

# DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

## CONSULTATION RESPONSE FORM

Respondent information		
Your name	Seth Chapman	
Your company	Morrison Data Services	
Type of company	Party Agent	
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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	
<i>All metering systems types are covered and map to an appropriate market segment, accepting there may be fringe case not covered with this high-level categorisation.</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?
<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: possibly	

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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>More mpans could be settled using Elective HH however this would be dependent on participants ability to support this process. It may not be beneficially to put significant effort into developing systems to support the elective HH process where this diverts effort from developing the market wide processes.</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: No	
<i>Although the TOM design has been developed using a "what is required" not a "how can we change we have" principle the same does not seem to have been applied to PAF. Agree with the assessment if you assume we only need to change the existing framework. However this approach may have missed the opportunity to go back to the "what is required" principle and consequently missed some efficiency improvements, particularly in the area of qualification.</i>	

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: Yes	

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Question 6	Do you agree with the phased approach proposed for the Advanced Market Segment?
<i>However there maybe parts of this transition where the existing HH agents could deploy parts of the ARP functionality before becoming an ARP.</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: Yes	
<i>Limited experience of Unmetered processes, but it is not clear why the migration of NHH sites to HH has to be in the second phase and not the first, or even before the first described phase.</i>	

  

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/No (delete as appropriate)	
<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?
<b>Please identify any issues with the proposed approach.</b>	
Answer: Yes/No (delete as appropriate)	
<i>Please provide your reasons here</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/No (delete as appropriate)	
<i>Please provide your reasons here</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?
<b>Please identify any areas of the approach that do not align with the principles.</b>	
Answer: Yes	
<i>However we do not think, at this level, the transition approach takes count of principle "h) The transition approach shall recognise when the existing arrangements are no longer viable"</i>	

Question 12	Do you have any other comments?
Answer: Yes/No (delete as appropriate)	
<i>Please provide your comments here</i>	