

# DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

## CONSULTATION RESPONSE FORM

Respondent information		
Your name	Paul Farmer	
Your company	Shell Energy Retail Ltd	
Type of company	Energy Supplier	
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Confidential Y/N	If yes, please indicate which parts of your response are confidential	

Please:

- Email your response to [dwgsecretary@elexon.co.uk](mailto: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](mailto:dwgsecretary@elexon.co.uk) with any questions.

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

Question 1	Do you agree with the DWG's proposed mapping for Metering System types to Market Segments?
<b>Please list any elements that should amended.</b>	
Answer: Yes	

# DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

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?
<b>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.</b>	
Answer: No	
<i>We agree with Elexon's point that using Elective Half Hourly for TOM transition will add implementation costs to Market-wide Half Hourly transition, and we are struggling to see what the overall value gained would be in the context of the TOM transition. Plus, the DWG's TOM transition approach does not create any barriers to using the elective process if participants wish to. Also the downgraded Elective Half Hourly settlement performance standards which currently exist make it hard to support this interim step, on the basis of that the transition should not degrade the quality of settlement data.</i>	

Question 3	Do you agree with the PAF Assumptions and Principles and that all the potential impacts on the PAF have been identified?
<b>Please identify any omissions.</b>	
Answer: Yes	
<i>The principals are reasonably high level and we support this development approach.</i>	
<i>We would suggest that the 3rd Transition Pre-requisite point of "A reasonable percentage of smart Meters rolled out" is further qualified so that it reads</i>	
<i>A reasonable percentage of smart Meters rolled out with a reasonable percentage of meters returning daily scheduled 48 HH data. Reliably and consistently to supplier systems in reasonable time after midnight of the following day, so that HH consumption data can be processed out of hours (prior to normal working hours).</i>	
<i>Perhaps long winded, but we should not assume that just having smart meters means that the HH data will be available when it is wanted.</i>	
<i>This sort of issue is reasonably reflected in the PAF Assumptions and Principles. However, the complexity of new infrastructure and evolving commercial arrangements will mean applying well targeted and reasonable assurance measures an extremely difficult one.</i>	

## DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

Question 4	Do you agree with the phased approaches proposed for BSC and Registration Systems?
<b>Please identify any issues and dependencies with the proposed approaches.</b>	
Answer: Yes	
<i>Please provide your reasons here</i>	

Question 5	Do you agree with the phased approach proposed for the Smart and Non-smart Market Segment?
<b>Please identify any issues and dependencies with the proposed approach.</b>	
Answer: Yes	
<i>Please provide your reasons here</i>	

Question 6	Do you agree with the phased approach proposed for the Advanced Market Segment?
<b>Please identify any issues and dependencies with the proposed approach.</b>	
Answer: -	
<i>Please provide your reasons here</i>	

Question 7	Do you agree with the phased approach proposed for the Unmetered Market Segment?
<b>Please identify any issues and dependencies with the proposed approach.</b>	
Answer: -	
<i>Please provide your reasons here</i>	

## DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

Question 8	Do you agree that the critical path captures all the key activities and dependencies?
<b>Please identify any omissions, issues and dependencies with the proposed approach.</b>	
Answer: Yes	
<i>As per question 3, we agree with the high level outline at this moment in time. However it is important to keep unforeseen challenges that will arise, well communicated and monitored in the round. Transformational change may require a more agile and proactive Elexon role for example, as the TOM roll out progresses.</i>	

Question 9	Do you agree with the DWG's proposed approach for transitioning to the revised Settlement Timetable?
<b>Please identify any issues with the proposed approach.</b>	
Answer: Yes	
<i>As per question 8</i>	

Question 10	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?
<b>Please identify any issues or risks with the proposed approach.</b>	
Answer: Yes	
<i>As per question 8</i>	

Question 11	Do you agree that the DWG's proposed transition approach aligns with the nine High Level Transition Principles set out for the transition approach?
<b>Please identify any areas of the approach that do not align with the principles.</b>	
Answer: Yes	
<i>Please provide your reasons here</i>	

Question 12	Do you have any other comments?
Answer: No	
<i>Please provide your comments here</i>	