

MHHS Cross Code Advisory Group Minutes and Actions

Issue date: 05/05/2022

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|----------------|----------------------------------|----------------|---------------------------|
| Meeting number | CCAG005 | Venue | Virtual – MS Teams |
| Date and time | 27 April 2022 10:00-12:00 | Classification | Public |

Attendees

Chair

Chris Welby (Chair)

Role

Chair

Industry Representatives

Andrew Green (AG)

Supplier Representative (I&C)

Ann Perry (AP)

REC Representative

Clare Hannah (CH)

Supplier Agent Representative

Lawrence Jones (LJ)

Elexon Representative (as BSC/BSCCo Manager)

Fungai Madzivadondo (FMa)

DNO/iDNO Representative

John Lawton (JL)

DCUSA Representative

Matt Hall (MH)

Elexon Representative (as central systems provider)

Paul Mullen (PM)

CUSC Representative

Paul Saker (PS)

Supplier Representative (Domestic)

Richard Vernon (RV)

DCC Representative (as smart central systems provider)

Rosie Knight (RK)

SEC Representative (on behalf of Robin Healey)

Sean Donner

National Grid ESO

Tom Chevalier (TC)

Supplier Agent Representative (Independent Supplier Agent)

MHHS IM

Andrew Margan (AM)

Governance Manager

Alex White (AW)

Change Control Manager

Fraser Mathieson (FM)

PMO Governance Lead

Jason Brogden (JB)

Industry Expert

Martin Cranfield (MC)

PMO Governance Lead

Other Attendees

David Kemp (DK)

SEC

Sinead Quinn (SQ)

Ofgem Representative

Tim Newton (TN)

SEC

Apologies

Ed Rees (ER)

Consumer Representative

Actions

| Area | Action Ref | Action | Owner | Due Date | Update |
|---|------------|---|---------------------------|------------|--|
| Previous meeting(s) | CCAG02-07 | Engage with code bodies offline on how information on identified consequential changes will be shared with this group | Programme (Andrew Margan) | 25/05/2022 | ONGOING |
| | CCAG04-06 | Further develop view of code draft resource requirement and return to next meeting with information for discussion | Programme (Andrew Margan) | 25/05/2022 | ONGOING |
| | CCAG04-07 | Flag operational choreography document to CCAG once issued for consultation | Programme (PMO) | 25/05/2022 | ONGOING |
| | CCAG04-09 | Consider whether MDR and other related matters will need to be picked up in subsequent REC admin CPs | REC (Ann Perry) | 25/05/2022 | ONGOING |
| Minutes and actions | CCAG05-01 | Forward TMAG email on E2E Testing and Integration Strategy v0.5 to CCAG members | Programme (PMO) | 28/04/2022 | COMPLETE – Forwarded alongside Headline Report publication |
| Horizon scanning | CCAG05-02 | Share CACoP Central Modification Register changes highlighted by the Programme for review by relevant code bodies | Programme (PMO) | 28/04/2022 | COMPLETE – Individual Code Bodies contacted |
| | CCAG05-03 | Provide updates on items in the Horizon Scanning Log | Code bodies | 17/05/2022 | NEW |
| CR003 CCAG proposals to move M6 and M7 | CCAG05-04 | Submit CR003 to Ofgem for decision | Programme (SRO) | 29/04/2022 | NEW |
| Code drafting principles | CCAG05-05 | Discuss with code bodies how code change documents can be stored in a central location to assist transparency and accessibility post programme completion | Programme (Andrew Margan) | 17/05/2022 | NEW |
| | CCAG05-06 | Update drafting principles based on feedback from CCAG | Programme (Andrew Margan) | 03/05/2022 | NEW |
| | CCAG05-07 | Add risk to RAID that design documentation may not be sufficient to enable effective translation into code | Programme (PMO) | 28/04/2022 | COMPLETE – Risk submitted through Programme RAID framework for review/addition to RAID |

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|-----------------------|-----------|--|---------------------------|------------|-----|
| | CCAG05-08 | Present code drafting principles to DAG for information | Programme (Andrew Margan) | 11/05/2022 | NEW |
| | CCAG05-09 | Provide any further comments on code drafting principles by 03 May | CCAG members | 03/05/2022 | NEW |
| DSP governance | CCAG05-10 | Initiate consideration of governance arrangements for parties undertaking the new Data Service Provider (DSP) role | Programme (Jason Brogden) | 17/05/2022 | NEW |
| | CCAG05-11 | CCAG attendees to provide views on the governance of agents based on the initial options drafted by the Programme | CCAG members | 17/05/2022 | NEW |

