

MHHS Cross Code Advisory Group Minutes and Actions

Issue date: 03/08/2022

Meeting number	CCAG008	Venue	Virtual – MS Teams
Date and time	27 July 2022 10:00-12:00	Classification	Public

Attendees

Chair

Chris Welby (Chair)

Role

Chair

Industry Representatives

Andrew Green (AG)

Clare Hannah (CH)

Fungai Madzivadondo (FM)

John Lawton (JL)

Jon Hawkins (JH) as alternate to Sarah Jones

Lawrence Jones (LJ)

Matt Hall (MH)

Neil Dewar (ND)

Paul Mullen (PM)

Paul Saker (PS)

Tim Newton (TN)

Sarah Jones (SJ)

Supplier Representative (I&C)

Supplier Agent Representative

DNO/iDNO Representative

DCUSA Representative

RECCo Representative (alternate)

Exelon Representative (as BSC/BSCCo Manager)

Exelon Representative (as central systems provider)

NGESO Representative

CUSC Representative

Supplier Representative (Domestic)

SEC Representative (on behalf of Robin Healey)

RECCo Representative

MHHS IM

Becca Fox (BF)

Martin Cranfield (MC)

Miles Winter (MW)

Paul Pettit (PP)

Pete Edwarde (PE)

Code Draft Project Manager

PMO Governance Lead

PMO Governance Support

Design Assurance Team

PPC Lead

Other Attendees

Sinead Quinn (SQ)

Ofgem

Apologies

Ann Perry – RECCo Representative alternate

Justin Andrews – MHHS Design Team

Matt McKeon – MHHS Design Team

Richard Vernon – DCC Representative

Actions

Area	Action Ref	Action	Owner	Due Date	Update
Horizon scanning	CCAG08-01	Speak with design team and clarify the process of how data item industry changes are tracked and managed within the Programme	Programme (Fraser Mathieson)	17/08/22	
	CCAG08-02	Ensure CCAG members have edit permissions for the Horizon Scanning Log	Programme (PMO)	03/08/22	Permissions adjusted and link re-shared with CCAG members
	CCAG08-03	Add Elexon issue group 101 looking at the enduring running of the DIP to the Horizon Scanning log	Programme (PMO), Supplier Agent Representative	17/08/22	Raised to the Horizon Scanning Log
	CCAG08-04	Meet with Justin Andrews (DAG chair) to discuss CCAG member concerns that some design artefacts are not sufficient to draft code from	Chris Welby	17/08/22	
	CCAG08-05	Discuss with REC any implications for code drafting as a result of MHHS on the REC that sit outside scope of the Programme design. Raise with design as required (e.g. through CCIAG)	Programme (Jason Brogden)	17/08/22	
Transitional text approach and code drafting requirements	CCAG08-06	Provide feedback and supporting rationale on whether new code needs to be implemented for qualification (i.e. if qualification start is dependent on M6 (CCAG approval of code) or M8 (code implementation)). If code does not need to be implemented for qualification, provide feedback and rationale on the time at which new code does need to be implemented.	CCAG members	17/08/22	
	CCAG08-07	Progress discussions on the enduring solution for hosting design artefacts and bring back to CCAG: <ol style="list-style-type: none"> Whether the design will be maintained post go-live (and if so, how) Confirm for all code bodies the role iServer plays for their code drafting 	Programme (Jason Brogden)	17/08/22	
	CCAG08-08	Determine the approach to drafting topic areas that will not be drafted from the design baseline (e.g. qualification, transition) and bring to back to CCAG.	Programme	17/08/22	Feedback sought from Elexon and REC on areas to consider

	CCAG08-09	Raise transition design dependency to the Programme RAID log	Programme (PMO)	17/08/22	Raised to RAID log
CDWG update	CCAG08-10	Update CDWG Terms of Reference with feedback from CCAG (e.g. clarity on CDWG scope and reference suite of documents required to be maintained) for approval next month	Programme	17/08/22	
	CCAG08-11	Stand down August CDWG	Programme (PMO)	28/07/22	Complete
Items for approval	CCAG08-12	Confirm when legal input will be provided in the steps of the code draft plan	Programme	17/08/22	

Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC15	Minutes of meeting held 22 June 2022 were approved
Items for approval	CCAG-DEC16	The CCAG approved four returning items: <ul style="list-style-type: none"> • Code draft principles and approach • Code draft RACI (subject to discussions regarding entries relating to Elexon) • Code draft resource model • Code draft plan

RAID items discussed/raised

RAID area	Description
Code Drafting Planning	The CCAG highlighted a dependency for the transition design to be baselined in order for transition text code drafting to be finalised

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 June CCAG minutes. No comments were received, and the minutes were approved as final.

DECISION CCAG-DEC15: Minutes of meeting held 22 June 2022 were approved

MC ran through the outstanding actions as per the slides, noting action CCAG07-05 could now be closed.

3. **Governance Group updates**

MC ran through the governance group updates, noting the slide as read. MC highlighted that the Programme Steering Group (PSG) had recently reviewed CR007 (a Change Request proposing a move to M3) and the design reschedule, and had subsequently developed and raised CR009 for Impact Assessment, with responses due on 29 July. CR009 proposes moving both M3 and M5 to the end of October.

SJ queried if the SEC Change Board had been deferred. CW confirmed no and that SEC MP162 was going to SEC Change Board at the same time as the CCAG meeting.

4. Horizon Scanning Log

MC introduced the item and invited code bodies to update on R0044 and MP162.

SJ confirmed R0044 Impact Assessment request had been sent to DCC and was due back by 10 August. Discussions as to whether R0044 would get progressed as a REC modification were also underway.

FM queried how data item changes were identified and progressed under the code and the Programme. FM noted that parties do not have the clarity of how they are being progressed and who they sit with, and that a clear and transparent process for this and related decision-making was required. CW responded that the was more of a design question than a code question. FM suggested that, as CCAG were discussing code and wider industry changes that impact MHHS, the CCAG may be the best place to discuss it. SJ echoed FM saying this is a conversation that is needed.

ACTION CCAG08-01: Programme to speak with design team and clarify the process of how data item industry changes are tracked and managed within the Programme

LJ noted BSC changes 432 and 434 had been raised. 432 had been rejected by the panel. There were mixed reviews for 434. LJ added no actions were required today. CW added that these modifications had implications for supplier migration and that the Programme would await the outputs of the panels.

JL queried where design responsibility for code modifications stops and code drafting responsibility starts. JL added that the code horizon scanning log was in read-only format and required updating. CW responded creating new data items shouldn't change in the code, it should be laid out in the Design and then Code fits around it. Design issues should be raised at the Design Advisory Group (DAG), but if Programme Participants think they have an impact in the code drafting then it should be raised at CCAG. MC noted the permissions may have changed following recent updates to the Portal and that they would ensure this was corrected.

ACTION CCAG08-02: PMO to ensure CCAG members have edit permissions for the Horizon Scanning Log

CH highlighted a new issue group 101 looking at the ongoing processes around the Data Integration platform (DIP) and queried if this should be added to the log. CH noted they were surprised this issue group had come from Elexon and not the Programme. CW responded that this issue group was about addressing the enduring service, while the Programme was only managing the procurement and build of the DIP. The running (20 years - so beyond the end of the Programme) was a matter for Elexon and their relevant stakeholders.

LJ noted Ofgem were very keen for industry to be involved in the progression of the DIP so this should be added to the Horizon Scanning Log to give all stakeholders visibility. CH asked if communications on the issue group would have reached all parties who may be interested. LJ responded that Elexon had gone through their normal channels and were also in conversation with Programme to use Programme's channels to ensure all parties were reached.

ACTION CCAG08-03 Programme and Supplier Agent rep to add Elexon issue group 101 looking at the enduring running of the DIP to the Horizon Scanning log

SJ queried the scope of code drafting in relation to the MHHS design, noting that there were things that were design-related but outside the scope of MHHS design that still needed to be picked up in Code drafting. SJ added that this may be from instances where design documents do not give enough clarity, meaning there could be ambiguities that would need to be picked up in code drafting. SJ noted an action at DAG was for DAG chair to speak to the CCAG chair to clear this up, as there had been conditional approvals of documents at DAG that SJ believed were not of sufficient clarity to draft code from. CW responded that this conversation hadn't yet taken place. CW added that the Programme would need to see the specifics of any design implications on REC in order to consider them.

