Code Drafting Consultation Advisory Notes - Consistency Check output for BSC, REC and DCUSA

June 2024

Version 1.0

MHHS DEL2308

The Code Workstream has produced multiple Code Artefacts across the Balancing settlement Code (BSC), Retail Energy Code (REC), Consequential Code Change from Elexon Assurance changes and Distribution Connection and Use of System Agreement (DCUSA) for industry final review and consultation comment.

This consultation process seeks to confirm that the Design Artefacts (MHHS Version 5.0, plus amendments up to Interim Release 8.1 and Elexon Assurance Design) have been, where relevant, correctly translated into the Code Artefacts.

Review feedback should consider whether the code drafting reflects the MHHS Design (Version 5.0 and up to IR8.1 amendments) and reflects the MHHS Design.
- If you feel it does not, please submit your feedback by downloading the **Code Artefacts Consultation Comments** from the Consistency Check collaboration base page.
- If you feel the Code could better reflect the MHHS Design, please respond with improved wording
- If you spot a minor change or typo, please respond Code@mhhsprogramme.co.uk

All documents are either new clean versioned artefacts or redlined versions.

The Design solution is baselined through the Design Workstream and does not form part of the Code Drafting Consultation. Any comments relating to the MHHS Design must be directed to design@mhhsprogramme.co.uk

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Consultation Advisory Notes
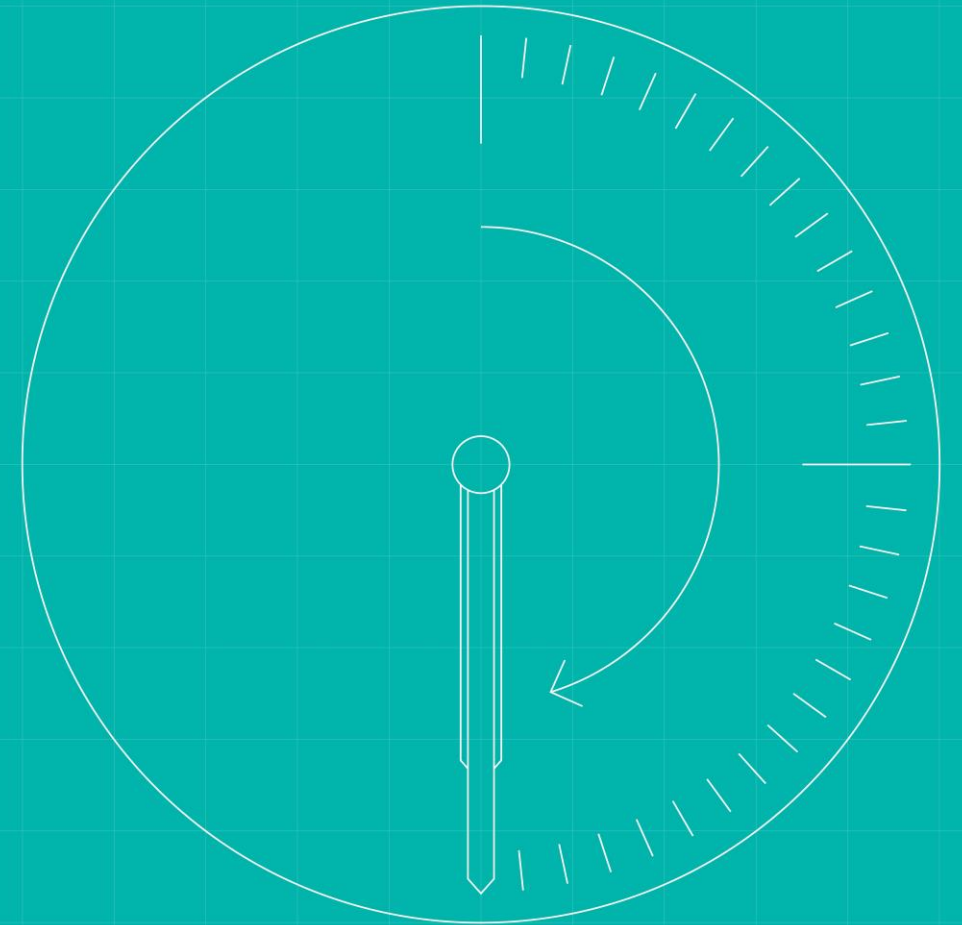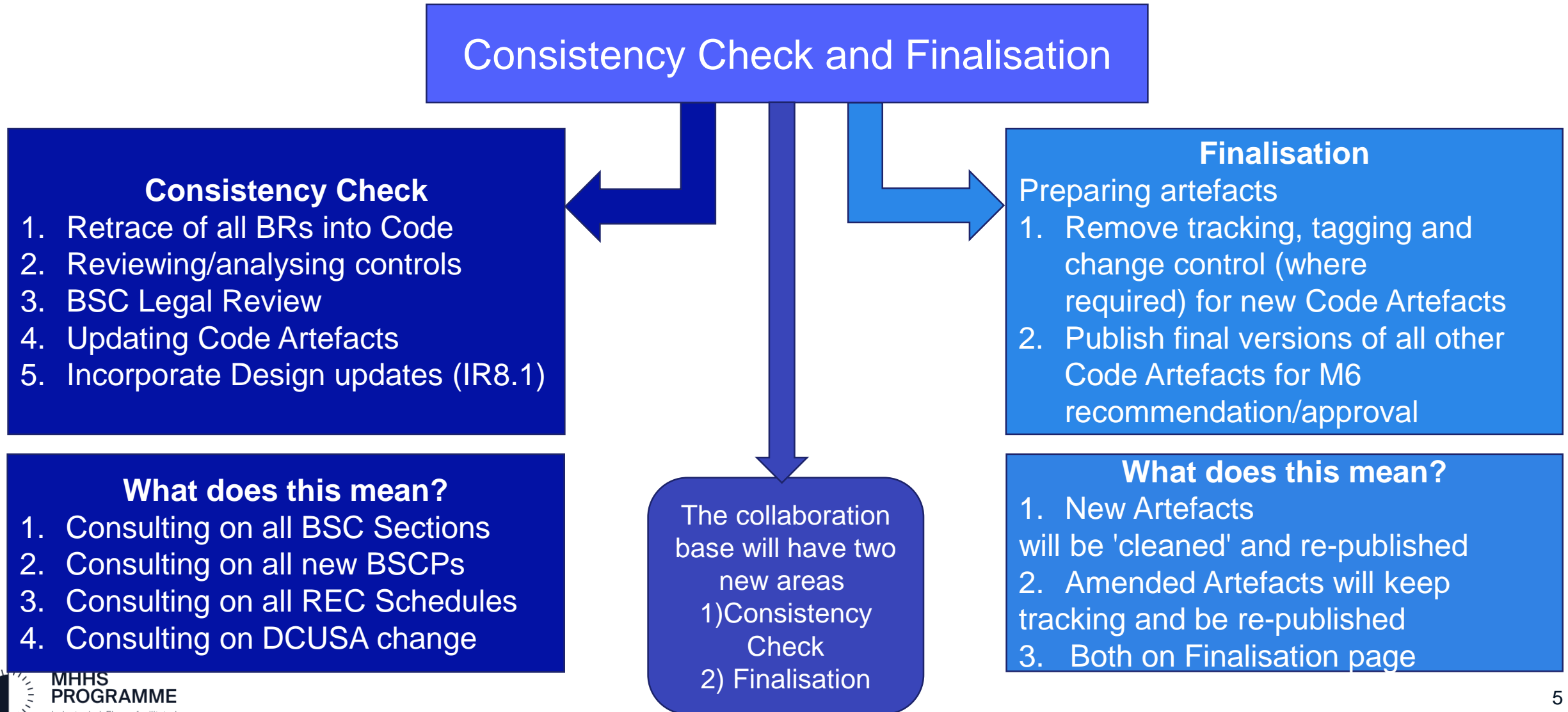
What is the Consistency Check objective?

