Cross Code Advisory Group #5
27 April 2022

Version 1.0

MHHS DEL365

Agenda

#	Item	Objective	Type	Lead	Time	Page
1	**Welcome**			Chair	10:00-10:05 *5 mins*	
2	**Minutes and Actions**	Approval of minutes of previous meeting and review of outstanding actions	Decision	Chair & Secretariat	10:05-10:10 *10 mins*	3-5
3	**Governance Groups Updates**	Updates from other MHHS Programme governance groups	Information	Programme (PMO)	10:10-10:15 *5 mins*	6-7
4	**Horizon Scanning Log**	Review new and existing code changes relevant to the MHHS Programme	Discussion	Programme (Andrew Margan)	10:15-10:30 *15 mins*	8-9
5	**CR003 CCAG Proposal to Change M6 and M7**	Review the outputs of CR003 Impact Assessment and agree a recommendation for submission to Ofgem (see Attachment 1)	Decision	Programme (Alex Whiteman/ Chris Welby)	10:55-11:15 *20 mins*	10-11
6	**Code Drafting Principles and Approach**	Agree code draft approach and principles, and review detailed code drafting and review process	Decision Discussion	Programme (Andrew Margan)	10:30-10:55 *25 mins*	12-15
7	**Data Service Provider Governance**	Discuss CCAG approach to governance of the Data Service Provider	Discussion	Programme (Jason Brogden)	11:15-11:25 *10 mins*	16-18
8	**SEC MP162 Implications on MDR**	Agree term to describe the Meter Data Retrieval (MDR) service in the SEC	Decision	SEC/DCC (Richard Vernon)	11:25-11:35 *10 mins*	19-20
9	**Summary and Next Steps**	Summarise meeting actions and next steps	Information	Chair & Secretariat	11:35-11:45 *10 mins*	21-22

Attachments
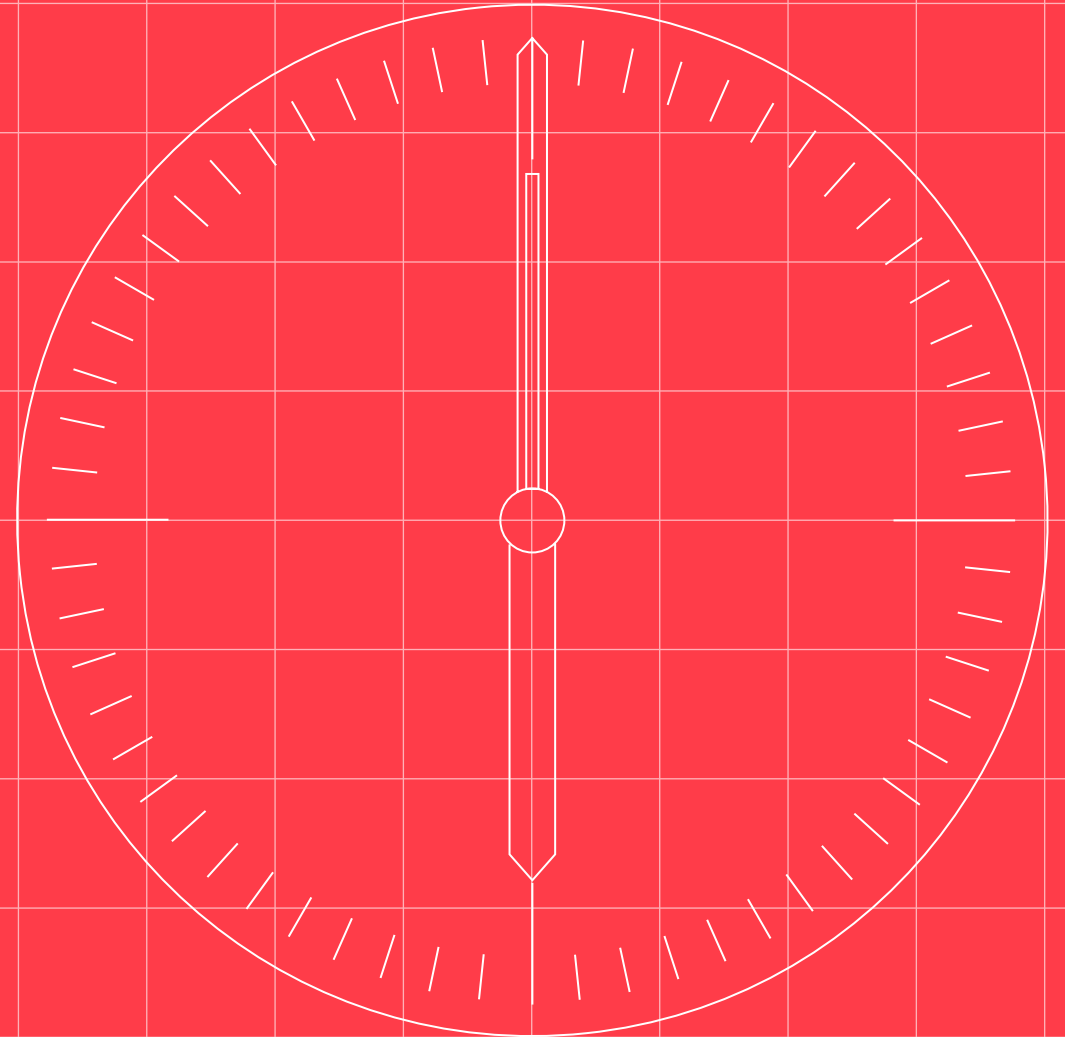Attachment 1 – Horizon Scanning Log v1.0
Attachment 2 – CR003 Impact Assessment Responses

