

MHHS Cross Code Advisory Group (CCAG) Minutes and Actions

Issue date: 02/02/2023

Meeting number **CCAG015**

Venue

Virtual – MS Teams

Date and time **22 February 2023 10:00-12:00**

Classification

Public

Attendees

Chair

Helen Tipton (Chair) as alternate to Chris Welby

Role

Chair

Industry Representatives

Clare Hannah (CH)

Supplier Agent Representative

Fungai Madzivadondo (FMa)

DNO/iDNO Representative

Jonny Moore (JM)

Elexon Representative (as central systems provider)

Lawrence Jones (LJ)

BSC Representative

Neil Dewar (ND)

National Grid ESO

Paul Saker (PS)

Domestic Supplier Representative

Richard Vernon (RV)

DCC Representative

Sarah Jones (SJ)

RECCo Representative

Tim Newton (TN) as alternate to Robin Healey

SEC Representative

Tom Chevalier (TC)

Supplier Agent Representative (Independent Supplier Agent)

MHHS

Becca Fox (BF)

Code Drafting Project Manager

Fraser Mathieson (FM)

PMO Governance Lead

Jason Brogden (JB)

Industry Expert

Nnenda Chinda (NC)

PMO Governance Support

Other Attendees

Andy MacFaul (AMF)

Ofgem

Mark DeSouza Wilson (MDW)

Elexon

Rhiannon Harrison (RH)

IPA

Apologies

Andrew Green

I&C Supplier Representative

Andrew Margan

MHHS Governance Manager

Chris Welby

Regular CCAG Chair / MHHS Industry SME

John Lawton

DCUSA Representative

Actions

Area	Ref	Action	Owner	Due
Minutes and actions	CCAG15-01	Programme to ensure BSC Issue 101 is looped into the Consequential Change Log	Programme (PMO)	22/03/2023
	CCAG15-02	BSC to provide overview of BSC Issue 101 at the next CCAG meeting, including a timeline, and plan for progression of outcomes/recommendations (e.g., potential BSC Modification, implication for SCR modifications, etc.)	BSC (Lawrence Jones)	22/03/2023
Horizon Scanning Log	CCAG15-03	RECCo to consider whether REC Change R0021 impacts on any aspect of MHHS Design, and add item to Horizon Scanning Log	RECCo Representative (Sarah Jones)	22/03/2023
	CCAG15-04	Programme to discuss with DCUSA Representative how DCP415 can be progressed/consulted on with DCUSA parties ahead of potential Programme Change Request being raised for any required design changes	Programme (Jason Brogden)	22/03/2023
Code Drafting Replan	CCAG15-05	Programme to add CDWG and 'comment raiser's availability' to the resources column of the Code Drafting Plan 'constituent elements applied to Topic Areas' plan on a page	Programme (Becca Fox)	22/03/2023
Summary and Next Steps	CCAG15-06	CCAG members to prompt constituents to respond to code drafting consultation (closing date 13 March 2023)	CCAG Members	ASAP
Previous Meeting(s)	CCAG14-01	Programme to clarify position and timelines on BSC Issue 101 and how any requirements may proceed into CCAG-led code drafting	Programme (Chris Welby)	24/05/2023
	CCAG13-02	Review the risks IDs for each Horizon Scanning entry to ensure there is a clear link/cross-reference between horizon scanning items and RAID log entries	Programme (Jason Brogden, Matt McKeon)	ONGOING
	CCAG13-03	Present the list of consequential change items to be included in code drafting and the rationale for including them to the March CCAG	Programme, Code Bodies	22/03/2023

Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC25	Minutes and Headline Report of CCAG meeting held 25 January 2023 approved
Summary and Next Steps	CCAG-DEC26	CCAG agree the CDWG meeting to be held 07 March 2023 should be stood down in favour of scheduled meeting on 14 March 2023

RAID Items

RAID area	Description
None	

Minutes

1. Welcome

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

2. Minutes and Actions

The group approved the Minutes and Headline Report of the CCAG meeting held 25 January 2023 with no amendments.

DECISION CCAG-DEC25: Minutes and Headline Report of CCAG meeting held 25 January 2023 approved

The CCAG reviewed the outstanding actions and updates are provided below. Full action wording can be found within the meeting papers.

CCAG14-01: The Programme recommended this action be closed as no dependencies between BSC Issue 101 and Programme code drafting. The BSC Representative agreed there did not appear to be any direct dependencies. The RECCo Representative requested the action be retained as ongoing to ensure ongoing consideration of any potential impacts to consequential change code drafting. The Programme agreed to ensure the item is considered alongside the items within the Consequential Change Log. The BSC Representative agreed to provide an overview of BSC Issue 101 at the next CCAG meeting, and how any recommendations may progress (e.g., via a BSC Modification) and whether any BSC changes may be directed under Significant Code Review (SCR) powers (ACTION CCAG15-02). Action ongoing.