The Consistency Check is to -

1. Ensure Design requirements are appropriately captured in the relevant Codes

2. Ensure Code Artefacts align e.g. style, intra and cross code alignment

3. Validate controls (e.g. matrix, logs etc.) to ensure no Code gaps remain

4. Legal review of all new and amended BSC Sections

5. Request Participants to confirm if due process has been followed

The Code Artefacts (all BSC Sections, new BSCPs (e.g. 700 series, BSCP Central System Service Description), all REC Schedules and DCUSA change), plus the Code Drafting controls will be published for industry consultation

The consultation will also request if due process has been followed

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Consistency Check and Finalisation activity will be split into separate steps

Consistency Check and Finalisation

Consistency Check
1. Retrace of all BRs into Code
2. Reviewing/analysing controls
3. BSC Legal Review
4. Updating Code Artefacts
5. Incorporate Design updates (IR8.1)

What does this mean?
1. Consulting on all BSC Sections
2. Consulting on all new BSCPs
3. Consulting on all REC Schedules
4. Consulting on DCUSA change

The collaboration base will have two new areas
1) Consistency Check
2) Finalisation

Finalisation
Preparing artefacts
1. Remove tracking, tagging and change control (where required) for new Code Artefacts
2. Publish final versions of all other Code Artefacts for M6 recommendation/approval

What does this mean?
1. New Artefacts
will be 'cleaned' and re-published
2. Amended Artefacts will keep tracking and be re-published
3. Both on Finalisation page

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What is in the Consistency Check and Finalisation steps

1. BRs Traceability Matrix – Design requirements retraced back to Code	Complete
2. Cross Code review – ensuring REC and BSC processes align	Complete
3. BSC interface matrix – ensure 'off-page' processes match 'on page' processes	Complete
4. DIP Manager traceability – requirements assurance	On track
5. Definitions & Interpretations – ensure all relevant terms have been defined	Complete
6. Comments Log – ensure no comments or actions outstanding	Complete
7. Change Control Log - ensure all actions complete	On track
8. Format style consistency check – ensure all artefacts look/feel the same	On track

9. Post Consistency Check, Finalisation will 'clean' new Code Artefacts and re-publish amended artefacts

Note: After M6 Elexon BAU Code configuration management process will review artefacts and ensure they are ready for BAU (M8) publication

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What are the key dates ?

