MHHS Cross Code Advisory Group (CCAG) Minutes & Actions

Meeting number	**CCAG001**	Venue	**Orange Room, Elexon, 350 Euston Rd, London NW1 3AW, & Microsoft Teams**
Date and time	**24 November 2021, 15:00-17:00**	Classification	**Public**

Attendees:

MHHS SRO	Chris Welby (CW)
MHHS Governance Manager	Andrew Margan (AM)
MHHS Programme Director	Chris Harden
Ofgem (as observer)	Andy MacFaul
MHHS PMO	Emma Sheppard
MHHS Design Manager	Ian Smith
Elexon Representative (as central systems provider)	Matt Hall
Elexon Representative (as BSC/BSCCo Manager)	Lawrence Jones
DCC Representative (as smart meter central system provider)	Richard Vernon
SEC Representative	Robin Healey
REC Representative	Jon Hawkins
CSUC Representative	Paul Mullen
DCUSA Representative	John Lawton
National Grid ESO	Keren Kelly
Supplier Representative (Domestic Representative)	Paul Saker
Supplier Representative (I&C Representative)	Gareth Evans
Supplier Agent Representative (Independent Supplier Agent)	Tom Chevalier
Supplier Agent Representative	Clare Hannah
DNO/iDNO Representative	Fungai Madzivadondo

Apologies:

Consumer Representative	Ed Rees

1.   Welcome & Introductions

C Welby (CW) welcomed everyone to the first CCAG and introduced himself as interim SRO for the programme and ran through the agenda for the meeting. Everyone then introduced themselves.

CW walked through the overall MHHS Programme objective and North Star for the programme. He updated the programme was currently in mobilisation stage and then walked through the principles as outlined in the CCAG pack.

CW reiterated the principle that the programme would be design-led, not code-led, meaning the programme will complete the design and the code updates will be drafted following design completion. This differs from the typical approach of updating the code and using that as the basis for design. Therefore the intention for the programme is to adapt the code and make the required changes after the design. This is believed to be more effective.

The other programme principles were talked through:
- Minimising dependencies, the intention to keep dependencies to a minimum e.g. one Lead Delivery Partner procured to assist with programme delivery rather than a number of different supplier;

- Utilise resources with skills – the programme wants to utilise the best industry expertise from Industry and is encouraging participation in the programme;
- Efficient decision making, the programme will be moving at pace and therefore decisions are expected at the relevant forums (with the relevant information being provided to enable these)
- Not moving at the pace of the slowest – the programme is trying to be inclusive, but we cannot move at the pace of the slowest. The programme needs to keep progressing. It is an industry-led programme, not led by Ofgem or Government and this programme should provide a blueprint for programmes going.

The programme objectives were covered and CW noted that everything has to be of benefit to the Industry and ultimately to the customer. The programme needs to be transparent and the CCAG will assist with this. In terms of a blueprint, the programme has completed a lot of research in terms of lessons learned from other Industry programmes (FSP, Nexus etc), and are trying to bring that into this programme.

2.   Progress Made

CW noted that he programme had made good progress to date.

Programme structure: CW walked through slide 10, programme structure definition, noting Ofgem as Sponsor at Level 1, with Elexon as SRO and IM and supported by the Level 2 PSG. The Lead Delivery Partner (LDP) are the next level who will run the Central Programme team and the PMO, PPC and SI. The Design work stream which Elexon as SRO will keep control of, as it is their area of half hourly expertise. CW noted that Elexon had seconded SMEs into the programme from Elexon, supplemented by Industry SMEs in the design area. IPA will then act as a critical friend to assess the programme and ensure we are delivering.

C Hannah questioned an update on the appointment of IPA. CW noted that Ofgem are hoping to appoint the IPA in December and passed over to A MacFaul from Ofgtem.

A MacFaul ran through Ofgem slides in the CCAG pack and noted that Ofgem remain accountable for the outcomes the programme and Ofgem expects the programme to achieve. As set out in the Governance Framework there are certain thresholds where Ofgem will intervene as detailed on the slide (e.g. Level 1 milestone moving by 3 months or more, variance from TOM, change in market stability). In any case Ofgem will be present in the programme governance meetings, so they have early warning of anything coming up and are well informed. A MacFaul noted Ofgem will be present in most if not all of the meetings as observers. Issues should be raised with the programme and not Ofgem. Ofgem will intervene if the issue crossed the thresholds. Ofgem hopes thresholds will not be not crossed often, also retain role in approving Code SCR or Smart meter powers when enacted. Ofgem will be supported by the IPA.

