

MHHS CCAG Actions and Minutes

Issue date: 02/03/2022

Meeting number	CCAG 003	Venue	Virtual – MS Teams
Date and time	23 February 2022 10:00-12:00	Classification	Public

Attendees

Chris Welby (Chair)	MHHS IM SRO - Chair
Justin Andrews (JA) (on behalf of Ian Smith)	MHHS IM Design Manager
Jason Brogden (JB)	MHHS IM Industry Expert
Tom Chevalier (TC)	Supplier Agent Representative (Independent Suppliers)
Martin Cranfield (MC)	MMHS IM PMO
Andrew Green (AG) (on behalf of Gareth Evans)	Supplier Representative (I&C)
Simon Harrison (SH)	MHHS IM Design Assurance Lead
Clare Hannah (CH)	Supplier Agent Representative
Elliot Harper (EH) (on behalf of Lawrence Jones)	Elexon Representative (as BSC/BSCCo Manager)
Rosie Knight (RK)	SEC Representative
John Lawton (JL)	DCUSA Representative
Andy MacFaul (AM)	Ofgem Representative
Fungai Madzivadondo (FMa)	DNO/iDNO Representative
Andrew Margan (AM)	MHHS IM Governance Manager
Fraser Mathieson (FM)	MMHS IM PMO
Paul Mullen (PM)	CUSC Representative
Ann Perry (AP)	REC Representative
Ed Rees (ER)	Consumer Representative
Paul Saker (PS)	Supplier Representative (Domestic)
Richard Vernon (RV)	DCC Representative (as smart meter central systems provider)

Apologies

Richard Shilton (IPA)
Keren Kelly (NGESO)

Actions

Area	Action Ref	Action	Owner	Due Date	Update
Minutes and actions review	CCAG03-01	Provide detail on Operational Choreography design artefact content and SLAs (such as when further detail on timing and performance behind each design artefact will be provided to CCAG)	Programme (Justin Andrews)	23/03/22	
Smart Meters Act Powers	CCAG03-02	Present the seven steps for code drafting and code approval at next CCAG for discussion, as raised by AMF	Ofgem (Andy MacFaul), Programme (Andrew Margan)	23/03/22	
	CCAG03-03	Update on the parliamentary approval process for SMAP e.g. lead times and if the process can work during parliamentary recess	Ofgem (Andy MacFaul)	23/03/22	
	CCAG03-04	Provide feedback on how CCAG would make code change recommendations to Ofgem, and how Ofgem designating changes would work in practice	Code bodies	16/03/22	
	CCAG03-05	Update at next meeting how consequential changes are captured in SMAP	Ofgem (Andy MacFaul)	23/03/22	
CCAG Feedback on M6 and M8	CCAG03-06	Clarify with PMO who would own the Change Request for M6	Programme (Jason Brogden /PMO)	23/03/22	
	CCAG03-07	Raise at the Testing Advisory Group (TAG) whether qualification will be tested against code drafting or design baseline	Chris Welby	23/03/22	
	CCAG03-08	Ensure the dependency between qualification and code drafting is captured in the Programme RAID Framework	Programme (PMO)	23/03/22	Update: Dependency has been submitted to the RAID Management Framework
	CCAG03-09	Escalate to PSG that M6 will need to change via a Change Request	Chris Welby	02/03/22	Update: Raised with PSG 02/03/2022
Code Body Assumptions Review	CCAG03-10	Add code body assumptions presented at CCAG to the RAID Framework, with updates as per CCAG discussion	Programme (PMO)	23/03/22	Update: All assumptions added to RAID
	CCAG03-11	Provide rewording of DCUSA/A1 assumption	DCUSA (John Lawton)	02/03/22	
	CCAG03-12	Provide details of REC Modifications R15 and R32 to the PMO to update in the CCAG Horizon Scanning Log	REC (Ann Perry)	23/03/22	
Horizon Scanning	CCAG03-13	Review contents of the CACoP Central Modifications Register and share any code modifications currently missing from MHHS Horizon Scanning Log with the PMO	Code bodies	23/03/22	

