

To: **Anna Stacey**, Consumers & Markets, *Ofgem, 10 South Colonnade, London, E14 4PU*

Dear Anna,

RE: MHHS Draft Impact Assessment Consultation

We thank you for this opportunity to provide feedback on the topic above.

Please find our responses detailed below to the MHHS Draft Impact Assessment Consultation on behalf of the Association of Independent Meter and Data Agents (AIMDA) which is a trade organisation that represents the largest and independent non-domestic metering and data collection businesses in the UK¹. Collectively our members manage metering and data at most non-domestic sites covered by the smart metering roll-out. Consumer choice and competition in metering and data are therefore core principles for our association.

AIMDA are fully behind the transition to MHHS and believe that this is the way forward for the Electricity Market and will bring significant benefit to Suppliers and Consumers; thus, enabling a more flexible and innovative market.

Following our analysis of the proposed TOM we shared many concerns and have collaboratively worked on an alternative TOM which would secure greater benefits through reduced costs, improved efficiency and ease of implementation. The alternative TOM has two key features. First, a new service called the Data Request Service to facilitate targeted access to non-aggregated data in the distributed databases that it already resides. Second, a formal consolidation of the Data Collection and Aggregation roles to form an integrated Data Service in each segment, which would provide aggregated files for settlement imbalance and load shaping calculations. In combination, these features ensure that the benefits of access to non-aggregated data are achieved without unnecessary duplication of data storage and transfer costs, whilst maintaining efficiency in core settlement processes.

AIMDA are concerned with the proposed transition of 4 years and again have looked at this in depth based on previous market wide programmes and provided what we feel is a more realistic timeline. A further concern regarding this transition period which hasn't been carried out since 1996 would be a mass Qualification exercise by many parties in new roles which are still to be defined.

We see that on Thursday 10th September, modification P413 was passed through the BSC Panel. This proposes that Elexon undertake the Programme Manager role within MHHS. Within AIMDA our core values of all our members are based around working together to keep competition open. We therefore find this modification unacceptable. We do not agree that in advance of a decision being made by Ofgem, that Elexon, or any other party should be able to begin the steps of transition into a role which is yet undecided. This role must be competitively procured and ensure that we don't just go for the easiest option. Also, within the proposed TOM, Elexon would have an integral role in the delivery of MHHS therefore we also see this in breach of the potential options for delivering the Programme Manager role.

Lastly, we find that the costs in the RFI are very vague or missing completely. We have on several occasions asked for the detailed data that was used in order to come to these costings. We would greatly appreciate any further insight into these.

¹ AIMDA members – IMServ Europe Limited, Energy Assets Limited, Siemens Managed Services, SMS Plc, Stark Software international Ltd, WPD Smart Metering Ltd and TMA Data Management Ltd.

We thank you again for the opportunity to provide feedback; if you wish to discuss this subject in greater detail, please contact AIMDA Chairman – Joel Stark on 07739711636 or jstark@stark.co.uk.

Yours faithfully

Joel Stark
Chair - AIMDA