

## MHHS Cross Code Advisory Group Minutes and Actions

**Issue date: 30/03/2022**

Meeting number	<b>CCAG004</b>	Venue	<b>Virtual – MS Teams</b>
Date and time	<b>23 March 2022 10:00-12:00</b>	Classification	<b>Public</b>

### 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

Ed Rees (ER)

Consumer Representative

Keren Kelly (KK)

National Grid ESO

Lawrence Jones (LJ)

Elexon Representative (as BSC/BSCCo Manager)

Fungai Madzivadondo (FMa)

DNO/iDNO 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 meter central systems provider)

Rosie Knight (RK)

SEC Representative (on behalf of Robin Healey)

#### **MHHS IM**

Andrew Margan (AM)

Governance Manager

Fraser Mathieson (FM)

PMO Governance Lead

Jason Brogden (JB)

Industry Expert

Martin Cranfield (MC)

PMO Governance Lead

Simon Harrison (SH)

Design Assurance Lead

#### **Other Attendees**

Andy MacFaul (AMF)

Ofgem Representative

### Apologies:

John Lawton (JL)

DCUSA Representative

## Actions

Area	Action Ref	Action	Owner	Due Date
Horizon scanning	CCAG03-13	ONGOING ACTION – Review contents of the CACoP Central Modifications Register and share any code modifications currently missing from MHHS Horizon Scanning Log with the PMO	Code Bodies	Ongoing
	CCAG04-01	SEC to add SEC MP200 to CCAG Horizon Scanning Log and CACoP Central Modifications Register	SEC (Rosie Knight)	27/04/2022
	CCAG04-02	BSC to assess if P419 should be added to CCAG Horizon Scanning Log and provide update to <a href="mailto:PMO@mhhsprogramme.co.uk">PMO@mhhsprogramme.co.uk</a>	BSC (Lawrence Jones)	27/04/2022
	CCAG04-03	PMO to discuss with DAG Chair inviting SEC representatives to any DAG conversations regarding SEC MP162	Programme (PMO)	30/03/2022
M6 and M7 Change Request	CCAG04-04	All CCAG members to consider detail of potential consequential changes and provide to <a href="mailto:PMO@mhhsprogramme.co.uk">PMO@mhhsprogramme.co.uk</a> for review at DAG and/or CCAG, to assist view of likely consequential changes and whether these relate to design or code drafting	All CCAG members	27/04/2022
	CCAG04-05	Update Change Request (CR) 003 <sup>1</sup> with feedback from CCAG members (e.g. reviewing contingency time, updating and adding to RAID) and submit CR to MHHS Change Board	Programme (PMO)	23/03/2022:
Resource planning	CCAG04-06	AM further develop view of code draft resource requirement and return to next meeting with information for discussion	Programme (Andrew Margan)	27/04/2022
Operational Choreography	CCAG04-07	PMO to flag operational choreography document to CCAG once issued for consultation	Programme (PMO)	May/June 2022
	CCAG04-08	Programme to discuss with DAG the extent to which Operational Choreography document can be 'sliced up'	Programme (Jason Brogden)	27/04/2022
AOB	CCAG04-09	Consider whether MDR and other related matters will need to be picked up in subsequent REC admin CPs	REC (Ann Perry)	27/04/2022

## Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC08	Minutes of meeting held 23 February 2022 approved
Change Request for M6 and M7	CCAG-DEC09	Raise MHHS Programme Change Request to change dates of M6 and M7

## RAID items discussed/raised

RAID area	Description
None	

<sup>1</sup> CCAG Change Request to move M6 and M7

## Minutes

### 1. Welcome and Introductions

The Chair welcomed attendees to the meeting.

### 2. Minutes and Actions

The minutes of the CCAG meeting held 23 February 2022 were approved with no comments.

