes are discontinued. This would be quite a significant change, which contradicts the principle of minimising disruption to the existing HH market.

We would therefore support a rationalisation of the Measurement Classes to align them with the TOM Design rather than remove them entirely. Equally, we would also support any alternative approach that achieves the same outcomes for performance management listed above. Clarity on this is required before any transition begins.

**Registration Data Items**

The inclusion of a "Direct Customer Contract" indicator could remove a source of inefficiency in the appointments process, however; we anticipate that this will be difficult to regulate effectively and could be prone to exploitation. Underlying detail of how this will be governed and by who is required.

Current data quality around connection type is poor and this will need to be improved if much of the MHHS design will be reliant on it.

It appears that a "Data Service ID" item is missing, which would be required. A separate "Meter Data Retriever" ID may also be required for the Smart segment so that the DCC can validate they are receiving service requests from the correct entity for a particular MPAN.

**Consumption Component Classes, Industry Standing Data and Meter Technical Details**

We have no specific comments in these areas.

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

**Yes**

Considering the total settlement volumes associated with ETs, introducing an entirely new process to deal with them could be disproportionate. Customer billing issues related to ETs can be resolved separately to Settlement and as industry is striving to reduce ETs overall, introducing a settlement process that supports them seems counter-intuitive. If an ET is of sufficient materiality there is also the Trading Dispute route for correction of settlement volumes.

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

## Minimal

The impact to AIMDA member organisations would be minimal. The impact to our customers could be greater, however; as highlighted above this is likely to be immaterial to settlement and resolvable, from a customer perspective, through alternative means.

## 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

## 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

AIMDA members have various comments in the proposed detailed processes set out in section B:

**Non-Smart Meters with Switched Load** – Please could ELEXON provide more clarity around the treatment of more complex metering arrangements (more than 2 rates and related MPANs) to ensure there is no misunderstanding about how these legacy arrangements are settled under MHHS.

**Data quality issues on Connection Type** – AIMDA members view this data as currently unreliable, which will lead to settlement errors, segment errors, and excessive numbers of forced change of segment processes. Will steps be taken as part of transition to improve data quality in this area?

**Exception Reporting** – Removing exception reporting on the assumption that data discrepancies will be completely designed out seems optimistic. Even if there is sufficient assurance that participants' and central systems' view of registration are aligned, a more comprehensive suite of reports as a backstop would still be helpful – particularly in the early stages of TOM implementation. More consideration is needed in this area in the view of AIMDA members.

Generally, there are some omissions in the detailed design, such as a description of how network billing will operate under the new arrangements. Therefore, the design is incomplete.

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

### No

We have varying views on a subset as to whether they meet Ofgem's Design and Development Principles therefore we have provided detail below on these items only

#### Design principles

- **Data retrieval and processing** – We do not agree that the MHHS TOM promotes a relatively simple model. We see that the one process which has been removed and moved to Central Systems in theory is slightly simpler however this is not taking into account where we are currently. In removing one role we have added

in newly defined roles which will require qualification which is yet to be defined and considerable (re)development of systems and processes in order to accommodate this. There are still too many items to be defined and designed that we do not agree that this can be defined as meeting Ofgem's Design Principles.

- **Change of Measurement Class** – We do not agree that the Comment addresses the Detail. The Comment states that the TOM work should address the transition including an effective and efficient CoMC process however we believe the Comment addresses the enduring CoMC process and there is little detail on the transition therefore we do not agree that this meets Ofgem's Design Principles.
- **Transition** – We do not agree that the MHHS TOM has met Ofgem's Design Principles as we do not believe that there is enough detail on this yet and there is reliance on delivery by the CCDG in 2021.

#### **Development Principles**

- **Potential central data store of Half-hourly data** – We do not agree that Ofgem's Development Principles have been met as whilst the CCDG agreed with the principle to deliver third-party access this is within the AWG's remit and has not yet been defined.
- **Data and communication standards** – We do not agree that Ofgem's Development Principles have been met as whilst the CCDG agreed with the principle to deliver standardised storage, data and communications as this is within the AWG's remit and has not yet been defined. Our perspective on the MHHS TOM is that there are inefficiencies with the transfer and storage of such large amounts of data where MHHS could have been achieved much quicker and simpler without the need for the transfer of dis-aggregated data. AIMDA have proposed an alternative TOM which makes suggestions in ways which deal with inefficiencies in the DWG Preferred TOM.
- **Security Standards** – We do not agree that Ofgem's Development Principles have been met as whilst the CCDG agreed with the principle to deliver Ofgem's Data & Security Principles and this is within the AWG's remit and has not yet been defined.

#### **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**

Most high-level changes to Industry Codes required to implement MHHS have been identified.

However, we believe the scope of required changes to the SEC are broader than implementing an MDR User Role. For instance, there should be specific MHHS performance measures for the DCC and some form of accountability to the BSC. This is the most significant external dependency of MHHS and the lack of BSC control over it is a cause for concern.

All major changes to the MRA and DCUSA appear to have been identified correctly.

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

##### **No**

A logical split could be "BSCPs" (BSC Processes) and then "BSCRs" (BSC Roles). However, the existing structure is workable and changing might be an unnecessary complication.

The potential impact of REC v2.0 on the BSCPs should be closely monitored. Currently this is mostly limited to BSCP514, however; if this becomes broader then there would be a stronger driver for altering the scope/structure of the BSCPs as a whole.

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

### Yes

The CCDG have developed a range of proposals that should enhance the ultimate TOM Design. However, some aspects require further thought and supporting detail to make them fully workable. Hopefully, this will occur during the legal text drafting, which we expect will require input from a range of committees and expertise outside of the CCDG.

An area that is not considered in the TOM Design is “Asset Metering”, which will be utilised for balancing services and potentially to facilitate multiple supplier scenarios. It may be the case that they fall into separate arrangements to MHHS, however; it would be helpful for this to be confirmed and acknowledged. Asset Meters will also be included in the BSCP601 process and be serviced by the ADS – this could present a minor conflict in terminology.

An important area of the TOM Design that has not been fully considered yet is the accompanying Performance Assurance Framework. This encompasses more than performance targets – multiple new processes will need some form of assurance and monitoring. Lack of clarity on this point has made it difficult for industry to accurately estimate the potential costs of servicing the shorter settlement timetable. It would be better for this to be built into the design now rather than put in place afterwards.

The Service Requirements produced by the DWG in 2019 are a helpful indication of the obligations to be placed on the Data and Metering services, however; they are not comprehensive or finalised. Some are outdated by the CCDG’s proposals. An updated view of these obligations and how they differ between market segments and from existing HH would be beneficial for AIMDA members to begin planning system development. For example, what the requirement will be for conducting mini-MARs in the Smart segment or whether the data service needs to collect reactive energy.