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9 July 2019

Dear Sirs,

Re: Consultation Response for the DWG Transitional Approach

Thank you for the opportunity to respond. Please find attached our response to the questions posed.

DCC are committed to the development of Half hourly settlement as part of the drive to realise the full benefits of Smart Metering for Great Britain. We are committed to helping energy consumers reap the benefits of Smart Metering and take control of their energy consumption. We have asked questions in our response, these are to aid the development of the optimal model for secure and efficient metering systems.

Please feel free to contact us about any part of our response.

Kind regards,

Simon Harrison

Design Director

Q1 – Do you agree with the DWG’s proposed mapping for Metering System types to Market Segments?

Please list any elements that should amended.

We do not have any comments on the proposed mapping.

Q2 - Do you believe it is feasible to use the elective HHS process to migrate significant numbers of MPANs to HHS as an interim step in the transition process?

Please identify what changes you believe would need to be implemented to use Elective HH as an interim step and/or any issues you have noted with the current elective process which are a barrier to using it as an interim step.

It is not clear from the description of the proposals for the elective migration whether there would be an impact on the traffic/capacity of the DCC network, the potential magnitude of that impact or when it would be expected to occur. DCC would welcome any information on these details as detailed planning would need to take place. We have made the assumption that it anticipated that smart meters collecting half hourly data will be via the DCC network – with suppliers then passing it on to HH agents for submission. If this is the case, we would expect the supplier to include a potential increased frequency and volume of data to be included in their monthly forecasts submitted to the DCC in line with Smart Energy Code requirements to allow us to manage the capacity of our network.

Q3 - Do you agree with the PAF Assumptions and Principles and that all the potential impacts on the PAF have been identified?

Please identify any omissions.

DCC supports the principle that DCC service issues (such as loss of connectivity or downtime) are considered as being outside the control of Parties. We remain concerned at the potential impact of having to support or provide evidence of service incidents where parties attribute performance shortfall to those incidents. Whilst information is captured on all incidents, DCC does not currently capture the information with a view to understanding the subsequent impact on settlement performance. We would need to understand this reporting function to propose potential system changes to enable these.

Q4 - Do you agree with the phased approaches proposed for BSC and Registration Systems?

Please identify any issues and dependencies with the proposed approaches.

DCC has no concerns with the proposed phasing, but would welcome further details of the changes and timing of changes to registration systems. It has been assumed that changes to the registration systems will not impact the design of the faster switching systems and services – but DCC is not aware of any central review of the target operating models for MHHS and faster switching, as well as all other major code and infrastructure changes to ensure dependencies or duplications are understood.

Q5 - Do you agree with the phased approach proposed for the Smart and Non-smart Market Segment?

Please identify any issues and dependencies with the proposed approach.

DCC notes the requirement for a new DCC user role type to support the target operating model, this could represent quite a significant change to DCC systems and will need to be planned into our release schedule, so resolving the detail of these requirements should be a priority. Changes to the SEC would also be required and should be progressed in concert with development work.

We anticipate the collection of half hourly data for settlement will have a significant impact on the way DCC provides services to its customers. Having clear and accurate forecasts of messaging traffic as early as possible, will enable us to establish the scope and implications of that impact on the system and our service providers. Any further clarity on the proposal for migration of the segments seeking to utilise DCC services is of paramount importance in order for us to have the clearest view of the demand on our systems. .

Q6 - Do you agree with the phased approach proposed for the Advanced Market Segment?

Please identify any issues and dependencies with the proposed approach.

DCC will need to understand how many of the MPANs with Advanced Meters (over 1.3m at present) are expected to migrate to the central HH system. How many would remain in NHH and therefore potentially communicate as if in the Smart segment? Would ability to change profile remain? For how long? The volume of MPANs in this segment could be significant, especially if there is uncertainty over what will happen.

Q7 - Do you agree with the phased approach proposed for the Unmetered Market Segment?

Please identify any issues and dependencies with the proposed approach.

DCC has no comments on the proposals for the Unmetered Segment.

Q8 - Do you agree that the critical path captures all the key activities and dependencies?

Please identify any omissions, issues and dependencies with the proposed approach.

DCC notes that the critical path refers mainly to changes to central and settlement systems and roles, no dependencies on DCC capabilities form part of the plan. The assumptions relating to smart meter deployment and DCC capacity notwithstanding, we consider that the critical path has to reference DCC readiness. A critical path for the entire Settlement Reform SCR should be completed as soon as practicable.

Q9 - Do you agree with the DWG's proposed approach for transitioning to the revised Settlement Timetable?

Please identify any issues with the proposed approach.

DCC views that the Settlement Timetable itself, and the potential volumes of data required to support performance levels, is more material than when the new timetable is introduced. However, if adoption of the reduced timetable would result in step changes to demand on DCC systems, then we would seek to be a key party to discussions on the plans for transition. Our concerns remain conflicts with changes to faster switching, we consider that all market participants will share those concerns as proprietary systems require upgrading alongside DCC systems.

Q10 - Do you agree that the DWG's proposed Dispute Timetable and approach to materiality strikes an appropriate balance between shortening timescales and correcting material Settlement errors?

Please identify any issues or risks with the proposed approach.

DCC has no comments on the proposals for the Dispute Timetable.

Q11 - Do you agree that the DWG's proposed transition approach aligns with the nine High Level Transition Principles set out for the transition approach?

Please identify any areas of the approach that do not align with the principles.

We have no comments.

Q12 - Do you have any other comments?

We have no further comments.