Consistency Check
24 June - Consultation opens
12 July - Consultation closes
26 July - Artefacts publish for 1 week assurance

Finalisation
2 August – Code Artefacts published
13 August – CDWG1
21 August – extraordinary CCAG

Significant Code Review (SCR)
4 September - BSC
5 September - REC
10 September - DCUSA

How will the Code Artefacts be published?

MHHS Collaboration Base will host two new pages –
1) Consistency Check
2) Finalisation

The Consistency Check page will host 4 libraries
1) BSC Sections
2) BSCPs,
3) REC Schedules
4) Controls and evidence

Final versions published on Finalisation page for M6 baselining and M7 Significant Code Review (SCR) stage

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To submit your feedback, please download the Code Artefacts Consultation Comments from the Mop Up 2 Code consultation page. Save the spreadsheet with a file name that includes the short name of your organisation. Once completed, please email the spreadsheet to code@mhhsprogramme.co.uk.

Consultation questions:

| Column Header	Guidance Note	Field Type	Field Requirement
Code Artefact Name	Choose the Code Artefact that you're reviewing from the drop-down list	Drop-down menu	Mandatory
Document Section	Include the section for which your comment is related to e.g. paragraph 4.1	Free text	Mandatory
Comments	Provide the comment you have in relation to the document you are reviewing e.g. CSS (or CCS in document) is referred to as Actor but no interaction with CSS in business process	Free text	Mandatory
Related Design Artefact	If your comment relates to a Design Artefact, please ensure you include the name of the Artefact e.g. MHHSP-BPD002	Free text	Optional
Related Design Artefact Section/Step	If your comment relates to a Design Artefact, please ensure you include the relevant section or step in the Artefact	Free text	Optional
Suggested Change	For example, propose new wording	Free text	Mandatory
Comment Owner	Provide your name as the comment owner	Free text	Mandatory
Organisation	Provide the name of your organisation	Free text	Mandatory
Constituency	Provide the name of your constituency	Free text	Mandatory

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| Review Stage	What happens in the review stage?	What do I need to do as a participant?
1. Comment Triage & Resolution	• Comments will be reviewed and allocated to a triage category • Code Issues will be identified and prioritised • Comment responses will be updated to provide the rationale and/or the proposed change	• Comment Owners to provide further information on comment if required • Comment Owners to be available to discuss comments directly if required
2. Comment Response Review	• Comment responses will be published onto the Collaboration Base and through the CDWG papers • Code drafting will be presented to CDWG for participant feedback and review following open consultation with industry parties • CDWG will review the comments and issues raised through drafting and determine any changes or additions to code drafting • CDWG review activities will be presented to CCAG for consideration as to whether code drafting can be approved in principle before the final consultation	• Review comment responses and proposed changes • Review CDWG meeting materials and provide feedback before the meeting • Attend CDWG meetings to contribute to comment discussions
3. Agree consensus	• Where there is not consensus across industry parties, comments will be identified and entered into the Dissensus process • Comment owners will be contacted to raise a Dissensus Form • Dissensus Issues will be discussed in the Dissensus forum	• Comment Owners to complete Dissensus Form, summarising their position and providing rationale and associated materiality • Comment Owners to present their position at the Dissensus forum for discussion • Industry Participants to attend the Dissensus forum to agree decision on Dissensus items
4. Cross-Code Advisory Group (CCAG) (assurance)	• Oversee central coordination, monitoring and management of code changes • Review and action work carried out by CDWG • Manage, consult and approve recommended decisions from CDWG	• Provide feedback to your Constituency Representative for discussion at CCAG. Please note that any code drafting questions should be raised at CDWG

Due Process Questions Code Artefacts
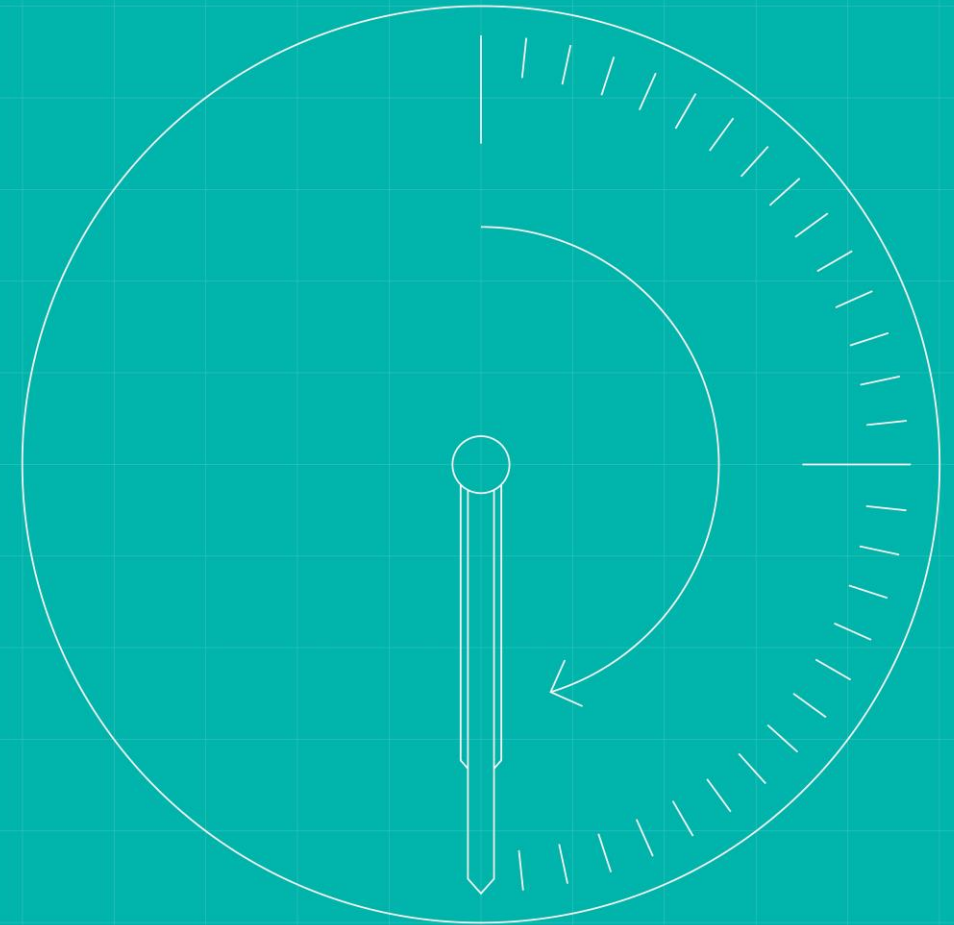
Due process questions are as followed -

