

## MHHS Cross Code Advisory Group (CCAG) Headline Report

Issue date: 24/02/2023

Meeting number	<b>CCAG015</b>	Venue	<b>Virtual – MS Teams</b>
Date and time	<b>22 February 2023 10:00-12:00</b>	Classification	<b>Public</b>

### Actions

Area	Ref	Action	Owner	Due
Minutes and actions	<b>CCAG15-01</b>	Programme to ensure BSC Issue 101 is looped into the Consequential Change Log	Programme (PMO)	22/03/2023
	<b>CCAG15-02</b>	BSC to provide overview of BSC Issue 101 at the next CCAG meeting, including a timeline, and plan for progression of outcomes/recommendations (e.g., potential BSC Modification, implication for SCR modifications, etc.)	BSC (Lawrence Jones)	22/03/2023
Horizon Scanning Log	<b>CCAG15-03</b>	RECCo to consider whether REC Change R0021 impacts on any aspect of MHHS Design, and add item to Horizon Scanning Log	RECCo Representative (Sarah Jones)	22/03/2023
	<b>CCAG15-04</b>	Programme to discuss with DCUSA Representative how DCP415 can be progressed/consulted on with DCUSA parties ahead of potential Programme Change Request being raised for any required design changes	Programme (Jason Brogden)	22/03/2023
Code Drafting Replan	<b>CCAG15-05</b>	Programme to add CDWG and 'comment raiser's availability' to the resources column of the Code Drafting Plan 'constituent elements applied to Topic Areas' plan on a page	Programme (Becca Fox)	22/03/2023
Summary and Next Steps	<b>CCAG15-06</b>	CCAG members to prompt constituents to respond to code drafting consultation (closing date 13 March 2023)	CCAG Members	ASAP
Previous Meeting's Minutes and Actions	<b>CCAG14-01</b>	Programme to clarify position and timelines on BSC Issue 101 and how any requirements may proceed into CCAG-led code drafting	Programme (Chris Welby)	24/05/2023
	<b>CCAG13-02</b>	Review the risks IDs for each Horizon Scanning entry to ensure there is a clear link/cross-reference between horizon scanning items and RAID log entries	Programme (Jason Brogden, Matt McKeon)	ONGOING
	<b>CCAG13-03</b>	Present the list of consequential change items to be included in code drafting and the rationale for including them to the March CCAG	Programme, Code Bodies	22/03/2023

## Decisions

Area	Ref	Decision
Minutes	CCAG-DEC25	Minutes and Headline Report of CCAG meeting held 25 January 2023 approved
Summary and Next Steps	CCAG-DEC26	CCAG agree the CDWG meeting to be held 07 March 2023 should be stood down in favour of scheduled meeting on 14 March 2023

## RAID Items Discussed

RAID area	Description

## Key Discussion items

Area	Discussion
Minutes and actions	<p>The CCAG reviewed the outstanding actions and updates are provided below. Full action wording can be found within the <a href="#">meeting papers</a>.</p> <p>CCAG14-01: The Programme recommended this action be closed as no dependencies between BSC Issue 101 and Programme code drafting. The BSC Representative agreed there did not appear to be any direct dependencies. The RECCo Representative requested the action be retained as ongoing to ensure ongoing consideration of any potential impacts to consequential change code drafting. The Programme agreed to ensure the item is considered alongside the items within the Consequential Change Log (<b>ACTION CCAG15-01</b>). The BSC Representative agreed to provide an overview of BSC Issue 101 at the next CCAG meeting, and how any recommendations may progress (e.g., via a BSC Modification) and whether any BSC changes may be directed under Significant Code Review (SCR) powers (<b>ACTION CCAG15-02</b>). Action ongoing.</p> <p>CCAG13-03: The Programme recommended this action be closed as the prospective list of consequential change code drafting topics had been published with the meeting papers. One attendee requested the item is retained until the full finalised list of consequential change code drafting topics is agreed and crystallised following the Consequential Change Impact Assessment Group (CCIAG) meeting to be held 23 February 2023. Action ongoing.</p>
Programme updates	<p>A participant queried what is happening with the Programme Replan, following the closure of the consultation window in January. The Programme advised the consultation comments are under review, and communications are due to be issued in due course on the next steps. The Programme advised an update will be published with the Programme Steering Group (PSG) papers for the meeting to be held 01 March 2023. The participant noted the Programme had considerable work to do to coordinate with Ofgem on the impacts to Programme timelines and milestones, noting it was positive the Programme were taking time to consider what change is needed to the Programme Plan.</p>
Horizon Scanning Log	<p>Latest updates on external code changes were provided by Code Bodies.</p> <p><b>BSC</b></p> <p>The BSC Representative advised BSC Modification P432 had been approved and issued to Ofgem for decision but that the change has dependencies on DCUSA CP415 and as such the decision timeframes are unknown and P432 is unlikely to be issued in the June BSC release.</p>

