

## MHHS Cross Code Advisory Group (CCAG) Minutes and Actions

Issue date: 05/10/2022

Meeting number **CCAG010**

Venue **Virtual – MS Teams**

Date and time **28 September 2022 10:00-12:00**

Classification **Public**

### Attendees

#### **Chair**

Chris Welby (Chair)

#### **Role**

Chair

#### **Industry Representatives**

Andrew Green (AG)

I&C Supplier Representative

Clare Hannah (CH)

Supplier Agent Representative

Fungai Madzivadondo (FMa)

DNO/iDNO Representative

Jonny Moore (JM) (on behalf of Lawrence Jones and Matt Hall)

Elexon Representative (as central systems provider) and Elexon Representative (as BSC/BSCCo Manager)

Neil Dewar (ND)

National Grid ESO

Richard Vernon (RV)

DCC Representative (as smart meter central system provider)

Sarah Jones (SJ)

RECCo Representative

Tim Newton (TN) (on behalf of Robin Healey)

SEC Representative

Tom Chevalier (TC)

Supplier Agent Representative (Independent Supplier Agent)

#### **MHHS IM**

Andrew Margan (AM)

Governance Manager

Becca Fox (BF)

Code Drafting Project Manager

Fraser Mathieson (FM)

PMO Governance Lead

Jason Brogden

Industry Expert

Matthew McKeon (MM)

Design Team

Nicole Lai (NL)

PMO Governance Support

Sharon Ward (SW)

SRO PMO

#### **Other Attendees**

Ann Perry (AP)

REC Code Manager

Sinead Quinn (SQ)

Ofgem

### Apologies

John Lawton

DCUSA Representative

Paul Mullins

CUSC Representative

Paul Saker

Domestic Supplier Representative

## Actions

Area	Action Ref	Action	Owner	Due Date
Horizon Scanning Log	CCAG10-01	BSC to add CP1568 to Horizon Scanning Log and complete any empty BSC fields	BSC Representative (Jonny Moore)	26/10/2022
	CCAG10-02	REC to add R0065 to Horizon Scanning Log	REC Representative (Ann Perry)	26/10/2022
Code Drafting Plan Update	CCAG10-03	Programme to discuss when settlement timetable drafting should be undertaken with MHHS Design Team, Elexon, and RECCo	Programme (Andrew Margan)	26/10/2022
	CCAG10-04	CUSC to provide response on approach to legal text review	CUSC Representative (Paul Mullen)	26/10/2022
Previous meetings	CCAG07-11	Consider the enduring referencing and hosting of design artefacts and how this should be brought into each code. Update the code draft principles for approval in July CCAG.	Programme (Andrew Margan)	20/07/2022
	CCAG08-01	Speak with design team and clarify the process of how data item industry changes are tracked and managed within the Programme	Programme (Fraser Mathieson)	17/08/22
	CCAG08-06	Provide feedback and supporting rationale on whether new code needs to be implemented for qualification (i.e. if qualification start is dependent on M6 (CCAG approval of code) or M8 (code implementation)). If code does not need to be implemented for qualification, provide feedback and rationale on the time at which new code does need to be implemented.	CCAG members	17/08/22
	CCAG08-07	Progress discussions to determine where the enduring solution for hosting design artefacts and bring back to CCAG	Programme (Jason Brogden)	17/08/22
	CCAG08-08	Determine the approach to drafting topic areas that will not be drafted from the design baseline (e.g. qualification, transition) and bring to back to CCAG.	Programme	17/08/22
	CCAG09-01	Chair to follow-up with MHHS Testing Workstream regarding response to CH query on qualification.	Chair	31/08/2022
	CCAG09-06	Programme to produce key code drafting dependencies relating to qualification to inform view of code drafting and text activation requirements.	Programme (Andrew Margan)	14/09/2022
	CCAG09-09	Programme to confirm where/how DIP data specification is hosted, managed, and owned.	Programme (Design Team)	14/09/2022

## Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC19	Amended minutes (v1.2) of CCAG meeting held 24 August 2022 approved (available <a href="#">here</a> )

<b>Code Drafting Plan Update</b>	CCAG-DEC20	Updated Code Drafting Principles and Approach approved
<b>CDWG Updates</b>	CCAG-DEC21	October 2022 Code Drafting Working Group stood down

### [RAID Items](#)

RAID area	Description
None	

### [Minutes](#)

#### 1. Welcome and Introductions

The Chair welcomed attendees to the meeting and outlined the agenda.