1. Have parties been able to be engage with the Code Workstream?

2. Have parties been able to input into -
   a) Code meetings?
   b) Code Artefact consultations?
   c) Code decisions?

3. Have comments from parties to correct text been addressed?

4. Have the Design Artefact been correctly translated into Code?

5. Do the Code Artefacts make sense? – Plain English test!

6. What are the Code Workstream lessons learnt?

MHHS document containing the questions is published on the Code collaboration base

Participants are requested to submit responses via the Consultation Comments Log accessed via the Consistency Check quick link

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Balancing and Settlement Code (BSC) Code Artefacts
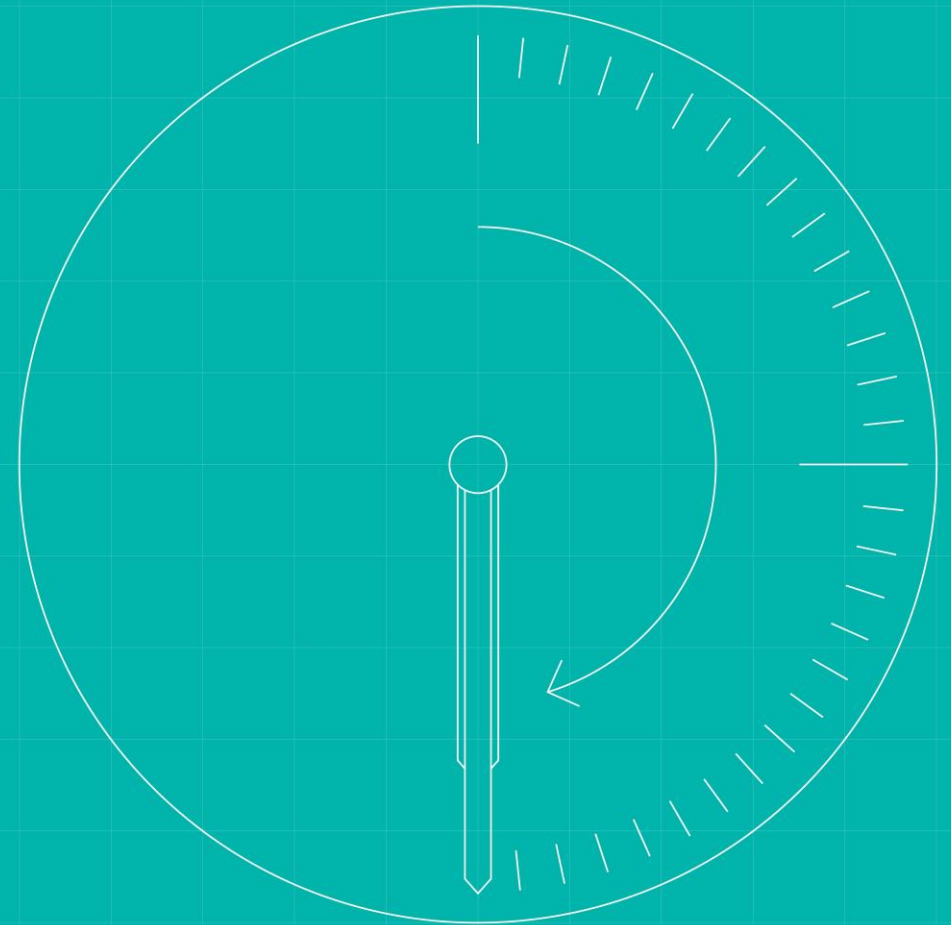
What were the key BSC outputs from the Consistency Check?

