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9<sup>th</sup> April 2015

Dear Smarter Markets,

**Moving to reliable next-day switching: Consultation on a Target Operating Model (TOM)**

Electricity North West are supportive of the objectives of the TOM for moving to reliable next-day switching, however we have the following comments and points of clarification on the scope.

Our understanding was that all data currently held within the Distribution Network Operators (DNOs) Metering Point Registration Systems (MPRS) would be migrated to the Central Registration System (CRS), so all MPANs and supplementary data would be centralised for the whole industry. However, the TOM excludes unmetered consumers and those supplied on licence exempt networks and/or by licence exempt suppliers as these have different switching arrangements. In both instances an MPAN is required; It would seem that any cost benefit to support the CRS would include all MPANs needed to be generated. It would therefore be helpful to understand why both unmetered and licence exempt networks/suppliers are excluded from this TOM. We do not believe that the DNOs are expected to hold an MPRS for a small number of customers. A clarification to the TOM in this area would be appreciated.

We believe there is an opportunity to undertake industry code consolidation within the TOM by reviewing the Master Registration Agreement (MRA) and the Supply Point Administration Agreement (SPAA), since a significant part of these agreements will no longer exist and form part of the Smart Energy Code (SEC). Similarly, it would seem appropriate to include within the TOM the Data Transfer Services Agreement (DTSA) since it is expected that a significant number of the dataflows may well have moved to DCC file format and communications. This may well be more cost effective approach by reducing the governance arrangements in a number of codes for a small number of services. This also supports the Competition and Markets Authority (CMA) Energy Market Investigation document issued 18<sup>th</sup> February 2015, where they identify a potential issue associated with the number of the codes within the electricity market that may be considered to act as a barrier to entry and/or expansion.

We believe the TOM identifies the key requirements in order to progress the design and as such we would be very interested in the next steps associated to the TOM as there a number of areas of further clarification required on accountability regarding data updates, transfers, and access to CRS and enquiry services seeing as some of these accountabilities are contained within the Distribution Licence. Also how the charging methodology and funding arrangements are to accommodate the CRS.

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**Yours sincerely**

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