

DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

CONSULTATION RESPONSE FORM

Respondent information		
Your name	Dermot Hearty	
Your company	Salient Systems Limited	
Type of company	System Solutions Provider – HHDC, HHDA, HHMO, NHHDC, NHHDR, NHHMO	
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Confidential Y/N	<i>N</i>	

Please:

- Email your response to dwgsecretary@elexon.co.uk by **08:00 (8am)** on **8 July 2019**, using the subject line 'DWG transition consultation response'.
- Use this response form where possible to make it easier for the DWG to identify and summarise views.
- Provide supporting reasons for your answers to help the DWG 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 DWG. However, Ofgem will see all responses in full. We encourage you to provide non-confidential responses where possible, to inform the DWG's discussions.
- Email ELEXON's MHHS team at dwgsecretary@elexon.co.uk with any questions.

The DWG will consider your responses and deliver its final report to Ofgem during summer 2019.

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Question 2

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.

Answer: Yes; but without any need to assume that EHSS must be positioned formally as an interim step in the transition process; rather, EHSS of itself will continue to provide significant and increasing value and benefit right up to transition to MHSS.

The Transitioning consultation document identifies a set of Transition Pre-Requisite events that must have occurred before transition to MHSS can begin (Faster Switching, REC V2, etc).

Given the long lead times attached to delivery of pre-requisites and given the significant effort expended to date by industry participants and Ofgem together to deliver and operate EHSS from mid 2017 onwards then it is indeed expected that Ofgem will be keen to achieve commitment from DWG to consolidate and perhaps even to extend the EHSS value proposition throughout the lengthy transition period.

We are not convinced, however, that EHSS would benefit from positioning as a formal interim step in the transition process. Rather, EHSS should be viewed as a coherent set of processes in their own right which are capable of achieving the benefits of HHS at supplier serviced metering systems.

Over the lengthy transition to full MHSS there will continue to be an acceleration of NBM's that will be enabled through HH data, an acceleration at Smets2 rollout and an accelerated Smets 1 adoption schedule at DCC – a continually improving landscape for the positioning of EHSS processes and benefits.

Over this period Suppliers, metering agents and industry systems solution providers will work together within the constraints of current codes and agreed procedures to agree and position attractive and effective EHSS service model architectures – irrespective of MHSS transition progress.

Over the transition period there will also likely be improved and discrete processes or facilities that become available through TOM or related developments that may improve or complement EHSS service architectures. However, imposing change upon EHSS processes over the transition period so that those processes become an evolving 'interim' stage of transition to MHSS should be avoided. Evolving and effective service architectures at EHSS should be encouraged to adopt new or extended facilities as they arise rather than compromised by imposing additional or consequential constraints upon existing working architectures.

At the start of the real transition to MHSS a considerable volume of metering systems will be expected to be managed by EHSS processes and any further transition from EHSS to MHSS will be expected to be very manageable.