Minutes and Actions

DECISION: Approval of minutes of previous meeting and review of outstanding actions

Chair & Secretariat

10 mins

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Minutes and Actions Review (1 of 2)

- Approval of Minutes from 23 March 2022 – one amendment suggested to attendees list (apology from CUSC Representative)

- Review of outstanding actions:

Actions will be discussed by exception. Please review the actions ahead of the meeting.

| Ref	Action	Owner	Due date	Status	Latest update
CCAG02-07	Engage with code bodies offline on how information on identified consequential changes will be shared with this group	Andrew Margan	23/02/22	Open - ongoing	Discussions in progress via mid-month CCAG meetings
CCAG03-01	Provide detail on Operational Choreography design artefact content and SLAs (such as when further detail on timing and performance behind each design artefact will be provided to CCAG)	Programme (Justin Andrews)	23/03/22	Recommend closed	Information provided by Programme Design Team at March CCAG. Document due to be approved by DAG in June 2022, following review by BRPWG as part of Tranche 3 design artefact review which will run 02 May - 30 May 2022. CCAG members will be included in the distribution when document issued to BPRWG for review.
CCAG03-04	Provide feedback on how CCAG would make code change recommendations to Ofgem, and how Ofgem designating changes would work in practice	Code bodies	16/03/22	Recommend closed	Process for code drafting and submission to Ofgem discussed at February/March CCAG. Further detail under development in code drafting plan.
CCAG03-13	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	23/03/22	Open - outstanding	Latest updates received from SEC and BSC and log published with CCAG meeting papers. Updates to log to be added directly in future.
CCAG03-15	Review CACoP Central Modification Register template to see if an MHHS impact field can/should be added	BSC (Elliot Harper)	23/03/22	Open - outstanding	Raised with CACoP and currently under consideration.
CCAG04-01	SEC to add SEC MP200 to CCAG Horizon Scanning Log and CACoP Central Modifications Register	SEC (Rosie Knight)	27/04/22	Recommend closed	Update provided by SEC Representative and added to Horizon Scanning Log.
CCAG04-02	BSC to assess if P419 should be added to CCAG Horizon Scanning Log and provide update to PMO@mhhsprogramme.co.uk	BSC (Lawrence Jones)	27/04/22	Recommend closed	Update received and added to CCAG Horizon Scanning Log due for discussion under agenda item 4 (*Horizon Scanning Log).*