	CCAG03-14	Update MHHS Horizon Scanning process and re-issued to CCAG members to review	Programme (Andrew Margan, PMO)	23/03/22	Update: Shared alongside CCAG Headline Report 24/02/22
	CCAG03-15	Review CACoP Central Modification Register template to see if an MHHS impact field can/should be added	BSC (Elliot Harper)	23/03/22	
	CCAG03-16	Update and re-issue assumptions CCAG meeting slides to correct typos	Programme (PMO)	24/02/22	Update: Shared alongside CCAG Headline Report 24/02/22
Other	CCAG03-17	Share link to PSG paper pack with headline report to highlight agenda item on Cooperation Principles and Ways of Working for CCAG member feedback	Programme (PMO)	24/02/22	Update: Shared alongside CCAG Headline Report 24/02/22
	CCAG03-18	Share BSC update on BSC changes P432 and P434 with CCAG members. Present updates on these changes at next CCAG	BSC (Elliot Harper)	24/02/22	Update: Shared alongside CCAG Headline Report 24/02/22

Decisions

Area	Decision
Minutes of previous meeting	CCAG-DEC-07: Minutes of CCAG held 26 January 2022 APPROVED

Minutes

1. Welcome

The Chair welcomed attendees to the third Cross-Code Advisory Group (CCAG) meeting.

2. Minutes and Actions Review

The Chair requested comments on the minutes for CCAG meeting held 26 January 2022. No comments were received, and the minutes were approved as final.

CCAG-DEC-07: Minutes of CCAG held 26 January 2022 APPROVED

The Chair presented the outstanding actions as per the meeting papers. Key updates are provided below:

ACTION CCAG02-02:

CH queried, explaining constituency feedback had highlighted a feeling parties were not receiving adequate detail or supporting information on design artefacts. CH asked when greater detail will be provided and whether there was a risk of Programme Participants (PPs) not being able to review artefacts effectively.

JA responded the design artefacts currently provide 'what and who' information, and the 'when' would be detailed in the Operational Choreography (OC) commencing in the coming weeks. SH added many artefact documents already contain timing information. CH clarified detailed information on timings and constraints was needed for DBT. JA explained timings would be included in the OC and constraints detailed in design artefacts. The timeframe for when all details will be available are currently unknown but will finalised at the end of the design phase, if not sooner through the design artefacts or OC. JA agreed to provide further information on this to the CCAG.

NEW ACTION: CCAG03-01 – Provide detail on Operational Choreography design artefact content and SLAs (such as when further detail on timing and performance behind each design artefact will be provided to CCAG)

ACTION CCAG02-05:

AMF advised Ofgem intend to publish the opt-out consultation next month.

3. Smart Meters Act Powers

In response to ACTION CCAG02-04, AMF provided an overview of the Smart Meter Act Powers (SMAP) and Ofgem's current position on use of the powers in relation to the MHHS Programme plan and designation of changes to industry codes. Key information is summarised below:

- SMAP grants Ofgem powers to directly modify codes and licenses more quickly than Significant Code Review (SCR) powers
- SMAP has not been activated yet. Once activated, powers last for 5 years, and Ofgem do not wish to activate the powers too early.
- If powers are used Ofgem is required to provide detail on the modifications to be made, specify applicable timelines, and specify the details of changes to code bodies, with a minimum 28 day consultation prior to publishing decision
- Regarding implementation dates, SMAP allows Ofgem to direct changes more quickly than the usual 56 day decision period if this is 'necessary or expedient', and there must be explicit consultation on this which identifies any known adverse effects on license holders and code parties
- Ofgem already has powers to make decision on MHHS through the MHHS Programme governance arrangements, and is exploring whether these are sufficient until the design phase is complete, in which case they will be activated only when need for a particular code modification thereby avoiding premature expiration of the powers
- A key question for Ofgem is how statutory powers can be most effectively mapped against the programme plan and how duplication of consultations can be avoided

