

MHHS Cross Code Advisory Group Minutes and Actions

Issue date: 01/06/2022

Meeting number	CCAG005	Venue	Virtual – MS Teams
Date and time	25 May 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

Fungai Madzivadondo (FuM)

DNO/iDNO Representative

John Lawton (JL)

DCUSA Representative

Lawrence Jones (LJ)

Elexon Representative (as BSC/BSCCo Manager)

Matt Hall (MH)

Elexon Representative (as central systems provider)

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)

Tom Chevalier (TC)

Supplier Agent Representative (Independent Supplier Agent)

MHHS IM

Andrew Margan (AM)

Governance Manager

Fraser Mathieson (FrM)

PMO Governance Lead

Jason Brogden (JB)

Industry Expert

Matt McKeon (MM)

Design Team

Miles Winter (MW)

PMO Governance Team

Other Attendees

Andy MacFaul

Ofgem Representative

Tim Newton (TN)

SEC

Apologies

Ed Rees (ER)

Consumer Representative

Paul Mullen (PM)

CUSC Representative

Sean Donner

National Grid ESO

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)	22/06/2022	ONGOING
	CCAG04-06	Further develop view of code draft resource requirement and return to next meeting with information for discussion	Programme (Andrew Margan)	22/06/2022	ONGOING
	CCAG04-07	Flag operational choreography document to CCAG once issued for consultation	Programme (PMO)	22/06/2022	ONGOING
	CCAG05-08	Present code drafting principles to DAG for information	Programme (Andrew Margan)	08/06/2022	ONGOING
Horizon Scanning Log	CCAG06-01	Programme to add Ofgem consultations / changes to Horizon Scanning Log	Programme (PMO)	22/06/2022	
Code Drafting Planning	CCAG06-02	Programme to add assumption to RAID log regarding quality of code drafting is adequate for single consultation window	Programme (PMO)	22/06/2022	
	CCAG06-03	Programme to update code drafting plan based on discussions at CCAG 25 May 2022	Programme (Jason Brogden)	22/06/2022	
Code Drafting Principles and Approach	CCAG06-04	Programme to update code drafting principles to clarify responsibility and accountability for delivery of code changes	Programme (Andrew Margan)	22/06/2022	
Code Drafting Working Group	CCAG06-05	Programme to update CDWG ToR based on comments from CCAG	Programme (Andrew Margan)	22/06/2022	
	CCAG06-06	Programme to identify an appropriate date for first CDWG meeting, and determine cycle of enduring meetings	Programme (Andrew Margan)	22/06/2022	

Decisions

Area	Dec Ref	Decision
Minutes and Actions	CCAG-DEC12	Minutes of meeting held 27 April 2022 approved subject to update of term 'Data Service Provider' to 'data services'
Code Drafting Working Group	CCAG-DEC13	CDWG ToR approved subject to agreed corrections

RAID items discussed/raised

RAID area	Description
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Code Drafting Planning	NEW ASSUMPTION: Quality of code drafting is adequate for single consultation window, as described in the CCAG Code Drafting Plan (see ACTION CCAG06-02)
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Minutes

1. **Welcome and Introductions**

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

2. **Minutes and Actions**

The Chair requested comments on the minutes of the CCAG meeting held 27 April 2022. TC requested the term 'Data Services Provider (DSP)' be amended to 'data services' to avoid confusion with the Data Communications Company (DCC) term of the same name. FrM confirmed this was discussed with the MHHS Design Team and agreed the term 'data services' would be used in future. TC commented DSP is still used in the current CCAG meeting papers. AM highlighted this relates to the actions. The Chair noted the clarification and agreed these would be updated.

DECISION CCAG-DEC12: Minutes of meeting held 27 April 2022 approved subject to update of term 'Data Service Provider' to 'data services'

FrM ran through the actions as per the slide.

AM confirmed CCAG02-07 would remain open.

CCAG04-06 discussions held with BSC and REC. Action will remain ongoing.

CCAG04-07 Operational Choreography document due to go to DAG for review in June and will be sent out to CCAG when available.

JB confirmed Tranche 3 (T3) documentation for DAG would be released today. CH asked if Operational Choreography document would be in T3. MH suggested no, as the Operational Choreography discussions are still ongoing. CH asked if this would be released as a discrete document if not. JB confirmed it wasn't in T3 as it's still in development.

CCAG05-05 Document repository is in development at the moment for storing code drafting. LJ commented that enduring owner of this code is still up for discussion.