	<p>An update was also given on BSC P442, which seeks to create a new party agent role. This change is current under development at a BSC working group and the BSC Representative believed it was likely that consequential change would be required as there may be impacts on Half Hourly (HH) Data Collector (DC) arrangements. The BSC Representative committed to providing updates as this modification develops.</p> <p>A further upcoming BSC modification was highlighted. Following the sandbox derogation application submitted by Good Energy, a modification is now due to be tabled, which will involve several considerations which may impact MHHS. Further updates will be provided as the new modification progresses.</p> <p><b>REC</b></p> <p>The RECCo Representative advised REC Change Proposal R0015 had been approved by the REC Change Panel and would now be issued to Ofgem for Authority decision. REC Change Proposal R044 was also approved, which facilitates provision of the new Meter Data Retrieval (MDR) role. New REC change R0093 has been raised to enable impact assessment of an uplift to Central Switching Service (CSS) maximum demand volumes during the MHHS migration period. This acknowledges the CSS will need to receive additional data flows during MHHS migration. New REC change R0097 has also been raised as a result of detailed design work ongoing by the Data Communication Company (DCC) and St Clements (the registration system provider).</p> <p>One attendee queried whether REC change R0021 should appear within the Horizon Scanning Log. The attendee wished to understand whether the new 'safe isolation' role which is proposed by this change impacts the MHHS design. The RECCo Representative agreed to review this and add the change to the log if there are potential MHHS impacts (<b>ACTION CCAG15-03</b>).</p> <p><b>CUSC</b></p> <p>It was noted that CUSC and NGESO met with the Programme last week and CUSC was now reviewing the design baseline to identify any CUSC impacts. An update will be provided at the next meeting.</p> <p><b>Horizon Scanning Log Review</b></p> <p>Regarding DCUSA Change Proposal (DCP) 415, the group were advised this change was not issued for consultation by the DCUSA Panel owing to potential impacts to data flows within the MHHS Design. The Programme believe a Programme Change Request (CR) is required not a DCP. Some DCUSA Panel members questioned whether, as the solution for DCP415 was developed by a DCUSA working group, handing off the implementation of the solution to the Programme's code drafting process may mean DCUSA parties have not specifically agreed to the solution.</p> <p>The Programme explained the change arose from MHHS design working groups, where it was determined the solution should be developed via DCUSA and the outputs brought into Programme-led code drafting. The Programme's challenge with DCP415 being issued to impact assessment is the proposed implementation date. If MHHS impacts are identified then a Programme CR may be required to progress in parallel to DCP415 and would need to conclude prior to the implementation date of DCP415 becoming fixed. The Programme considered whether DCP415 could be issued to DCUSA parties for consultation but with a non-specific implementation date, thereby enabling views to be obtained prior to a Programme CR being raised. The Programme agreed to discuss this with DCUSA (<b>ACTION CCAG15-04</b>).</p>
<p><b>Ofgem Code Designation Update</b></p>	<p>Ofgem presented slides on the routes available to implement the code changes required to implement MHHS, advising of a preference to use 'tried and tested' SCR powers. A question was raised from BSC about whether the relevant SCR is now closed, and whether it could be reused in future. The Ofgem Representative confirmed SCR powers could be reused and noted it was previous doubt over this which had led to the</p>

offer from BEIS to use Smart Meter Act powers (SMAP). The CCAG were advised that once code drafting was stabilised, Ofgem would take a decision on whether SCR or SMAP should be used.

The BSC Representative posed several questions:

BSC Q1: The BSC Representative presumed the management of code changes via SCR would be via the 'Authority led' route. The Ofgem Representative believed this would be the case and noted the significant engagement with Code Bodies and CCAG which would be required as part of this.

BSC Q2: The BSC Representative considered whether the use of SCR powers could undermine the CCAG process, as parties may lessen their response to Programme code drafting consultations, in favour of the SCR modification/change proposal consultations via the Code Bodies. Ofgem noted this was potentially an issue regardless of which powers were used and expressed an expectation that Ofgem would receive 'a well baked product' by the time it came to the SCR consultation. Another participant noted Code Bodies would need to ensure parties were aware of the importance of providing all significant comments through the Programme consultation route.

