MHHS Cross Code Advisory Group (CCAG) Headline Report

Issue date: 24/11/2022

Meeting number	**CCAG012**	Venue	**Virtual – MS Teams**
Date and time	**23 November 2022 10:00-12:00**	Classification	**Public**

Actions

Area	Action Ref	Action	Owner	Due Date
Horizon Scanning Log	CCAG12-01	DCUSA Representative to forward invites and details of DCP415 & DCP416 working groups to Programme	DCUSA Representative (John Lawton)	ASAP
	CCAG12-02	CUSC Representative to add CMP401 to Horizon Scanning Log	CUSC Representative (Neil Dewar)	ASAP
CR12 Impact Assessment Update	CCAG12-03	Programme to ensure consequential change code drafting topics are built into the Programme plan and updated into the Round 3 Programme Replan consultation	Programme (Jason Brogden)	06/12/2022
	CCAG12-04	Programme to update code drafting plan following decision on Programme Change Request 12, and bring to the next CCAG meeting	Programme (Becca Fox)	06/12/2022
	CCAG12-05	Programme to review CCIAG ToR published on Programme Collaboration Base and ensure the final version one is displayed	Programme (PMO)	ASAP
	CCAG12-06	Programme to review how potential extension to code drafting timelines to accommodate Programme Change Request 12 may affect the commencement of qualification (including reviewing dependencies between potential M6 extension and the SAD process for qualification)	Programme (Jason Brogden)	06/12/2022
Minutes and actions	CCAG11-01	Share the mapping of design artefacts to code drafting and the process for tracking which artefacts have been translated into code. Share the level of detail artefacts will be tracked at (e.g. document, paragraph etc). Consider how consequential change design artefacts will be included in this (*subject to RECCo Change Request*)	Programme (Becca Fox)	23/11/22

Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC23	Amended minutes of CCAG meeting held 26 October 2022 approved

RAID Items Discussed

RAID area	Description
M6 delivery and qualification drafting	A dependency will be added to the Programme RAID log regarding the dependencies between the prospective M6 delivery extension and delivery of qualification code drafting which supports the commencement of qualification.

Key Discussion items

Area	Discussion
Horizon Scanning log	Code bodies provided updates on their code changes as contained in the CCAG Horizon Scanning log. The SEC Representative advised SEC Modification Proposal (MP) 162[1] was currently with Ofgem for decision. A decision is expected at the end of November 2022. The DCUSA Representative advised of two DCSUA Change Proposals (DCPs) which may lead to a requirement for change within the MHHS Programme. Specifically, DCP414 and DCP415 have been raised as a consequence of the detailed MHHS design and may require changes to data flows either within the MHHS Data Integration Platform (DIP) or the external Data Transfer Catalogue (DTC). The DCUSA Representative noted the changes were in the early stages of development. The Programme requested to attend the working groups where these changes will be discussed (**ACTION CCAG12-01**). The REC Representative provided updates on several REC changes with potential links to MHHS, details of which will be provided in the CCAG Minutes and Actions. The BSC Representative advised BSC Modification Proposals P432 and P434, which were previously sent back by Ofgem, had now been approved by the BSC Panel and was currently awaiting a decision from Ofgem. BSC Change Proposal (CP) 1558, which seeks to introduce new registration data items, is still under development. The CCAG noted this change links to REC Change Proposal R0032, which is awaiting implementation, and discussed the need for the implementation dates to align. The group then considered the risks of CP1558 not being implemented at the same time as R0032.
Qualifications Code Drafting Timeframes & Dependencies	The Programme provided an updated on the dependencies around qualification code drafting and commencement of qualification activities. Following discussions with Code Bodies it was confirmed that providing qualification code drafting is approved by the CCAG, the BSC/Elexon can commence qualifications on the basis of the approved legal text, as opposed to specifically requiring the text be implemented in code. This means Programme milestones M8 (code changes delivered) and M10 (central systems ready for migrating MPANs) can be aligned. Any changes which impact the approved qualification legal text will need to be managed. The Programme advised the alignment of M8 and M10 will be incorporated into the Programme Replan timelines.