#### **DECISION CCAG-DEC08: Minutes of meeting held 23 February 2022 approved**

FM provided updates on outstanding actions as per the meeting papers. Further relevant updates are detailed below:

#### **ACTION CCAG02-07: Engage with code bodies offline on how information on identified consequential changes will be shared with this group**

AM recommended this action is closed following feedback on the use of Smart Meter Act Powers (SMAP) from Ofgem. There will be an ongoing need to identify and assess prospective consequential code changes related to the MHHS Programme as understanding develops of both the design and changes to the Retail Energy Code (REC) and Balancing and Settlement Code (BSC). PS commented there was need for codes to be able to identify all changes that may arise through SMAP to enable planning and coordination for both MHHS changes and other changes which may sit outside the MHHS Programme. PS noted challenges during the Faster Switching Programme (FSP) with change congestion and visibility of changes on the horizon. AM agreed, noting the code changes required to deliver MHHS are complex, and the Programme are agnostic as to the extent of MHHS-related consequential change required and other potential changes which may be directed under SMAP which are outside the scope of the Programme. ACTION CLOSED.

#### **ACTION CCAG 03-08: Ensure the dependency between qualification and code drafting is captured in the Programme RAID Framework**

It was confirmed this dependency had been recorded within the Programme RAID log. JB advised the RAID log will be published for all participants to view, once the programme portal is operational. ACTION CLOSED.

### 3. Governance Group updates

FM introduced a new standing agenda item 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**

FM advised that MHHS Programme Change Requests (CR) CR001<sup>2</sup> and CR002<sup>3</sup>, which provide alternative proposals to change the date of the M5 programme milestone, were issued to Programme Participants (PPs) for impact assessment. The deadline for submitting responses is 17:00 Friday 25 March 2022. The responses will be presented at PSG on 06 April 2022, before being sent to Ofgem for a decision.

#### **DAG**

FM highlighted the extraordinary DAG meeting held 17 March 2022 to discuss the enactment of the level playing field design principle as it relates to Smart Energy Code (SEC) Modification Proposal (MP) 162<sup>4</sup>. SEC MP162 enact several MHHS-related requirements relating to Meter Data Retrieval (MDR) in Data Communication Company (DCC) systems. The outcome of the extraordinary meeting was agreement on the need to engage closely with SEC and that assessment by the Smart Meter Segment Sub-Group (SDS) is needed to determine whether there is an essential need for Target Response Times (TRTs) or less than 24 hours for parties undertaking MHHS-related MDR.

### 4. Horizon Scanning Log

#### **Review of Horizon Scanning Log**

AM advised the purpose is to record changes across all codes that may have an interaction with or impact on the MHHS Programme. Code Bodies were reminded to share any relevant changes with [PMO@mhhsprogramme.co.uk](mailto:PMO@mhhsprogramme.co.uk) for inclusion in the Horizon Scanning Log as per ongoing action CCAG03-13. The log mirrors the structure of the Code Administration Code of Practice (CACoP) Central Modifications Register, and as such updates for the CCAG log should be provided in

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<sup>2</sup> *Design Baseline Replan to July 2022*

<sup>3</sup> *Design Baseline Replan to November 2022*

<sup>4</sup> *SEC changes required to deliver MHHS*

an identical format. CCAG's role is to discuss and monitor changes which may impact MHHS and engage with code parties as required.

AM asked attendees if any relevant changes were missing from the log and queried whether Code Bodies have processes to identify changes that impact MHHS. One attendee noted SEC MP200<sup>5</sup> did not appear within the log and believed it should be included as it implements certain aspects of MP162.

**ACTION CCAG04-01: SEC to add SEC MP200 to CCAG Horizon Scanning Log and CACoP Central Modifications Register**

AP advised REC have a process for identifying change which may impact MHHS and are raising these at CACoP. KK stated National ESO also have a procedure and they had identified BSC Modification P419<sup>6</sup> may require inclusion within the Horizon Scanning Log. LJ advised the BSC have a process too but had not identified BSC P419 as having impacts on MHHS. LJ agreed to assess whether P419 should be added to the log.

**ACTION CCAG04-02: BSC to assess if P419 should be added to CCAG Horizon Scanning Log and provide update to PMO@mhsprogramme.co.uk**

The group noted the recent addition to the log of REC Modifications R15 and R32.

