

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

Issue date: 31/08/2023

Meeting number **CCAG021**

Venue

**Virtual – MS Teams**

Date and time **23 August 2023 10:00-12:00**

Classification

**Public**

### Attendees

#### **Chair**

Chris Welby

#### **Role**

SRO SME

#### **Industry Representatives**

Andrew Wallace (AW)

RECCo Representative

David Kemp (DK)

SEC Representative

Fungai Madzivadondo (FM)

DNO/iDNO Representative

Harriet Truss (HT)

REC Code Manager

John Lawton (JL)

DCUSA Representative

Milly Lewis (ML)

CUSC Representative

Neil Dewar (ND)

National Grid ESO Representative

Paul Saker (PS)

Supplier Representative (Domestic)

Sarah Jones (SJ)

RECCo Representative

Tom Chevalier (TC)

Supplier Agent Representative (Independent Supplier Agent)

#### **MHHS Programme**

Amy Clayton (AC)

PMO Governance Support

Andrew Margan (AM)

Governance Manager

Fraser Mathieson (FM)

PMO Governance Lead

Jason Brogden (JBr)

Industry Expert

Kevin Spencer (KS)

Market Architect

Mark DeSouzaWilson (MDSW)

Code Drafter

Matthew McKeon (MMK)

Market Architect

Simon Chidwick (SC)

Design Administrator

#### **Other attendees**

Andy MacFaul (AMF)

Ofgem

Joshvan Begol (JBe)

IPA

Kanchan Thite (KT)

IPA

Oli Meggitt (OM)

Elexon Head of Assurance

Sinead Quinn (SQ)

Ofgem

### Apologies

Andrew Green (AG)

Supplier Representative (I&C Suppliers)

Caroline Farquhar (CF)

Consumer Representative

Clare Hannah (CH)

Supplier Agent Representative

Lawrence Jones (LJ)

BSC Representative

### Actions

| Area                              | Ref       | Action   | Owner                     | Due   |
|-----------------------------------|-----------|--|---------------------------|---|
| Horizon Scanning Log              | CCAG21-01 | Ofgem to discuss putting out a statement to industry which explains the rationale behind delay of the P432 decision.   | Ofgem (Sinead Quinn)      | 27/09/23  |
| Horizon Scanning Log              | CCAG21-02 | Programme to engage with Elexon regarding concerns around R0144 (linked to P459) impacts to the MHHS Programme.        | Programme (Chris Welby)   | 27/09/23  |
| Horizon Scanning Log              | CCAG21-03 | To ensure all Code Bodies are in attendance at CCAG meetings and make appropriate updates to the horizon scanning log. | Programme (Chris Welby)   | 27/09/23  |
| Horizon Scanning Log              | CCAG21-04 | Programme to provide an update on their inputs to the horizon scanning long at subsequent CCAGs (in relation to P459). | Programme (PMO)           | 27/09/23  |
| NGESO Delivery Update             | CCAG21-05 | Programme to include the Charging Futures mailing list for Task Force updates with the headline report.                | Programme (PMO)           | Please see link to NGESO Charging Futures mailing list <a href="#">here</a> . |
| NGESO Delivery Update             | CCAG21-06 | NGESO to provide further delivery updates on consequential code change at subsequent CCAGs.                            | NGESO (Neil Dewar)        | 27/09/23  |
| Elexon Delivery Update            | CCAG21-07 | Elexon to provide further delivery updates on consequential code change at subsequent CCAGs.                           | Elexon (Oli Meggitt)      | 27/09/23  |
| Elexon Delivery Update            | CCAG21-08 | Programme plan to be updated to reflect Elexon's amended consequential change delivery date.                           | Programme (Andrew Margan) | 27/09/23  |
| Open action from previous meeting | CCAG20-02 | Programme to include a list of Mop-up planning and the changes to be delivered under this.                             | Programme (Andrew Margan) | 23/08/2023  |

### Decisions

| Area                | Dec Ref    | Decision  |
|---------------------|------------|---|
| Minutes and Actions | CCAG-DEC33 | Minutes and Headline Report of CCAG meeting held 26 July 2023 approved.                       |
| CDWG Escalations    | CCAG-DEC34 | The CCAG approved the CDWG recommendation of BSC and RED Registration Code Artefact approval. |

### 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 Chair asked if there were any questions from the headline report and minutes from last month's CCAG. No questions.