#### 2. Minutes and Actions

The Chair invited comments on the amended August CCAG minutes. TC noted they were not included in the attendees list, to which a [change-marked version](#) was agreed to be issued.

#### **CCAG-DEC19: Amended minutes (v1.2) of CCAG meeting held 24 August 2022 approved (available [here](#))**

The group proceeded to review outstanding actions:

**ACTION CCAG07-11: Programme to consider the enduring referencing and hosting of design artefacts and how this should be brought into each code. Update the code draft principles for approval in July CCAG.**

See update under item 7 REC/BSC Code Drafting Prototyping. Action ongoing.

**ACTION CCAG08-01: Programme to speak with design team and clarify the process of how data item industry changes are tracked and managed within the Programme.**

FM noted the design team is currently occupied reviewing the c.3100 responses received to the design baseline consultation and an answer is yet to be provided.

SJ noted RECCo are conducting a review of the Data Transfer Network (DTN) messages being retained post-MHHS that require tweaks to reflect new data items. This will be brought to the Consequential Change Impact Assessment Group (CCIAG). Action ongoing.

**ACTION CCAG08-04: CCAG Chair to meet with Justin Andrews (DAG chair) to discuss CCAG member concerns that some design artefacts are not sufficient to draft code from.**

FM advised the matter had been discussed between the CCAG and Dag Chairs. A code drafting prototyping exercise was successfully conducted with the BSC and REC which has demonstrated code drafting can be undertaken based on the design artefacts. See item 7 REC/BSC Code Drafting Prototyping for further information. Action closed.

**ACTION CCAG08-05: Programme to discuss with REC any implications for code drafting as a result of MHHS on the REC that sit outside scope of the Programme design. Raise with design as required (e.g. through CCIAG).**

FM advised discussions were now underway at the CCIAG. Action closed.

**ACTION CCAG08-06: CCAG members to provide feedback and supporting rationale on whether new code needs to be implemented for qualification (i.e. if qualification start is dependent on M6 (CCAG approval of code) or M8 (code implementation)). If code does not need to be implemented for qualification, provide feedback and rationale on the time at which new code does need to be implemented.**

FM noted feedback had been received and updates would be provided under agenda item 6 Replan Activity for M7/M8. The action was retained as ongoing until the approach to qualification code drafting is confirmed. Action ongoing.

**ACTION CCAG08-07: Programme to progress discussions on the enduring solution for hosting design artefacts and bring back to CCAG: 1. Whether the design will be maintained post go-live (and if so, how) 2. Confirm for all code bodies the role iServer plays for their code drafting.**

See update under agenda item 7 *REC/BSC Code Drafting Prototyping*. Action ongoing.

***ACTION CCAG08-08: Determine the approach to drafting topic areas that will not be drafted from the design baseline (e.g. qualification, transition) and bring to back to CCAG.***

JB advised the matter was under discussion at the CCIAG. The group determined to retain the action as ongoing until the code drafting approach for qualification and transition are confirmed. Action ongoing.

***ACTION CCAG09-01: Chair to follow-up with MHHS Testing Workstream regarding response to CH query on qualification.***

CH noted the query is yet to be finalised and will be worked through in the Qualification Working Group (QWG). Action ongoing.

***ACTION CCAG09-02: All Code Bodies to confirm approach to legal review of code text (e.g. will this occur during each drafting topic prior to consultation, or later, for example, during consistency review, etc.).***

FM advised feedback has been received from the majority of code bodies. See also ACTION CCAG10-04. Action closed.