A MacFaul noted that the role of the IPA is a major service for all, everyone should feel the IPA is a resource devoted to ensuring the programme is running as effectively as can and will identify any potential issues early before they arise. Ofgem are hoping to make the IPA appointment next month and the IPA will therefore be an active presence in the New Year. Both PSG and the SRO can also ask the IPA to complete work as well and thereby the hope is this will generate confidence amongst all programme participants.

T Chevalier raised a question regarding the Design being kept within Elexon as this was their area of expertise. He noted that the design of MHHS spans across a number of Codes and what expertise has been brought in for codes other than BSC. A Margan (AM) advised this was a discussion point for later under Ways of Working which identifies the need to bring Code Bodies within the programme.

LDP procurement: CW noted a very robust process had been followed with 6 proposals submitted. Following review, 3 had been shortlisted and BAFOS submitted. Dialogues and follow up sessions had been completed and a recommendation presented to the Elexon Board which had been approved in early November. The programme is now into the Legal stage and an announcement cannot be made until contracts are signed. CW advised we hope to have the LDP on board in December and fully mobilised during January 2022. CW noted that there were 3 credible BAFOs submitted and the programme is confident in the recommendation made.

Design – CW noted the aim is to deliver a complete set of design artefacts, once delivered they will give programme participants all that they need to work on own systems design and build. Code changes will then be addressed to reflect the detailed design. Delivery of the design is targeted for April 22. MHHS started with the TOM, CCDG and AWG and the programme is now into design process with detailed Design working groups feeding in and participating.

J Lawton raised question as he was seeking clarification on the slide referencing changes required to industry code. He noted that CCDG did not deliver any code changes as part of their work. CW noted this and advised CCDG was set up originally and the programme had concluded a design-led approach is best and the Code Changes will be made under the programme.

CW advised most of the detailed work will be completed at L4 working groups. The Advisory Groups make the decisions and the working groups will complete the require activities, will work on artefacts, make recommendations and will be presented to DAG for a decision. CW noted anyone can participate in a L4 working group but they need to an SME in the subject area and participate actively. The Programme needs Code representatives at these and early participation so they can feed in as the programme works through the design as any Code knowledge may identify a more effective way for design to work. The programme will not have a final consultation, they want to get it right in the first place with no consultation at end and the design is right when delivered in April 2022.

F Madzivadondo questioned how the programme keeps Industry appraised of process if they are not involved in the working groups. CW reiterated the need for programme participants to be involved in the working groups. If you are content to wait for the design and then start building on artefacts that is their choice or if you do need involvement then participate.

I Smith (IS) advised as design artefacts are worked on and go through approval process, there will be an opportunity to feedback through constituency reps. Artefacts will be made available to Industry for info. J Hawkins noted a concern in the absence of an IAG forum as to when the plan and milestones will be visible as from lessons learned from other programmes, if this is design-led and point it comes into Code and then issues are identified. He noted that IA and consultation needs to be incorporated into design process e.g. Smart meter programme did not have code involvement and issues were not picked up until testing as that was Industry's point of engagement.

AM noted for programme delivery people the design-led approach was normal and expected. He noted the need to ensure a quality end to end design and the process of continuous engagement and review throughout and the need for Code Bodies to participate in L4 working groups.

IS advised on a nuance if L4 working groups are completing the work, the recommendation then goes to DAG, at that point all will have visibility of the artefact and constituency representatives of DAG will canvas for incremental review. The point is that there will be incremental review of artefacts as they are available. P Saker accepted this but noted it is still of concern as parties are very resource constrained currently and therefore difficult to engage due to FSP impacts and current market conditions. Need to see how the iterative process will work, how engagement works and how Code Bodies can feed in.