**DECISION CCAG-DEC33:** Minutes and Headline Report of CCAG meeting held 26 July 2023 approved.

The CCAG reviewed outstanding actions, updates for which can be found within the meeting papers.

The Programme noted comments against the following action:

**CCAG19-04:** Action now moved to closed.

### 3. Programme updates

The item was considered as read by attendees, with no questions.

### 4. Horizon Scanning Log

#### DCUSA

JL, the DCUSA representative provided updates on the following horizon scanning code body changes:

**DCP414** - JL, shared that this change proposal seeks to provide transitional protection for NHH CT customers affected by regulatory change. JL noted that distributors and suppliers had voted in favour for a default MIC and rejected a new transitional aggregated tariff. The new aggregated tariff was approved by the Authority on 21 July.

JL shared that he thought the latest information from Ofgem was interesting. It stated that P432, which is closely linked to DCP414, would come into effect in January 2024 which is after DCP414. JL thought they would come into effect at the same time.

CW responded that he had spoken to Ofgem and relayed that the rationale for this is that if P432 came into effect at the same time then it could leave customers exposed to capacity charges, therefore P432 would come into effect 5WD after the P432 decision.

TC, the Supplier Agent representative, shared that the above information was important. TC asked if Ofgem or the MHHS Programme could publish the rationale of delaying P432 due to consequential change impact. SQ, from Ofgem took an action to take this back to the team and discuss putting out a statement for industry on this. AM noted that SQ could discuss communications on this with the Programme.

**ACTION CCAG21-01:** Ofgem to discuss putting out a statement to industry which explains the rationale behind delay of the P432 decision.

#### REC

The updates from REC were as follows:

**R0083 and R0083A** – HT, the REC Code Manager shared that R0083 & R0083A (changes to supply number format for MHHS) is awaiting Authority decision. The final Change Report presented to Change Panel, where they recommended to approve R0083 (retaining top line) for implementation at M8 'Code changes delivered' and reject R0083A. It was noted that the decision date for this has been moved to 20/09/23.

**R0143** – HT shared that this was a new change proposal that came in. The change will add a new Site Visit Check Code for Chargeable DUoS Capacity costs. This is to support DCP411, which is awaiting Authority decision and has been progressed as an urgent change.

JBr stated that DCP411 has not been highlighted as an issue to MHHS. HT responded that it is a valid change to the data item, so would depend on if the interface catalogue or ISD for this will be updated. HT further highlighted that as the change had just come in REC had not looked at how it will work in the future yet.

**R0144** – HT shared that this was a new change proposal that came in. This is a cross-code change relating to BSC P459, which looks to update the management of Import and Export Metering Equipment Managers. It was noted that REC has not started progressing with this change and details need to be developed.

PS, the Supplier (Domestic) representative highlighted that he was surprised this change had been raised as P459 has a fundamental impact on MHHS Design, which is a large concern for Suppliers in his constituency. PS asked for further clarity on where this change had come from and the impact it would have should it progress.

SJ, the RECCo representative responded that this change had been discussed with the MHHS Design team, however, did agree this would be a fundamental change to design if progressed.

TC agreed that the change would cause lots of issues and suggested doing this after MHHS instead of during.

**ACTION CCAG21-02:** Programme to engage with Elexon regarding concerns around R0144 (linked to P459) impacts to the MHHS Programme.

HT highlighted that several changes in the log had moved to under development and therefore not included in the slide.

