

Question 1	Do you agree with the DWG's recommended TOM as a basis for delivering Market-wide Half Hourly Settlement? <i>Please list any elements that should be changed or improved.</i>
Relevant report sections: Executive Summary, Introduction, Section 2 'Scope, design approach and the future role of the Supplier', Section 5 'Overview of the DWG recommended TOM', Section 6 'Service Overview (Summary Guide)', Attachment A 'Detailed TOM Service and Data requirements'	
Answer: Partial.	
We agree a good basis is established but require further information. DCC would welcome further detail on the flow and volume of data used in the TOM to allow us to better model the impacts on DCC capacity, particularly around the volume and periodicity of recovery of data from households and businesses. DCC encourages the implementation of a TOM that takes into account the service provisions of all DCC customers and Users, both present and future.	

Question 2	Do you agree that the DWG has identified the correct TOM, taking into account Ofgem's 'least-regrets' policy steers?
Relevant report sections: Section 1 'The Vision', Section 3 'TOM Design Principles and Strategic Objectives', Section 4 'Ofgem policy development', Attachment B 'DWG's development of the TOM'	
Answer: Yes	
We consider the Working Group has responded to the least regrets steer but at present we struggle to make a full analysis due to the high level nature of the impacts on DCC capacity, particularly the volume and periodicity of recovery of data. DCC encourages the implementation of a TOM that does not doesn't adversely impact DCC service provision to other customers.	

Question 3	Do you agree that the TOM captures all essential Settlement processes?
Relevant report sections: Section 5 'Overview of the DWG recommended TOM', Section 6 'Service Overview (Summary Guide)', Attachment A 'Detailed TOM Service and Data requirements'	
Answer: To be determined	
No comment	

Question 4	Do you agree that the DWG has identified all the required data to be processed by the three Data Services (Smart Data Service, Advanced Data Service and Unmetered Supplies Data Service)?
Relevant report sections: Section 6 'Service Overview (Summary Guide)', Attachment A 'Detailed TOM Service and Data requirements'	
<p>We can not agree. We would ask the Working Group should consider:</p> <ul style="list-style-type: none"> <li>• The TOM calls out that it intends to share HH data with other parties – Other Users and innovative new services should be the priorities as their demand is most likely to be presented as on-demand service requests</li> <li>• HHS Traffic would need to be scheduled by the DCC Data Services Provider distribute the load over the day. Without this there risks negative impacts on other Users.</li> <li>• HHS Service Request Variant's (SRV) should be in the form of daily SRV's. Monthly and aggregated periods are to be avoided as they have the greatest impact on the DCC system due to the size of the message required to transfer this data.</li> <li>• the contracts for DSP and CSP were struck before the finalised design, therefore we need to review in detail now that payloads and periodicity is clearer. Until we've reviewed with our SPs, we don't know what the actual impact would be</li> <li>• SRV's 4.6.1 and 4.8.1 account for over 50% of service traffic based on the 'Invitation to Submit Final Tender' (ISFT) contracted profiles and current service usage. These SRV's have the greatest impact on the utilisation of the service. Adding to the volume of these SRV's will impact on the spare capacity of the service, and therefore change the business case around reinforcement and scalability of the network</li> <li>• In identifying all future required data – The Working group should consider if this would include any future evolution of Electric Vehicle charge points, both domestic and public, given OLEVs forthcoming legislation of smart charging?</li> </ul>	

Question 5	Do you agree that the TOM does not hinder new market entrants, technologies and innovations?
Relevant report sections: Introduction, Section 2 'Scope, design approach and the future role of the Supplier', Section 5 'Overview of the DWG recommended TOM', Section 6 'Service Overview (Summary Guide)'	
<p>We agree the Working Group has been mindful of future innovation and the needs of new entrants to the energy market. We would also note:</p> <ul style="list-style-type: none"> <li>• Aspirations of the TOM are well aligned to DCCs licence objectives and interests of the Smart Metering Implementation Plan. We consider the TOM will be pivotal in achieving the full benefits of Smart Metering</li> <li>• At this stage it is difficult to judge how the TOM could hinder innovation. The implications of future change and the ability to build flexibility into the system architecture Should be prime considerations in the design of the TOM.</li> <li>• Whilst the TOM concept of multiple parties contracting with the end consumer may help to support market innovation, this needs to be considered in context of wider system change, managing security risks, regulatory framework, permissions and managing growth of DCC users and strain on services.</li> <li>• Note the reference to develop of data services for non-settlement purposes (public interest initiatives, academic research) – with an appropriate access regime for 3<sup>rd</sup> parties.</li> </ul>	

