

DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

CONSULTATION RESPONSE FORM

Respondent information		
Your name	Alexandra Pourcelot	
Your company	TMA Data Management Ltd	
Type of company	Supplier Agent and Shared Services provider for Smart Metering	
Contact details	udms@tma.co.uk	0413941060
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/No (delete as appropriate)	
We are surprised to see PC 5-8 listed in the current MC A list since all PC 5 to 8 sites should have been migrated to Half-Hourly settlement as part of P272 under MC G.	

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?
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We agree with the DWG that a situation where MPANS can jump from HH back to NHH when going through the migration should be avoided.

The Elective HHS process would apply to Advanced (whole current and CT) metered sites and all NHH unmetered Supplies. We do not have any issue with the Elective HHS process and support its use to migrate significant numbers of MPANS to HHS.

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

We agree with the PAF's assumptions that serials will be different from the current ones for both HH and NHH, that the performance serials could be configurable by the PAB and that the Performance serials will not be based on actual and estimates as currently defined.

We also agree with the principles listed, in particular that the performance serials should incentivise moving to HHS as well as maintain appropriate pressure on current Settlement performance;

We are obviously supportive of the principles ensuring that the performance serials would not penalise Parties because of a DCC issue, a customer decision to not have a smart meter or not to share period data with the Supplier.

We are also supportive of performance serials being flexed by market segment or MC. The differentiation by Measurement Class type might be more meaningful as it reflects the type of metering and the potential impact on settlement of not attaining the appropriate level of performance.

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 are supportive of an agile built and deployment of the BSC Central system. We also agree that the BSC Central system will be required to support a run off of the previous settlement arrangements.

We agree that the Registration System will need to hold the new MPIDs and appoint the new TOM Data Services

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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

Overall we agree with the phased approach for the Smart and Non-smart Market segment.

The DWG consultation document refers to the qualification "The Smart and Non-smart Market segment represents the biggest change from the current NHH arrangements. These are reflected in the qualification requirements for the new Smart Data Services (SDS)." Has any qualification requirements been defined and if so, where can we find the information?

We agree that the first MPANs to be migrated would need to be the ones with SP level data available. How many would be needed to provide meaningful information to the Load Shaping Service and for how long before the LSS could actually fulfil its role?

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

As noted by the DWG we are interested in the identification of MPANs with CT advanced meter and remote communication that are currently settled NHH. Do we expect any?

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/No (delete as appropriate)

If data from UMS transferred from NHH to HH need to be processed by the HHDC and HHDA to the nearest Watt level, it should be done using the existing data flows D0379 and D0380, flows introduced with CP1469 and DTC CP 3496. We do not support any changes to systems that will be phased out such as HHDA to support the transition process. The loss of earnings to existing Supplier Agents cannot be coupled with expenses for changes required for the transition period only.

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.

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Question 8 Do you agree that the critical path captures all the key activities and dependencies?

Please provide your reasons here

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

We agree that the BSC Central System changes should be live before considering reducing the Settlement Timetable, we also agree that the exact transition, cut off points etc can be determined nearer the time.

We also support the idea of cutting the run off short at R2 for instance rather than the full 14 months. It would allow Industry Parties to redeploy resources and we expect the number of sites involved in the final run off of the old BSC arrangements to be small.

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: Yes

As the preferred DWG option is to have the DF runs up to 20 months after Settlement Date, it makes sense to have an incremental dispute value threshold and dispute deadline.

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.

Question 12 Do you have any other comments?

Answer: No

Please provide your comments here