ACTION CCAG15-01: Programme to ensure BSC Issue 101 is looped into the Consequential Change Log

ACTION CCAG15-02: BSC to provide overview of BSC Issue 101 at the next CCAG meeting, including a timeline, and plan for progression of outcomes/recommendations (e.g., potential BSC Modification, implication for SCR modifications, etc.)

CCAG13-03: The Programme recommended this action be closed as the prospective list of consequential change code drafting topics had been published with the meeting papers. One attendee requested the item is retained until the full finalised list of consequential change code drafting topics is agreed and crystallised following the Consequential Change Impact Assessment Group (CCIAG) meeting to be held 23 February 2023. Action ongoing.

3. Programme Updates

TC asked for an update on the Programme Replan, following the closure of the consultation window in January. The Programme advised the consultation comments are under review, and communications are due to be issued in due course on the next steps. The Programme advised an update will be published with the Programme Steering Group (PSG) papers for the meeting to be held 01 March 2023. TC noted the Programme had considerable work to do to coordinate with Ofgem on the impacts to Programme timelines and milestones, noting it was positive the Programme were taking time to consider what change is needed to the Programme Plan.

4. Horizon Scanning log

FM invited Code Body representatives to provide the latest updates on change within their codes which may have a bearing on MHHS.

BSC

LJ advised BSC Modification P432 had been approved by the BSC Panel and issued to Ofgem for decision. LJ stated there is a dependency on DCUSA Change Proposal (DCP) 414 and as such the decision timeframes are unknown and P432 is unlikely to be issued in the June BSC release.

LJ provided an update on BSC P442, which seeks to create a new party agent role. This change is currently under development at a BSC working group and LJ believed it was likely that consequential change may be required to the MHHS Design as there may be impacts on Half Hourly (HH) Data Collector (DC) arrangements. Any change required would be raised as a Programme Change Request (CR). LJ committed to providing updates as this modification develops.

A further upcoming BSC modification was highlighted. Following the sandbox derogation application submitted by Good Energy, a modification is now due to be tabled, which will involve several considerations which may impact MHHS. Further updates will be provided as the new modification progresses.

REC

SJ advised REC Change Proposal R0015 had been approved by the REC Change Panel and would now be issued to Ofgem for Authority decision.

REC Change Proposal R044 was also approved, which facilitates provision of the new Meter Data Retrieval (MDR) role.

New REC change R0093 has been raised to enable impact assessment of an uplift to Central Switching Service (CSS) maximum demand volumes during the MHHS migration period. This acknowledges the CSS will need to receive additional data flows during MHHS migration.

New REC change R0097 has also been raised as a result of detailed design work ongoing by the Data Communication Company (DCC) and St Clements (the registration system provider) and is progressing via REC governance.

PS queried whether REC change R0021 should appear within the Horizon Scanning Log. PS wished to understand whether the new 'safe isolation' role which is proposed by this change impacts the MHHS Design. The RECCo Representative agreed to review this and add the change to the log if there are potential MHHS impacts.

ACTION CCAG15-03: RECCo to consider whether REC Change R0021 impacts on any aspect of MHHS Design, and add item to Horizon Scanning Log

CUSC

ND advised that CUSC and NGESO met with the Programme last week and CUSC was now reviewing the design baseline to identify any CUSC impacts. An update will be provided at the next meeting.

Horizon Scanning Log Review

Regarding DCUSA Change Proposal (DCP) 415, JB advised they had attended the DCUSA Panel and this change was not issued for consultation owing to potential impacts to data flows within the MHHS Design. The Programme believe a CR is required not a DCP. Some DCUSA Panel members questioned whether, as the solution for DCP415 was developed by a DCUSA working group, handing off the implementation of the solution to the Programme's code drafting process may mean DCUSA parties have not specifically agreed to the solution.

JB explained the requirement for change arose from MHHS design working groups, where it was determined the solution should be developed via DCUSA and the outputs brought into Programme-led code drafting. The Programme's challenge with DCP415 being issued to impact assessment is the proposed implementation date. If MHHS impacts are identified then a Programme CR may be required to progress in parallel to DCP415 and would need to conclude prior to the implementation date of DCP415 becoming fixed. JB considered whether DCP415 could be issued to DCUSA parties for consultation but with a non-specific implementation date, thereby enabling views to be obtained prior to a Programme CR being raised. The Programme agreed to discuss this with DCUSA.

