

DWG CONSULTATION ON TRANSITIONING TO THE MHHS TOM

CONSULTATION RESPONSE FORM

Respondent information		
Your name	Tom Chevalier	
Your company	Association of Meter Operators	
Type of company	Trade Association	
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Confidential Y/N	No	

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	
<p><i>There are a number of 'edge cases' in the metered segment which will need working through to develop a definitive and unambiguous allocation.</i></p> <p><i>One aspect not considered is Related meters. In the current NHH arrangements where there are two registers recording consumption at the same time, it is required to establish two MPANs so that the appropriate profile can be applied to each register consumption. In the new arrangements when using Settlement Period data should be on a site basis with a single import MPAN. So even if there are multiple coincident tariff registers, with different SP profiles, then, a single import & export SP profile should be used within settlement.</i></p> <p><i>Over time it is the view that Advanced meters will reside in the CT segment and whole current metering will become smart metering through DCC. Any Advanced metering in the whole current segment will be supported for the life of the equipment will progressively become replaced by smart meters, removing another edge case.</i></p>	

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	
<p><i>There are already 10k's maybe 100k smart meters in the elective arrangements. There are a number of improvements that can be made to the elective arrangements. If & when more SMETS1 meters are adopted then the interoperability will improve allowing more to enter the elective arrangements. The key issue at the</i></p>	

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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?
<p><i>moment appears to be the inability of some incoming suppliers to successfully take on an existing smart meter which is trading HH – this needs resolving.</i></p> <p><i>Without a clear timeline for the commencement of the new TOM smart metering arrangements it is difficult to judge how much effort to expend on the existing elective framework, rather than waiting for the new arrangements. If the new arrangement was available in [2] years then little value considering elective, although it is more likely to be 5+ years.</i></p>	
Question 3	Do you agree with the PAF Assumptions and Principles and that all the potential impacts on the PAF have been identified?
<p>Please identify any omissions.</p> <p>Answer: No</p> <p><i>The PAF is not a static framework but an evolving arrangement. It would be naïve to assume that all risks have been identified. The risks will continue to emerge as the transition progresses.</i></p>	
Question 4	Do you agree with the phased approaches proposed for BSC and Registration Systems?
<p>Please identify any issues and dependencies with the proposed approaches.</p> <p>Answer: Unsure</p> <p><i>The proposals do not have any timescales associated with the activities so it is difficult to determine the optimum sequence or how much activity can run in parallel. The transition will be dependent on a range of factors:</i></p> <ul style="list-style-type: none"> <i>on the penetration of smart metering to replace existing NHH metering</i> <i>the speed that the industry and/or Ofgem wish to progress, which might become clearer after the Ofgem RFI</i> <i>the penetration of micro generation which is currently significantly distorting the settlement arrangements and may require early SP level settlement of export consumption either in the existing arrangements or in the new</i> <i>changes to the registration systems which are expected to follow the faster switching implementation</i> <i>other changes being considered and progressed by the industry</i> 	
Question 5	Do you agree with the phased approach proposed for the Smart and Non-smart Market Segment?
<p>Please identify any issues and dependencies with the proposed approach.</p> <p>Answer: broadly</p>	

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Question 5	Do you agree with the phased approach proposed for the Smart and Non-smart Market Segment?
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The steps outlined have not been extensively challenged by the DWG. There are probably other dependencies and activities which have not been fully identified. Further work is required.

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.

Answer: Yes

There is every reason to progress with a 'quick win' of settling all CT Metering systems on a HH basis by April 2021. There are no system changes required, simply governance changes.

Over time it is the view that Advanced meters will reside in the CT segment and whole current metering will become smart metering through DCC. Any Advanced metering in the whole current segment will be supported for the life of the equipment will progressively become replaced.

Question 7	Do you agree with the phased approach proposed for the Unmetered Market Segment?
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Please identify any issues and dependencies with the proposed approach.

Answer: N/C

Please provide your reasons here

Question 8	Do you agree that the critical path captures all the key activities and dependencies?
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Please identify any omissions, issues and dependencies with the proposed approach.

Answer: Broadly

The responses to Q4 reflect the view that without more detailed planning it is not clear what the critical path is, or importantly its timescale.

Question 9	Do you agree with the DWG's proposed approach for transitioning to the revised Settlement Timetable?
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Please identify any issues with the proposed approach.

Answer: Broadly

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Question 9	Do you agree with the DWG's proposed approach for transitioning to the revised Settlement Timetable?
<p><i>The implications of reducing the settlement timescales are embedded in every business process, from obtaining SP data to fixing metering faults to the value of duplication of communications for large metering systems. While the aspiration is appropriate, the detail will not be able to be determined for some years as other aspects of the design are determined. It should remain as an objective to which all industry changes should be judged against.</i></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?
<p>Please identify any issues or risks with the proposed approach.</p>	
<p>Answer: Yes</p>	
<p><i>The Disputes process could, and should, adopt a value/time framework now. This approach makes sense and its implementation does not need to be delayed any further.</i></p>	
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?
<p>Please identify any areas of the approach that do not align with the principles.</p>	
<p>Answer: Yes</p>	
<p><i>Please provide your reasons here</i></p>	
Question 12	Do you have any other comments?
<p>Answer: Yes</p>	
<p><i>Two aspects are missing from the current transition plan:</i></p> <ul style="list-style-type: none"> <i>A broad timescale for the transition</i> <i>Some initial early transition changes – 'quick wins'</i> <p><i>While it is not possible to develop a detailed transition timetable it should be possible to determine a broad indicative timetable which would allow business decisions about changes (such as improvements to the elective arrangements) to be determined. It would also inform industry of the investment/change timescale, particularly when considering new changes by the industry or individual stakeholder changes.</i></p> <p><i>The transition should also consider changes that can be done early in the process to enable the benefits to be gained early, such as the Disputes changes and the settlement of all CT Advanced meters. Particularly when no system change is required, simply some governance changes.</i></p>	