BSC Sections Code Artefact	Version Number	Update status
SECTION E: BSC AGENTS	10.2	No change
SECTION J: PARTY AGENTS AND QUALIFICATION UNDER THE CODE	22.5	Amended
SECTION K: CLASSIFICATION AND REGISTRATION OF METERING SYSTEMS AND BM UNITS	48.6	Amended
SECTION L: METERING	25.5	Amended
SECTION S: SUPPLIER VOLUME ALLOCATION	44.8	Amended
SECTION S-1 ANNEX S-1: PERFORMANCE LEVELS AND SUPPLIER CHARGES	13.8	Amended
SECTION S-3 ANNEX S-3: SUPPLIER VOLUME ALLOCATION RULES FOR MIGRATED MHHS METERING SYSTEMS	0.91	Amended
SECTION S-4 ANNEX S-4: SUPPLIER VOLUME ALLOCATION RULES FOR METERING SYSTEMS DURING TRANSITION	0.7	Amended
SECTION W: TRADING DISPUTES	22.2	Amended
SECTION X-1 ANNEX X-1: GENERAL GLOSSARY	115.5	Amended
SECTION X-2 ANNEX X-2: TECHNICAL GLOSSARY	54.9	Amended
SECTION Z: PERFORMANCE ASSURANCE	10.2	Amended

New BSCPs Code Artefacts	Version Number	Update status
BSCP700: Unmetered Supplies Data Service	0.92	Amended
BSCP701: Smart Data Service	0.91	Amended
BSCP702: Advanced Data Service	0.93	Amended
BSCP703: BSC Central Services for MHHS Metering Systems	0.92	Amended
BSCP704: Unmetered Supplies Operations for MHHS Metering Systems	0.92	Amended
BSCP705: Licensed Distribution for MHHS Metering Systems	0.9	Amended
BSCP706: Supplier Meter Registration Service for MHHS Metering Systems	0.95	Amended
BSCP707: Changes to Industry Standing Data	0.91	No change
BSCP707: Appendix 1: Changes to Industry Standing Data: ISD Entity Change Request Forms	0.92	Amended
BSCP707: Appendix 2: Changes to Industry Standing Data: ISD Change Request Entity Validation	0.92	Amended
BSCP708: Migration of Metering Systems to and from the MHHS Arrangements	0.92	Amended
BSCP709: Supplier Requirements for MHHS Metering Systems	0.5	Amended
BSCP710: Supplier Charges for MHHS Metering Systems	0.6	Amended
BSCP711: PAM Data Provision, Reporting and Publication of Peer Comparison Data	0.6	Amended
BSCP711: Appendix 1 Fixed PAM Data Provider File Formats	0.6	Amended
BSCP711: Appendix 2 Fixed PAM Calculation Guidelines	0.6	Amended
BSC Service Description for BSC Central Services for MHHS Metering Systems	0.9	Amended
BSCP38 - Authorisations	25.3	Amended

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What are the Code Drafting controls?

Control Name	Purpose	Consistency Check objective/output
BR Traceability Matrix	Maps relevant Design requirements to Code Artefact requirements	Design requirements retraced to Code. Gaps were addressed. Every Design requirement has been captured in Code (BSC & REC)
Cross Code Review	Ensure that BSC and REC handoffs are correct and align	The review confirmed that hand-offs were correct and duplication removed and dual governance re-checked
Interface Matrix	Map 'off-page' handoffs from BSCP to BSCP	The check confirmed the exchanges data between parties and the related BSCPs correctly mapped across where relevant to the BSCPs
Change Control Log	Recorded gaps in Code and mapped incremental Design updates	All entries were reviewed to ensure all entries resulted in correctly updated Code. All activities had been actioned and closed off. All Design changes, include IR8.1 resulted in an update to the Code, noting there is a delay risk for Interface updates
DIP Manager Traceability	Map relevant E2E Design requirements to the DIP Manager requirements and/or Code	Identified DIP rules to include an obligation on parties to contact the BSC Service Desk Additional Service Management to be added to the relevant BSC Code Artefacts
Consolidated Comments Log	Record all consultation comments	Reviewed to ensure all comments actioned
Decisions and Issues Log	All issues and decisions were centrally recorded	All entries were reviewed and all items have been resolved and/or closed.

For transparency controls are published as part of the consultation

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What were the key outputs

The Matrix was reviewed and updated to capture all the latest Business Requirements

Every Requirement was checked against the relevant Code Artefacts, recording the location in Code

1. The exercise identified new requirements (e.g. new IR Design requirements)

2. Updating IRs and increments of Design updates captured

3. Additional archiving requirements for central systems identified and updated

4. Ensured requirements across Code were clearly linked and the handoff between Codes was correct

5. Gave confidence all requirements are captured in Codes

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What were the key outputs?

A Cross Code Review between BSC and REC confirmed that hand-offs were correct, and where relevant duplication and dual governance re-checked -

1. The main output of this review was the Codes aligned

2. BSCP705 updated so that energisation steps correctly captured

3. Duplication has been avoided where relevant

4. To improve style consistency Section 2 of BSCP701 additional subheadings were included

5. No gaps are outstanding

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How did we align DIP Manager Governance and MHHS Code?