***ACTION CCAG09-03: BSC Representative to check whether recent BSC sandbox application affects MHHS.***

JM advised the sandbox application was valid because it would end before MHHS was implemented and the underpinning principles are sound. The BSC Panel elected to reject the sandbox application, feeling the matter would be better served by a BSC modification. JM noted if a modification is progressed it will impact the MHHS design around the registration service.

FM noted the sandbox application is on the Horizon Scanning Log. If a modification is raised, the BSC Representative will ensure this entered into the log and this will enable the Programme and CCAG to monitor the modification. Action closed.

***ACTION CCAG09-04: CCAG to provide reminder to MHHS Design Team to resource attendance at CCAG and present on progress of latest changes.***

FM advised the MHHS Design Team were in attendance to present updates on the Horizon Scanning Log. Action closed.

***ACTION CCAG09-05: Highlight BSC MHHS success criteria to DAG.***

FM advised the criteria had been highlighted to the DAG Chair and would be informally considered as part of M5 approval.

***ACTION CCAG09-06: Programme to produce key code drafting dependencies relating to qualification to inform view of code drafting and text activation requirements***

The group were advised this action is ongoing in conjunction with other considerations regarding qualification. Action ongoing.

***ACTION CCAG09-07: Programme to update Programme plan with latest code drafting inputs through the MHHS replan activities.***

BF advised the plan had been updated following review of replan consultation comments. Action closed.

***ACTION CCAG09-08: Programme to engage with Ofgem regarding CCAG decision to link M7/M8 delivery to M10.***

FM advised Ofgem had been informed and discussion meetings offered for any clarifications. Action closed.

***ACTION CCAG09-09: Programme to confirm where/how DIP data specification is hosted, managed, and owned.***

As the design team is undergoing comment review, FM suggested to retain this action as ongoing until formal confirmation is provided.

JM flagged this may have an impact on BSC Issue 101, and Elexon would appreciate clarity on this action.

SJ noted they are working on the assumption this would sit within the Energy Market Data Specification (EMAR) and if anything was proposed otherwise, a conversation would need to be had with REC. It was noted this was also the BSC and Programme assumption. Action ongoing.

***ACTION CCAG09-10: CCAG members to discuss with constituents whether a pre-CCAG webinar would be of value and provide views to Programme to enable decision***

The Chair advise no direct evidence pointing to the need for a pre-CCAG webinar had been provided. The Chair noted if there is a further point within code-drafting where a webinar would be useful, then this action would be revisited. The

CCAG will respond to the Programme Steering Group (PSG) to advised a CCAG webinar will not be convened at this time. Action closed.

### 3. Programme Updates

FM shared updates from other level 3 MHHS Programme governance groups, including the PSG, Testing and Migration Advisory Group (TMAG), and the Design Advisory Group (DAG).

Regarding wider Programme updates, the Round 2 re-plan consultation is ongoing until Friday 30 September. CCAG members were encouraged to provide responses.

Regarding the design comment review process, design issue impact assessment sessions are being held 03-05 October 2022. CCAG members were advised to contact [PMO@mhhsprogramme.co.uk](mailto:PMO@mhhsprogramme.co.uk) for joining information.

It was noted Readiness Assessment (RA) 2 is ongoing, and constituents were encouraged to provide responses through the relevant communication channels.

### 4. Horizon Scanning Log

AM introduced the item, noting the aspects of the Horizon Scanning Log and stressing the importance of Code Bodies updating their respective changes. If a code modification is needed to enable the Programme and is unlikely to be approved, AM advised Code Bodies raise this to ensure Programme assessment and intervention where appropriate, enabling the Programme to remain proactive in these areas.

Regarding improvements to the log process, the difficulty of reviewing individual changes was noted. Changes with common themes were encouraged to be grouped together. FM flagged Code Bodies have an existing duty to review changes with potential cross code impacts through the Code Administration Code of Practice (CACoP).

#### **SEC updates**

Regarding SEC MP162, TN noted it had been sent back by Ofgem and there is ongoing work to deliver options for the implementation of the Meter Data Retrieval (MDR) role by the October 2022 deadline. AM said the Programme is fully aware of SEC MP162 and engaging with both SEC and the DCC.

