RETAIL ENERGY CODE

MHHS SUPPLY NUMBER CONSULTATION

1 QUESTIONS

1. Do you or your third party service providers currently use the information contained in the top line of the Supply Number e.g. to support sales or onboarding processes? If yes, please provide details.

The majority of suppliers stated that they use the top line as part of their sales and quoting process. Other examples include non commodity (DUoS) forecasts.

Other suppliers stated that they do not currently use the top line info as they rely on the EES data for the information needed.

One supplier differentiated between domestic and non domestic customers, stating that they used the top line for large non domestic customers only, to support sales and new connections. However, they noted that this information could be obtained from the EES.

An IDNO responded to state that they use the LLFC Id in the top line to determine the DUoS tariff applicable to the customer.

DNO respondents stated that they do not use the information in the top line. However, one noted that they do have an obligation to assign a unique SVA Metering System Number to the Unmetered Supply Certificate which includes the top line information.

2. Do you consider that a top line should be retained as part of the Supply Number format? Please provide any supporting rationale?

Supplier respondents were split, with some stating that the top line should remain as it is beneficial for customers and will support the sales process. Two suppliers noted that the required changes should be captured within MHHS design requirements to enable full impact assessment. It was suggested that where consumption data is not available, the valid set will be used to support estimations for billing.

Other suppliers stated that the top line could be removed as the information is available from other sources. It was also noted that the top line is only guaranteed correct on the day it is generated. If the customer had changed tariff or had a new meter installed, the information from their paper bill could be out of date.

An IDNO responded to state that the LLFC Id or DUoS Tariff Id should be retained as it is a crucial element for charging, particularly non domestic.

DNOs were also split with one suggesting the information is useful for customers and the other stating that the information is already held within DNO systems.

3. If you stated a preference to retain a top line as part of the Supply Number format, which data items do you believe should be included? Please provide any supporting rationale:

a) Profile Class
b) Market Segment
c) Connection Type
d) DUoS Tariff Id
e) Standard Settlement Configuration Id
f) Other (please provide details)

If retained, respondents suggested the following items could be included:

DUoS Tariff Id (six respondents)
SSC (two respondents)
Market Segment (four respondents)
Connection Type (two respondents)
LLF Id (one respondent)

One supplier suggested the following data items could be included – 3 phase, single or dual rate and kva capacity for traditional meters

One supplier suggested that information e.g. Tariff Id could be made available in customer documents, rather than in the Supply Number. This would allow a clear explanation to be provided with the data.

One supplier and the MA suggested Rota Load Block Alpha Id could be included as this is useful to consumer and suppliers are already required to notify this to customers via the DCUSA.

4. Do you envisage any consumer impacts (positive or negative) associated with any of the options?

Two suppliers suggested that the top line is not required for domestic customer. It was also suggested that the 'S' should be removed and the bottom line should be provided as an MPAN.

One supplier noted that large or multi site customers may not be aware that the information could be accessed via the EES.

Three suppliers suggested that there would be increased queries from customers requesting confirmation of information such as DUoS Tariff Id. There would also need to be communication to customers ahead of implementation.

One supplier noted that the solution should be simple and any excessive costs would negatively impact consumers.

The IDNO respondent suggested that removal of LLFC Id / DUoS Tariff Id would be detrimental to customers as it provides DUoS charging transparency.

5. Please provide an estimated timescale for amending the Supply Number format within your systems and whether this timescale differs depending on the option chosen.

One respondent suggested a 6 – 12 month implementation lead time to amend the supplier bills

Others suggested a significant lead time e.g. more than 12 months.

The majority of respondents suggested it was not possible to confirm the timeline, two of which noted the dependency on understanding the programme decision on reverse migration.

One respondent noted that option 3 would require the least system change and option 2 would require extensive system changes.

6. Do you believe the change to Supply Number format should be introduced at the start of MHHS transition with parallel running of old and new approaches; or at the end of MHHS transition? Please provide any supporting rationale.

One respondent suggested the change could be made ahead of MHHS with a transition period allowing suppliers to show the Supply Number in either format. Another respondent provided a similar view that parties should have flexibility to apply when they chose, with a backstop date applied.

One respondent suggested the date would differ depending on the option, with option one implemented at the start of MHHS transition and option 3 at the end.

The majority of respondents suggested the change should be made at the end of MHHS transition to avoid parallel running.

Three respondents suggested option 2 should be delivered at the start of MHHS transition with old and new approaches delivered in parallel (noting the additional complexity associated with reverse migration.

7. Do you have any further comments in relation to the MHHS impacts to the Supply Number format?

The following additional comments were made:

Respondent 1: The expectation that legacy meter set ups (and so top lines) will no longer exist within a couple of years from delivery of MHHS is wholly unrealistic. Resolving non-communication or legacy set-ups have a financial and material impact on customers, and we can't assume that these meters can be changed short term, unless there is a network and industry led push to remove old set-ups. However, this does not mean that the Supply Number needs to be retained on customer literature, as this information can be accessed elsewhere.

Respondent 2:

- We feel it will be appropriate to repurpose the naming convention of the Standard Settlement Configuration Id to reflect its enduring use against a meter's billing configuration, we suggest something along the lines of Standard Billing Configuration (SBS) Id.
- To facilitate transition it maybe appropriate to ensure the ISD, MDD or both have separate sets of standing data to reflect the use of configuration on meters, this may mean duplicating the existing SSC data in MDD as SBS data in ISD in order to differentiate over the migration period.
- Whilst we are extremely thankful that RECco have took a proactive approach to engage the market through its own communication channels regarding this issue we feel this is an item of importance to the MHHS programme delivery and therefore any next steps should be under the umbrella of the MHHSprogramme. There are 2 clear pointers to the link between this consultation and the MHHS programme's required work within the published detailed design work off list:
    - **D-027 Advanced SSC/TPR Provision** – described in the work off list as "activity required to discuss potential requirement for SSC/TPR transfer mechanism"
    - **D-012 E7/E10 differential settlement** - described in the work off list as "Further investigation required to agree the best option for a technical solution for domestic import customers who have chosen to opt out of allowing access to their HH profile data from the meter".

  We feel quite strongly that the need for top line changes is driven by the programmes work in so far as the current Top line valid combinations derive settlement a validation so underpins the NHH arrangements strongly today, so we perplexed as to why the programme feel it is reasonable for them to remove top line items and address them through its own work.

- The MHHS program aims to ultimately deliver ToU tariffs so there should be some consideration to improve the process offering flexibility in tariff offerings by raising new SSCs from a supplier or agent perspective going forward to ensure that customers who cannot benefit for MHHS due to technical constraints are not disadvantaged through limitations created by its removal from today's settlement arrangements.

Respondent 3: We have alternative solutions.

- Remove the requirement altogether and do not tie this in with MHHS go-live. This could be done sooner and leaves it to supplier's discretion.
- Only publish the MPAN but do not have it segmented in boxes, simply publish the 13-digit number which would match how the gas MPRN is displayed.