The DIP Traceability Matrix was reviewed to ensure the DIP requirements were taken from the correct Design Artefacts and to ensure the correct Design requirements were captured under the DIP Governance

In total there were 56 requirements. Of these requirements the following was identified as needing to be updated -

- DIP Manager to add an additional incident management obligation on DIP Users to notify the BSC Service Desk when users have service outage issues

- 15 Design requirements were identified as not linking to DIP arrangements. These were added to the BSC Central Systems Service Description to reflect relevant non-functional requirements

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What was the output of reviewing the Definitions and Interpretations control?

The Control was reviewed internally, plus the Legal review overlapped with the objective to ensure that all Definitions have been correctly captured in BSC text and enable REC to point to a correct definition

The output was -

- 50 new definitions were created

- Definitions were added to BSC Section X-1

- Definitions were added to BSC Section X-2

- Definition of MHHS Transition Period added to BSC Section S-4

Based on the analysis, we are confident that all definitions have been captured and the correct wording applied

What was the Legal Review Outputs?

Legal Review

1. Recommendation to increase the number of defined terms – impact BSC Section X-1

2. Recommendation to increase the number of defined terms – impact BSC Section X-2

3. Recommendation to tighten Supplier Charges wording – impact BSC Section S-1

4. Recommendation to give PAB discretion when to apply Supplier Charges – impact BSC Section S

5. Recommendation to strengthen GDPR and use of personal data provisions – impact BSC Section Z and BSCP711

6. Recommendation to update BSCP038 Authorisations, to include GDPR

7. Recommendation for aligning use of speech marks and semicolons

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How were Issues and Decisions tracked and logged?

- When an issue was identified it was centrally recorded on the Issue and Decision Log

- The same control was used to record any decisions made, so that an audit trail was maintained

- The control was managed on a weekly basis and resulted in 36 entries

- The consistency check confirmed that all entries have been closed and no outstanding actions remain

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REC Code Drafting

M6 consultation supporting notes

REC artefacts in scope for the M6 Consultation (listed in next slide).

- To support the M6 consistency check, all 21 REC documents with MHHS changes previously agreed by CCAG have been reviewed and re-published with an updated version number.

- In some instances, we have identified further changes required to the legal text. Any proposed amendments to the previously agreed MHHS changes have been identified with a comments box marked **red bold***.

- Further information on the proposed changes is set out in the Change Control Log, published with the M6 consultation.

Interface Code Drafting

- The Interface Code Drafting, approved by CCAG as part of Mop Up 2 in May 2024 reflects the MHHS design up to and including IR7.

- For the M6 consultation, the Interface Code Drafting has been updated to reflect the MHHS design up to and including IR8.1 published on 12 Jun 2024.

- A Programme Risk (R0920) has been raised to seek confirmation that all MHHS design changes made to Swagger, which are also needed for code drafting, are fully captured in DES138 (the MHHS design artefact used for code drafting).

* For clarity, comments to support the original Tranche 1 to 4 consultations are not colour coded, post Tranche 1 to 4 consultation updates are yellow, comment to support the Mop Up 2 consultation are blue, post Mop Up 2 comments are colour coded green and post Mop Up 2 assurance check changes are pink

REC Code Drafting – Summary of artefacts issued for M6 Consistency Check Consultation

Document Type	Document Title	M6 Consultation Version	Updated for M6 consultation following CCAG approval?
Schedule 1	Interpretations and Definitions	MHHS v0.7	Yes
Schedule 9	Qualification and Maintenance	MHHS v0.5	No
Schedule 12	Data Access	MHHS v0.5	No
Schedule 14	Metering Operations	MHHS v0.7	Yes
Schedule 15	Metering Accreditation	MHHS v0.4	No
Schedule 19	Market Exit and Supplier of Last Resort	MHHS v0.5	Yes
Schedule 23	Registration Services	MHHS v0.5	No
Schedule 24	Switching Data Management	MHHS v0.5	No
Schedule 25	Central Switching Service	MHHS v0.4	No
Schedule 27	RMP Lifecycle	MHHS v0.7	Yes
Schedule 28	Related Metering Points	MHHS v0.6	No
Schedule 29	Address Management	MHHS v0.5	No
Schedule 30	Resolution of Consumer Facing Switching and Billing Issues	MHHS v0.5	No
Schedule xx	MHHS Migration	MHHS v0.7	Yes
Service Specification	Electricity Enquiry Service Service Definition	MHHS v0.5	No
Service Specification	Electricity Retail Data Service Definition	MHHS v0.6	No
Metering Code of Practice	Consolidated Metering Code of Practice (CoMCoP)	MHHS v0.3	No
Data Specification	Data Item Catalogue	MHHS v1.6	Yes
Data Specification	Market Message Catalogue	MHHS v1.6	Yes
Data Specification	Standards Definition	MHHS v0.5	Yes
Data Specification	EES API Technical Specification	MHHS v0.6	Yes

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Alignment with REC Baseline

- All REC CPs agreed prior to Mop Up 2 consultation (published Feb 2024) were reflected in the MHHS drafting approved by CCAG in May 2024.

- We have reviewed all REC CPs approved after the Mop Up 2 consultation (Feb 2024), to consider if they impact redline MHHS changes.