BSC Q3: The BSC Representative noted some BSC provisions are 'protected', and change may require Secretary of State approval. The Ofgem Representative committed to discussing these potential issues.

The Domestic Supplier Representative advised they did not have a preference for which powers are used, and that if MHHS drafting and consultation process was effective the SCR modifications should progress via the Code Bodies straightforwardly. The participant reiterated the need for parties to view the Programme-led consultations as the primary route for providing any comments.

Another participant wished to understand the rationale for this change in Ofgem position, noting it was stated in the Smart Meter Act that it existed to smooth implementation of MHHS and avoid any issues with Code Body processes, and therefore appeared to be specifically geared toward MHHS implementation. The Ofgem Representative believed there was no change in position, and there had always been a preference for SCR, but the question about whether SCR powers could be reused had not been answered, and so SMAP had been posited as an alternative.

The Ofgem Representative acknowledged the usual requirement for a 56-day standstill period after an SCR modification decision to enable appeals to be raised before implementation. Whereas SMAP allowed Ofgem to state a faster implementation timeframe. The Ofgem Representative noted there were no issue with using SMAP powers if needed, but that this standstill period could potentially be reduced. The BSC Representative believed the SCR route was not as flexible or efficient as the SMAP route.

The Programme queried whether use of SCR powers would decentralise the implementation directions for the code changes required to give effect to MHHS and if this would introduce more complexity and risk. The Ofgem Representative considered work would be required to understand how modifications/change proposals directed under SCR powers would operate as a package, and how they could be best managed to ensure efficiency.

The Programme advised, in relation to the Programme-wide replan CR due to be raised, that SCR powers were the current assumed process for implementation of MHHS-related code changes. The Programme and Ofgem will develop a detailed plan for this and insert the relevant activities into the replan CR.

<b>Code Drafting Replan</b>	<p>The Programme advised changes would be required to the Code Drafting Plan following responses received as part of the round three Programme Replan consultation and based on dependencies and lessons learned from code drafting thus far. The consultation period for each code drafting topic will be extended from two weeks to three and more time will be allocated for drafting to allow extra time to produce traceability matrices for each drafting topic. Additional time will also be added to each code drafting topic for review of consultation comments.</p> <p>The group discussed the Programme resources allocated to code drafting, and how complex issues which arise during review would be managed (e.g., by raising the issue at the Code Drafting Working group (CDWG)). The Programme agreed to add CDWG to the resources column of the code drafting Plan on a Page (PoaP) (<b>ACTION CCAG15-05</b>).</p>
<b>CCAG Reporting</b>	<p>BSC and REC metering services code drafting was issued for consultation 14 February 2023, alongside with two BSC data services drafting artefacts. Additional data service artefacts were also due to be published, and the closing date for responses had been extended to 13 March 2023 to account for the additional drafting issued. One attendee thanked the Programme for issuing the available documents immediately for review rather than waiting to send all drafting out together, noting it assisted participants to obtain proposed code drafting as soon as possible.</p> <p>The Programme went on to advise that, owing to the proposed extensions to the code drafting timeline, some code drafting topics were now appearing to be delayed within code drafting reporting. This would continue to be the case until a new code drafting plan was agreed.</p>
<b>CDWG Update</b>	<p>The group noted the ongoing code drafting consultation and how the response deadline would not have passed ahead of the next scheduled CDWG meeting. As such, the group agreed to stand down the CDWG meeting to be held 07 March 2023 in favour of the CDWG meeting scheduled for 14 March 2023 (<b>DECISION CCAG-DEC26</b>).</p>
<b>Summary and Next steps</b>	<p>AOB1: One attendee asked whether ambiguity emanating from current industry arrangements which may not be required for MHHS would be considered a design issue. The Programme requested that any such items are submitted to the Programme for review. If any party becomes aware of an issue which may affect the MHHS Design, they should raise this as a Design Issue Notification to the Design Authority for review. If there is doubt over potential impacts, participants are urged to highlight the relevant section of code to the Programme, who will assess and determine appropriate next steps.</p> <p>A request was made to CCAG members to prompt their constituents to provide responses to the current code drafting consultation (<b>ACTION CCAG15-06</b>). The current code drafting consultation deadline is 13 March 2023.</p>

**Date of next CCAG meeting: 22 March 2023**

**Date of next CDWG meeting: 14 March 2022**