Question 6	Do you agree that the DWG's reduced Settlement Timetable is appropriate and achievable in the Target End State? Please identify any constraints that you believe are relevant.
Relevant report sections: Section 8 'Settlement timetable', Attachment B 'DWG's development of the TOM'	
Answer: To be determined	
<p>The timing of, and required performance levels for actual data to support reconciliation runs, and the load shaping service needs to be designed with the DCC network capacity in mind, to prevent impact over and above that originally intended in the DCC design.</p>	

Question 7	Do you agree with the DWG that participants should be able to correct Settlement Errors after the Final Reconciliation Run through Trading Disputes, and for at least 12 months after the Settlement Day (subject to an appropriate materiality threshold)? <i>Please identify the number of months and materiality threshold you believe are appropriate and why.</i>
Relevant report sections: Section 8 'Settlement timetable', Attachment B 'DWG's development of the TOM'	
Answer: No comment	
No comment	

Question 8	Do you agree that there are overall cost benefits to Parties from the reduced Settlement timetable? <i>Please identify any enduring cost implications of the proposed timescales.</i>
Relevant report sections: Section 8 'Settlement timetable', Attachment B 'DWG's development of the TOM'	
Answer: To be determined	
DCC are unable to provide a view on the overall cost benefit of the reduced settlement timetable at this stage.	

Question 9	Do you agree with the nine transition principles that the DWG intends to follow when developing its approach?
Relevant report sections: Section 10 'High level development of transitional approach'	
Answer: Yes	
<p>DCC agree the transition principles but note:</p> <ul style="list-style-type: none"> <li>Transition should be managed towards HHS. The instant transition of the market to HHS should be avoided, better that this is done over time, in case there are technical difficulties with new solutions implemented as part of model.</li> <li>During transition, data from a single meter on a given settlement day should be provided to one settlement process only.</li> </ul>	

Question 9	Do you agree with the nine transition principles that the DWG intends to follow when developing its approach?
<ul style="list-style-type: none"> <li>▪ CGI's contract to provide Data Service Providers services to the Total DCC System, is due for re tender in 2021/2022. This may add complexity to the design stage if the DSP service transitions to a new DSP provider following tender</li> <li>▪ The distribution of meters may vary regionally with higher penetration in South and Central than the North.</li> <li>▪ Faster Switching to be implemented by Q1 2021 (5 day switching)</li> <li>▪ Adoption of SMETS1 metres completion target of end 2020</li> </ul>	

Question 10	Do you have any views on the areas of design detail for further consideration?
Relevant report section: Appendix B Areas of design detail where the DWG recommends further consideration (Page 19).	
Answer: Yes	
<p>DCC maintains an independent Security team tasked with ensuring the integrity of the security solution across the DCC System. Regarding security implications of MHHS TOM we wish to note:</p> <ul style="list-style-type: none"> <li>▪ <b>Data Access and Data Privacy:</b> For the purposes of the design work at this time, we would consider it prudent for the DWG to proceed with the design of a TOM without Enhanced Privacy.</li> <li>▪ <b>Conceptual system architecture:</b> The DWG noted that any architecture for the TOM should have a robust governance layer which governed policies, role based access controls, auditing and monitoring. It was also noted that encryption of data may also be required when communicating data between the system users.</li> <li>▪ <b>General:</b> All new components will require due diligence on any new hosting/infrastructure (SOC2, ISMS etc) and applications vulnerability testing. Formal CHECK security testing and CIO assurance will be required as part of go live. Please note these as part of any timetabling.</li> </ul>	

Question 11	Do you have any further comments?
Answer: No	
<i>Please provide your comments here</i>	