- With the exception of Schedule 14: Metering Operations (see bullet below), MHHS legal text has only been updated to include approved REC CPs where they impact the MHHS redlining. For clarity, the next slide shows approved REC CPs that have been considered as part of this assessment.

- As Schedule 14: Metering Operations is being fully replaced at M8, we have taken a different approach to drafting. We have included a clean schedule with redlining to show all changes made since the Mop Up 2 CCAG approval (May 2024). This includes REC CPs which amended the baseline artefact and also those explicitly changing the MHHS drafting.

- A new REC CP is being progressed to address issues with the footnotes in Schedule 14: Metering Operations. If agreed in July, we will include this CP in updated documents sent to CDWG for review (as noted above, this is important as Schedule 14 will be fully replaced by new MHHS drafting).
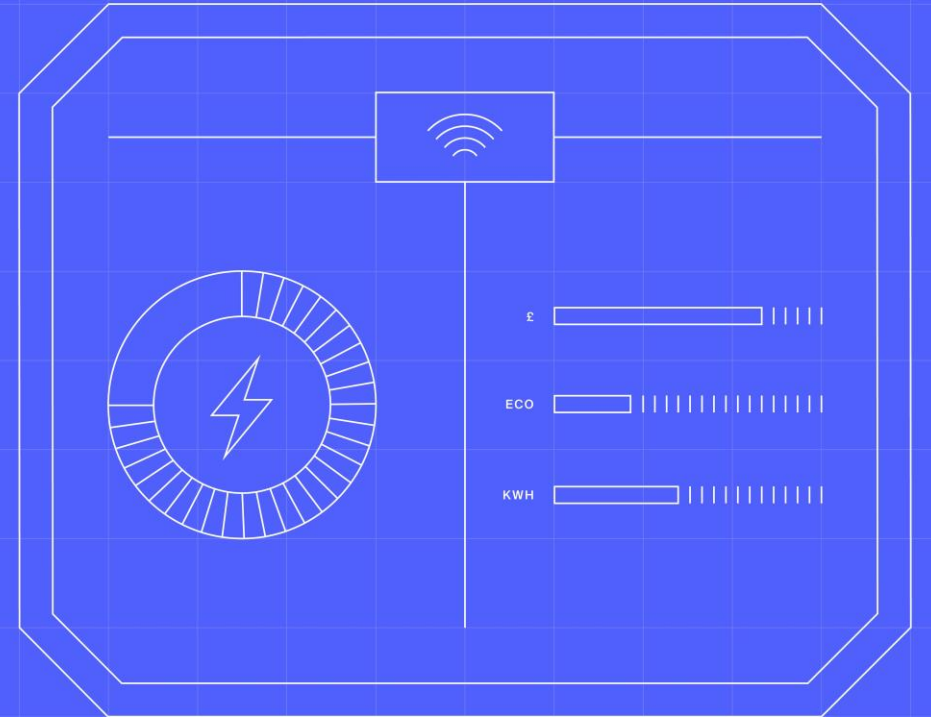
REC Code Drafting – Impact of approved REC Change Proposals (CPs) on proposed MHHS REC Code Drafting

Document Type	Document Title	Impact of approved REC CPs on CCAG agreed MHHS legal text
Schedule 1	Interpretations and Definitions	R0070, R0147, R0160 - Reviewed and no impact on MHHS drafting
Schedule 9	Qualification and Maintenance	N/A
Schedule 12	Data Access	N/A
Schedule 14	Metering Operations	R0094, R0121, R0150 - MHHS drafting updated to reflect these changes
Schedule 15	Metering Accreditation	N/A
Schedule 19	Market Exit and Supplier of Last Resort	N/A
Schedule 23	Registration Services	N/A
Schedule 24	Switching Data Management	N/A
Schedule 25	Central Switching Service	R0070 - Reviewed and no impact on MHHS drafting
Schedule 27	RMP Lifecycle	R0062 - MHHS drafting updated to reflect this change (also progressed as MHHS CR046) R0121 - Reviewed and no impact on MHHS drafting
Schedule 28	Related Metering Points	R0121 - Reviewed and no impact on MHHS drafting
Schedule 29	Address Management	R0121 - Reviewed and no impact on MHHS drafting
Schedule 30	Resolution of Consumer Facing Switching and Billing Issues	R0121 - Reviewed and no impact on MHHS drafting
Schedule xx	MHHS Migration	N/A
Service Specification	Electricity Enquiry Service Service Definition	N/A
Service Specification	Electricity Retail Data Service Definition	N/A
Metering Code of Practice	Consolidated Metering Code of Practice (CoMCoP)	N/A
Data Specification	Data Item Catalogue	N/A
Data Specification	Market Message Catalogue	N/A
Data Specification	Standards Definition	N/A
Data Specification	EES API Technical Specification	R0098 and R0108 – Reviewed and no expected impact on MHHS drafting. To be confirmed once redline drafting for CPs has been fully developed.

