

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

Issue date: 02/11/2022

Meeting number **CCAG011**

Venue

**Virtual – MS Teams**

Date and time **26 October 2022 10:00-12:00**

Classification

**Public**

### Attendees

#### **Chair**

Chris Welby (CW)

#### **Role**

Chair

#### **Industry Representatives**

Andrew Green (AG)

I&C Supplier Representative

Caroline Farquhar (CF)

Consumer Representative

Clare Hannah (CH)

Supplier Agent Representative

Fungai Madzivadondo (FMa)

DNO Representative

John Lawton (JL)

DCUSA Representative

Jonny Moore (JM)

Elexon Representative (as central systems provider) and BSC Representative (on behalf of Lawrence Jones)

Paul Saker (PS)

Domestic Supplier Representative

Sarah Jones (SJ)

RECCo Representative

Tim Newton (TN)

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 (JB)

Industry Expert

Matt McKeon (MM)

MHHS Design Team

#### **Other Attendees**

Andy MacFaul (AMF)

Ofgem

#### **Observers**

Harriet Truss (HT)

REC Code Manager

### Apologies

Lawrence Jones

BSC Representative

Paul Mullen

CUSC Representative

Stuart Scott

DCC Representative

## 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
Previous Meeting	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 ( <i>subject to RECCo Change Request</i> )	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

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.

## Minutes

### 1. Welcome

The Chair welcomed attendees to the meeting and outlined the meeting agenda. The Chair introduced CF as the new Consumer Representative and welcomed them to the group

## 2. Minutes and Actions

FM noted a change-marked version of the minutes of the meeting held 27 October 2022 with updates from RECCo had been shared with the meeting papers. The CCAG approved the amended minutes as final.

### CCAG-DEC21: Amended minutes of CCAG meeting held 26 October 2022 approved

FM provided an update on outstanding action. Full action wording can be found within the [CCAG meeting papers](#).

**CCAG08-06:** It was noted this action would be discussed under agenda item 5. Action closed.

**CCAG08-08:** SJ noted this action relates to matter which cannot necessarily be drawn out of the MHHS Design Baseline. AM wondered whether the examples given in the action were incorrect. The group agreed that Programme Change Request (CR) 12 may bring matter such as this within the purview of CCAG-led code drafting activities, and the action could be closed. Action closed.

**CCAG 09-01:** CH confirmed a response had been received and the action could be closed. Action closed.

**CCAG 09-06:** Discussed under agenda item 5. Action closed.

**CCAG 09-09:** It was confirmed that, once in operation, the Data Integration Platform (DIP) data specification will be hosted on the Energy Market Architecture Repository (EMAR) and managed under the REC.

**CCAG 10-03:** It was confirmed that settlement timetable code drafting would be included as part of the Programme's M6 milestone (delivery of code drafting). Action closed.

**CCAG 11-01:** The Programme advised the code drafting/design artefact traceability matrix will be shared at the December 2022 CCAG meeting. Action ongoing.

**CCAG 11-02:** The CCAG were advised import/export Meter Point Administration Number (MPAN) transfers were discussed at the November 2022 Testing and Migration Advisory Group (TMAG). The matter have been passed by the TMAG to the Migration Working Group to discuss, with the initial view being this matter may require specific addressment in the migration strategy. The matter will be discussed at the next MWG on 08 December 2022. Action closed.

**CCAG 11-03:** Discussed under agenda item 7. Action closed.

**CCAG 11-04:** Discussed under agenda item 5. Action closed.

## 3. Programme Updates

FM shared a short update on wider Programme activity, highlighting the issuance of the Round 3 Programme Replan consultation was deferred by the Programme Steering Group (PSG) to mid-December 2022 until a decision is available on migration approach and participants have had time to provide an overview of their plans as part of the consultation.

FM also highlighted work underway by the MWG on the Migration Evaluation Framework, following the closure of the Programme Party Information Request (PPIR) which requested information from industry parties on both the quantitative and qualitative impacts of the various migration options.

## 4. Horizon Scanning log

FM introduced the item noting the recent change in format whereby Code Bodies provide updates on the changes for their respective codes. FM invited Code Bodies to provide their updates:

### SEC Updates

TN provided an update on Smart Energy Code (SEC) Modification Proposal (MP) 162, advising the change was approved by the SEC Change Board and is now awaiting a decision from Ofgem.

TN advised SEC Draft Proposal (DP) 206 was likely to progress.

### DCUSA Updates

JL provided updates on Distribution and Connection Use of System Agreement (DCUSA) Change Proposal (DCP) 328, details of which are available in the CCAG meeting papers.

Regarding DCP415 and DCP416, JM asked whether this would require an MHHS Programme Change Request (CR). JL believed it may, advising the changes had been raised early to allow development to commence. JB asked JM what

the plan is for Elexon to assess the changes and raise a Programme CR if required. JL noted the changes are in early stages of development and progression will depend on the support of DCUSA parties. The changes propose certain existing Data Transfer Network (DTN) data flows are replaced by DIP flows. Depending on the views of DCUSA parties, a Programme CR or change to the Data Transfer Catalogue (DTC) may be required.