PS queried if the items SJ referred to would be defined as consequential changes, and if they could therefore go to the Consequential Change Impact Assessment Group (CCIAG) instead. PS added it was helpful to have sight of all the code changes that are needed for delivery of MHHS, even if these sit outside the scope of the Programme. CW said If the changes highlighted by SJ were directly related to MHHS delivery, they would fit in MHHS, and if they were consequential then CCIAG would be best.

ACTION CCAG08-04: Chris Welby to meet with Justin Andrews (DAG chair) to discuss CCAG member concerns that some design artefacts are not sufficient to draft code from

ACTION CCAG08-05: Programme to discuss with REC any implications for code drafting as a result of MHHS on the REC that sit outside scope of the Programme design. Raise with design as required (e.g. through CCIAG)

5. Transitional Test Approach and Code Drafting Requirements

MC introduced the item noting this was part of a list of drafting requirements requiring discussion and agreement through CCAG. MC ran through the items in turn.

Transition text

MC provided an overview of the proposed approach to transition text as per the slide, adding that the approach to drafting would be to start transition code drafting in each topic area, with the final drafting and consistency check completed in a dedicated transition text topic area. MH queried how transition text would be drafted if the transition design is not delivered until after M5. MC responded that the transition design was now scheduled for December and so not all elements would be available when code drafting needed to begin, and that this was something the Programme now needed to consider.

SJ noted that parts of transition were understood from today (e.g. that there were processes running in relation to unmigrated metering points) and therefore that some text could be developed in parallel while the full transition design was ongoing. SJ added that there the full transition approach and drafting would be covered in the transition text code draft topic area. SJ highlighted that there was another dependency for the CCAG to understand what was meant by migration and how it would work from a design perspective. CW noted this needed to be raised to the Programme RAID log.

ACTION CCAG08-09: Programme to raise transition design dependency to the Programme RAID log

PS noted the approach to transition text seemed reasonable, but raised a point that drafting needs to be clear and managed in a way that makes it as easily digestible for suppliers as possible.

Text activation

MC provided an overview of the proposed solution as per the slide. The assumption so far had been that all text needed to be activated before qualification starts, but through recent conversations it had been suggested this isn't the case. The Programme were now exploring when M8 (code activation) should fall in relation to qualification start, testing and migration. MC asked CCAG members to complete some 'homework' as to whether code activation was required for qualification start, or if CCAG approval was enough. If CCAG approval was enough, when did CCAG members believe code needed to be activated. MC noted the Programme intended to complete an options appraisal, as there may be benefits for different solutions (such as for change control).

PS responded that they had shared feedback with the Programme already and that, as per the Faster Switching Programme, suppliers believed that they did not need text to be formally activated in legal text for qualification start. PS added that delaying implementation until the latest point would enable more effective management of any changes required to the code between M6 and M8.

CH queried how Ofgem's consultation would run ahead of M8 and how the Programme would address any changes required to the code as a result of the consultation. CW replied that the intention was for code drafting to be correct and have dealt with everything through the CCAG's review process and therefore shouldn't change. CW added that it was possible someone spots a hole in the legal text through Ofgem consultation and this would need to be addressed. MC noted that, from discussion with Ofgem, the intention wasn't for the Ofgem consultation to reopen the detail of MHHS code drafting but to verify that the CCAG's process had been robust.

CH queried if the Programme/CCAG knew what the qualification process would involve e.g. how long was needed for qualification for all participants. CW responded that the short answer was no, and that this sat under the Testing and Migration Advisory Group (TMAG). Work on qualification was to come, including in transition and the enduring qualification process in the new world post-migration. A lot of qualification would be part of Participant Integration Testing (PIT), internal testing and signing testing off. CW highlighted that the Qualification and E2E Sandbox Working Group (QWG) was starting on Tuesday 9th August and would begin to address this. CW noted that most of qualification would be a tick box exercise as part of testing, and if parties did go through Systems Integration Testing (SIT) then they wouldn't need to qualify again.