AMF verbally outlined seven steps to enable code changes to be delivered:

1. Code Bodies attend level four design working groups to ensure design can be supported by individual codes
2. Design signed off by the Design Advisory Group (DAG)
3. A new level four code drafting working group is established to collectively draft code changes
4. Code Bodies, with support from MHHS, draft the changes
5. Code drafting presented to CCAG for action (e.g. final review, approval, consultation, referral back to working group, etc.)
6. CCAG approval and recommendation made to Ofgem (confirm legal text reflects the system design)
7. Ofgem designates the changes through SMAP for all codes

AG requested clarification on whether Ofgem may use SCR powers instead of SMAP. AMF replied SCR powers have been effective previously and could mitigate the time limited nature of SMAP, however Ofgem will need to review the suite of modifications to determine the most effective approach with due consultation.

PM queried where SCR powers are used, would the modifications be authority led or is it expected that code bodies will draft the changes. AMF responded this is important to steps three and four, and that if SCR powers were used it would likely be Ofgem who would raise the modifications with the code body leading development.

AMF and AM took an action to provide a walkthrough of the seven steps at the next meeting.

NEW ACTION: CCAG03-02 – Present the seven steps for code drafting and code approval at next CCAG for discussion, as raised by AMF

AM noted there may be a lead time for parliamentary activation of SMAP which the Programme will need to be aware of for planning purposes and to ensure effective timing of the drafting of code modifications and submission to Ofgem for designation. It was highlighted that Parliament's summer recess and the possibility of higher priority matters may displace the parliamentary time needed to activate SMAP and could therefore confound the programme plan. AMF agreed to provide information on the parliamentary approval process to assist consideration of whether this is a risk to the programme timetable.

NEW ACTION: CCAG03-03 – Update on the parliamentary approval process for SMAP e.g. lead times and if the process can work during parliamentary recess

EH asked whether Ofgem would like feedback from code bodies on how steps six and seven would operate in practice. AMF welcomed any input.

NEW ACTION: CCAG03-04 – Provide feedback on how CCAG would make code change recommendations to Ofgem, and how Ofgem designating changes would work in practice

TC queried how consultations on code drafting will operate, and whether these will be via the Programme or individual codes. AM responded code bodies have proposed drafting changes on each code 'area' with mini-consultations on each area throughout the drafting process which is centrally owned by the Programme. A final 'mop-up' consultation may then be required once changes are drafted, and consideration will need to be given to whether this occurs via Ofgem as part of the SMAP or SCR consultations to avoid duplication.

PS stated it was important to ensure the code changes are correct and asked to what extent consequential changes would be in scope of the powers Ofgem choose to use. PM questioned what the scope of the term 'consequential changes' was. The group noted SCR powers are confined to the area of change for which they are activated. AMF advised SMAP enables Ofgem to direct all necessary consequential changes and it was expected the changes needed to other codes would be flushed out during design. AMF agreed to provide further information on this at the next meeting.

NEW ACTION: CCAG03-05 – Update at next meeting how consequential changes are captured in SMAP

The group discussed the benefits of a mop-up consultation and PM suggested this should be Programme led. The Chair agreed, stating it should focus on whether the legal text appropriately reflects the design and identifying any inconsistencies. TC noted there will be other code changes in progress concurrently with MHHS changes and it was therefore wise to undertake a mop-up consultation once drafting is finalised. FM noted such matters should be considered a part of programme assurance. JB noted that any consultation should not be an opportunity to re-visit positions already agreed but should be an opportunity to find inconsistencies or errors/issues that would stop the codes working efficiently.

