

DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

CONSULTATION RESPONSE FORM

Respondent information		
Your name	Matt Young	
Your company	Drax Group plc (Opus Energy & Haven Power)	
Type of company	Supplier	
Contact details	Matt.Young@drax.com	
Confidential Y/N	No	

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>All Metering System types are mapped to the appropriate segments.</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: Yes	

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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>While the elective HHS process could be used to facilitate migration, this may cause unnecessary complications during transition. Any migration of MPANs should, where possible, be a one-way process to avoid issues with switching, settlement and billing during the transition period. The potential delays in billing and settlement as a result of switching to and from HH and NHH could have a negative impact on consumer experience. Should MPANs be able to switch between HH and NHH during the transition period, robust processes would need to be in place to minimise disruption to billing and settlement performance during this time.</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>No further points to note.</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>No further points to note.</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>Providing that all architecture and roles are assigned at the relevant stages as noted in the consultation document (such as SDS being introduced at an early stage), the smart and non-smart segment will take longest to transition due to the volume of MPANs. Also, as noted in relation to the PAF assumptions, performance targets for NHH would need to be reviewed to allow for the anticipated drop in NHH performance (both during migration and following cutover to the new TOM) as settled volumes move into the HH pot. The move into HH settlement will exacerbate the impact on NHH settlement performance of those sites that are more difficult to engage to procure meter readings and/or gain access to install a Smart meter. This review would also need to continue post migration.</i>	

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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>No further points to note.</i>	

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>No further points to note.</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>No further points to note.</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>Cutover to the new timetable in the latter stages of transition seems to be the most sensible option, allowing for all MPANs to have transitioned to the TOM and newly created services to be ready. We agree that monitoring trigger points (such as Smart Meter penetration) should help to inform the decision on when and how to reduce the Settlement Timetable.</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.	

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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?
Answer: Yes	
<i>No further points to note.</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?
Please identify any areas of the approach that do not align with the principles.	
Answer: Yes	
<i>No further points to note.</i>	

Question 12	Do you have any other comments?
Answer: Yes	
<p><i>The transitional arrangements set out as part of this consultation are well thought through and the DWG has clearly considered potential risks and requirements of industry to ensure a smooth transition to the new TOM.</i></p> <p><i>We would like to take this opportunity to highlight the importance of appropriate planning ahead of migration, specifically considering lessons learned from migration of larger non-domestic meters to HHS as part of core P272 migration and the challenges this created for suppliers and other industry participants.</i></p> <p><i>Quality of data caused difficulty, and in some cases, caused supplies to be migrated to HHS where there was not an industry requirement to do so, resulting in additional unnecessary costs and a poor customer experience. Whilst the data cleansing work currently underway as part of the Ofgem-led Faster Switching programme may mitigate some of this risk, guidance should supplement the legal text that details transitional requirements in the BSC, which also details the responsibilities of different parties. We encountered several issues with agents having varying interpretations of requirements during the P272 migration.</i></p> <p><i>Further to our answer to Q5, BSC Issue 78 should be considered as part of the cutover to MHHS. As the Smart rollout progresses, any remaining hard-to-read sites will have a greater proportional impact on performance targets, (especially considering a reduced RF date of 4 months and the ability to get a read within this timeframe for those HTR sites). With 4-month RF in mind, BSC Issue 78 has already highlighted that there is a challenge in obtaining a read within the current 14-month window (particularly for non-domestic as these sites are less likely to benefit from an actual/deemed read generation within this window).</i></p>	