The programme intention is to have already identified key points – e.g. REC and trying to understand those and the direction in Design working groups is to articulate clearly how the end to end process works. He knows further discussion is required with Code Bodies but is clear that the design approach is predicated on incremental approval and engagement. Resources are required from New Year all the way through to end of Design to review artefacts. P Saker noted if participants are unable to attend meetings then they still need involvement. He agreed with the design-led approach agreed but needs to be confident on getting to an end to end design.

J Lawton noted that two Design working groups had been established already with no involvement of Code Bodies. AM responded that code bodies are involved in working groups. JL advised working groups TOR does not request code bodies. At some point with all WGs there need to be some representatives from codes and how far to end of process will they be involved. AM advised need to be involved immediately, this meeting is specifically requesting that involvement.

J Hawkins noted was comfortable that Code Bodies were being engaged in L4s. The difference is between Codes being engaged in design and having the relevant Code experts in design and having a market who need to operate as a whole having an opportunity to review the design – he thinks that part is missing. Code Bodies is one part of the parties and the other is clarify with other parties that done job right. Whatever mechanism is for achieving that but that we have a way of doing that so can place full reliance on.

Key concern is message to Industry and the programme needs to get the design-led message across to all programme participants/Industry clearly.

C Hannah noted she was surprised at the design-led statement for the programme and believes there will be a large portion of Industry who have not read it yet and are not involved as yet. She reiterated the need to get the message out there.

T Chevalier raised a point that design-led is a new way, a good way and in many ways have done code changes in past on a smaller scale. There was a comment made previously about 30 people on a meeting and only 2 talk – he advised he thinks risk at moment that is not an end to end view as no suppliers involved. There is a gap on suppliers and distributors which needs addressing although there are a no of experts involved also.

Industry do not have time currently to get involved in the detail but when the documents/artefacts get to nearly final this should be drawn to Industry's attention that they do need to review them now. IS agreed with the point

K Kelly questioned if points raised here will be played back to DAG? IS noted there is already an action on DAG to publicise artefacts and working groups more widely.

AM noted the programme is on the on first step, it will be a long journey and in reality the programme are just setting the process up, we need to get engagement, governance group representatives need to engage with their constituency representatives. LDP are coming on board and comms channels are up and running. We need to keep it under review.

P Saker advised no issue on the process, the issue is on resource commitments currently and that the programme is continuing nonetheless. CW noted there will always be something else happening for Industry, if don't get sufficient engagement design may not be right, but if it is about design right but don't like it then that is a different issue.

IS advised the Working Groups have been underway for a number of weeks now, an active supplier position is required to allow progression and this is required now. There is a requirement for more active approval – we will be reaching out to representatives for a way to optimise the process. Consensus model only works if get right people contributing in the groups. What is the best way of deriving info to get feedback?

G Evans questioned what do want by active engagement? If people are in the meeting, review artefacts and don't say anything, not sure what expecting if they genuinely agree with what happening and don't feel the need to comment. CW noted this was a discussion for DAG not CCAG.

T Chevalier raise Design working group and a direct question being asked - what do suppliers think of that, there was silence and then a question are there any suppliers on the call – again silence despite the fact there were suppliers on the call. It would be helpful to have someone on the call to say yes, agree, or no you've missed the point. TC noted need a response. If silence then left with nagging feeling that not an understanding at all.

J Hawkins noted that not everyone has luxury of having resource who understands the end to end process/design. With consultation the artefact is taken away and the resource will work across the business to get responses from the correct resources and then provide a full response. With a change this big it feels without having some opportunity to get in-depth design before getting into testing. Uneasy risk.

R Healey joined the meeting at this point.

Communications CW walked through the update slide noting that the programme website will be the single source of truth, with easily available info. www.mhhsprogramme.co.uk. Programme is also communicating weekly via the Newsletter "The Clock" which is being well received and sign up to this is available on the website.

CW mentioned SRO roadshows are taking place with a CSJ one scheduled tomorrow, BEMA planned and various others.

P Mullen joined the meeting at this point.

C Hannah questioned availability of confidential information to programme participants, not general public information. CW advised will be a programme portal with restricted information on but that all programme information would be available to all programme participants. AM noted all programme participants would have access to the information via the website and programme portal. The programme's concern would be press or media or malicious intent to get information that was not publicly available.