4. CCAG feedback on M6 and M8

Programme Milestones

JB provided an overview of the M4 to M8 milestones in the programme plan which relate to industry code change drafting timeframes. JB highlighted the replan activity due to take place after M5 once detailed design information is available to inform the programme timetable. The group were advised the replan will complete at M5+3 and this will affect subsequent milestones currently in the plan. JB went on to advise that changes to the programme timelines or milestones prior to the replan will require a Change Request (CR). The practical upshot of this is that any change to M6 will require a CR, whereas changes to M8 can be accommodated in the replan. It was highlighted the programme is still currently progressing according to the Ofgem-defined timetable, and that code bodies must consider whether a CR is needed to move M6. JA queried who the proposer of such a CR would be. AM considered it may require a sponsor who is supported by the Programme, or it may be possible for the CCAG to raise the change itself if the governance framework allows this. JB agreed to investigate this to reach a firm conclusion.

NEW ACTION: CCAG03-06 – Clarify with PMO who would own the Change Request for M6

Code Change Timeframes

AM then provided view on the potential timelines for code drafting, reflecting the inputs from code bodies thus far. AM asked the group whether there should be a pause between publication of the programme design baseline and commencement of code drafting, to enable review of design. Following this, and the mini consultations discussed above, the CCAG would be informed and able to make a recommendation to Ofgem on designation of the changes. AM highlighted some of the complexities of drafting and sequencing code change, including potential parallel running of systems, cut over arrangements, and potential transitional legal text within codes.

AM invited views. EH noted time will be required to firstly draft the code changes and, if SCR powers are used, time will be needed for changes to proceed via individual code change control process. AM replied the intention is that code drafting is undertaken by the programme and recommended for implementation by Ofgem. If SMAP used, this negates the need for individual change control processes, as Ofgem will direct implementation. EH concluded the method Ofgem choose, will impact how code changes progress.

AG asked whether there was a risk of industry parties not having sufficient visibility of the changes if they are raised and submitted directly to Ofgem via the Programme, rather than the usual code processes. AM replied it will be important to consider this and how code bodies support awareness of the changes being drafted through the Programme. The Chair highlighted the need for constituency reps to engage with parties to create awareness.

PS queried how the period for code drafting may interact with other programme requirements such as design testing, and other wider industry change, and whether resourcing issues could arise. The Chair noted this and clarified that parties are required to engage with the programme. PM agreed the use of mini consultations would help.

RV queried whether changes to the design could emanate from the code drafting process. JB clarified that, as a design led process, it is not anticipated significant changes to design should occur because of the code drafting process. If changes were required, these could be raised via a CR. RV noted the need for service provider impact assessment, highlighting the Central Switching Service (CSS) specifically. SH and JA clarified the aim is to avoid impacts on the CSS, but this is being monitored. RV believed there will be changes to CSS, even if only minor. JA responded this is under consideration currently through the design workstream.

CH asked about qualification processes, and whether parties will be qualified against the design process or against code legal drafting, and how qualification operates post-implementation. The Chair noted Elexon will operate the qualification process on enduring basis post-implementation and that whilst there should be no difference between design requirements and legal drafting in code, it was an important question that should be considered by the Testing Advisory Group (TAG). The group considered there may be a dependency between code drafting being available/finalised/implemented and qualification, if qualification against the design baseline is not allowed or if parties are unwilling base systems on the baseline alone.

NEW ACTION: CCAG03-07 – Raise at the Testing Advisory Group (TAG) whether qualification will be tested against code drafting or design baseline

NEW ACTION: CCAG03-08 – Ensure the dependency between qualification and code drafting is captured in the Programme RAID Framework

JL asked whether code drafting will be undertaken by level four working groups and whether additional time is needed to bring these working groups up to speed. The Chair highlighted that design expertise will be shifted into the code drafting working groups as necessary. AM provided an expectation on how this will operate and noted there is a still planning required.