SJ highlighted that text changes after the point of final approval at M6 would need to go through change control, and a further activity would be required for CCAG to define the text for implementation before it goes to Ofgem, should M8 be pushed later in the plan.

ACTION CCAG 08-06: CCAG members to provide feedback and supporting rationale on whether new code needs to be implemented for qualification (i.e. if qualification start is dependent on M6 (CCAG approval of code) or M8

(code implementation)). If code does not need to be implemented for qualification, provide feedback and rationale on the time at which new code does need to be implemented.

MC ran through final five code drafting requirements for comments by exception: Text amendment post-M8, code removal (sunset clauses), Consequential Code Changes, Drafting Approach, and Enduring Solution.

CH queried if the enduring solution was referring to design artefacts or all code documents. MC said this activity was to a trial code drafting with Load Shaping Service to test whether drafting could reference design artefacts with iServer. CH clarified all code docs with each code body would have a link back to iServer.

CH queried if there had been a conscious decision on how the design artefacts would be maintained after go live, with variable opinions in their constituency. CH noted this contradicted the first code draft principle on having a 'lean approach'. SJ referenced discussion at last CCAG where this had been removed from the principles and responded that the REC would not be referring to iServer as REC drafting would need to be covered in the REC.

LJ responded that there are two points, firstly if the Programme should use iServer and secondly whether the design would be maintained post go-live. LJ noted discussion was required on the second and queried where this sat (CCAG or DAG). LJ suggested it would require additional workload and complexity due to the design being E2E but that is there was value in this, the BSC would consider it. CH noted there was quite a strong difference of opinion in their constituency.

CW responded that the Programme needed to determine where the approach (design or CCAG) and that it was important the Programme take into account all code body views, focussing on BSC. LJ responded that they were keen to understand what wider Programme Participants think with regard to maintaining the design post-go live. CW noted the prototyping needed to be expanded beyond just iServer to check whether this can be done and is cost effective to do so. SJ added that the enduring design artefacts weren't written as code documents so the REC would need to spend time getting them into legal drafting. Therefore, the REC did not intend to refer to design artefacts in any capacity. CW noted this was therefore mostly applicable for the BSC.

ACTION CCAG08-07: Progress discussions on the enduring solution for hosting design artefacts and bring back to CCAG:

- a. Whether the design will be maintained post go-live (and if so, how)**
- b. Confirm for all code bodies the role iServer plays for their code drafting**

MH echoed it would be complex to maintain iServer documents on an enduring basis. LJ suggested a strong case would need to be made for these to be maintained. MC said this requirement could be adjusted based on feedback, and that the original suggestion of using iServer was that it would be easier to use than recreating the content of design artefacts in the code.

PP added that they were iServer lead and that iServer was not a tool for generating regulatory code, it was an index to contain the MHHS design. The prototyping for the Load Shaping Service was to show the traceability of each element of the design to enable the code drafting, not as an enduring solution. PP added that they hoped the design would be maintained post-go live. CW noted that the Programme needed to determine if there was value in keeping iServer as a working document repository.

6. CDWG Update

MC gave an update from the first Code Drafting Working Group (CDWG) that was last held on 30 June. The forward plan had been agreed, with CDWG's scheduled for the second Tuesday of each month.

MC asked the CCAG for approval of the CDWG Terms of Reference (ToR). The ToR were issued with the CCAG Papers. CW invited comments. CH responded that they felt the scope description of the document types that need to be drafted and reviewed by CDWG were not clear. The ToR talked about 'code' (lower case) which could be meant to mean all code documents, but this was not stated anywhere. CH queried if CCAG believed this scope description was clear enough, using guidance notes as an example. CW responded that it covered codes and other documents as well, but that guidance notes may not be covered if not referenced as part of the legal text, and so this would need to be clarified.

PS suggested a number of other documents may need to be produced ahead of go-live, e.g. guidance docs. PS was happy to approve the ToR subject to the scope being updated.

