

# DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

## CONSULTATION RESPONSE FORM

Respondent information		
Your name	Leanne Yates	
Your company	Northern Powergrid	
Type of company	Distribution Network Operator (NEEB & YELG)	
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Confidential Y/N	No	

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	
The proposed mappings are logical.	

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: 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?
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It could be feasible as an interim step but an assessment would need to be made on the effort required when considered with the potential outcome i.e. how many customers would remain in the elective HHS process. As Suppliers manage the process they should be best placed to answer this question.

Question 3	Do you agree with the PAF Assumptions and Principles and that all the potential impacts on the PAF have been identified?
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**Please identify any omissions.**

Answer: Yes

All Assumptions and Principles appear to be have identified and those that have been identified provide flexibility should changes be required further down the line.

Question 4	Do you agree with the phased approaches proposed for BSC and Registration Systems?
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**Please identify any issues and dependencies with the proposed approaches.**

Answer: Yes

We agree with the phased approaches for BSC and Registration Systems although detailed planning would be required for interface testing, Go-Live etc. Registration System changes should not be progressed until post implementation of the Faster Switching arrangements and any relevant industry code changes would also need to be considered. The interactions between the different significant code reviews need careful 'air traffic control' to minimise risk and maximise efficient delivery.

Question 5	Do you agree with the phased approach proposed for the Smart and Non-smart Market Segment?
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**Please identify any issues and dependencies with the proposed approach.**

Answer: Yes

The proposed phased approach is sensible given the activities required and the volume of MPANs that require migration. However, as Suppliers will lead on the proposed process they should be best placed to comment.

Question 6	Do you agree with the phased approach proposed for the Advanced Market Segment?
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**Please identify any issues and dependencies with the proposed approach.**

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Question 6	Do you agree with the phased approach proposed for the Advanced Market Segment?
Answer: Yes	
The proposed phased approach is sensible given the activities required and the volume of MPANs that require migration. However, as Suppliers will lead on the proposed process they should be best placed to comment.	

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: Yes	
<p>We agree that the transition of the Unmetered Market Segment should be phased, however we have some points for consideration in respect of issues and dependencies:</p> <ul style="list-style-type: none"><li>• Customers are not bound by the BSC and would not be obligated to adhere to the transition approach;</li><li>• UMSO and BRPs may face difficulties in encouraging customers to consolidate inventories. Some customers have separate MPANs for billing purposes i.e. a local authority may have separate MPANs where separate budgets are in place for example, street lighting, traffic etc.;</li><li>• Ensuring that responses are received from customers cannot be enforced. UMSOs should not be encouraged to remove erroneous NHH MPANs until confirmation is received and this may take time;</li><li>• UMSOs face challenges with customer contact details i.e. customers notify BRPs of changes which may not be shared with the UMSO therefore the BRP's involvement in the data cleanse and contact with customers re changes and timings is essential;</li><li>• Although the majority of customers are familiar with the market there are smaller customer e.g. some Parish Councils that have limited/no knowledge of the market and may struggle to understand the changes;</li><li>• It is noted that MA systems 'may also need to be scaled to deal with an addition volume of data', this will also apply to UMSO's systems;</li><li>• The current BSCP520 process to change from NHH to HH sets out creation of a new MPAN and disconnection of the old, we would welcome clarification that will this still apply in terms of the transition as that would be a significant task for UMSOs and BRPs who would need to register the new MPAN in the Registration system;</li><li>• Arrangements for temporary and festive unmetered supplies will need to be considered. They have separate MPANs as the consumption is calculated on an annual consumption and the registered supplier energises and de-energises the MPAN in line with the switch on and off dates;</li><li>• Consideration needs to be given to those UMS customers that could not be contacted that may need to remain on NHH settlement.</li></ul>	

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>	

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Question 8	Do you agree that the critical path captures all the key activities and dependencies?
Answer: No	
<p>Although we agree that the core critical path activities have been captured for the changes to the BSC Central Systems we have some concerns regarding impacts and potential consequences for other key industry systems. For example, where code parties or market participant companies have systems with functionality in line with the existing settlements timetable and reconciliation runs there will need to be time allocated in the programme for those systems to be assessed and changed. It would not be appropriate for the programme only to focus on the timetable for changes to BSC Central Systems (page 30 of the consultation) as this may create unintended consequences for other key industry systems. It would be helpful if the RFI scoping call planned for 15 July 2019 had an agenda item on consequential system impacts in terms of both costs and timing.</p>	

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: No	
<p>While we agree with the logic for transition to the new settlement timetable, we have some observations linked to our answer to question 8. We note the DWG's proposal that the transition to the reduced Settlement timetable would ideally occur after changes to the BSC Central Settlement Services have gone live and we agree with this. However, the transition should only occur after the changes to code party's systems have been completed (against a reasonable timetable). We agree that the decision on how and when to reduce the Settlement timetable could be taken nearer the time, based on market monitoring against trigger points.</p>	

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	
<p>Yes, this appears to be a prudent approach of respect of delivering faster and more accurate settlement. However, it may be worth the DWG considering Master Registration Agreement (MRA) agreed procedure MAP04 arrangements for the 'Faster Switching arrangements Retrospective Amendments' as this as this may not be facilitated by the proposals. This links to the 6<sup>th</sup> row in the table on page 33 of the consultation (Disconnection Issue – Metering Systems registered as disconnected in error resulting in missing energy volumes in Settlement).</p>	

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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?
<b>Please identify any areas of the approach that do not align with the principles.</b>	
Answer: Yes	
The proposed transition aligns with the nine principles.	

Question 12	Do you have any other comments?
Answer: Yes	
<p>The programme presents a significant piece of work for DNOs (please see our answers to questions 7, 8 and 9) and as set out in the consultation the changes for Faster Switching arrangements need to be implemented before any activities on MHHS could commence e.g. design, build etc. When planning the transition, timescales will need to consider dependencies on any customer involvement as any required actions by customers are not obligated via the BSC and, for example, transition could necessitate processes and arrangements for those NHH UMS MPANs that may not be migrated.</p>	