Constituency Representative Feedback

The group discussed feedback on the current M6 and M8 milestones as detailed in the MHHS Programme Plan set by Ofgem. Some representatives advised that parties to their code had expressed a preference for being able to review draft legal text before commencing their design and build activities. AM advised that, as MHHS is a design-led programme, it is expected industry parties will commence design and build based on the design artefacts. PS highlighted some industry parties may wish to await legal text and some may commence their design and build based on design documents alone. PS believed caution was necessary to ensure design information is complete enough to ensure the efficacy of any design/build undertaken by parties ahead of the finalisation of legal text. AM agreed and noted this was an important topic of discussion. AM explained the expectation is that industry parties commence their systems work ahead of legal text finalisation and as there should be no substantive difference between the requirements of the design and the requirements in code the risk to parties was low.

CCAG Outputs from Previous Meetings

AM advised the Balancing and Settlement Code (BSC), and Retail Energy Code (REC) are the codes most impacted by the MHHS Programme, with lesser impacts on the Connection and Use of System Code (CUSC), Distribution and Connection Use of System Agreement (DCUSA), and Smart Energy Code (SEC).

The group discussed the release cycles within the codes which highlighted the complexities of sequencing changes effectively. AM noted sequencing and configuration of changes to each code will need to be known by M6, and it is important for the Programme to continue proactive engagement with codes.

The group noted there is likely to be a 12 month transition period with dual running arrangements. JB raised the interaction of M6, which relates to the initial drafting of code changes, with the replan due to take place after M5. AM advised a degree of pragmatism would be required but M6 would need to be moved through the raising of a CR, and the Chair agreed to highlight this to the Programme Steering Group (PSG), despite the specific dates being unknown at present.

NEW ACTION: CCAG03-09 – Escalate to PSG that M6 will need to change via a Change Request

JL questioned whether M5 relating to delivery of the design baseline will happen as anticipated, as this will impact M6. The Chair advised this was not clear at present but is being monitored closely.

5. Code Body Assumptions Review

The group proceeded to review assumptions provided by each code body relating to the Programme, with attendees asked to provide any comments. JB advised all assumptions will be captured in the Programme's central RAID log, with an expectation this will be published in future via the MHHS Programme Portal currently under development.

NEW ACTION: CCAG03-10 – Add code body assumptions presented at CCAG to the RAID Framework, with updates as per CCAG discussion

Regarding CUSC assumptions; JA queried the dependency on the Access and Forward Looking charges SCR and transmission use of system charging reform, noting that Ofgem should be monitoring this also. PS believed it was important to record this due to the level of current industry change and how interaction of these and the MHHS Programme are somewhat unknown. JA agreed and noted the engagement work being undertaken by the Programme

Regarding DCUSA assumptions; JA queried the assumption legal text will be drafted by the level four design working groups with code body involvement. JA highlighted each working group reports to an advisory group, and the intention is to constitute a new level four code drafting group under the CCAG with subgroup workstreams as necessary for specific technical topics, and these will require code body involvement. The Chair noted there was a question about how expertise from existing technical subgroups is migrated to the code drafting group under the auspices of CCAG. JL agreed to update the assumption accordingly.

NEW ACTION: CCAG03-11 – Provide rewording of DCUSA/A1 assumption

AG queried the DCUSA assumption that there are no impacts on Distribution Use of System (DUoS) tariffs and whether the Programme had considered this. JA replied that whilst there is an indirect link, the data distributors need to set tariffs is under consideration in the charging SCRs. TC agreed regarding DUoS but believed there will be changes to transmission charging as this sector currently differentiates between half hourly and non-half hourly. The group agreed any such changes will need to occur over the coming years.

No comments were provided on the BSC assumptions.

Regarding REC assumptions; TC questioned current assumptions about impacts to the CSS. JB believed understanding of this would be refined via the assessment of changes as part of the replan activities following release of the detailed design.

Regarding SEC assumptions; a query was received on assumption six relating to the timing of code changes, which are based on existing programme milestones, it was confirmed these are very likely to change.