CCAG05-06 to be discussed as agenda item 7. TC asked if this is recorded as an action for AM to go back to DAG to update drafting principles. MH suggested the action may have been met, but the spirit of the action hasn't. FrM pointed to CCAG05-08 to present code drafting principles to DAG which is still outstanding. TC noted they had had a conversation regarding the level of clarity for T1 documents. JB noted a Design Newsletter was issued by the Programme yesterday which included the success criteria that will be applied to the design baseline at M5. There is a 'design status update' link in that email which gives a current level of confidence against the success criteria. FrM noted DAG had a 2.5 hour conversation regarding comments on T1 documents brought for conditional approval.

CCAG05-10 makes reference to DSP, this will be changes to make reference to data services.

3. **Governance Group updates**

FrM 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

FrM noted that CR001 that changes the M5 Milestone to July 2022 was approved.

DAG

FrM noted the conditional approval of T1 design artefacts. DIP functional specification and Non-Functional Requirements documents were issued to DAG members and the date for comments has now passed. T2 documents due to be considered for approval at DAG in June, with T3 due at DAG on 06 July.

CCIAG ToR has been considered and is due to be approved and mobilised in June/July. TC asked what a Consequential Change is, and what's in scope of the Programme. AM confirmed this is what CCIAG will intend to discuss, how these

issues are picked up either by the Programme or in another setting. MH asked if there's a definition of what's in scope for the Programme. JB confirmed that the TOM currently defines the scope and the outcomes expected. There needs to be a 4-week lead time to mobilise the group as per standard Programme practice to give notice to participants. MH asked since the design baseline is being done ahead of CCIAG, how will CCs be incorporated into design baseline. JB used example of CoS reads. There's some design development activities that will take this into account. TC suggested either something is in scope of MHHS and needs to be incorporated into the design baseline, or isn't in scope and so doesn't need to be. JB noted that this is what the ToRs cover and used example of consumption forecasting. The Programme will impact upon this, but won't cover this, however, it would be useful for Programme Participants to discuss how to deal with consumption forecasting post MHHS. MH suggested they were uncomfortable with the timings of this. CW suggested that CCIAG sits under DAG and so any concerns with this will need to be raised at DAG. TC suggested any changes to the design may require changes to code drafting so will impact upon CCAG. JB suggested there will always likely be design changes, these will come through in the form of change requests off the back of design issues.

PS noted they were expecting CRs off the back of the code drafting. It would be ideal to have a list of what is and isn't in scope of the Programme and PS would welcome CCIAG being set up. This was noted.

FuM agreed with the earlier points regarding timing of CCIAG and impact upon Design. Asked when ToR for CCIAG was issued, FrM confirmed first draft was issued with DAG papers in May and finalised ToR would be released with the next set of DAG papers.

JL made the following points: 1. Is there a document that explains what Consequential change and what consequential design change means – it was noted that this was presented to a prior CCAG. 2. CCAG as a group should have a copy of the ToR – this is available through the DAG papers. 3. If something is deemed out of scope for the Programme and a code need to raise a change, that may impact the Programme as it impacts the implementation dates provided. Code groups and Design groups need to speak to each other better to ensure there's no gaps. CW noted the Programme is aware of this, as a Programme we are aligned across the groups. JL said they would want to see the list of items on CCIAG list of issues – this will be published with the CCIAG papers. JL asked if CCIAG concludes at same time as Design. JB said it would continue to run as an opportunity to discuss items that are outside of the scope of the design. If something is concluded as needed to be included within the programme by CCIAG after design is baselined at M5, this would need to be raised as a CR and subject to Impact Assessment. CW added CCAG will want any CRs to the baseline to be raised to CCAG too as it will impact the code drafting and it was noted that this is part of the change process.

CH asked are there any requirements about the constituency of the CCIAG. JB confirmed it is an L4 WG so anyone can attend and welcomed attendance from any interested parties.

TC said they understood there would be changes identified over the coming years. Would the CCIAG be better labelled as getting any issues sorted pre-baseline, and then post-baseline sorting any issues that sit outside of the design baseline. TC suggested they had left a number of comments on the design through tranche reviews that are yet to be addressed. JB suggested these comments should have been responded to as part of the design artefacts through DAG processes.

FrM noted the vacancies for different constituency groups in various groups and requested that CCAG members consider these within their constituencies.

4. Horizon Scanning Log

AM outlined the process of the HSL and handed over to MM from the MHHS Design team to talk through the HSL. MM focused on MP162 and how this would impact the programme. RV commented this was targeted for Feb 24 release and there's a work group on 7th June so if anyone is interested in this they should come along.

MM commented that P432 follows on from CCDG's transitional recommendations for CTs. Idea is to follow existing processes but to set up this part of the market for an easier migration.

P434 is a similar process but for unmetered. Slightly longer time horizon. LJ asked what it might mean if these didn't get approved and does a risk need to be raised for this. MM said this went through the existing governance as relatively low risk with the Programme unlikely to have to work to push these changes through. There was consensus to approve. LJ agreed and suggested picking up the discussion offline. MM summarised that these code mods have no design interaction. PS asked do these go through the regular change control processes, do we need to discuss these at CCAG or will all these changes happen separately. AM confirmed these are being monitored by MHHS but not developed here.

