

## MHHS Cross Code Advisory Group Minutes and Actions

**Issue date: 29/06/2022**

Meeting number	<b>CCAG007</b>	Venue	<b>Virtual – MS Teams</b>
Date and time	<b>22 June 2022 10:00-12:00</b>	Classification	<b>Public</b>

### Attendees

#### **Chair**

Chris Welby (Chair)

#### **Role**

Chair

#### **Industry Representatives**

Andrew Green (AG)

Clare Hannah (CH)

Fungai Madzivadondo (FMa)

John Lawton (JL)

Lawrence Jones (LJ)

Neil Dewar (ND)

Paul Mullen (PM)

Paul Saker (PS)

Rosie Knight (RK)

Richard Vernon (RV)

Sarah Jones (SJ)

Supplier Representative (I&C)

Supplier Agent Representative

DNO/iDNO Representative

DCUSA Representative

Elexon Representative (as BSC/BSCCo Manager)

NGESO Representative

CUSC Representative

Supplier Representative (Domestic)

SEC Representative (on behalf of Robin Healey)

DCC Representative (as smart central systems provider)

RECCo Rep

#### **MHHS IM**

Andrew Margan (AM)

Fraser Mathieson (FM)

Martin Cranfield (MC)

Matt McKeon (MM)

Paul Pettit (PP)

Stephen Conway (SC)

Governance Manager

PMO Governance Lead

PMO Governance Lead

Design Team

Design Assurance Team

Design Assurance Team

#### **Other Attendees**

Ann Perry (AP)

Sinead Quinn (SQ)

Tim Newton

REC Code Manager

Ofgem Representative

SEC Code Administrator

### Apologies

Ed Rees

Tom Chevalier (TC)

Consumer Representative

Supplier Agent Representative (Independent Supplier Agent)

## Actions

Area	Action Ref	Action	Owner	Due Date	Update
<b>Horizon Scanning Log</b>	CCAG07-01	Update MHHS responses to content in the Horizon Scanning Log	Programme (Matt McKeon)	20/07/22	
	CCAG07-02	Add Changes R044 and DP206 to the Horizon Scanning Log	REC and SEC Representatives	20/07/22	
<b>Code Drafting Planning</b>	CCAG07-03	Update the code draft M6-M8 plan following CCAG discussion and bring to July CCAG for approval	Programme (PMO)	20/07/22	
	CCAG07-04	Develop the Programme's approach to transitional text, including for the drafting approach, activation arrangements following code implementation, sunset clauses, and the plan for a final release. Discuss the transitional text approach with BSC and REC offline. Bring the outputs to July CCAG for discussion.	Programme (Andrew Margan)	20/07/22	
	CCAG07-05	Provide feedback on periods of activity in industry to be taken into consideration when determining the timing and durations of activities in the plan	All CCAG members	20/07/22	
	CCAG07-06	Discuss the post-release/implementation plan, including how changes will be managed. Discuss with REC and BSC. Present back to CCAG in July	Programme (Andrew Margan)	20/07/22	
	CCAG07-07	Meet to discuss the Ofgem steps within code release and implementation. Updates the plan as required and present outputs in July CCAG	Programme, Ofgem	20/07/22	
	CCAG07-08	Provide responses to the code draft plan feedback received prior to the CCAG meeting	Programme (Andrew Margan)	29/06/22	
	<b>Code Drafting Resource Model</b>	CCAG07-09	Amend the resource RACI to make REC a responsible party for registration service and qualification	Programme (Andrew Margan)	20/07/22
CCAG07-10		Update resource plan to note that the resource in the plan is for code drafting only (additional resource is required for meeting attendance and consultation)	Programme (Andrew Margan)	20/07/22	
<b>Code Drafting Principles</b>	CCAG07-11	Consider the enduring referencing and hosting of design artefacts and how this should be brought into each	Programme (Andrew Margan)	20/07/22	

<b>and Approach</b>		code. Update the code draft principles for approval in July CCAG.			
<b>Previous Meeting(s)</b>	CCAG04-07	PMO to flag operational choreography document to CCAG once issued for consultation	Programme (PMO)	July/August 2022	

### Decisions

Area	Dec Ref	Decision
<b>Minutes</b>	CCAG-DEC14	Minutes of meeting held 25 May 2022 were approved

### RAID items discussed/raised

RAID area	Description
<b>Code Drafting Planning</b>	Feedback was provided on the assumptions underlying the code draft plan, such as for the durations of certain steps in the plan (please see key discussion items below). This will be updated for the next iteration of the plan (actions CCAG07-03 to 08)

### Minutes

#### 1. **Welcome and Introductions**

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

#### 2. **Minutes and Actions**

The Chair invited comments on the May CCAG minutes. No comments were received, and the minutes were approved as final.