Decisions

| Area | Dec Ref | Decision |
|---|------------|--|
| Minutes and Actions | CCAG-DEC10 | Minutes of meeting held 23 March 2022 approved |
| CR003 CCAG proposals to move M6 and M7 | CCAG-DEC11 | Submit CR003 to Ofgem for a decision |

RAID items discussed/raised

| RAID area | Description |
|-------------------------------|--|
| Industry Code Drafting | Design documentation may not be sufficient to enable effective translation into code legal text (NEW RISK, see action CCAG05-08) |

Minutes

1. **Welcome and Introductions**

The Chair welcomed attendees to the meeting.

2. **Minutes and Actions**

The Chair asked for approval of the March CCAG minutes. One amendment was noted by the Programme PMO to update the attendees list. TC their apologies be added also for last month's meeting. The minutes for March were approved.

DECISION CCAG-DEC10: Minutes of meeting held 23 March 2022 approved

The Chair ran through the actions as per the slide.

- LJ noted on CCAG03-13 that the modification to the Code Administration Code of Practice (CACoP) Central Modifications Register (CMR) would be made in the next month's register. The group agree this action could be closed
- FM noted on CCAG04-04 that comments had been received from CCAG members on anticipated consequential changes and these would be touched upon in agenda item five and reviewed in greater detail at the May CCAG.
- CH queried CCAG04-08 and the outcome of discussion with the Programme Design Team on 'slicing up' the Operational Choreography document. JB noted the conversation had been held with the Design Team and the outcome was the document would be issued in the Tranche 3 design artefact review. MH queried if this would be split across Tranche 3 and 4 and how updates to the document may be made. JB noted this was the same as the approach to any artefact changes and updates may need to be made in future. CH commented the request ability to 'cut up' the document would aid the review of other documents. TC echoed this view. JB noted there is the opportunity for CCAG members to engage in the design through the L4 Design Working Groups. TC noted that no other L4 design Working Groups were currently planned, and that discussion is required on outstanding

issues (i.e. the L4 working groups are needed). AM advised there are outstanding design issues which require resolution and as such, additional workgroups will be provided. AM noted the Programme can re-escalate this to design if required by CCAG. CH concluded the answer to the question of whether the Operational Choreography document can be sliced up was that it could not be at this time.

3. Governance Group updates

FM introduced this standing agenda item and explained it is aimed at increasing visibility and awareness of matters under discussion at the levels two and three programme groups. Updates were provided from the Programme Steering Group (PSG), the Design Advisory Group (DAG), and the Testing Advisory Group (TAG).

PSG

The Chair advised MHHS Programme Change Request (CR) 001 (*Design Baseline Replan to July 2022*) was approved by Ofgem on 21 April 2022. The result is the M5 Programme milestone relating to the delivery of the detailed design baseline has been moved to July 2022. Alternative change request, CR002 (*Design Baseline Replan to November 2022*), was rejected by Ofgem.

The first Programme Readiness Assessments have been carried out and the responses will be reviewed at PSG. The assessments seek to gauge participants readiness in relation to the implementation of MHHS.

TMAG

The Chair advised TMAG approved in the principle the E2E Testing and Integration Strategy, subject to it being reissued for further comment prior to being published as version one. There will be further opportunity to amend and refine the document as the Programme progresses. MH commented the strategy had not been approved by the Elexon project Helix team, and that further internal discussion was required. JB advised further comments or suggestions for amendment could be provided by correspondence on the next version of the document.

CW provided an update on the Data Working Group (DWG), highlighting the Test Data Strategy had been reissued for review following changes agreed at the DWG meeting on 07 April 2022. MH and TC questioned whether the document review process had been well communicated, believing it was not clear the document had been issued to industry parties for review. The Chair stated the notice of the document review including relevant links had been published in the MHHS Programme newsletter, The Clock, as the agreed primary method for communicating programme-specific messages to industry parties and interested stakeholders. Furthermore, the Chair advised the Test Data Strategy had been issued directly to TMAG members, who are constituency representatives, and to the DWG which is a group open to all.