REC CPs

- R0062 - Removal of ERDA meteringPointEnergyFlow change restriction
- R0070 - Provision of Enduring Test Environments
- R0094 - Clarify obligations on gas meter exchanges that occur close to CoS
- R0098 - Optional fuzzy searching in EES
- R0108 - Enabling Electricity Enquiry Service searches using a Unique Property Reference Number
- R0121 - SDEP Review Improvements (1) - Process Types
- R0147 - Prepayment Levelisation
- R0150 - On-site Aggregation as a method to facilitate Third Party Access - BSC P455
- R0160 - Electricity Supply to Hydrogen Electrolysers

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Pre-Consultation: DCUSA Update

DCUSA (John Lawton)

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DCP433 Impact on MHHS DCUSA legal text

DCP433 – Limitation for backdating of rebates/charges under Schedule 32

- **This change proposal was voted on by Parties and is now with the Authority for approval**

- **If approved the MHHS legal text will need to be amended as shown below:**

6.10 On or before 15 September of the Annual Allocation Review, the DNO/IDNO Party shall provide each Supplier Party with a list of each and every MPAN associated with a Non-Domestic Premises that is connected to the DNO/IDNO Party's Distribution System that has been reallocated to a New Charging Band as a result of the Annual Allocation Review, identifying the Old Charging Band and the New Charging Band and LLFC Id or for MHHS the DUoS Tariff ID to which each such MPAN has been reallocated, and the LLFC Id or for MHHS the DUoS Tariff ID which is assigned to the MPAN.

6.11 The New Charging Band will be effective from the later of 1 August of the prior year or the date on which the Old Charging Band was applied. Charging band reallocations are actioned by amending the LLFC Id or for MHHS the DUoS Tariff ID assigned to the MPAN, which must be completed by the DNO/IDNO Party before the date of the Final Reconciliation Settlement Run (as defined in the BSC) for 1 August of the prior year.

6.112 Reallocation of a Final Demand Site to a New Charging Band in accordance with Paragraph 6.11 may result in the Registrant for the Final Demand Site being either eligible for a rebate or subject to an additional charge both of which shall be backdated to the date on which the Final Demand Site was first charged the Old Charging Band residual fixed charge. The New Charging Band will be applied from the next billing period.

- **In order to meet the M6 decision date and avoid a Programme CR, consideration of a potential change to the legal text during the consistency check consultation is to be undertaken if the Authority decision is not made prior to the date of the consultation**

- **Please note that if a decision is not made by the Authority by M6 , or the decision is to reject the change proposal, the DCUSA text will not include the above changes and will revert to the Mop up 2 version since this is the only change being considered during the consistency check consultation.**

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M6 Success Criteria
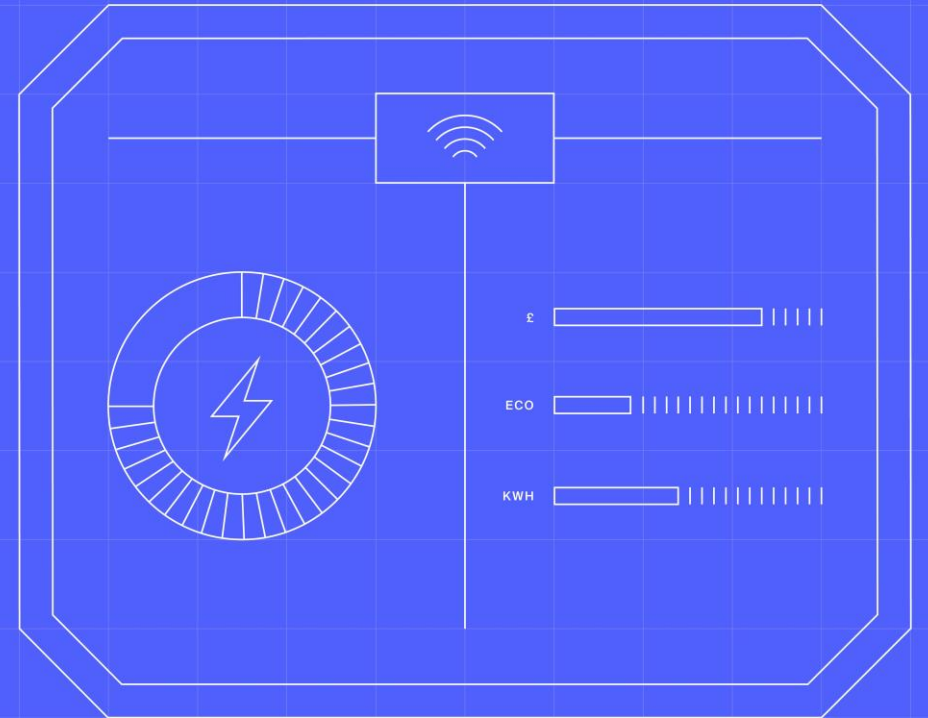
M6 - Success Criteria

Code Baseline Success Criteria :
•All Design requirements translated into Code
•Code changes incorporate all approved CRs and DINs
•Code meets the plain English test and no obvious ambiguity
•Due Process followed
•Approved by SRO following CCAG recommendation

Key Dependencies:
•Design and inflight DIN and CRs are complete/released
•Code bodies correctly draft the Code in time for M6 baseline
•Due process and governance followed

Key Artefacts:
•BSC/REC documents and subsidiary documents and DCUSA text

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