**SEC MP162 Update**

RV provided a DCC update on SEC MP162, highlighting changes to how registration data is received by DCC systems as part of the FSP for the purposes of validating access control. RV highlighted SEC MP162 will require the DCC to validate MDR role appointments, which relate to parties other than suppliers who will need to undertake MDR for MHHS. The group were advised of several assumptions relating to the interfaces between DCC, the Central Switching Service (CSS), and MHHS, including an assumption the DCC will be notified of the identity of a supplier's MDR user. RV noted uncertainty which exist around the implementation of DCC system changes in November 2023 and requirements for User Acceptance Testing (UAT). RV further noted the importance of ensuring sufficient impact assessment is conducted with systems providers and the need to ensure alignment in the terms used in the legal drafting of the SEC changes.

PS queried whether suppliers will always know who an MDR service provider is, and therefore whether they will always be able to notify DCC of this. RV acknowledged this and responded it was possible any errors which are encountered in the process may require updates to the data items due to be introduced by SEC MP162.

RS noted a SEC representative did not appear to have been invited to the extraordinary DAG meeting where SEC MP162 was discussed, and request an invite is extended to attend such discussions in future.

**ACTION CCAG04-03: Discuss with DAG Chair inviting SEC representatives to any DAG conversations regarding SEC MP162**

**5. Smart Meter Act Powers Clarifications**

AMF provided an update on the prospective use of Smart Meter Act Powers (SMAP) as the current preferred method of designating the code changes required to give effect to MHHS. CCAG were advised the powers can be activated in c.40 working days and do require parliamentary time specifically. As such the powers could be activated even during Parliamentary recesses.

The group discussed how consequential changes would be defined to understand what changes will be designated by SMAP, if this is chosen as the most appropriate method for directing the necessary code changes to give effect to MHHS. The group agreed this required consideration and AM highlighted the current thinking is that consequential changes include anything that is material to the enactment of MHHS. AMF confirmed SMAP remains active for five years following commencement, and as such, it was possible for further tranches of code change to be directed should further consequential code changes be identified as the programme progresses. PS and RV agreed it was important to identify and track all potential consequential changes.

AM presented high-level analysis undertaken in conjunction with CCAG members regarding the use of SMAP or Significant Code Review (SCR) powers by Ofgem in directing the code changes required for MHHS. Following an assessment of the advantages and disadvantages of each power, there was a preference for the use of SMAP as it allows multiple tranches of changes across all codes, if necessary, whereas SCR powers may introduce additional risk

<sup>5</sup> *Faster Switching consequential changes to the SEC*

<sup>6</sup> *Extension of P383 to include non-final Demand*

owing to potentially narrower scope and the need for interaction with code change control processes and release dates, which may extend timelines.

## 6. Change Request for M6 and M7

### Introduction

MC provided an overview of this agenda item, advising movement of the M6 and M7 programme milestones relating to the delivery of code drafting and enactment of SMAP powers by Ofgem would require a CR. MC advised work had been undertaken following the last CCAG meeting to create a more detailed plan to identify the timelines and activities required to draft the necessary code changes for MHHS.

MC further advised a draft CR had been provided with the meeting papers and the BSC had agreed to act as proposer. It was explained there is a need to move forward quickly to avoid issues with the current programme deadlines for M6 and M7, which have been accepted as requiring change. AM highlighted the Programme drafted the change following engagement with the BSC and REC, and a CCAG member is acting as proposer to assist CCAG engagement in this.

MC explained the detailed steps to reach M6 will require input from CCAG Members. MC invited the group to comment on whether the plan timeframes were realistic and achievable, and noted the objective was to review the plan and agree the need to raise a CR. The CR would then be submitted to the MHHS Programme Change Board on 24 March 2022 and issued for impact assessment thereafter.