ACTION CCAG05-01: Programme to forward TMAG email on E2E Testing and Integration Strategy v0.5 to CCAG members

DAG

The Chair highlighted new design principles which have been approved by the DAG, and decisions made on technical addressing options for the Data Integration Platform (DIP). It was also highlighted that DAG are working with representatives of the Smart Energy Code (SEC) to ensure alignment between design activities and SEC Modification Proposal (MP) 162¹.

4. Horizon Scanning Log

FM provided an overview of the Horizon Scanning Log including updates on related actions. FM highlighted several modifications in the CACoP CMR which mentioned half-hourly settlement but do not appear in the CCAG Horizon Scanning Log. Five entries in the CACoP CMR were highlighted and relevant Code Bodies were asked to review these and determine whether these should be entered into the CCAG Horizon Scanning Log.

ACTION CCAG05-02: Programme to share CACoP Central Modification Register changes highlighted by the Programme for review by relevant code bodies

AM explained the purpose of the CCAG Horizon Scanning Log is to record any code modifications which may be relevant to the MHHS Programme, to enable an assessment by the Programme of any impacts. PS queried the scope of items to be placed within the log and whether it was impacts on MHHS design or benefits that are to be recorded. AM responded it is both, and that CCAG members should submit anything which may have a bearing on the MHHS Programme, to

¹ SEC changes required to deliver MHHS

enable review by the Programme and then action or monitoring by the CCAG if necessary. PS noted many of the changes currently recorded in the log will impact the Programme if they are *not* approved, rather than if they are approved.

LJ stated they were happy to provide the rationale on why certain BSC changes in the CACoP CMR have not been entered into the CCAG Horizon Scanning Log, noting P432 has split recommendations with some code parties seeking to reject the change. LJ advised the change may impact the scope of the MHHS Programme working groups are planned to progress the modification. The CCAG Horizon Scanning Log notes that a member of the MHHS Design Team is now in attendance at these working groups.

LJ went on to highlight that Ofgem has established three cross-code forums, the CACoP, the Cross Code Steering Group (CCSG), and a committee constituted by the chairs of each codes' executive committee or governing panel. LJ commented this feels inefficient, especially as there is now CCAG.

CH asked whether there would be a code change freeze in the lead up to implementation of code change related to MHHS. AM replied this was not the intention and may not be technically possible in any case. AP advised REC do not anticipate a formal change freeze but will consider the timing and impacts of other code changes against the implementation of MHHS-related changes, undertaking prioritisation where required.

JL highlighted certain DCUSA changes which have now been implemented and should no longer appear in the CACoP CMR and questioned why the CCAG are reviewing the CMR rather than the CCAG Horizon Scanning Log. FM advised version one of the Horizon Scanning Log had only been formally published for the first time with the CCAG meeting papers, and the objective was to ensure all relevant existing changes have been included, to ensure the Programme is able to assess the impacts of any existing changes on the MHHS design. In future, the CCAG will review its Horizon Scanning Log and not the CMR. FM shared the Horizon Scanning Log to demonstrate the assessment of each relevant code change undertaken by the Programme and advised this is what the CCAG would review at future meetings. The Horizon Scanning Log mirrors the layout of the CMR to assist in minimising the effort required by Code Bodies in providing updates, as the CACoP CMR already requires monthly updates. AM asked code bodies to review the log and submit any relevant modifications that are not already present and to update the log to populate any missing data such as descriptions and anticipated implementation dates.

ACTION CCAG05-03: Code Bodies to provide updates on items in the Horizon Scanning Log

5. CR003 CCAG Proposals to Change M6 and M7

AW provided an overview of CR003² and the outputs of industry Impact Assessment. CR003 seeks to move the M6 and M7 programme milestones, which relate to the delivery of code drafting and enactment by Ofgem of Smart Meter Act Powers (SMAP), to nine and ten months respectively following the delivery of the M5 milestone (delivery of the detailed design baseline). AW advised all respondents had either indicated support for the change or had abstained from providing a recommendation. No respondents indicated they do not support the change. Several parties supported the change on condition there would be no impact to the overall Programme end date.

Several CCAG members highlighted concerns with the content within the CR, namely the detailed code drafting plan and timeline, were already being superseded by further planning activity being undertaken by Programme. Some members noted a lack of clarity on resourcing, such as who will lead on legal text drafting for code changes. The Programme responded the plan in CR003 outlining the expected code drafting stages and timelines should be considered a living plan and will subject to refinement as the code drafting topic areas and review cycles become clearer. It was highlighted that CCAG are not being asked to recommend approval of the code drafting plan per se, rather they are being asked to recommend the approval of the movement of the M6 and M7 milestones as it is certain they cannot be delivered by the dates within Ofgem's current transition plan. The group were advised the code drafting plan would be reviewed regularly by the CCAG and continue to be developed as the resourcing requirements and sequencing of code drafting topics is determined.