ACTION CCAG15-04: Programme to discuss with DCUSA Representative how DCP415 can be progressed/consulted on with DCUSA parties ahead of potential Programme Change Request being raised for any required design changes

5. Ofgem Code Designation Update

AMF presented slides on the routes available to implement the code changes required to implement MHHS, advising of a preference to use 'tried and tested' Significant Code Review (SCR) powers as opposed to Smart Meter Act powers (SMAP). A question had been raised to Ofgem by the BSC about whether the relevant SCR is now closed, and whether it could be reused in future. The Ofgem Representative advised their legal team had no confirmed SCR powers could be reused and noted it was previous doubt over this which had led to the offer from BEIS to use SMAP. The CCAG were advised that once code drafting was stabilised, Ofgem would take a decision on whether SCR or SMAP should be used. If SMAP is required, steps will be taken to activate these powers.

The BSC Representative posed several questions:

BSC Q1: LJ presumed the management of code changes via SCR would be via the 'Authority led' route. AMF believed this would be the case and noted the significant engagement with Code Bodies and CCAG which would be required as part of this.

BSC Q2: LJ considered whether the use of SCR powers could undermine the CCAG process, as parties may lessen their response to Programme code drafting consultations, in favour of the SCR modification/change proposal consultations via the Code Bodies. AMF noted this was potentially an issue regardless of which powers were used and expressed an expectation that Ofgem would receive 'a well baked product' by the time it came to the SCR consultation, meaning consultation comments will have already been received and actioned. LJ noted Code Bodies would need to ensure parties were aware of the importance of providing all significant comments through the Programme consultation route.

BSC Q3: LJ noted some BSC provisions are 'protected', and change may require Secretary of State approval. AMF committed to discussing these potential issues.

PS advised they did not have a preference for which powers are used, and if MHHS drafting and consultation process was effective the SCR modifications should progress via the Code Bodies straightforwardly. PS reiterated importance of parties viewing the Programme-led consultations as the primary route for providing any comments. ND agreed with this, stating NGESO's preference is for whichever designation method is most efficient.

LJ wished to understand the rationale for the change in Ofgem's position, noting it was stated in the Smart Meter Act that it existed to smooth implementation of MHHS and avoid any issues with Code Body processes, and therefore appeared to be specifically geared toward MHHS implementation. AMF believed there was no change in Ofgem's position, and there had always been a preference for SCR, but the question about whether SCR powers could be reused had not been answered, and so SMAP had been posited as an alternative.

AMF acknowledged the usual requirement for a 56-day standstill period after an SCR modification decision to enable appeals to be raised before implementation. Whereas SMAP allowed Ofgem to state a faster implementation timeframe. AMF stated there were no issue with using SMAP powers if needed, but the standstill period could potentially be reduced if the SCR route is chosen. LJ believed the SCR route was not as flexible or efficient as the SMAP route. AMF stated Ofgem will need to be satisfied the code drafting package delivered via the Programme is sufficient to allow implementation of MHHS. This will require legal and policy due diligence by Ofgem. As such, Ofgem will discuss with the Programme when this scrutiny can begin to ramp up, such that appropriate work can commence regardless of which designation route is chosen. JB agreed, noting the Programme are discussing with Ofgem whether legal review can commence in parallel with the code drafting plan, such that any issues are identified ahead of M6 and initiation of the powers/processes for designation. Part of this is a consideration of how to ensure the 56-day standstill period does not affect M6 delivery.

FM queried whether use of SCR powers would decentralise the implementation directions for the code changes required to give effect to MHHS and if this would introduce more complexity and risk, noting this was a question which may arise at the Code Drafting Working Group (CDWG). AMF considered work would be required to understand how modifications/change proposals directed under SCR powers would operate as a package, and how they could be best managed to ensure efficiency.

The Programme advised, in relation to the Programme-wide replan CR due to be raised, that SCR powers were the current assumed method for implementation of MHHS-related code changes. The Programme and Ofgem will develop a detailed plan for this and insert the relevant activities into the replan CR.

6. Code Drafting Replan

BF provided an update on how the Programme Replan may affect the Code Drafting Plan. An overview of the Programme-level principles underpinning code drafting was provided.

BF advised changes would be required to the Code Drafting Plan following responses received as part of the round three Programme Replan consultation and based on dependencies and lessons learned from code drafting thus far. The consultation period for each code drafting topic will be extended from two weeks to three and more time will be allocated for drafting to allow extra time to produce traceability matrices for each drafting topic. Additional time will also be added to each code drafting topic for review of consultation comments.