Any issues would need to be raised directly with those bodies that are developing the code changes. Programme's job is to keep an eye on them being approved and track their progress.

FuM noted some of these changes do have system impacts and how these are being coordinated. MM said these changes are interrelated, e.g. CP1558, as it's an element of the targeted design. LJ suggested that maintaining code drafting as changes are ongoing will become more important. MM said the governance footprint of these changes is quite small and requires including a few items into an existing process. It was noted that what might seem to be an innocuous change still requires a system change but that this should be taken into account as part of the change or modification processes within code governance. It was also noted where there are issues that touch multiple codes, these can be raised simultaneously.

TC asked if Programme is monitoring and mapping Ofgem consultations and changes. Are these being monitored to see if they'll impact the design. MM said the data access and DUoS reform will be tracked. TC said this should be included too, even if not CACOP.

ACTION CCAG06-01: Programme to add Ofgem consultations / changes to Horizon Scanning Log

5. Code Drafting Planning

JB ran through the slides and gave the plan for re-planning activities as a discussion topic for CCAG members to provide input to help the Programme with replanning. The Programme replan will produce a consistent and coherent view of the code drafting changes. CCAG members have an opportunity to provide further input at the consultation stages. Challenge for Programme is that having multiple reviews and consultations, there would be a need to extend the delivery date of code changes. The Programme are looking at ways to deliver Code Changes in a timely way with an appropriate level of review and consultation to ensure input and quality, but without extending or duplicating review and consultation where possible. Some options in approach were discussed, as per the slide. Parallel drafting, increased overlap after initial code drafting activity by topic, remove/reduce review cycles, shorten drafting steps, combine final topic consultation with wrap-up consultation.

There are a number of options to take into the replan. Two Strawman proposals were included as per the slides.

JB invited people's feedback and views for when the next iteration of the plan is presented.

TC suggested for Strawman 1, a key issue is how good the quality of the doc is for first consultation. If whole industry is going to review it and there are holes, gaps, weaknesses, this may then need to be redone and resent out. JB suggested 3-4 weeks of drafting and 1.5 weeks of internal review would be sufficient time. TC said current experience of Design doesn't indicate this. JB noted there is an assumption this would be of sufficient quality given the level of expertise within the Code drafting teams and the additional quality check cross-Code teams after drafting and in advance of publication.

ACTION CCAG06-02: Programme to add assumption to RAID log regarding quality of code drafting is adequate for single consultation window
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PS had concerns on overlap or reduced timescales as the focus should be on quality. AM said that any overlap will need defining and it was noted that we should try to avoid overlap of drafting activities using the same resources at the same time. One example is REC are heavily impacted by Meter Services and SEC are heavily impacted by data services. Could we run these issues simultaneously as they won't draw resource from each other. Would be overlapping topics, rather than overlapping resources. JB said this is the starting point for this discussion and the Programme will work through this. CW noted the Programme is design led, so code should be matching the design rather than changing the design. PS noted getting legal text to fit can be quite intense.

PS asked if the plan can flex if the intended progression of documents doesn't meet standards. AM noted that we could include a quality gate/review of working practices after 3 months to ensure that we learn the lessons in the drafting and adapt as necessary.

LJ added caution over doing things in parallel. Would need to go deeper in terms of detail to assess whether this was feasible. Need to ensure there's flex as there's always a possibility of someone key, i.e. drafters, being off for a week ill during a key period. Given the size of work, this is likely to happen at some point. JB said this needs to be worked through with the Planning team to check that it's practical. Planning done left to right with the original multiple review windows did not result in a practical delivery timeframe and it is a usual process to review and update planning. It's intended to find more efficiencies in this process. Having two consultations that were wide and broad wouldn't be necessary. Needs drafters to deliver sufficient quality documents initially. AM suggested docs should be of sufficient quality otherwise they

should not go out to consultation and then have lots and lots of comments and that is the assumption we have captured above. CDWG can work through the comments and approve.

CH agreed with comments so far. Added there's an understandable and obvious need to consider the effort required by programme and drafters, but also the effort by industry. These consultations will need to happen separately with no overlap so responses from industry can be of sufficient quality.

TC suggested in the code drafting and potentially through the review cycle there will be inconsistencies and anomalies identified when you do the drafting and realise these don't match up. There needs to be an ability to recognise that those problems will emerge and how these will be dealt with. AM acknowledged this and that there is planned to be a consistency check towards the end of the process. JB thanked CCAG for their input and said this gives us enough input to feed into planning and RAID.