### Change Request and Plan

MC explained particulars of the draft CR, including that it would enhance the deliverables of M6 compared to the current M6. Specifically, the current M6 is described as *'initial code changes drafted'*, whereas the enhanced M6 will require that code changes are fully baselined and ready for submission to Ofgem for direction on implementation as per the M7 milestone.

AM provided further detail on the plan, noting it contains periods for the assessment of the design baseline and its potential impact on the codes prior to code drafting commencing. The plan then details periods for the development of changes for individual topic areas (e.g. registration, etc.), the drafting and review of legal text, and development of transitional text.

CH asked what level of analysis had currently been undertaken regarding the specific areas of code requiring change, and therefore the extent to which individual Code Bodies should be involved in planning and whether they are able to support the level of work required at the times it is required. AM confirmed the plan does not specifically identify which areas of code require review/assessment at present, but this detail was in the process of being added with support from CCAG. Several members agreed further analysis will be required to develop understanding of what areas of code would require change. AM noted the plan divided these areas into 'large' and 'small' topics for assessment and development under each code, and it was possible to forecast what some of these areas will relate to (e.g. registrations). It was explained that the 'mini-consultation' periods contained in the plan had been set at two weeks, but this was flexible depending on the complexity or significance of a given topic area under consultation with code parties.

The group discussed the plan timelines, with PS asking whether there was any built-in contingency time. MC advised the timelines contains a mid-plan review period which provides for reassessment of the plan during its operation. LJ, as the proposer of the draft CR, stated there had been analysis to define the timescales detailed in the plan and these were considered reasonable based on current information. LJ went on to say further analysis may be required of the timescales once the plan is mobilised. JB highlighted the importance of raising the necessary CR to change the M6 and M7 milestones as soon as possible, to ensure it can be issued for impact assessment and submitted to the PSG and Ofgem before the current M6 and M7 deadlines elapse. The plan would be kept under review throughout the code drafting process and an ongoing assessment made of whether the relative timescales contained therein remain workable.

The Chair explained the M5 replanning activity, which will commence following publication of the detailed design baseline, will provide a further opportunity to review and change the code drafting timeframes if necessary. AM advised the group the code drafting plan will be included in the CR to change the dates of M6 and M7 and urged parties to express any concerns over the timescales or activities detailed in the plan through their impact assessment responses once the CR is issued for comment. The Chair reminded parties the CR relates solely to changing the deadlines for code drafting and enactment of SMAP by Ofgem and were not to be viewed as an opportunity to seek any changes to design matters.

## Consequential Changes

Members further discussed consequential changes, noting these may affect the timelines for delivery of code drafting. AM advised there will need to be a continuing assessment of consequential change requirements and it was likely understanding of this would develop as clarity is obtained on the changes required to the two most impacted codes – the Retail Energy Code (REC) and the Balancing and Settlement Code (BSC).

KK highlighted the Connection and Use of System Code (CUSC) as a specific example of a code where all prospective changes relating to MHHS are likely to be considered consequential rather than programme-critical. KK explained that despite the assumption CUSC changes were likely to be consequential only, this did not mean there would not be material changes needed to the code itself. An example of potential changes to Transmission Network Use of System (TNUoS) charges was given, and it was explained that whilst these changes may not be programme-critical, they will require significant input and agreement from code signatories, and as such may require Ofgem involvement to ensure implementation timelines are acceptable. PS provided another generic example of changes which are required because of MHHS but are not necessarily required to enact the MHHS Target Operating Model (TOM). The Chair advised it was not for the Programme to dictate matters that are outside of the programme scope, but it is important for Code Bodies to assess such matters and respond through appropriate channels such as impact assessments. The Chair requested members to consider specific consequential changes which may be required to enable the CCAG to begin to quantify practical examples of such change.