#### **DECISION CCAG-DEC14: Minutes of meeting held 25 May 2022 were approved**

FM presented action updates as per the slides. FM noted the direct link provided to the Horizon Scanning Log had expired and a new link would be shared. On action CCAG06-06, FM noted the enduring cycle for the Code Drafting Working Group (CDWG) had been updated and was planned to be the second and third Tuesday of the month, with the second meeting held on a 'call-off' basis as required.

JL noted they did not work on Tuesday and an alternate representative would be required for the Distribution Connection and Use of System Agreement (DCUSA). JL advised this would be taken to the DCUSA panel for discussion.

#### 3. **Governance Group updates**

FM advised updates this agenda item provides updates from the Programme Steering Group (PSG), the Design Advisory Group (DAG) and the Testing and Migration Advisory Group (TMAG). FM highlighted two areas of note:

- The MHHS Design Team announced at DAG there would be a delay M5 due to complexity in the design and a high volume of comments received during review of the design artefacts. The Design Team will issue a new schedule for both M5 and the Tranche 4 design artefact review in the near future
- The wider Programme re-plan activity is progressing through working groups and 'show-and-tell' meetings, with volunteers welcome

#### 4. **Horizon Scanning Log**

The Chair introduced the item and handed over to MM. MM noted new changes within the log which required MHHS Programme review. MM noted some items should have a common implementation dates rather than staggering update releases and these would be reviewed.

#### **ACTION CCAG07-01: Programme (Matt McKeon) to update MHHS responses to content in the Horizon Scanning Log**

AM noted Smart Energy Code (SEC) Modification Proposal (MP) 200 has been approved by Ofgem and that this needs to be reflected in the log. MM responded that there had been a 'holding position' for SEC MP200 and this required updating in the log. RV noted SEC MP200 would include legal text around data that the Data Communications Company (DCC) would see from registration systems, hence it had been on hold. RV had reviewed the SEC MP200 legal text which now suggests this change would be less important for MHHS, but feedback was required from the Retail Energy Code (REC). MM thanked RV for this update and noted the most important existing changes has been accounted for thus far.

FM noted two new changes, REC Change Proposal R0044 and SEC Draft Proposal (DP) 206, which had not yet been added to the log and reinforced the message to code bodies to update the horizon scanning log when sharing their monthly updates with the Code Administration Code of Practice (CACoP). TN advised SEC DP 206 was still in draft and not yet a formal modification proposal. As such, it was not yet clear what relevance, if any, SEC DP206 may have to MHHS. LJ noted SEC DP206 would significantly impact the Balancing and Settlement Code (BSC) and as such, the proposed implementation date was likely to be post-MHHS implementation. AM advised it was nonetheless prudent to include it within the CCAG Horizon Scanning Log as per the agreed process to enable the modification to flagged to the Programme Design Team.

<b>ACTION CCAG07-02: REC and SEC representatives to add Changes R044 and DP206 to the Horizon Scanning Log</b>
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JL provided an update that DCUSA Change Proposal (DCP) 397 had been approved and would be released 23 June 2022. This modification will impact some arrangements in place relevant to MHHS. JL noted there were no new DCPs over the last month impacting MHHS. MM responded there will be a mop up exercise to ensure all had been considered.

## 5. Code Drafting Planning

MC introduced an updated CCAG code drafting planning, which details the view of code drafting topic areas and timeframes for progression to M6.

MC provided an overview of the latest iteration of the high level code drafting steps and review cycles. MC advised the latest drafting steps and review cycles had been updated following review by the CCAG. MC noted the general structure for code drafting and review and advised the detailed code drafting plan will have some parallel running of drafting topics.

JL queried what was meant by 'CDWG to discuss issues as required'. AM replied the intention is that code drafting is issued for mini-consultation prior to being presented to CDWG, to enable issues and comments to be discussed by the CDWG. This is based on experience through the design document reviews and believed to be the most efficient way of cycling code drafting through the CDWG – and will enable them to tackle questions and issues immediately and focus discussions. JL also asked whether specific topics in the plan would commence sooner if the previous topic has completed earlier than the plan indicates. AM stated it would be positive if drafting topics could commence sooner and the Programme would seek to facilitate this where possible. Lastly, JL commented that issuing for consultation first may generate comments that could have been resolved by presenting to the CDWG in the first instance.