ACTION CCAG08-10: Programme to update CDWG Terms of Reference with feedback from CCAG (e.g. clarity on CDWG scope and reference suite of documents required to be maintained) for approval next month

LJ noted there were drafting topic area that did not have any Design artefacts associated with them, so it would need to be clear how drafting for non-design areas would be completed (e.g. for assurance or governance). SJ echoed this.

ACTION CCAG08-08: Programme to determine the approach to drafting topic areas that will not be drafted from the design baseline (e.g. qualification, transition) and bring to back to CCAG.

CW suggested not approving the ToR this month and doing the requested updates first.

MC asked for feedback on a proposal to stand down August CDWG due to the movement of M5. None received.

ACTION CCAG08-11: Programme PMO to stand down August CDWG

7. **Items for approval**

MC provided an overview of the item and proposed allowing CCAG to raise comments by exception, noting the items for approval may continue to be reviewed and updated as the CCAG builds further detail in the code draft approach.

CW moved to approve discuss the items in turn.

Code draft RACI

CW highlighted that the code draft RACI needed an update following conversation with Elexon. LJ added that they were not comfortable with the RACI as it stands today with respect to with qualification and performance assurance.

Principles and approach

CW highlighted a small change to the principles and approach following discussion at last CCAG and related discussion held earlier in this meeting.

Resource model

PS queried if the code body resource models were within existing budgets. CW responded that the MHHS Programme's resourcing was within budget. All code bodies confirmed their resourcing was within current budgets. PS added that a concern of suppliers is any change to future budgets that may need to be built into financial forecasting.

Code draft plan

JL noted some reservations on the review process and the points the plan goes to consultation for large topic areas, particularly with the first two topic areas being big ticket items for review within a two-week timescale.

PS queried how the code draft plan would move as a result of M5, and if a broken down, elaborated plan with activities and dates against each activity would be provided. PS noted suppliers would like to see the dates and periods for consultation as soon as possible so resources can be allocated to this. CW responded that this would be detailed further through re-planning activities and that there were wider considerations to work through, such as dependencies on code and when code needs to be delivered by (see action CCAG08-06). Once the Programme re-plan was complete and published, the dates would be provided. CW added that the first draft of the re-plan would be out for consultation next week, and that it would take some time to nail down the dates.

PS queried for the consultation review processes if there was input from legal advisors taking place during these review processes. MC responded that there had been discussion on legal resource and that they believed this was in the first two steps and the final CCAG consultation, but this needed to be confirmed. JH noted this was the assumption they were working on, with primary legal input expected in the final consultation.

ACTION CCAG08-12: Programme to confirm when legal input will be provided in the steps of the code draft plan

CW asked if CCAG are happy to approve the items, with the caveat that the Elexon line in the RACI needed to be explored further. No comments received.

Decision CCAG-DEC16: The CCAG approved four returning items:

- **Code draft principles and approach**
- **Code draft RACI (subject to discussions regarding entries relating to Elexon)**

- **Code draft resource model**
- **Code draft plan**

8. PPC Introduction

PE introduced the item, noting the intention to give constituency reps more information on the role of the Programme Party Coordinator (PPC). PE provided an overview of the PPC team, their vision and their role as per the slides. PE invited CCAG members to get in contact with the PPC should they have any queries.

9. Summary and Next Steps

MW summarised the meeting actions as per the table above.

The Chair provided an overview of upcoming agenda items for CCAG

AG gave notice they were on holiday next meeting but would seek an alternate.

JL asked if it was possible to go back to slide detailing the CCAG code draft plan. JL asked for clarification that all code bodies would be doing their own legal review, and whether this would be done during each topic area or in the final approval step. JH responded that it was their assumption. JL wanted to clarify if this was the expectation of the Programme, rather than having legal review throughout. CW responded that the BSC and REC point of view might be to do the legal review as and when due to larger changes, but that they could also see the benefit of doing legal review at the end of the period for efficiency's sake. CW confirmed this should be done however works best for code bodies.

Date of next meeting: 24 August 2022