KK asked about consequential changes and what analysis has happened here, noting that these could affect the timescales for code changes. AM replies there are two definitions of consequential changes – changes to matters out with the programme and changes to codes as a result of the programme. AM highlighted that consequently changes to code are believed to be non-substantive at present. There will need to be an assessment of potential consequential changes once REC and BSC drafting is complete. Chair believes changes to CUSC are all consequential. KK notes there may be impacts on TNUoS charges, and how this is managed given it is not central to MHHS but may be a requirement in CUSC. Chair responds that this should be led by what degree of discussion is required with code parties, as changes to charging will need significant input from code parties. PS raises similar point about changes that may be required because of MHHS but not necessarily required to enact the TOM. Chair notes it is important that programme does not dictate matter that are outside code or outside programme – this is for affected parties to assess and respond to. Chair asks CCAG members to consider what consequential changes may be required and begin to quantify practical examples of consequential changes

**ACTION CCAG04-04: All CCAG members to consider detail of potential consequential changes and provide to [PMO@mhhsprogramme.co.uk](mailto:PMO@mhhsprogramme.co.uk) for review at DAG and/or CCAG, to assist view of likely consequential changes and whether these relate to design or code drafting**

## Specific Planning Matters

MC posed several specific questions regarding elements of the code drafting plan developed by the Programme.

1. Does the plan include sufficient time for the development of transitional legal text?

AM discussed the need for parallel running of old and new systems, and as a result, the clear need for legal text which caters for this transitional period and provides cutover arrangements. AP noted REC have a transitional schedule and believed it key to determine the specific dates of any parallel operation of systems and how transitional arrangements will commence. JB and the Chair highlighted the Programme will review individual code schedules and processes and as cutover begins, there will be a need to precisely delineate the commencement of certain processes' operation in new systems and deal with any 'in-flight' activities. The Chair believed four weeks as currently provided in the plan seemed sufficient to identify cutover arrangements for individual processes. No objections or further comments were received from the group.

2. Will more than one code release be required to implement the necessary code changes?

MC explained two code releases were currently anticipated as a minimum to enable implementation of the required code changes. PS noted the need for close coordination between code changes and system changes, and that it was difficult to determine how many releases would be required without knowing the specific content and level of change (e.g. requirements for the installation of new equipment or other hardware). PS believed this will only become apparent as the details of the design become clearer. AM believed two releases could be sufficient if all changes were well-identified during drafting and development of the code changes. PS explained it may be necessary to implement code changes first, with systems changes occurring later or phased according to cutover arrangements. The Chair agreed this was a pertinent topic of discussion and it would need to be determined whether the M8 milestone, which relates to designation

of code changes by Ofgem, should be linked to a code release date or whether legal text can simply provide effective dates which are set in the future, to ensure simplicity and efficiency in as far as possible. The group did not consider at this juncture that significantly more than two code releases would be required

**ACTION CCAG04-05: Programme to update Change Request (CR) 003<sup>7</sup> with feedback from CCAG members (e.g. reviewing contingency time, updating, and adding to RAID) and submit CR to MHHS Change Board**

The group agreed for a CR to be raised to move the M6 and M7 dates and were advised this would be submitted to the MHHS Programme Change Board on 24 March 2022 and submitted to impact assessment thereafter. Responses will then be reviewed at the Programme Steering Group (PSG) and a recommendation made to Ofgem for approval. Members were advised a quick turnaround would be required to impact assess the CR and ensure submission to Ofgem ahead of the current programme plan deadline for M6. As such parties were urged to provide any impact assessment responses as soon as reasonably practicable.

**DECISION CCAG-DEC09: Raise MHHS Programme Change Request to change dates of M6 and M7**

## 7. Code Draft Resource Planning

AM provided an overview of initial thinking on the resource requirements for Code Bodies and explained further detail would be provided at the next meeting. AM posed several questions and assumptions to Code Bodies on resourcing requirements, the most pertinent of which was the assumption the Programme will draft the required code changes via programme working groups with input and support from CCAG and Code Bodies. Code Bodies will then review the drafting with the CCAG and in consultation with their code signatories.

PS asked whether suppliers will also be provided with a view of resourcing requirements, and whether early visibility can be provided to enable industry parties to plan. AM agreed this would be ideal, and the Programme will begin to flesh out the individual topic areas within the code drafting plan and map the timelines for input of expert resource. AP highlighted REC is looking closely at resource requirements and support a 'long and thin' resource model, meaning it is important to avoid significant overlap of drafting stages where expert input is required.