6. Horizon Scanning

AM provided updates on the groups Horizon Scanning (HS) document, explaining that changes raised to individual codes as a result of the MHHS Programme should come to CCAG for review and development. AM highlighted each code body already provides details of new and existing code changes/modifications to the Code Administration Code of Practice (CACoP) forum via its Central Modification Register (CMR). AM proposed CCAG use the CACoP CMR to monitor changes raised in individual codes and encouraged CCAG members to also flag changes related to MHHS.

AM asked whether the group were aware of any other relevant code changes that are not listed in the HS document. PS queried what level of impact is relevant, for example, whether a non-related change in a gas code but one which reduces resource availability is a 'related' change, and how resource constraints like this could be raised. AM clarified the CCAG Horizon Scanning tool was not intended to include changes that were not directly related, and that resourcing considerations were most pertinent to the replan activity and should be fed through consultation process for this. PS also opined that resource availability could be captured in the RAID, to which the Chair confirmed it already is.

JL queried whether code changes implemented during the design phase could then affect the design. JA responded this would require monitoring by the CCAG and could be included as part of the horizon scanning activity. AP further highlighted the need for code bodies to monitor and support the assessment of whether current code changes requests/modifications may be nullified by progression of the MHHS Programme.

FMA highlighted a REC change not currently captured in the HS document or the CMR. AP agreed to provide an update for these.

NEW ACTION: CCAG03-12 – Provide details of REC Modifications R15 and R32 to the PMO to update in the CCAG Horizon Scanning Log

JB noted several changes do not appear to be highlighted via the 'impacts SCR' column in the CACoP CMR. The Chair asked all to take an action to review this and ensure the CACoP log is clear. EH and AP queried the definition of 'impacts

SCR', and whether this sufficiently prompts individual code bodies or CACoP to highlight all modifications which have MHHS impacts.

NEW ACTION: CCAG03-13 – Review contents of the CACoP Central Modification Register and share any code modifications currently missing from MHHS Horizon Scanning Log with the PMO

AM agreed to update the MHHS horizon scanning process and re-issue this to CCAG members.

NEW ACTION: CCAG03-14 – Update MHHS Horizon Scanning process and re-issued to CCAG members to review

JB queried whether the CACoP CMR could be updated to include a specific field for MHHS impacts. EH agreed to take this to CACoP for consideration.

NEW ACTION: CCAG03-15 – Review CACoP Central Modification Register template to see if an MHHS impact field can/should be added

AM requested updates on BSC changes P432 and P434. EH replied the changes are progressing and offered to issue slides summarising each.

NEW ACTION: CCAG03-18 – Share BSC update on BSC changes P432 and P434 with CCAG members. Present updates on these changes at next CCAG

7. **Next Steps**

MC summarised the actions of the meeting and invited any comments or additional actions.

JA asked whether Ofgem has considered a change moratorium. AM believed that once the MHHS code drafting has commenced, code bodies will be expected to monitor and be aware of such impacts. The Chair highlighted the agenda road mapping being undertaken for each programme workstream which should begin to provide a clearer view of the forward workplan and actions.

The group noted updates were required to the code assumptions slides to correct the names of each code representative.

NEW ACTION: CCAG03-16 - Update and re-issue assumptions CCAG meeting slides to correct typos

The Chair invited any other business (AOB).

AOB 1: JB highlighted a proposal regarding cooperation principles and ways of working which will be discussed at the PSG with the intention of including within the programme governance framework which applies to all programme participants including code bodies. A link to the PSG papers will be provided within the CCAG Headline Report to enable CCAG members to provide any feedback.

NEW ACTION: CCAG03-17 – Share link to PSG paper pack with headline report to highlight agenda item on Cooperation Principles and Ways of Working for CCAG member feedback

The Chair thanked attendees for their contributions and closed the meeting.