### **BSC**

There was no BSC representative at the meeting, therefore CW from the Programme provided the following updates in their absence:

**P458** – CW shared that the panel had recommended approval of this change around introducing data controller and processor obligations in the BSC for MHHS Testing.

**P459** – CW shared that this change had been discussed and that they were monitoring it. This change was around allowing different Supplier Agents to be appointed to Import and Export MSIDs.

**P460** - CW shared that this change was currently out for panel consultation. This change aims to amend the responsibility to propose and consult on a MHHS Migration Plan.

TC noted the importance of having all Code Bodies in attendance at CCAG meetings and questioned if this was due to Elexon being under resourced.

Additionally, HT asked if the Programme would be walking through their own updates and inputs to the Horizon Scanning Log. AM responded that he would provide an update on this at the September CCAG.

The Chair took an action to follow up with Code Bodies on this and to ensure they make the appropriate updates to the horizon scanning log.

**ACTION CCAG21-03:** To ensure all Code Bodies are in attendance at CCAG meetings and make appropriate updates to the horizon scanning log.

**ACTION: CCAG21-04:** Programme to provide an update on their inputs to the horizon scanning long at subsequent CCAGs (in relation to P459).

## **5. CDWG Escalations**

AM provided an overview of the CDWG recommendation of BSC and REC Registration Code Artefact approval. The CCAG's role and purpose was noted and that the CCAG will make Level 3 decisions. It will further ensure that any decisions are based on full transparency with Programme Participants (PPs) and appropriate consultation.

AM highlighted that the CCAG recommended Code Artefacts will remain 'live documents' which means that they are not baselined until M6 final approval. The Code Artefacts will remain public at all times. Any contentious areas can be ring fenced, tracked and picked up through the mop-up process to avoid delaying whole tranches. It was further noted that there are no plans for 'repeat' consultation and any changes to design before M6 will need to be reflected in the Code Artefacts. Changes to approved artefacts must be change controlled and approved by CCAG.

AM shared the CDWG recommendation that BSC and REC Registration Code Artefacts are sent to CCAG for their consideration. The recommendation is based on the current MHHS Design, the Code Artefacts have been translated accurately (subject to CRs and DINs) and are ready to be approved by the CCAG Chair in consultation with CCAG, published and where relevant updated during later tranches.

The Chair asked if there were any objections. No objections.

**DECISION CCAG-DEC34:** The CCAG approved the CDWG recommendation of BSC and REC Registration Code Artefact approval.

## 6. CCAG Reporting, Risks and Milestones

### Code Workstream Summary

AM provided a status summary on code drafting activities and August deliverables. It was noted that the Code Drafting workstream is on track for M6 delivery and lower-level tier 3 milestones.

Registration comments have been addressed and where accepted, the Code Artefacts have been red-lined and that these will be uploaded to the Collaboration Base. BSC Central Services milestones for the consultations have been met and comments need to be triaged and actioned.

AM shared that the next steps would be to consult on Migration, Governance and Qualification, which are on track. Also, to start the Mop-up planning how and when changes to Design through CRs and DINs will be delivered.

AM asked if there were any questions around the work against the plan.

TC queried if the EMAR phase of work was on track. AW, the RECCo representative responded that it was on track. However, they are aware that there are some areas of the plan which are slightly behind where they expected to be. This is largely due to information provided to REC to then translate into the interface drafting (e.g., CR19 and ECS reports) being delayed. AW noted that the team is validating with those working on these areas to understand what can be provided and when.

AW shared that the plan is to have this document out on 11 October 2023, however it was noted there may be slight delays due to information coming in later and the need to incorporate this into the document, so PPs should expect mid-October for this.

TC thanked AW for the explanation above. TC noted that the plan had been agreed at a later date subject to a number of decisions being made (e.g. data items) and asked if the data items had been agreed at the dates on the timeline.

Additionally, TC was aware that through the DIN log that there are many changes that have happened without understanding or clarity which has changed the interface specification significantly.