TN flagged SEC DP206 as being in draft, with potential impact on the Programme, noting further discussions are due to take place. TN and JM noted the proposal would raise changes to the BSC and impact the REC. TN confirmed AM's assumption that SEC DP206 would only require monitoring from the Programme until further information is needed.

TC noted the earlier the MPANs are created, the earlier they would end up in the settlement arrangement. The Chair responded generators are outside the scope of the Programme and this needs to be looked at in more detail.

Regarding SEC MP200, FM noted it was now implemented and flagged as low risk, with no further action to be taken by the Programme. It will remain on the Horizon Scanning Log for visibility.

#### **BSC updates**

Regarding BSC CP1568, JM noted this is due to be added to the Horizon Scanning Log. The change revolves around the inclusion of data items that were not included in BSC CP1558, including the connection type and import/export meter data. SJ noted this change also impacts REC and AP advised of some challenges in coordinating BSC CP1568 with REC R66 and requested support to ensure the changes are coordinated effectively.

AM queried if the challenges were technical or political. SJ replied both; the REC change was progressed ahead of the CCAG code drafting, and challenges exist around understanding and articulating the benefits. There are questions around the target implementation of June 2023 and the population of data items prior to data-cleansing activities.

Since a defined solution had already been created, JM noted there are no working groups for these BSC change proposals. The next steps involve producing a change report to address questions raised by the BSC Panel, for which a Programme representative would be needed. JM will reach out to ensure the right people are looped in. TC would connect with JM to share further views.

FM noted BSC P419 was yet to be populated, to which JM agreed to ensure completion of any empty fields.

**ACTION CCAG10-01: BSC to add CP1568 to Horizon Scanning Log and complete any empty BSC fields**

## **REC updates**

Regarding REC R0015, AP noted the recommendation to approve from the REC Code Manager was rejected by the REC Change Panel. REC are currently awaiting a decision from the Authority. The REC Code Manager believes this is a positive change, but it is unlikely that it would go ahead for its targeted release of November 2022. Subject to Ofgem's decision, the plan is now to implement in February 2023 with legal text becoming effective in June 2023.

AM queried why the REC Change Panel felt they should reject REC R0015 and considered if the Programme could have positively influenced the Panel to come to a different conclusion if they had been present. AP noted there had been significant debate around this, with one of the Panel's challenges centred on R0015 failing to provide quantifiable business benefits. AP noted while the benefits are intangible, R0015 still meets the REC objectives, and the presence of a Programme member may have helped to enhance discussions.

MM noted one consequence if REC R0015 is not approved is it would weaken the MHHS aspects of BSC P432.

TC raised their support for P432 and R0015, as they both ensure advanced meters can successfully migrate into MHHS. If they do not progress, this could cause difficulties for migration under MHHS for a significant number of sites, extending migration periods and leading to solutions that do not use half-hourly data.

AP confirmed the scope of REC R0044 is solely around the Central Switching Service (CSS) at present and will be developed alongside SEC MP162. SJ noted MHHS Business Process diagram (BP) 003A requires updating to reflect the R0044 solution. This is to ensure a mismatch between T0044 and the Programme design artefacts does not occur, in accordance with the aims of the Horizon Scanning Log process.

SJ noted the CSS change and interactions with the Data Service Provider (DSP) revolve around MHHS Business Process 003A. There are open comments in the design artefacts relating to this which will need to be picked up in the design artefact baseline. Since there is now a final solution, the relevant fields in the Business Process document will need closing out.

SJ advised certain change proposals, such as REC R0066, have been added to the Horizon Scanning Log which impact MHHS and require monitoring.

Regarding REC R0065, AP noted it has been raised but was yet to receive initial assessment. AP agreed to add it to the log and conduct a sense-check on other REC changes to ensure completeness. AP advised of some issues accessing the Horizon Scanning Log, to which FM advised they would pick up with AP separately.