LJ commented that the durations allocated to some of the drafting topics would need to be kept under close consideration as awareness builds of the size of each topic. In relation to the specific questions posed in the slides, LJ advised: regarding drafting topics running in parallel – this was possible, but this does introduce some additional risk and may spread resource more thinly; regarding resourcing against timelines in plan – this seemed to be correct, but until commencement it is uncertain how it will really work. Members noted the first topic areas may be subject to some teething issues as ways of working are established. MC advised additional time has been built into the first drafting topics to mitigate teething issues.

PS commented that any left-shift in the plan would need notice to suppliers to ensure resource planning is not affected. AM responded the intention would be that any topics which commence earlier than planned would still aim to close on the dates denoted in the plan, meaning any currently allocated resource would not necessarily need to shift but that parties may have longer for review.

CH commented the plan seemed achievable providing code bodies communicate effectively. CH expressed a concern over large drafting topics being issued for consultation at the same time, and the impacts this may have on expert resource. AM replied part of the intention was to enable teams who will be undertaking review to be able to review topic areas which have potential interlinks in conjunction. CH noted some areas such as metering services may be impacted by other topic areas such as data services. SJ agreed this could be a risk, and suggested it was important for code bodies to liaise to address comments or review matters across both codes.

CH then asked whether code drafting could be changed once it has been agreed in principle. AM advised it could be, and the intention was to baseline code drafting and to continually consider whether any subsequent topics affect previous drafting topics to ensure any need for change is accounted for.

### **Code Draft Plan to M6**

JL queried whether the 'Transitional Text' topic means there will not be sunset clauses, and whether it was the intention that no area will be complete until transitional text is drafted also. AM replied that it was not clear what level of transitional text is required, and some of the nuances of how old and new processes are cut over would need to be reviewed. Whilst transitional text would be under consideration throughout each drafting topic and where possible detailed requirements for transition recorded, there would be a specific transitional text drafting topic at the end of the timeline. JL believed there was still understanding to be developed on what will be drafted under each individual topic area, and whether transitional text will be included. AM responded that transitional requirements will be considered under each drafting topic, but because of the potential complexity here and the desire to ensure nothing is omitted, a specific step of reviewing transitional and developing transitional text is included in the code drafting plan. AM advised it was important to consider transitional arrangements during each drafting topic, and then the transitional text stage is a catch-all at the end. The Chair agreed it was a good question over whether the transitional text stage is required and noted it something the Programme could consider as to whether this is required as a distinct drafting topic.

JL also questioned who would lead each drafting topic, noting the drafting plan includes some drafting areas as having more than one lead, but the drafting principles and approach state there will be a single lead for each drafting topic. AM agreed this was not as clear as it could be and would be reviewed.

**ACTION CCAG07-03: Programme to update the code draft M6-M8 plan following CCAG discussion and bring to July CCAG for approval (including reviewing drafting leads in plan against principles and approach to ensure consistency)**

SJ echoed comments on the transition approach and questioned whether the transitional approach should be discussed sooner in the plan to map the options and identify any code-specific preferences. SJ noted transition design is due to be rescheduled to later in the design work but needs to be an early consideration from a drafting perspective. The Chair suggested an action is taken to provide information on the transitional approach and how this interacts with the drafting plan overall.

**ACTION CCAG07-04: Programme to develop the Programme's approach to transitional text, including for the drafting approach, activation arrangements following code implementation, sunset clauses, and the plan for a final release. Discuss the transitional text approach with BSC and REC offline. Bring the outputs to July CCAG for discussion.**

PM commented that if BSC and REC are happy with the plan, the remainder of CCAG should be happy also, and this is the correct approach to let the most impacted codes lead the conversation on whether the plan is sufficient.

### **Delivery Dates**

AM advised the movement of M5 would mean movement in the commencement and completion of the code drafting plan. AM noted the code drafting plan had been drafted in a way that dates can be relative – i.e. activities commence x months after y trigger.

AM noted previous comments on the optimal dates for issuing consultations and asked if there were any dates or times of year which would not be optimal. SJ asked whether there was a view on when the design replan and overall programme replan would complete, and a view become available of when code drafting needs to be delivered. AM responded the design replan dates will be released very soon, and then the overall Programme replan will require a Programme CR, which will proceed through consultation and go to Ofgem for approval. In this regard, there will be opportunities to determine this as the replan progresses. AM advised it would likely be August before a view of the overall replan timelines begins to firm up.

**ACTION CCAG07-05: All CCAG members to provide feedback on periods of activity in industry to be taken into consideration when determining the timing and durations of activities in the plan.**

PS asked how the effective dates of code drafting would work. Noting the risk that code changes could be approved and then need to be made effective or possibly require change and asked how other 'business as usual' changes may affect baselined drafting for MHHS. The Chair urged all parties to ensure they keep the Horizon Scanning Log up to date. LJ advised that once code drafting has been placed into code, any changes would be undertaken according to the given

code's change control process. PS noted there may be dual governance at play, which can complicate things, especially if a change needs to be raised to the Programme design which then requires change to code drafting that is already approved and awaiting activation in code. The group agreed this required careful consideration and there may be differing requirements for each code.