AW responded that it is always the expectation that this work will be published on the interface consultation, however, there may be more changes and DINs that may need to be incorporated at a later date. AW highlighted that they are working out what is realistic to include, in terms of the progress of CRs and DINs, in the October consultation, and if more days are needed then they will do this and are currently validating this with the Design leads.

AW highlighted that if there are any particular areas on the DINs or CRs that participants would like to share with then they could email the RECCo team.

AM highlighted that the intention is for the interfaces to be updated to interim release 4, and any areas not able to be updated will be ring fenced and likely picked up in the mop up in December. It was noted that the Programme will carry on reporting on this so industry is aware.

### Top Programme Risks related to CCAG

AM ran through the top risks related to CCAG, highlighting that there was a new emphasis being driven in the Programme on bringing these risks to Advisory Groups. AM asked if there were any questions on the risks.

HT highlighted there was a duplicated mitigation action on risk R202 and R355. The Programme noted this was inaccurate and would update accordingly. AM noted in reference to R355 that if the consequential change is not delivered on time, then it will be delivered through a stand-alone MOD.

### DCUSA Consequential changes status report

JL provided an overview of DCUSA's latest position and updates from the panel meeting last week.

JL shared that DCUSA had raised six Consequential Code Changes (CCC) – two are no longer required, three are completed and one is waiting on the Programme for CR19 and CR27. The DCUSA panel agreed to release all the changes (CC and the Programme impacted changes) in one document. JL went on to share that the intention is to do so in the transition phase of the Programme in preference to the mop-up phase. This coincides with the second, now first drop post CCAG approval of the code changes plan, both in October 2023. JL shared that DCUSA welcomes the additional drop of CCCs during December aligned with the mop-up tranche.

It was noted that there is a large dependency on CR19 (linked to DUoS Billing) and CR27 (linked to DUoS invoicing), which are both planned for interim release 5 in October.

JL provided an overview of the six CC changes. It was noted that DCUSA are meeting on 04 September to sign-off the documentation across the Programme and then will move through the official Programme processes for October release.

AW asked if any information could be shared with RECCo at the same time as they will also be waiting for updated design artefacts on CR19 alongside DCUSA. JL agreed to this.

AM shared that the Programme is planning to produce a red-line version earlier on design updates to CR19. It was noted that this would be useful to share the red-line version with Design Advisory Group (DAG) members.

## 7. **NGESO Delivery Update**

ND, the NGESO representative, shared that Milly Lewis would be replacing Paul Mullins as the CUSC representative for CCAG.

ND provided an overview of the challenges CUSC charging – Transmission Network Use of System (TNUoS) faces. It was noted that the biggest challenges are how Suppliers and directly connected demand are charged for TNUoS, Half Hourly Settled (generally commercial) and Non-Half Hourly (generally domestic, or smaller non-domestic premises), and for all final demand customers, there is a daily site charge which replaced the previous residual charge.

There were two solutions proposed by NGESO.

ND walked through solution 1: TNUoS Task Force to review Triad HH methodology as part of "Signals" work. The advantages are that it pits the obligation on TCMF to develop legal text and resolves the long-standing industry problem of HH charging and triads concept out of date. The disadvantage is that does it fit with MHHS timelines.

ND walked through solution 2: ESO develops legal text to remove NHH from CUSC as well as removing Measurement Classes by February 2024, but Ofgem does not implement until 2025. The advantages are that Ofgem approves as part of SCR powers and that it fits with MHHS Code Body requests to BSC, RECCo etc. The disadvantages are that they will need to engage with industry – TCMF in September and look to get a select sub-group to assist them.

ND shared that the plan is to develop solutions 1 and 2 concurrently to prevent further delays. This will allow the TNUoS Task Force to review Triad HH methodology as part of "Signals" work from August 2023 and develop the legal text to remove NHH from CUSC so there is only 1 set of charging calculations for implementation in April 2025.