The Chair invited CCAG members to indicate whether they would support a recommendation to Ofgem that the change be implemented. Ten CCAG members offered support for CR003, and three members abstained. As such, the Chair, who is also the Senior Responsible Owner (SRO) for the MHHS Programme, determined the change should be recommended for approval by Ofgem.

DECISION CCAG-DEC11: Submit CR003 to Ofgem for decision, with recommendation for approval

² [Proposals to Change M6 and M7](#)

ACTION CCAG05-04: Programme to submit CR003 to Ofgem for decision

6. Code Drafting Principles and Approach

AM explained a mid-month meeting had been held with representatives of the REC and BSC, as the two codes most impacted by MHHS, to discuss the approach to code drafting. As a result, several principles have been developed to help guide the approach to code drafting, and these are now being presented to CCAG for discussion. AM explained the draft principles will 'set the scene' for the next 12 months of code drafting.

Review of Code Drafting Principles

CH suggested an additional principle regarding clarity of content and centrality of documents, with a request that relevant MHHS documents and code-specific documents be held in one place to assist transparency both during code drafting and on an enduring basis post programme completion. AM was uncertain whether it would be possible to centralise code documentation as this would be owned and published by each code individually.

ACTION CCAG05-05: Discuss with code bodies how code change documents can be stored in a central location to assist transparency and accessibility post programme completion

PS commented on the first draft principle relating to the proposed lean approach to documentation, noting this was good in principle but potentially subject to differing interpretations.

TC queried how the baselining of code changes would operate and how subsequent changes could be raised where issues or concerns are identified. AM responded an MHHS Programme Change Request can be raised by any party if changes to the design are necessary following the commencement of code drafting. TC asked whether products such as data flow catalogues would be considered design artefacts and how/by whom these would be maintained. AM responded this would require determination during the development of the code changes, alongside several other decisions.

TC asked whether qualification will be based on the design baseline or code drafting. The Chair advised qualification will be based on the design, and the TMAG have previously discussed that testing will be undertaken against the design baseline and code changes will reflect the design baseline. JB added that the intention is there is no mismatch between code changes and the design, with the code changes not expected to affect the baseline design, but to reflect it. TC noted a potential lack of clarity around requirements in the design artefact review tranches, and how it was not necessarily clear how requirements in these documents would be translated into code drafting. TC expected further debate will be required on several of the code changes once the design has been translated into legal text and consulted upon.

MH advised they had no objection to the proposed principles but queried how test tooling would be managed post programme completion given there are currently no plans for a central body to manage this. MH noted that whilst this was not necessarily a question for the CCAG to answer, it may be something which makes the code drafting principles challenging to operate in practice. MH then expressed concern over whether the design artefacts will be of sufficient quality to enable the design to be translated into code legal text, and to uphold the proposed code drafting principles. MH believed the code drafting principles should also be reviewed by the DAG, as their operation is dependent on design outputs. JB highlighted that, as a design-led programme, it is intended the MHHS design baseline drives the form and content of associated code changes.

CH queried the consistency checking provided in the approach guidance provided alongside the proposed code drafting principles, and how this would be managed. AM responded this is intended to enable a juncture where the Programme would undertake checks to ensure code changes reflect the design, with findings presented to relevant MHHS governance groups.

AM concluded that updates will be made to the proposed code drafting principles to reflect the following discussion points:

- Clarity of content – a new principle to state content should be complete and unambiguous
- Change control – clarity on how changes to design elements can be raised
- Enduring document/product management – information on how information such as artefact catalogues are owned and managed post programme completion
- Qualification – clarity that initial qualification will be undertaken against the design, not the code drafting
- Code drafting – will reflect the design

ACTION CCAG05-06: Update drafting principles based on feedback from CCAG

AM summarised other actions such as the addition of a risk to the Programme RAID log regarding the adequacy of design documentation, the presentation of the code drafting principles to the DAG for comment, and a request for CCAG members to provide any further comments on the principles by 03 May 2022.