LJ asked whether it was the intention to place approved code text into code with activation arrangements, and therefore whether sunset clauses are required. LJ noted that without consideration of this, further change requests or further releases may be required. The Chair agreed this was important to consider. SJ echoed this and added it was further evidence of the importance of the transitional text approach now and the need for a deeper understanding of how this will work,

**ACTION CCAG07-06: Programme to discuss the post-release/implementation plan, including how changes will be managed. Discuss with REC and BSC. Present back to CCAG in July**

PS queried the step in the drafting plan for activation of SMAP powers and Ofgem consultation and decision. AM advised that all efforts will be made to identify and resolve all issues prior to Ofgem's consultation, to try to assure a smooth path through the stage where these statutory requirements come into play.

**ACTION CCAG07-07: Programme and Ofgem to meet to discuss the Ofgem steps within code release and implementation. Updates the plan as required and present outputs in July CCAG**

AM noted detailed feedback had been provided by CCAG members on the code drafting plan prior to the meeting and this would be reviewed, and responses provided.

**ACTION CCAG07-08: Programme to provide responses to the code draft plan feedback received prior to the CCAG meeting**

## 6. Code Drafting Resourcing Model

### Design Dashboard

AM provided an overview of the design artefact volumes to assist code bodies in estimating the level of resource required to review.

### RACI

AM overviewed the new RACI as per the slides and invited comments from CCAG.

SJ queried REC's RACI classification for registration and metering services and advised REC should be classed as responsible for these topics. AM agreed and offered to amend this in the RACI.

**ACTION CCAG07-09: Programme to amend the resource RACI to make REC a responsible party for registration service and qualification**

### Resourcing plan

AM provided an overview of the updated resource model as per the slides and invited comments. AM noted some lesser-impacted codes had been allocated one full time employee (FTE) day for certain drafting topics, but it was unlikely a full day would be required in practice.

PS asked whether code bodies have budgeted for the resource denoted in the plan. SJ believed this was the case for REC. LJ noted the BSC had allocated the resource shown in the plan.

LJ commented the code drafting resource plan does not include attendance at meetings or consultation resourcing and additional resource would be required for the monthly CCAG and potentially two CDWG's per month. As such the resource plan as presented did not give a full indication of code body resource requirements.

MC added that the resource plan also did not indicate code resource required for the mini-consultation phases and suggested it was made clear that the resource plan covered only code drafting and no other CCAG activity.

**ACTION CCAG07-10: Programme to update resource plan to note that the resource in the plan is for code drafting only (additional resource is required for meeting attendance and consultation)**

## 7. Code Drafting Principles and Approach

AM provided an overview of changes made to the Principles and Approach noting updates from comments from CCAG and review by DAG. The Chair noted the principles would be reviewed throughout code drafting and were 'living' principles.

LJ queried principle three, noting it was not yet confirmed whether Elexon would manage design artefacts on an enduring basis post-Programme. This principle should be kept under review in case change is required.

PS stated they were happy with the wording of the Principles and Approach but wanted to understand how the principles would be kept in mind during drafting.

AM asked if the group had any objections to approving the Principles and Approach.

SJ advised they would be happy to approve subject to principle three being changed or removed – as this potentially causes an issue with referencing of the enduring arrangements for hosting and management of the design artefacts as REC will not reference documents outside the code as being part of the code. The BSC representative agreed. The Chair suggested an action to address this query.

**ACTION CCAG07-11: Programme to consider the enduring referencing and hosting of design artefacts and how this should be brought into each code. Update the code draft principles for approval in July CCAG**

PP advised the Programme was working on the enduring management and hosting of design artefacts with a trial planned for Load Shaping Service information. The outcome of this would determine the workability of principle three. PS suggested the wording of principle three could be tweaked to have less specificity and just reference documents. LJ was not opposed to this but noted it required thought. SJ advised this would need consideration from a REC perspective before a decision on approval can be made.

AM concluded the decision on approval of the Code Drafting Principles and Approach would be deferred to the next meeting to provide time for consideration of principle 3 and any amendments.

## **8. Summary and Next Steps**

FM summarised the meeting actions.

The Chair provided an overview of upcoming agenda items for CCAG and noted the topics of upcoming CCAG meetings would be affected by the rescheduling of the design timetable.

**Date of next meeting: 27 July 2022**