Separation: CW noted the programme have listened to Industry regarding Elexon as IM and the potential conflict of interest and a formal Business Separation plan has been agreed with Ofgem and Elexon Board. This was formally issued by Ofgem on 19 November. CW walked through the update on the slide on this and noted that the IPA will also check COI being adhered to. Separation training is also in plan for all Elexon and MHHS staff in order to mitigate risk and audit results will be provided to IPA. IPA also have specific responsibility also to monitor COI.

Governance – AM walked through slide. All Code matters will be delegated to CCAG from PSG.

3.   CCAG Terms of Reference

The CCAG were asked to approve the Terms of Reference, which had been issued for review ahead of the meeting as part of the pack.

DECISION CCAG-DEC01: The CCAG TOR were approved.

AM noted the programme governance framework is a living document and will likely require further update once the LDP on board – e.g. decision making criteria.

P Saker raised question on Ways of working – I&C and everything else then Gareth – if want to engage with Gareth as well. Large suppliers also have non domestic, does there need to be a clear demarcation. GE noted FSP had some

keen to stay in small supplier group, some domestic interest. Views of non-domestic only by GE. May be someone with large domestic interest where want to be in large supplier group and assume large supplier has some in non-domestic.

CCAG Roles of Representatives – AM walked through the slide on the CCAG responsibilities.

C Hannah questioned if there were SLAs in terms of papers. AM advised papers would be issued 5 working days ahead of the meeting, headline reports within 24 hours of the meeting and detailed minutes and actions within 5 working days of the meeting.

DECISION CCAG-DEC02 The CCAG roles of representatives were APPROVED

4.   CCAG Ways of Working

AM noted would like to approve principles now as way forward for CCAG.

Principles ran through as per the slide.

AM noted it was key that Code Bodies support a design-led model is key and representative is required in working groups now. The programme do not want to make a change that impacts code and not find out until the end. Code body resource comes into the programme now if not then a huge risk.

AM also requested confirmation that the CCAG are responsible for the Code. This was agreed.

CCAG DEC03 - The CCAG Principles were APPROVED.

ACTION CCAG-001: As noted in the CCAG principles "Code Bodies support a design-led model; not a Code-led model requiring Code Bodies to be involved in the end-to-end Design work immediately", CCAG representatives are asked to ensure early and continued participation in the DAG Level 4 Working groups from their constituencies and members. Confirmation required by 8/12/21 when the programme team will ring around for an update.

ACTION CCAG-002: Programme to issue a timetable (and subject areas) of the DAG Level 4 Working groups to assist CCAG representatives to identify appropriate Code Body resources for each.

L Jones questioned who is holding pen on code crafting. CW advised the programme, code bodies are within the programme to assist. CW noted the programme will be responsible for redlining of text but could not do without Code Bodies support within the programme.

CCAG are responsible for quality of it, drafting under umbrella of the programme but Code Bodies will be drafting under the umbrella of the programme with input from SMEs where required. IS noted some of the design team will transition to code updates/ drafting. CH noted need the SME code bodies will be needed at L4 and then approval at L3 i.e. CCAG.

AM advised L4 WG will draft code change and when ready will come to CCAG for recommendation to Ofgem to note codes drafted sufficiently for Ofgem to enact Smart meter powers. Want to confirm CCAG are supportive of that.

L Jones advised if that is iterative or a big bang? A MacFaul noted that Ofgem will need to liaise with BEIS to activate the powers, will remain open for a period of time, 5 years, to call upon as and when needed. L Jones raised need to manage different versions of the code. C Harden noted will come to milestones M6 and M8 discussion. M6 is interlinked with code and design – suggesting and proposing M6 becomes initial drafts of codes – question is when should it be? Ofgem are aware programme is design-led and therefore M6 will move. M8 is when the codes are ready to be enacted and M10 is linked to go live. M8 is precursor to M10. All of these need consideration as part of the rebaseline exercise proposed for Spring 2022.