The group briefly discussed the mini-consultations within the code drafting plan, agreeing flexibility may be required on the duration of these. FMA agreed and stated it was important to consider whether the timeframes code parties are given for responses are sufficient and appropriate. The Chair noted the two-week periods for mini-consultations contained within the plan are in line with other such periods within the programme, providing the example of design documentation which are consulted on rapidly. The Chair agrees with CCAG members the need for consideration of what timeframes are adequate for the mini-consultations depending on the topic under consideration.

AM then highlighted the anticipated cyclical process for code drafting activities, involving drafting, review, consultation, refinement, and which gives an indication of the structure of the review cycle and therefore what will need resourcing by the codes.

Finally, AM advised the view of resourcing requirements for code drafting would be further developed and more detail presented at the next CCAG meeting.

**ACTION CCAG04-06: Programme to further develop view of code draft resource requirement and return to next meeting with information for discussion**

## 8. Operational Choreography

A verbal update on the Operational Choreography document was provided, with the group advised the MHHS Programme Design Team are currently scoping the design activities to be included and will be scheduling a subgroup meeting to prepare the document for review by the Business Process Rules Working Group (BPRWG). It is anticipated this will be reviewed as part of the Tranche 3 design artefact work which is due to operate from 02 May 2022 to 30 May 2022, with submission to Dag for final approval due in June 2022. The Chair advised the document will be flagged to CCAG once it is issued for consultation.

**ACTION CCAG04-07: Programme to flag operational choreography document to CCAG once issued for consultation**

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<sup>7</sup> CCAG proposals to delay M6 and M7

CH asked whether the document could be 'cut and sliced' as necessary in line with what individual PP may feel is relevant to them. JB responded such questions would require discussion with the DAG and offered to raise this with the DAG chair.

**ACTION CCAG04-08: Programme to discuss with DAG the extent to which Operational Choreography document can be 'sliced up'**

## 9. Summary and Outcomes

FM summarised the meeting actions and confirmed action owners. No comments were provided by the group.

The Chair invited any other business (AOB) to which two matters were raised.

### AOB 1

JB asked whether REC Modification R32 includes specifics on the need to update CSS systems to receive MDR registration details and how this is provided to the Data Service Provider to allow access to systems for service requests from MDR to smart meters. JB explained it was not clear where this change to REC (as the code governing CSS) was defined. JB stated this is a critical changes for the MHHS Programme.

AP agreed to investigate where the current provision for this requirement and, if required, to identify the steps required to raise a change which ensures implementation is in line with MHHS timescales.

**ACTION CCAG04-09: REC to consider whether MDR and other related matters will need to be picked up in subsequent REC admin CPs**

### AOB 2

The Chair highlighted the timelines required for the CR to delay M6 and M7 to meet the timelines necessary for submission to Ofgem ahead of the current M6 and M7 dates elapsing. The change will be issued for impact assessment week commencing 28 March 2022, and a fast turnaround will be required to enable submission to Ofgem for decision.

MH asks how the CR to change M6 and M7 interacts with CR001 and CR002, given these would give different amounts of time to undertake code drafting. MC responded the M6, and M7 CR has relative timings within the drafting plan and stands alone in terms of mapping necessary time for code drafting.

RV asked whether the M6 and M7 CR could include an assumption on the alternative dates stipulated in CR001 and CR002. JB responded this was not possible as the Programme cannot prejudge the outcomes of CR001 and CR002. The Chair noted parties can choose to answer the impact assessment for the M6 and M7 CR, based on whether CR001 or CR002 is implemented, if they choose. RV asked when the impact assessment comments on CR001 and CR002 are due to be reviewed. JB responded the responses are due for review by PSG on 06 April 2022, and which change is implemented is subject to Ofgem's approval.

The Chair thanked attendees and closed the meeting.

**Date of next meeting: 27 April 2022.**