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Ref	Action	Owner	Due date	Status	Latest update
CCAG04-03	PMO to discuss with DAG Chair inviting SEC representatives to any DAG conversations regarding SEC MP162	Programme (PMO)	30/03/22	Recommend closed	Discussed with DAG Chair. DAG now have standing agenda item to discuss Level Playing Field Design Principle. Invitations will be extend to SEC Representatives and specific notice will be sent when SEC MP162 is to be discussed.
CCAG04-04	All CCAG members to consider detail of potential consequential changes and provide to 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	All CCAG members	27/04/2022	Recommend closed	No responses received. Information provided by Programme on definitions of consequential change from both a MHHS governance and design perspective (see agenda item 5 (*Code Drafting Principles and Approach*)). Recommend closed and any further requitement to discuss captured under Consequential Change Impact Assessment Working Group (CCIAWG).
CCAG04-05	Update Change Request (CR) 003[1] 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	Recommend closed	Updates completed and CR issued for Impact Assessment by MHHS Change Board. Impact Assessment responses to be reviewed under agenda item 6 (*CR003 CCAG Proposal to Change M6 and M7*) and decision sought on whether approval to be recommended to Ofgem.
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	Open - ongoing	Discussions held with BSC and REC at mid-month CCAG catch up. Outputs of resource review discussions to be brought to May 2022 CCAG meeting. Initial outputs from discussions to be discussed under agenda item 5 (*Code Drafting Principles and Approach*).
CCAG04-07	PMO to flag operational choreography document to CCAG once issued for consultation	Programme (PMO)	May/June 2022	Open - ongoing	To be completed once document becomes available. Currently expected to be released in Tranche 3 design documentation review in early May and return to June DAG for approval.
CCAG04-08	Programme to discuss with DAG the extent to which Operational Choreography document can be 'sliced up'	Programme (Jason Brogden)	27/04/2022	Recommend closed	Due to be published in Tranche 3 design artefact review on 02 May 2022. CCAG members encouraged to review and provide comments.
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	Open - ongoing	REC Change Proposal proforma received. MHHS Programme to draft REC change. Action ongoing until code drafting undertaken.

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Governance Group Updates

INFORMATION: Updates from other MHHS Programme governance groups

Secretariat

5 mins

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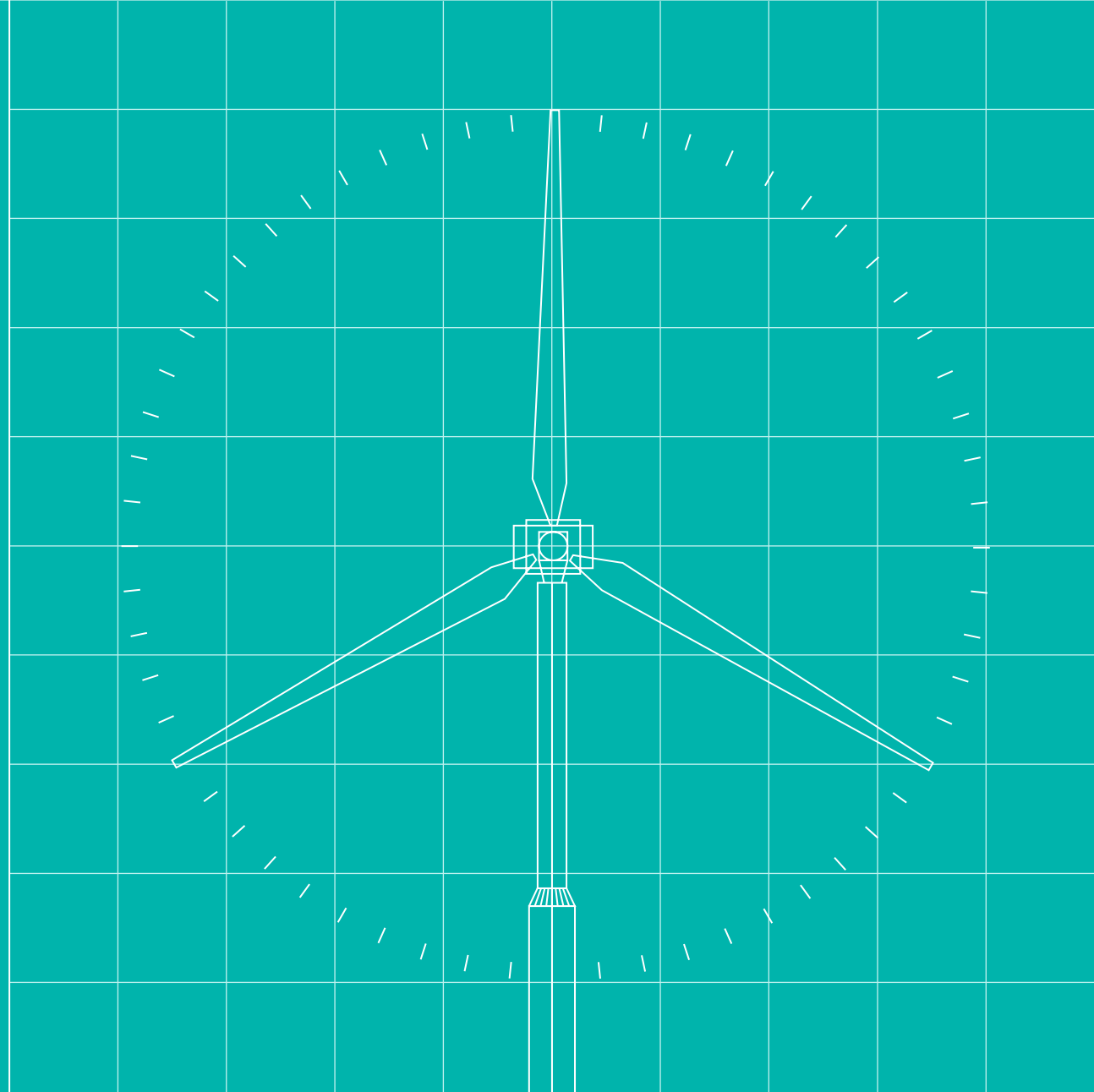
This slide is included for information. Content will be presented in the meeting by exception