ACTION CCAG-003: In line with the programme being design-led, Milestone 6 is being proposed to be changed to "Initial drafts of Code changes". CCAG representatives are therefore tasked with consulting with their constituencies to determine realistic dates for Milestone 6 and Milestone 8 Code Changes Delivered (bearing in mind the dependency between M8 Code Changes Delivered and M10 Central Systems ready for migrating MPANs). This information will be critical to the rebaselining of the plan which requires participation from all parties and evidence of reasoning for changes.

JH keen to get involved in this for a clear understanding of how it all comes together. AM noted this is an action rather than for information. Consideration needs to be be given to the roadmap and what other code changes are going on – how does programme fit in and how do resources fit and when the optimum time is for the work/milestones.

IS noted that the programme recognises there is a huge amount of procedural work and where there is talk about IAs and continuous review this is to mitigate risk that the Code process identifies a flaw in the design. As part of design the

programme is completing deep dives to provide assurance. IS asked is the actual ask that they would like to understand is interfaces and touchpoints as part of design activity? J Hawkins agreed this to be the ask.

T Chevalier raised IA, noting that much of the IA will be being completed as part of L4 Working Groups so should be judging that already. He recognised that J Hawkins will have Echos etc to consider. He has talked previously with IS on design artefacts – as artefacts become embedded in code if there are documents then they may not require a lot of further work to turn into code artefacts. IS advised wherever artefacts that can be lifted and shifted then the programme will take the opportunity if possible. Therefore code IA risk of changing design – should just be about wording of artefact to code design is key. Come end April when design is defined we will be building systems so need locked down design. AM noted design slide represents that. Code process is not a review of the design it a review of does the legal text match the design.

JH advised what is not quite matching up currently is the design outputs of working groups and point of code updates – but there is a middle point of where go to providers of other Codes. Can commission if available earlier than April then can ensure changes together in their systems. If the information for technical assessment is not available until April then that needs to be completed then and a route back in if issue identified at that point.

IS questioned the full MHHS detailed design completion and then it goes off to suppliers? J Hawkins advised need to be able to put that to them as when do code changes need to be identified and not just looking at high level obligation, looking at detailed process steps, interfaces etc. IS noted need to look at areas where will be an impact and bring the relevant bodies in earlier to refine the process and ensure IA undertaken e.g. what information do you need from a REC perspective for suppliers to review?

T Chevalier noted if Code Bodies attended the Registration Work Group (Design Working Group sub group) then they would understand the impact and that could be further detailed over the next few months.

Horizon scanning – AM noted there will be other Code changes and questioned whether the programme needs to stand up a Regulations Manager for this or will CCAG representatives feed in via CCAG where there are potential changes that may impact MHHS. J Hawkins noted that it was already an Obligation on Code Bodies to identify any changes to Ofgem. AM noted that need to formalise the process for the programme.

L Jones noted the ability will mature over time as Code Bodies gain a reasonable understanding of where impacts may be but don't have specifics.

J Hawkins advised no concerns on CCAG representatives completing this as they already have an obligation to notify the authority where a change and do not progress unless have approval It made sense to raise at this forum as well and flag any potential impacts.

J Hawkins noted wider understanding is needed and it is interpreted differently by each body – there is an obligation in each of the codes right now but is not robust enough to stop issues from being identified now. He is supportive of the proposal based on the fact they are still finding problems with REC based on SCR as obligation interpreted differently.

ACTION CCAG-004: Programme to organise a meeting with Code Bodies to develop and agree a framework for reporting changes that could impact the MHHS Programme.

The CCAG principles were APPROVED, noting the requirement for a further meeting between the Programme and Code Bodies in order to agree the process for how they feedback on Code changes that may impact the programme

MP162: RV provided an update on this as per the slide in the pack. The MOD was raised in May this year, business requirements as per the slide detail. Five working groups have been undertaken so far as part of the IA. Functional requirements understood, NFRs still require some understanding. Just completed refinement consultation – closed Friday 19/11/21 and there are a number of responses to be reviewed. Next steps is final IA with service providers which will complete 11/2/21 and then targeting approval May 2022 and release in Nov 23 schedule.

Under Sec governance, needs some further thought in light of discussions today. In terms of consequential changes there will be changes to REC and validate MDR role. Lots going on in L4 working groups that are being monitored.

AM noted this is one of the examples of horizon scanning and useful to share with CCAG.

