

DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

CONSULTATION RESPONSE FORM

Respondent information		
Your name	Jonny Moore	
Your company	ENGIE Power Limited	
Type of company	Supplier	
Contact details	jonathan.moore@engie.com	Phone 0113 3062048
Confidential Y/N	N	

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.

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

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: No	

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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?
<i>Market Participants currently not using elective HHS should not be required to update their systems in order to use this approach. This would result in some participants having to pay for two system upgrades (Elective HHS and for the TOM).</i> <i>In our opinion the use of Elective HHS should remain a commercial decision for suppliers, meaning that it could not be relied upon to migrate significant numbers to HHS.</i>	

Question 3	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.	
Answer: Yes	
<i>Please provide your reasons here</i>	

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

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

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

Question 8	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.	
Answer: Yes	
<i>Please provide your reasons here</i>	

Question 9	Do you agree with the DWG's proposed approach for transitioning to the revised Settlement Timetable?
Please identify any issues with the proposed approach.	
Answer: Yes	
<i>We agree with the DWGs decision making here and would continue support changes to the settlement timetable not being made until the TOM is in place.</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?
Please identify any issues or risks with the proposed approach.	
Answer: No	
<i>The proposed timetable for the DF Run alleviates many of our concerns. However, the materiality thresholds do look high. We would suggest the maximum materiality threshold being £100k at 12 months with a gradual increase up to this.</i> <i>We do continue to believe that the reduction of the RF window to 4 months, will see a significant increase in the number of trading disputes raised and this should be costed into the implementation impacts of the TOM</i>	

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

Answer: Yes

Please provide your reasons here

Question 12	Do you have any other comments?
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Answer: No

Please provide your comments here