The group discussed the Programme resources allocated to code drafting, and how complex issues which arise during review would be managed (e.g., by raising the issue at the Code Drafting Working group (CDWG)). The Programme

agreed to add CDWG and 'comment raiser's availability' to the resources column of the code drafting Plan on a Page (PoaP).

ACTION CCAG15-05: Programme to add CDWG and 'comment raiser's availability' to the resources column of the Code Drafting Plan 'constituent elements applied to Topic Areas' plan on a page

TC queried why code drafting was taking longer than originally expected and asked whether this was a Programme resource issue. BF replied the Programme had been open about some of the allocated drafting resources being pulled into design work in order to complete the rebaseline of the design, but noted the complexity of producing traceability matrices to a requirements level was also a factor. TC wished to understand whether additional resource was required to bolster code drafting activities and ensure the timescale can be achieved and the required quality delivered. TC advised they had identified several typographical and cross-referencing errors or inaccuracies in the code drafting currently out for consultation. TC advised it was taking longer to review the legal text that originally thought and welcomed the proposed increase to the consultation periods within the Code Drafting Plan. TC advised of a preference to receive code drafting for review even where there may be immaterial errors such as spelling mistakes, rather than the Programme delaying issuance for the resolution of minor issues.

TC considered there may be complex comments which arise during consultation and asked whether these would be taken to the CDWG for review. BF replied that if a CDWG fell within the time period of a drafting topic, any comments would be raised to CDWG. BF encouraged parties to provide early sight of any complex comments rather than awaiting the consultation deadline. TC advocated the benefits of complex comments being discussed in a working group as opposed to via correspondence only.

The group discussed code drafting relating to migration design, with TC noting this may need to dovetail with other areas of the MHHS Design and other code drafting topics. JB advised this is under consideration and would need to be understood as part of migration design planning. JB provided the example of the 'BSC Procedure 500' series of documents, advising these were expected to be part of transition drafting, but may required their own topic area. JB explained these changes would be required ahead of M11 to ensure they work.

TC asked for clarification on what the Programme view as migration and transition activities. JB advised that migration covers migrating Meter Point Administration Numbers (MPANs) from olde arrangements to new arrangements, whereas transition was about what is needed to operate old and new arrangements in parallel. Transition will operate from the start of migration through to final changes to the settlement timetable. As such, transition legal text drafting will require all necessary transitional text including sunset clauses, etc. TC considered this meant there may be three sets of arrangements Supplier Agents may need to be aware of – current, new, and transitional. TC believed transitional text may require implementation into code ahead of migration. SJ challenged this, advising REC expected to release transitional and migration legal text together, and the activities participants would need to undertake would be available for review in the approved legal text and parties would be expected to commence activities based on this.

7. **CCAG Reporting**

BF introduced this standing agenda item, and highlighted the following points:

- BSC and REC Metering Services code drafting artefacts were issued 14 February 2023 alongside two BSC Data Services code drafting artifacts
- CCAG constituency representatives are urged to prompt their constituents to provide responses
- The remaining four BC Data Services code drafting artefacts will be issued shortly and the consultation deadline has been extended by a week to 13 March 2023, to account for the delayed issuance of these artefacts
- The dates of other drafting topics are currently at risk due to potential changes to timelines emanating from responses to the Programme Replan consultation

8. **CDWG Update**

FM provided updates from the February CDWG meeting, and information on upcoming discussion items, full details of which can be found within the meeting papers.

BF noted the current consultation closure date was now 13 March 2023, and this meant there may not be any comments to discuss at the next CDWG scheduled for 07 March 2023. FM asked whether there were any objections to standing

down the 07 March 2023 CDWG in favour of the next scheduled meeting on 14 March 2023. The group considered that if no comments were available for discussion, the 07 March 2023 meeting could be stood down.

DECISION CCAG-DEC26: CCAG agree the CDWG meeting to be held 07 March 2023 should be stood down in favour of scheduled meeting on 14 March 2023

9. Summary and Next Steps

AOB1: TC asked whether ambiguity emanating from current industry arrangements which may not be required for MHHS would be considered a design issue. The Programme requested that any such items are submitted to the Programme for review. If any party becomes aware of an issue which may affect the MHHS Design, they should raise this as a Design Issue Notification to the Design Authority for review. If there is doubt over potential impacts, participants are urged to highlight the relevant section of code to the Programme, who will assess and determine appropriate next steps.

A request was made to CCAG members to prompt their constituents to provide responses to the current code drafting consultation. The current code drafting consultation deadline is 13 March 2023.

ACTION CCAG15-06: CCAG members to prompt constituents to respond to code drafting consultation (closing date 13 March 2023)

FM summarised the actions of the meeting.

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

Date of next CCAG meeting: 22 March 2023

Date of next CDWG meeting: 14 March 2022