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[1] SEC changes required to deliver MHHS

CR12 Impact Assessment Update	The Programme provided an overview of the impact assessment responses received in relation to <u>Programme Change Request (CR) 12 (*Increase in scope of CCAG ToR and code drafting activities to include consequential change*) and</u> advised of several recommendations the Programme will make to the Programme Steering Group (PSG). The Programme highlighted their impacts assessment response, which states CR12 introduces additional risk into the Programme, but that this is mitigated by the benefits to code drafting delivery and efficiency, which industry parties wished to see.

The Programme advised that 24 impact assessment responses were received, with 19 supporting, two rejecting, and two abstaining. Subject to approval of CR12 by the PSG, the Programme will seek to include an additional 'consequential change' code drafting topic area within the CCAG's code drafting plan. This will require an increase to the code drafting timescales from eight to twelve weeks. It was noted some Code Bodies will undertake consequential change code drafting alongside other drafting topic areas. A revised code drafting plan will be presented at the next CCAG meeting (**ACTION CCAG12-04**) and this has also been included in the Programme's impact assessment response which the PSG will consider as part of their decision on whether to approve the change. Other aspects of the Programme's response include increased costs at a rough order of £60k for the additional Programme resource required. No quantitative data was provided by Programme Participants in their responses, however the qualitative information provided suggests the benefits to parties outweigh the risks to the Programme.

The group discussed the scope of consequential change and the Programme noted the importance of certainty over how consequential change could affect the Programme delivery timelines with regard to the upcoming Round 3 Programme Replan consultation. The CCAG were advised consequential change will be brought into the Programme plan for awareness (**ACTION CCAG12-03)**. One attendee asked how performance assurance consequential requirements will be monitored and the Programme confirmed this would be via the Consequential Change Impact Assessment Group's (CCIAG) Consequential Change Log. The log will record which topics are being incorporated into code drafting. Elexon advised they will also be considering consequential change requirements in their planning. Following the Programme Replan consultation, and baselining of the consequential change topics to be incorporated into the CCAG-led code drafting, any significant consequential changes may need to be raised as a Programme

The group discussed the definition of consequential change, with the Programme noting this was defined in the CCIAG Terms of Reference (ToR), and a revised definition is currently under consideration which will specific that consequential change includes any matters outside the Design Baseline. One attendee noted the CCIAG ToR appears to still be a draft document on the Programme Collaboration Base, and the Programme agreed to review and update this (**ACTION CCAG12-05**).

A question was raised over how the extension to the delivery of M6 (code change and detailed design recommendations delivered) as a result of CR12 would affect the commencement of qualification. The Programme agreed to review how qualification commencement may be affected (**ACTION CCAG12-06**). One attendee note that whilst the Programme's proposed response to CR12, subject to its approval by the PSG, extended the code drafting timelines, this would be preferable to the significant delays which may occur if consequential change must proceed via individual code change processes outside the Programme. |
| **Code Freeze Request** | The CCAG discussed how business as usual code change could be managed alongside MHHS code drafting and implementation. The Programme advised a 'code freeze' would be challenging to implement and would be unlikely to be a viable solution. Alternative options were discussed, with the Programme recommending that a formal request is made to both Ofgem and Code Bodies to set a higher threshold for the implementation of non-MHHS change as the implementation of MHHS code drafting approaches.

The group discussed the need for a case-by-case approach to considering non-MHHS at the time MHHS code drafting is due to be implemented to ensure essential changes or change with high consumer benefit can be implemented in spite of MHHS changes. Several attendees considered |

	the terminology to use around this concept, agreeing 'code freeze' would not be a helpful description and 'higher threshold' would be more accurate. Code Bodies will need to consider as a part of their critical friend activities and as part of ensuring wider industry or Significant Code review (SCR) impacts are recorded in change proposal forms whether changes arising around the time of MHHS legal text implementation can be deferred or otherwise managed. A Supplier representative noted this constituency will need to assess additional work from non-MHHS change arising at the time of MHHS implementation to ensure resource can be managed effectively. The impact assessment processes under each code will be important in ensuring non-MHHS change is considered appropriately. It was noted not all codes can 'increase' thresholds and may not be able to prevent industry parties from raising non-MHHS change close to the implementation of MHHS.

Date of next meeting: 21 December 2022