### **ACTION CCAG10-02: REC to add R0065 to Horizon Scanning Log**

## **DCUSA**

The group noted no DCUSA representative was present. TC advised DCP375 had been implemented in February 2022, leading to a conversation between CCAG members to consider the need to grey-out changes that had been implemented within the log. FM agreed to pick this up as part of wider improvements to the Horizon Scanning Log process.

## **Conclusion**

AM observed the efficiency and usefulness of this meeting's review of the Horizon Scanning Log compared to previous meeting, to which the group agreed.

## **5. Code Drafting Plan Update**

### **Code Drafting Plan to M6**

AM provided an overview of the updated code drafting plan. AM noted the original draft plan was not overlaid with the CCAG monthly meeting cycle, resulting in the extension of M6 delivery from 12 months to 13 months to align with CCAG meeting dates. As there had been feedback to not compress the time scales, this provides the advantage of extending the consultation periods for certain topic areas, allowing for improved quality of responses and contingency for sickness and other leave. Code drafting is due to commence in December 2022 and complete in January 2024.

### **Code Drafting Principles and Approach**

While each code was originally due to be updated by topic area, AM noted a recommended change in the code drafting principles. Namely, lesser-impacted codes would now be dovetailed to the end of each topic drafting phase, allowing for REC/BSC code drafting to be stabilised ahead of the commencement of drafting for lesser-impacted codes. This change

had been approved by Code Bodies. AM raised this change to the group to discuss and agree an update to the code drafting principles.

TC expressed disappointment at the length of the code drafting process, to which AM noted the time taken up by industry review and the expressed desire from industry to have adequate time allocated. TC advised they had seen previous plans which indicated a three month period for code drafting and queried why drafting was now scheduled to take 13 months. AM advised the code drafting had never been scheduled to complete in three months and noted the template plan for the drafting of each topic area had been set at three months which may be where the confusion lies.

TC considered how the interface data specification was occurring late in the process and believed it should be delivered promptly. SJ advised the new MHHS interfaces will be defined in the design and will need to be input into EMAR. From a REC perspective, this could be completed anytime and has been sequenced in a way so as to manage resourcing requirements. AM replied the sequence of activities had been well-established, with participants expecting to build around the design rather than the code. AM acknowledged TC's point but did not plan to change the sequence of activities moving forward.

TC noted the registration interactions with metering and data central services is fundamental and should be viewed as a higher priority.

Regarding the MDR piece and flow of data into CSS, SJ noted this is done through REC R0044 and will be delivered as part of its drafting, which is separate to what is being delivered through MHHS.

ND flagged the inclusion of the settlement timetable as a code-drafting topic. MM noted the initial go-live would not include the timetable, so it would have to be a separate release. AM agreed to discuss the preferred approach with the design team.

**ACTION CCAG10-03: Programme to discuss when settlement timetable drafting should be undertaken with MHHS Design Team, Elexon, and RECCo**

Eight CCAG members voted in favour of the additional code drafting principle relating to lesser-impacted codes dovetailing into the code drafting topics being undertaken by BSC and REC. TC voted against the principle. The Chair confirmed the principle was approved.

**CCAG-DEC20: Updated Code Drafting Principles and Approach approved**

**Code Body Feedback on Legal Review Approach**

FM noted the feedback from Code Bodies on legal review of code text, crucially from BSC and REC, would be considered when planning. AM noted the importance of fully reviewing the legal text at the end of the process and that different approaches would be supported by the Programme.

ND noted CUSC would provide a response to the legal review of code text.

**ACTION CCAG10-04: CUSC to provide response on approach to legal text review**

**6. [Replan Activity for M7/M8](#)**

JB noted Round 2 of the Programme-wide replan activity had been issued for consultation, and urged CCAG members to respond by Friday 30 September 2022. Responses should be supported by substantial support and evidence if dates are to be changed.

JB advised the planning consultation drafts have been shared, noting the 'challenge' timeline contains less rationale than the illustrative timeline. JB thanked BF for their efforts on planning.