JB suggested the Programme attend the DCP415 and DCPp416 working groups. JL welcomed this and agreed to forward details to interested parties.

**ACTION CCAG12-01: DCUSA Representative to forward invites and details of DCP415 & DCP416 working groups to Programme**

**REC Updates**

HT provided update on several Retail Energy Code (REC) change proposal, details of which can be found within the CCAG meeting papers.

Regarding change REC R0081, TC questioned use of the terms 'refresh' and 'replay'. SJ advised the change uses refresh, but this is the same as replay functionality and the Central Switching Service (CSS) will be brought in line with the terminology used for the DIP. SJ believed there was an existing Programme risk to help monitor registration related flows.

**BSC Updates**

JM advised Balancing and Settlement Code (BSC) Modification Proposals P432 and P434, which were previous sent back by Ofgem have been approved by the BSC Panel and are with Ofgem for decision.

JM advised BSC Change Proposal (CP) P1558, which seeks to implement new reg data items is still under development but likely to be approved. JB noted the CP is related to REC R0032. MM advised the implementation dates of the changes need to align. The risk of the changes not being implemented by June 2023. JM did not believe there was significant risk and. MM noted CP1558 is a purely technical exercise.

JM advised CP1568 and Issue 101 continue to progress.

Several BSC changes which may affect the MHHS Programme were noted. BSC P441 was likely to be implemented after the CCAG-led Programme code drafting completes, and whilst it does not affect the design, it will impact Programme code drafting. By the time this modification is approved by Ofgem the CCAG-led code drafting for Advance Data Services (ADS) will have completed. JB noted a Programme CR may be required. TC considered that whilst the CAG had previously considered code freezes, this change highlighted potential challenges with the sequencing of change. JB agreed, noting this was an implementation issue and considered whether the change should be aligned to M8.

JM advised BSC P419 may also affect programme and BSC 442 may affect services implemented by the Programme.

**CUSC Updates**

FM noted Connection and Use of System Code (CUSC) MP 401 may be relevant to MHHS and ND noted the change was raised by NGENSO to mitigate existing code provision which currently expire in March 2023. ND advised the change was currently out for consultation, closing 05 December 2022. ND agreed to add the change to the CCAG Horizon Scanning Log.

**ACTION CCAG12-02: CUSC Representative to add CMP401 to Horizon Scanning Log**

ND further advised more CUSC changes were likely to be raised in early 2023 and would be updated into the Horizon Scanning Log.

**Programme Updates**

FM advised the Programme had updated the Programme impacts column for recently added changes and those which have developed since the last meeting. MM advised several newly added changes were low impact and do not affect Programme. Other newly added changes may affect the Programme if not implemented, and these will be monitored.

**5. Qualifications Code Drafting Timeframes & Dependencies**

JB 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.

JL asked what M9 was, and whether it was relevant to the alignment of M8 and M10. JB confirmed this was the commencement of Systems Integration Testing (SIT) and would not affect this.

CH asked when qualifications can start. JB confirms and the confirmation from BSC/Elexon meant it could start before code legal text is implemented. In other words, qualification can be operated on the basis of the M6 approved code drafting. The Elexon representative concurred.

## 6. CR 12

The Programme provided an overview of the impact assessment responses received in relation to Programme Change Request (CR) 12 (Increase in scope of CCAG ToR and code drafting activities to include consequential change) and 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: Programme to update code drafting plan following decision on Programme Change Request 12, and bring to the next CCAG meeting**

A draft revised code drafting plan was 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: Programme to ensure consequential change code drafting topics are built into the Programme plan and updated into the Round 3 Programme Replan consultation**

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: Programme to review CCIAG ToR published on Programme Collaboration Base and ensure the final version one is displayed**

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.

**ACTION 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)**

## 7. 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 despite 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.

## 8. CCAG Reporting

BF provided an overview of the new CCAG report which will be provided to the group as code drafting progress. The report will ensure CCAG are kept informed of Code Draft Working Group (CDWG) progress and activities. BF invited comments were invited on any suggestions for other inclusions in report.

JM asks how risks can be raised. AM confirmed this would be via the [MHHS Programme RAID Log Input Form](#).

TC asked whether there will be a view of the status of individual documents, and therefore whether drafting milestones have been reached. AM replied that the traceability matrix is intended to support this and provide a live view of where drafting of individual documents are. TC asks if this will be available in December, AM advised the matrix will be developed as part of the prototyping sprint in December and will be provided to CCAG at the next meeting on 21 December 2022.

## 9. CDWG Update

FM provided updates from the CDWG meeting held 08 November 2022. FM shared that some agenda items (e.g., the code draft prototyping report) had been proposed for the December CDWG and queried if CCAG members would like a meeting, noting the compressed working month due to Christmas. Several members were supportive of a November CDWG. TC asked that expected deliverables in the code workstream from January could be added to the agenda.

## 10. Summary and Next Steps

FM noted six actions from the meeting. CW thanked attendees for their contributions and closed the meeting.

**Date of next meeting: 21 December 2022**