Programme Steering Group (PSG)

Update from PSG 07 April 2022

1. **CR001 and CR002 Change Requests** – The Programme presented the outputs of the impact assessments from programme participants on CR001 and CR002. The IPA provided their view and recommendation. Each constituency representative provided their view on the Change Requests and voted for the Change Request they preferred. Based on the outputs of impact assessment and the views of constituency representatives, the SRO made the decision to recommend CR001 to Ofgem for a decision. Full detail and rationale will be provided in the PSG Headline Report.

2. **Readiness Assessment** – An update was provided on Readiness Assessment 1. Feedback was given by PSG members to include in the final report.

3. **Data Integration Platform (DIP)** – The Programme provided an update on DIP.

4. **Further updates** – Several smaller updates were provided, such as on the status of other Change Requests (e.g. CR003-05), the MHHS Open Day, and Central Party finances.

5. **Programme Dashboards** – Questions were taken on Programme Dashboards. Some dashboards will be updated following feedback.

Testing and Migration Advisory Group (TMAG)

Update from TMAG 20 April 2022

1. **E2E Testing and Integration Strategy** – Draft document review deadline 12 April 2022. Over 40 responses received from range of Programme Participants. Majority of responses query/clarification related. TMAG seeking to approve document by end of April 2022.

2. **Test Data Strategy** – Draft document issued for review and discussed at Data Working Group 07 April 2022. Several amendments agreed and document re-issued for further review with deadline of 29 April 2022. Updated document, and comments log available on MHHS Portal. Document will be presented for ratification at TMAG on 18 May 2022.

3. **Data Working Group (DWG) –** The second DWG was held 07 April 2022 and reviewed responses to the draft Test Data Strategy, as noted above.

4. **Migration Working Group (MWG) –** The first MWG was held 14 April 2022. The group will develop the draft MHHS migration strategy.

5. **Working Group Plan –** TMAG have now mobilised two Working Groups (DWG and MWG). A further four Working Groups are anticipated to be stood up as the MHHS Programme progresses.

