

DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

CONSULTATION RESPONSE FORM

Respondent information		
Your name	Tracey Pitcher/Simon yeo	
Your company	Western Power Distribution plc	
Type of company	DNO	
Contact details	<i>tpitcher@westernpower.co.uk/syeo@westernpower.co.uk</i>	<i>Phone 01752 502220</i>
Confidential No	<i>If yes, please indicate which parts of your response are confidential</i>	

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>This is a logical and sensible approach</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?
We believe the Elective HH process would not be fit for purpose , however Suppliers would be best placed to answer this question in more detail	

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	
Changes required to Registration systems will need to consider timescales and the work currently being undertaken for the faster switching project	

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	
We are unaware of any other solution that would ensure the accuracy of settlement during this transition phase	

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	
We are unaware of any other solution that would ensure the accuracy of settlement during this transition phase	

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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: No	
We have the following comments concerns :-	
<ul style="list-style-type: none">On the assumption that all NHH UMS mpans will migrate to HH, we have some concerns that engaging with the smaller customers will be difficult (such as small parish councils etc.)We would also would like to understand what will happen to the customers with small EAC's and how this will be apportioned over each HH during the year – e.g. some customers will only have an EAC for 50 kwh per annum.Alternatively what is the minimum EAC that can be shared over each HHIn addition it is general practice that when a NHH mpan is migrated to HH a new mpan is created and the NHH mpans are disconnected. – The volumes of new HH mpans required and the process to register them could be onerous.What will happen to those NHH mpans that we are not able to migrate, there does not seem to be any parallel running for NHH mpans in diagram 4 on page 24.	

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: No	
Please explain the bullet - End dating of LLFC Ids relating to Duos tariffs in MDD?	
Consideration should be given to consequential changes required to industry systems , e.g. Durabill	

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	
Consideration should be given to consequential changes required to industry systems , e.g. Durabill	

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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?
Please identify any issues or risks with the proposed approach.	
Answer: Yes	
Further explanation of how the materiality would be assessed to warrant a DF run would be welcome	

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	
During the transition , there need to be regular checkpoints to ensure the principles are upheld	

Question 12	Do you have any other comments?
Answer: Yes	
<p>DCP 268 moves customers to a RAG/BYG tariff structure and DNO's will be charging using the De- linked method currently used in the West and East Midlands DNO area. If all NHH are moved to measurement class F & G currently the HH data is chunked into the relevant HH's using the pseudo SSC/TPR. Has any thought been given to if this will be discontinued?</p> <p>As previously mentioned , any consequential changes to both MPRS & Durabill need to be considered and timetabled in alongside other industry programs</p>	