ACTION CCAG05-07: Add risk to RAID that design documentation may not be sufficient to enable effective translation into code

ACTION CCAG05-08: Present code drafting principles to DAG for information

ACTION CCAG05-09: Provide any further comments on code drafting principles by 03 May

Code Drafting Plan

MC provided an overview on the latest detail added to the code drafting plan. The latest updates include more detail on the review cycles of code changes, and the outputs to CCAG for discussion or approval. LJ highlighted that the review cycles within the latest detailed plan had been increased, and this may impact resource planning. MC responded that several drafting elements can be operated in parallel to avoid delays to overall delivery with the additional review cycles.

LJ stated the plan was shaping up well but commented that the notion of having some elements of drafting happening in parallel may increase the resource requirement and therefore cost. AM advised the plan had been revised to include more review cycles, in response to comments from CCAG and code bodies. This now means some elements may need to operate in parallel rather than in sequence. AM advised the key objective now is to establish and optimise the resourcing plan for each code and discuss this at CCAG. JB added that part of the development of the code drafting plan would involve identifying areas where there could be parallel work, and how flexibility could be added into the plan to ensure code drafting is delivered on time. LJ agreed and affirmed the BSC's commitment to supporting the process and meeting the deadline.

PM asked whether there was still an intention to carry out a mop-up consultation at the end of the drafting process. AM responded this was the intention and parties have indicated a preference for more review periods rather than fewer.

TC asked whether there is a view yet on the code drafting topic areas, how many documents may be generated as a result. AM advised topic areas identified thus far include data services, metering services, registration, BSC central services, interfaces, governance and transitional arrangements, qualification and consistency checking. The number of documents was unknown at present.

Consequential Change

AM advised consequential change had been discussed previously at CCAG, but there were differing interpretations on what this means. AM outlined that where consequential change should be discussed would be determined by whether it relates to governance or design matters, with the former to be discussed at CCAG and latter at DAG.

7. Data Service Provider Governance

AM explained MHHS creates a new group/role called 'Data Service Provider' (DSP) who are not signatories to code. There is a question about whether these parties are required to undertake qualification and how this should be governed. AM advised the Programme had provided several initial options for discussion. The Chair and JB noted this is not necessarily something CCAG can answer and where the most appropriate place for the matter to be discussed and agreed is still to be determined. PM did not believe this was a CCAG or Programme matter.

TC noted the DSP role is new, and does not exist today, and therefore there has not been a decision on where governance for this group lies. Whilst it may be within the BSC, it should be considered a Programme matter because where the governance lies may affect code drafting. Therefore, TC believed a position is needed before code drafting commences, to ensure arrangements for this group are included in the drafting approach and delivery plan. CH agreed and noted there has been long-term debate about whether agents should be qualified. CH believed it was right this matter was considered and not assumed the status quo continues. CH added that, whilst CCAG may not be the ideal forum for this debate, it was important to attempt to commence the discussion on this now to avoid it being overlooked or not picked up in code drafting, if required.

The Chair noted this matter affects several areas in the Programme including design, code drafting, and qualification and a wider discussion was prudent under the auspices of the Programme. The Chair further noted there is already a default position/status quo that the Programme and CCAG should work from, which is that agents need to pass qualification and are not signatories to code.

ACTION CCAG05-10: Initiate consideration of governance arrangements for parties undertaking the new Data Service Provider (DSP) role

TC believed it was right to commence discussion on this matter now, and to involve Ofgem if necessary. JB noted the initial options developed for CCAG by the Programme are not exhaustive, and input from industry parties would be appreciated to help initiate consideration and develop the options further.

ACTION CCAG05-11: CCAG attendees to provide views on the governance of agents based on the initial options drafted by the Programme

8. SEC MP162 Implications on MDR

RV explained that, as part of SEC MP162, a new term is required to be introduced into SEC to describe the Meter Data Retrieval (MDR) service. As such, RV brought this to CCAG as the MHHS governance group for discussion on cross-code matters affecting the Programme. RV highlighted two potential options for how the service is defined, which included a specific description of '*MDR Service*' or a more generic description of '*the BSC service that retrieves metering data for the purposes of MHHS*'. RV invited views on these.

TC queried where the qualification of the MDR will be undertaken, as this may inform what the description of the role should be. The group considered that use of a non-specific description was preferable at present.

9. Summary and Next Steps

FM summarised the meeting actions, noting 11 new actions had been raised.

The Chair thanked attendees for their contribution and closed the meeting.

Date of next meeting: 25 May 2022.