

CCDG Consultation Response Template

Date **17 December 2020**

Classification **Public**

Document owner **Elexon**

Document version **Version 1.1**

Respondent information

Your name	Claire Henderson	
Your company	TMA Data Management Ltd	
Type of company	Supplier Agent	
Contact details	Claire.henderson@tma.co.uk	07841032015
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@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

Whilst we do agree that the CCDG's recommendations in the TOM design are comparable with the DWG's TOM we do not agree that this is the best way to implement MHHS. We are part of AIMDA and we believe that the alternative TOM which was put forward by AIMDA better meets the requirements.

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

With the removal of Measurement Classes and an alternative not yet defined we do not yet understand how performance will be managed. All current processes and reporting is currently built round Measurement Classes and whilst we understand the need for change, perhaps this is change for changes sake. As an agent we currently work to performance levels by Measurement Class and we had hoped for some consistency given the scale of the changes proposed. This seems like another large change which could be very disruptive. Ideally we seek clarity on the alternative.

Registration Data Items

We have no comments.

Consumption Component Classes, Industry Standing Data and Meter Technical Details

We have no comments.

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

Yes.

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

Minimal

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 – Further clarity is required in the treatment of complex metering arrangements to ensure parties are advised on legacy arrangements for settling under MHHS.

Data quality issues on Connection Type – We believe this is currently prone to error, will this be taken into account during the transition in order to improve data quality?

Exception Reporting – Whilst we understand the aim is that all and any data discrepancies will be designed out this seems extremely optimistic and we see that a level of reporting should be considered and provided.

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

No

We have provided further context below to the items which we have a further comment.

Design principles

- **Data retrieval and processing** – We do not agree that the TOM promotes a relatively simple model. The main change being removing a competitive process and re-allocating this to Central Systems does on paper appear simpler there is much complexity regarding the newly defined roles and with the requirements not yet defined we cannot say at this moment that it meets Ofgem's Design Principles.
- **Change of Measurement Class** – We do not agree that the Comment addresses the Detail. The Comments is about transition whereas the Detail hardly mentions transition.
- **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** – This is currently within the AWG's remit but has not been defined therefore we do not agree that Ofgem's Development have been met.
- **Data and communication standards** – This is currently within the AWG's remit but has not been defined therefore we do not agree that Ofgem's Development Principles have been met. We see several 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. We are supportive of the alternative TOM proposed by AIMDA which makes suggestions which deal with inefficiencies in the DWG Preferred TOM.
- **Security Standards** – This is currently within the AWG's remit but has not been defined therefore we do not agree that Ofgem's Development Principles have been met.

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

Not sure.

Whilst we believe that the major changes to the MRA and DCUSA look to have been identified along with the high-level changes to Industry Codes we believe that the required changes to SEC are broader. There seems to be little control from the BSC over the DCC and this is cause for concern given the dependency.

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

Yes/No

We believe the existing structure would work however are impartial if an alternative was proposed.

Question 10. Do you have any other comments?

Yes

We are concerned with the level of detail currently described and the amount of work still to be done. From an agent's perspective this is an extremely large change with extremely short timescales. We require detailed designs, obligations and descriptions very soon in order that we can be ready to make the changes required.