ND noted that they had been asked to provide a timeline by the Programme. ND The noted that the TNUoS Task Force had met last week and decided the leads for each area would look at what needs to be considered with an indicative timeline, which was shared on the slide. The timeline shows what will be delivered in the next 5 months and through to implementation in April 2025 for M11.

PS asked how the TNUoS Task Force would keep participants informed on developments over time, as Suppliers in his constituency have had a lot of interest on this. ND responded that they need to work through how the task force will provide updates. ML, the CUSC representative shared that it would be best for interested participants to sign up to the Charging Futures mailing list which provides meeting and summary packs. ML noted she would share this in the chat and be provided in the headline report.

**ACTION CCAG21-05:** Programme to include the Charging Futures mailing list for Task Force updates with the headline report.

ND also took an action to provide a further delivery update on consequential code change at future CCAGs.

**ACTION CCAG21-06:** NGENSO to provide further delivery updates on consequential code change at subsequent CCAGs.

TC asked of the two solutions, will there be a decision to follow one and or continue with both. ND responded that the decision made with ESO will likely be to run both solutions in parallel. This will ensure there is a back-up if the Task Force isn't able to delivery by 2025 with the concern that there could then be a full year of double charging issues. It was noted that they do realise this will cause more work, however it is to avoid reconciliation. TC agreed.

## 8. Elexon Delivery Update

OM, the Elexon representative shared the outline and key steps of their CCC path for the performance assurance areas. OM shared the key areas and timelines (Supplier Charges, Trading Disputes, Qualification, Performance Standards, Performance Monitoring, Section Z Changes, BSC Audit, TAM, Breach & Default, Bulk Change of Agent).

OM noted that Supplier Charges, Trading Disputes and Qualification would not be done together but had the same timelines and therefore shown as one chevron.

PS asked if the code drafting review would be an industry consultation. OM responded that it would be an internal piece.

TC asked of the performance assurance had been shared with industry and highlighted the risk that industry would not have site of the performance assurance until the formal consultation in February. Thus, suggested having a consultation before this to engage industry. OM shared that there will be an opportunity in February to respond to this. OM also noted that it is public on their website and organisations assurance subject matter experts should be attending the Working Groups around this and therefore have sight of it.

TC highlighted the issue around whether the bulk change of agent will exist in MHHS HH or not, and highlighted further thinking should be done on this.

OM went over the assumptions which underly the timeline, as per the slide. It was noted that the workstream impacts and changes for PPs are minimal. It was further noted that the Programme milestones M6 will remain unchanged, however the Tier 3 Elexon CCC will need to move from October to February consultation.

OM also took an action to provide a further delivery update on consequential code change at future CCAGs

**ACTION CCAG21-07:** Elexon to provide further delivery updates on consequential code change at subsequent CCAGs.

AM took an action to update their plan to reflect Elexon's amended CC delivery date.

**ACTION CCAG21-08:** Programme plan to be updated to reflect Elexon's amended consequential change delivery date.

JBr asked if there will be any additional requirements for MHHS systems and services for reporting to support performance assurance, and if so, how will this be implemented. OM responded that it will likely do this through reporting functions, and not through a system change. Most of this reporting data will come out of the new Helix system, which they are aware of and being engaged with.

TC asked if these requirements end up as DINs will they formally go into design and be picked up in the mop-up process. The Programme responded that they wouldn't necessarily be DINs and it depends on the nature of the requirements which will have to be assessed if they require a CR. The view is that this is in place for BAU monitoring for registration. TC highlighted his view on this would be the need for a formal requirement.

## CDWG Update

AM provided an overview from the Code Drafting Working Group (CDWG), as per the slide.

## 9. Summary and Next Steps

AC summarised the meeting actions as per the table above.

CW shared next steps and asked any other AOB.

The Chair thanks members for their contribution and closed the meeting.

**Date of next meeting: 27 September 2023**