Regarding the illustrative timeline, JB noted M10 (commencement of migration) is set for July 2025 and code is required to be in place by that point, thus creating a backstop for M8 (legal text activation). If M8 were to be pushed back as far as possible, this would result in a June 2025 release, allowing for only a month between the release of code drafting and central parties' readiness for migration.

Regarding the 'challenge' timeline, JB noted M10 is in Autumn 2024, which does not lead to the same issue. The discussion to be had is therefore around the illustrative timeline. JB asked the CCAG whether M8 should be set to February 2025, which is the preferred Programme position as it would allow for leeway, or June 2025, which would grant parties more time to undertake qualification before the backstop.

CH believed code implementation would need to happen by systems go live. CH noted code implementation in June/July 2025 means very little leeway will exist and asked how much time is needed between code implementation and systems go live. JB believed qualification drafting needs to be in place before go live to enable the performance assurance board to approve qualifications. The current expectation is qualification will commence one month after system integration testing (SIT), and this would align with the July 2025 date. CH considered the option of extraordinary code releases and whether these would be considered by the Programme. JB assumed extraordinary releases may introduce complexity and standard releases were preferable. AM believed If there is a need for an extraordinary release, a high threshold of reasoning would be required. SJ did not believe REC would undertake an extraordinary release and stated a preference for code to be implemented as close to M10 as possible. JM advised the BSC could undertake an extraordinary release but would wish to limit the implementation of code with future effective dates or time-limited clauses.

JB believed the safest assumption is to align M8 with M10 and make this subject to discussions on what cutover activity looks like. JB advised consideration would be required over whether parties will be willing to undertake qualification prior to code drafting being in place. This would need to be discussed with the Performance Assurance Board, but it would result in the best outcome and allow for flexibility with milestones. TC agreed qualification is a key question and suggested this topic should perhaps be brought forward for in the drafting plan.

JB will add the M8 and M10 alignment and assumptions associated with qualification into Round 3 of the re-plan.

## 7. REC/BSC Code Drafting Prototyping

JB provided an overview of the outcomes from the prototyping sprints. The general conclusion is positive and has demonstrated that design artefacts can be used to draft code. It was noted SJ used the prototyping to raise issues into the design consultation. The prototyping highlighted issues around terminology and inconsistencies in the artefacts

Another element of prototyping was to explore the opportunities of using the Enduring Design Hub as a reference for code drafting. As they have their own digital tools, RECCo did not utilise the Enduring Design Hub. MM noted it was well-suited for business processes and diagrams but not legal obligations and methodology statements, confirming initial assumptions.

JB expressed their recommendation for the M5 Success Criteria that the design artefacts are suitable for code-drafting. Regarding the method, the Enduring Design Hub cannot be recommended for drafting, with the main issue being the amount of work and effort to go through to put it into the enduring governance baseline and make it legally binding as a reference document for code drafting. A formal report on the prototyping exercise will be provided to CCAG in due course.

SJ added they are looking into demonstrations of the Enduring Design Hub. Discussions are being held around the need for an enduring solution that holds end to end processes outside the REC and can be a tool for industry. REC are due to attend a demonstration of the Enduring Design Hub, and are engaging with BSCCo and the Programme on potential solutions. JB was pleased to hear positive feedback from SJ and the group noted the CCAG success criteria relating to M5 approval could be met.

## 8. CDWG Update

The CCAG considered whether to go ahead with the October CDWG. AM noted the main subject areas for the October CDWG would be to articulate progress on the M6 plan and provide a prototyping update. AM considered the interest around these items at this stage and whether an update in January would be sufficient.

JM noted this decision is based on whether feedback on the M6 plan is needed by the CDWG.

JB noted more prototyping details would be released following the November sprint.

The Chair agreed to stand down the October CDWG in favour of a meeting in November where feedback on the code drafting plan can be sought.

## CCAG-DEC21: October 2022 Code Drafting Working Group stood down

## 9. Summary and Next Steps

FM summarised the meeting actions as per the table above and provided an overview of upcoming agenda items for the October CCAG.

**Date of next meeting: 26 October 2022**