ACTION CCAG06-03: Programme to update code drafting plan based on discussions at CCAG 25 May 2022

6. Code Drafting Resourcing Model

FrM ran over the Design Dashboard which gives an overview of topic areas and number of documents coming through in those areas. The intention is for this to allow Code Drafters to be able to plan their resourcing.

AM noted this activity would be undertaken in the coming weeks with rest of code bodies to put together a Strawman for roles and responsibilities (RACI) for each topic as a reference point. Programme feels the right resources are in place for this work.

7. Code Drafting Principles and Approach

AM thanked CCAG members for their comments on these principles. The changes as a result are on the slide in red. AM invited input.

PS asked with regard to qualification, when will we get a better understanding of what qualification will mean. AM suggested it needs the code to be drafted pre qualification as there will likely be a requirement for PPs to be compliant with the code. PS asked if this will need to be baselined, agreed, or published. The Code will be baselined and published at M6 with implementation at M8.

TC suggested they had read the point on qualification differently and that this would be done against the design not the code drafting and so the timing of the code drafting is less important than the design baseline. TC commented on 12. The code drafting would need to be sufficiently flexible on the basis that the code timetable could change without going back through the governance.

TC asked if approach 2 should make a reference to Helix or either BSC or MHHSP, depending on who is responsible for delivery of the code changes, the Programme, or the code bodies. AM said ultimately the code bodies are accountable for their own codes, with the Programme centrally managing that activity and taking responsibility for drafting of BSC changes. Responsibility on Programme to ensure the docs are updated by code bodies. CW summarised MHHSP's obligation to get Code changes delivered and Code Bodies' obligation to support the Programme.

TC suggested this could be made clearer the Programme is taking responsibility for these updates.

ACTION CCAG06-04: Programme to update code drafting principles to clarify responsibility and accountability for delivery of code changes

TC suggested a 'warm start' and that some things that could be started now, including profile class change.

8. Data Services Governance

AM outlined the agenda item, noting the MHHS Programme is creating a number of new market roles known as 'data services'. A question in relation to this new roles is whether those undertaking these roles should be subject to formal governance, potentially via industry codes. AM advised the Programme have assessed this and formed a position that the Programme does not need to make this new role a signatory to any code in order to deliver the outcomes for the Programme and therefore this is not in scope of our developments.

TC summarised that it is understood those providing data services will be required to undertake qualification and asked whether they should be signatories to code. If this is required, the question is whether they should be parties to BSC or REC. JB advised that if any party believes data services should be signatories to code, this will need to be raised as a

Programme Change Request as the Programme have currently assessed this is not a requirement of delivery of the TOM. TC believed this is a design issues that is yet to be addressed as it is the design which creates the new role. CH agreed and noted the merits of this were discussed under BSC P432, where several suppliers were strongly of the opinion those providing data services should be parties to code. CH believed this matter requires consideration and asked where is this being discussed if not via a Programme group such as the CCAG, and that visibility is required. JB responded a key way of creating more visibility would be to raise a Programme CR.

The group considered where the matter could be discussed with DAG being suggested. MM noted design groups are governance agnostic, and would therefore not provide an opinion on whether providers of data services must be signatories to code. JB reiterated that a Programme CR would require issuance to all Programme Parties and therefore create the space for a discussion on this.

The Chair clarified the Programme does not require data services to be subject to code governance to deliver TOM, so if parties want this they would need to raise a CR.

9. Code Drafting Working Group

AM provided an overview of the plans to set up CDWG and noted the ToR had been shared and no comments received.

TC noted a reference to CUSC and noted this is the Connection Use of System Code so needs updating. TC also raised the scheduling of meetings, and the need to publish in advance. AM envisaging at least two meetings per month will be scheduled, and aim will be to fully utilise these and have back up meetings planned if necessary. AM believed meeting will need to be in diaries for September and believes at least three months of meetings will be required.

LJ happy to approve provided BSC comments were addressed. AM confirmed these have been addressed.

JL provided comments and noted DCUSA requires correction also.

ACTION CCAG06-05: Programme to update CDWG ToR based on comments from CCAG

PS expressed there are no material issues with ToR but noted some non-material typos requiring correction, and offered to send these to AM.

AM invited the group to recommend the ToR be approved subject to the updates discussed. All members were in favour of approval, none objected.

AM advised four weeks' notice will be provided of meeting.

ACTION CCAG06-06: Programme to identify an appropriate date for first CDWG meeting, and determine cycle of enduring meetings

DECISION CCAG-DEC12: CDWG ToR approved subject to agreed corrections

10. Summary and Next Steps

FrM summarised the meeting actions, noting 6 new actions had been raised.

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

TC asked whether CCAG should be longer duration. AM responded Programme position is two hours to ensure productivity. Chair advised that any potential requirement for longer meeting would be circulated to group.

Date of next meeting: 22 June 2022.