P Saker questioned R Vernon as to whether there were any concerns on hitting the dates. R Vernon advised still looking at consultation responses and dependent on decisions taken there is no concern currently but a lot to go through in refinement.

C Hannah questioned awareness of all Code changes in progress currently and whether there is a clear list of those or a requirement for one. AM noted there is not one currently. IS noted he is aware some Code Changes are being

drafted currently. AM noted the PMO are tasked with providing a consolidated list of changes and this should be available by the January meeting.

CCAG-DEC04 Meeting dates: CW walked through the proposed Governance meeting schedule, CCAG is planned to be held on the third Wednesday of each month, with the proposal for the next CCAG to be held on Wednesday 26 January 2002. This was APPROVED.

AM raised the point as to whether or not there was enough a requirement for the CCAG to be scheduled monthly currently. It was agreed the meetings will be scheduled monthly and cancelled if not required. The meetings will be virtual unless a face to face is specifically required.

CW noted there will be no unplanned AOB items in order to ensure full awareness of agenda items and time to prepare ahead of the meeting.

CH reiterated the requirement for Code Bodies to get involved in the Level 4 Working Group now until design completion and to assist in communicating the design-led programme approach to all.

CH noted the current transition plan is aspirational and all programme participants need to buy in to this. Therefore the action on CCAG representatives for consideration of Milestone 6 and Milestone 8 is very important. A replan is required and has been accepted by Ofgem as a requirement after the design has been completed. It has been determined that the best time from a delivery perspective to complete this is after the design has been delivered such that they have taken part in design had a period after M5 to consume, think, talk about suppliers input and then come back and re-baseline at that point. Want to get a plan everyone believes in shortly after design rather than have a plan that potentially not believed in. CW noted the re-plan approval is a Level 1 threshold decision and therefore we need the evidence to support the recommendation to Ofgem.

P Saker raised the Design itself and noted it is not always clear and someone will always interpret a design differently, he questioned whether there is anything in the programme process where we expect a stakeholder to be impacted by the design and we know they are likely to be vocal and can identify these and address ahead of the design being issued. IS noted as part of the design work, the team will be checking with representatives to ensure the programme is reaching out to all. P Saker then questioned the meeting as to whether other Code Bodies would also be reaching out and seeing if anything came back. IS noted it is expected that post M5 the design team will need to support code modifications but following the issue of the design there will likely be a high volume of design queries the team will need to address.

JL raised a request for timetable of L4 Working Groups and subjects in order that Code Bodies can target the right attendance at these.

TC raised a point to note regarding if the Code Changes go on for a long period and changes are then identified, it needs to be taken into account that programme participants will be building systems from April so there will be a lesser impact if any further changes are identified earlier in the phase rather than leaving for 8 month for example..

Actions Summary

Action Ref	Action	Owner	Due Date
CCAG01-01	As noted in the CCAG principles "Code Bodies support a design-led model; not a Code-led model requiring Code Bodies to be involved in the end-to-end Design work immediately", CCAG representatives are asked to ensure early and continued participation in the DAG Level 4 Working groups from their constituencies and members. Confirmation required by 8/12/21 when the programme team will ring around for an update.	CCAG Reps	8/12/21
CCAG01-02	Programme to issue a timetable (and subject areas) of the DAG Level 4 Working groups to assist CCAG representatives to identify appropriate Code Body resources for each.	Programme PMO	29/11/21
CCAG01-03	In line with the programme being design-led, Milestone 6 is being proposed to be changed to "Initial drafts of Code changes". CCAG representatives are therefore tasked with consulting with their	CCAG Reps	26/1/22

	constituencies to determine realistic dates for Milestone 6 and Milestone 8 Code Changes Delivered (bearing in mind the dependency between M8 Code Changes Delivered and M10 Central Systems ready for migrating MPANs). This information will be critical to the rebaselining of the plan which requires participation from all parties and evidence of reasoning for changes. CCAG representatives to report members & constituents views at the next CCAG on 26 January 2021.		
CCAG01-04	Programme to organise a meeting with Code Bodies to develop and agree a framework for reporting changes that could impact the MHHS Programme.	Programme PMO	3/12/21