

## Jonathan Dixon

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**From:** Hargrave, Lynne <Lynne.Hargrave@northernpowergrid.com>  
**Sent:** 28 September 2017 10:41  
**To:** switchingprogramme  
**Subject:** UK Link and the proposed Central Switching

Please find our response to your consultation entitled "UK Link and the proposed Central Switching Service" issued on 27 July 2017.

Northern Powergrid Metering Limited is an established Meter Asset Provider (MAP), investing in both conventional and smart meters with energy suppliers in UK and Ireland with a current portfolio of circa 4.0 million metering assets. We have an interest in the Ofgem Switching Programme and have been representing CMAP within the BPDG, design forum and EDAG. The MAP interest relates to improving the ability of MAPs to track assets through the switching process to enable accurate and timely billing of meter rental charges and reduce time spent by MAPs and suppliers in resolving billing disputes.

We have reviewed the consultation and provide answers to the questions raised within the consultation. We recognise that our queries relating to the Governance of XOServe are not strictly relevant to the consultation in hand and may be more relevant to a future debate about the ability of XOServe to deliver the CSS required by Ofgem and all industry parties.

Question 1: Do you agree with the benefits outlined in 3.7 a-c below. If so, how significant do you consider these benefits could be for the purposes of implementing more reliable, faster switching?

*Having reviewed the benefits outlined in 3.7b I remain sceptical that these benefits exist and if they do exist then they are neutralised by additional risks and costs elsewhere in the industry.*

*Firstly, both UKLink and MPRS currently have links to many of the key CSS users, this is not unique to UKLink.*

*However, UKLink does not provide any links to some of the parties that will be CSS users such as MAP and these links will still need to be established.*

*Secondly, using UKLink does not mean that only half of the registration data would need to be migrated to a new system. Using a stand-alone CSS system would require the migration of a subset of data from both the existing UKLink and MPRS systems whilst other for data items mastery would remain in UKLink and MPRS. Using the UKLink platform would require ALL existing data held within MPRS to be migrated presenting a large delivery risk to the programme. Additionally parties such as DNOs, supplier agents and MAPs will need to establish brand new links into the UKLink system but this would not be required if the existing MPRS is retained.*

Question 2: Are there other benefits that we have not identified?

*No comment.*

Question 3: Do you see any particular risks or disadvantages? If so, please outline them.

*We consider that there is a potential risk associated with the use of the UKLink platform via XOServe. Project Nexus delivery was delayed significantly and the risk of this kind of delay to the delivery of the CSS must be avoided. As such we query the ability of XOServe to deliver such a critical programme.*

Question 4: Under the current Xoserve CDSP governance do you believe there are any substantive obstacles to Xoserve's ability to participate in a competition? If so how could these obstacles be overcome?

*The existing board of XOServe consists of GTs, GSs and iGTs. This limited representation presents significant barriers to other parties that are affected by the operations of XOServe and UKLink. An example of this would be the industry split of the MAM function into MOP and MAP. Despite several approaches to XOServe the MAPs remain excluded from the gas industry change management process.*

*If the UKLink system were to be used for the CSS then significant changes would need to be made to the future governance structure of XOServe to ensure that all industry parties and CSS users have clear representation within the governance framework.*

If you have any questions relating to our response please do not hesitate to contact me.

Regards,

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