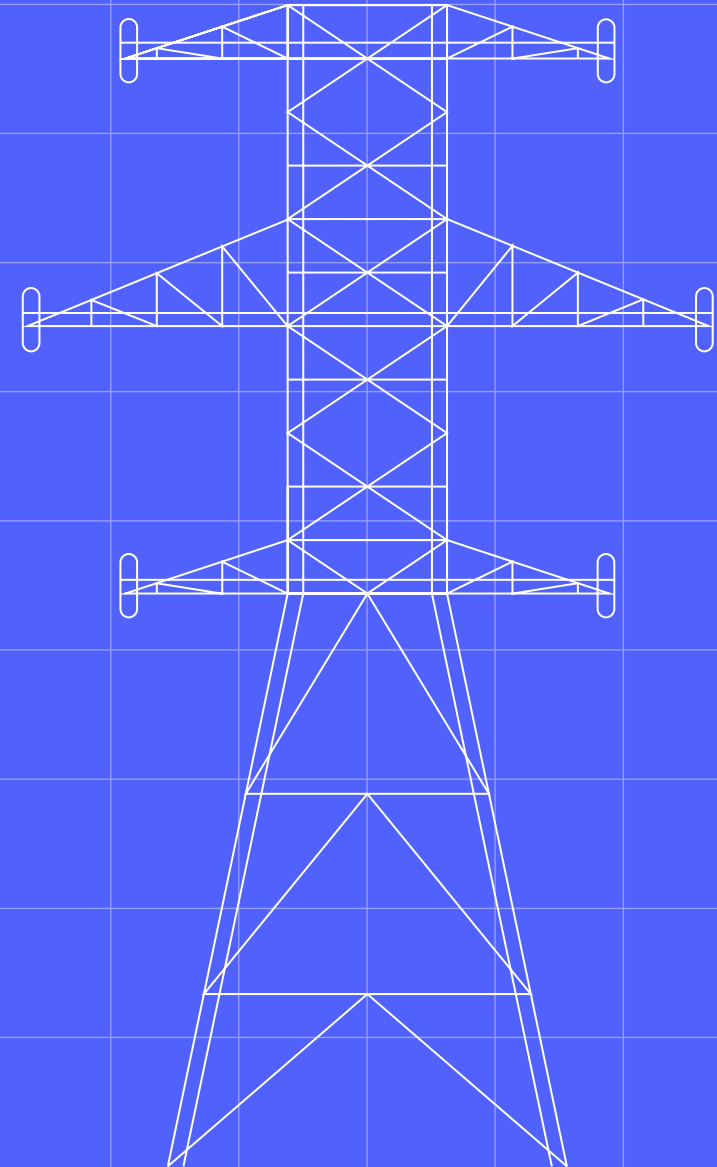## Design Advisory Group (DAG)

Updates from DAG 13 April 2022

1. **DAG Design Principles** – Two new design principles were approved relating to consumer benefits and level playing field. The design principles act as guidelines for design decision making, and are 'living' principles that are reviewed at each DAG meeting

2. **Level Playing Field Principle** – Several actions underway in conjunction with Smart Energy Code colleagues to ensure alignment between SEC MP162 and Programme design principles. Weekly discussions now held between DAG Chair and SEC working group manager, and Programme will attend SEC MP162 working groups. Invites to be extended to SEC representatives to attend any DAG discussions on MP162. Request for information issued to the Smart Meter Segment Sub-Group (SDS) to review need for Target Response Times (TRTs) of <24 hours for Meter Data Retrieval (MDR) service requests to DCC.

3. **Design Decisions** – DAG approved the orchestration of secondary addressing options via the Data Integration Platform (DIP), having reviewed high level costing information on several options. Request for Proposal (RFP) documents have now been issued to prospective DIP bidders.

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Horizon Scanning

DISCUSSION: Review new and existing code changes relevant to the MHHS Programme

Programme – Andrew Margan

15 mins

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1 CCAG Horizon Scanning Log

- Review content of log (see Attachment 1)
- Receive updates from CCAG members as required
- Identify any additional/missing changes related to MHHS
- Version 1 published – format of future updates

2 Actions from previous meeting

CCAG03-13	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
CCAG03-15	Review CACoP Central Modification Register template to see if an MHHS impact field can/should be added	BSC (Elliot Harper)
CCAG04-01	SEC to add SEC MP200 to CCAG Horizon Scanning Log and CACoP Central Modifications Register	SEC (Rosie Knight)
CCAG04-02	BSC to assess if P419 should be added to CCAG Horizon Scanning Log and provide update to PMO@mhhsprogramme.co.uk	BSC (Lawrence Jones)

- Latest updates on actions
- SEC MP200 added to log
- BSC P419 added to log
- Review of items not in log

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Document Classification: Public

CR003 CCAG proposals to change M6 and M7

DECISION: Review the outputs of CR003 Impact Assessment and agree a recommendation for submission to Ofgem (see Attachment 1)

Martin Cranfield/Jason Brogden

20 mins

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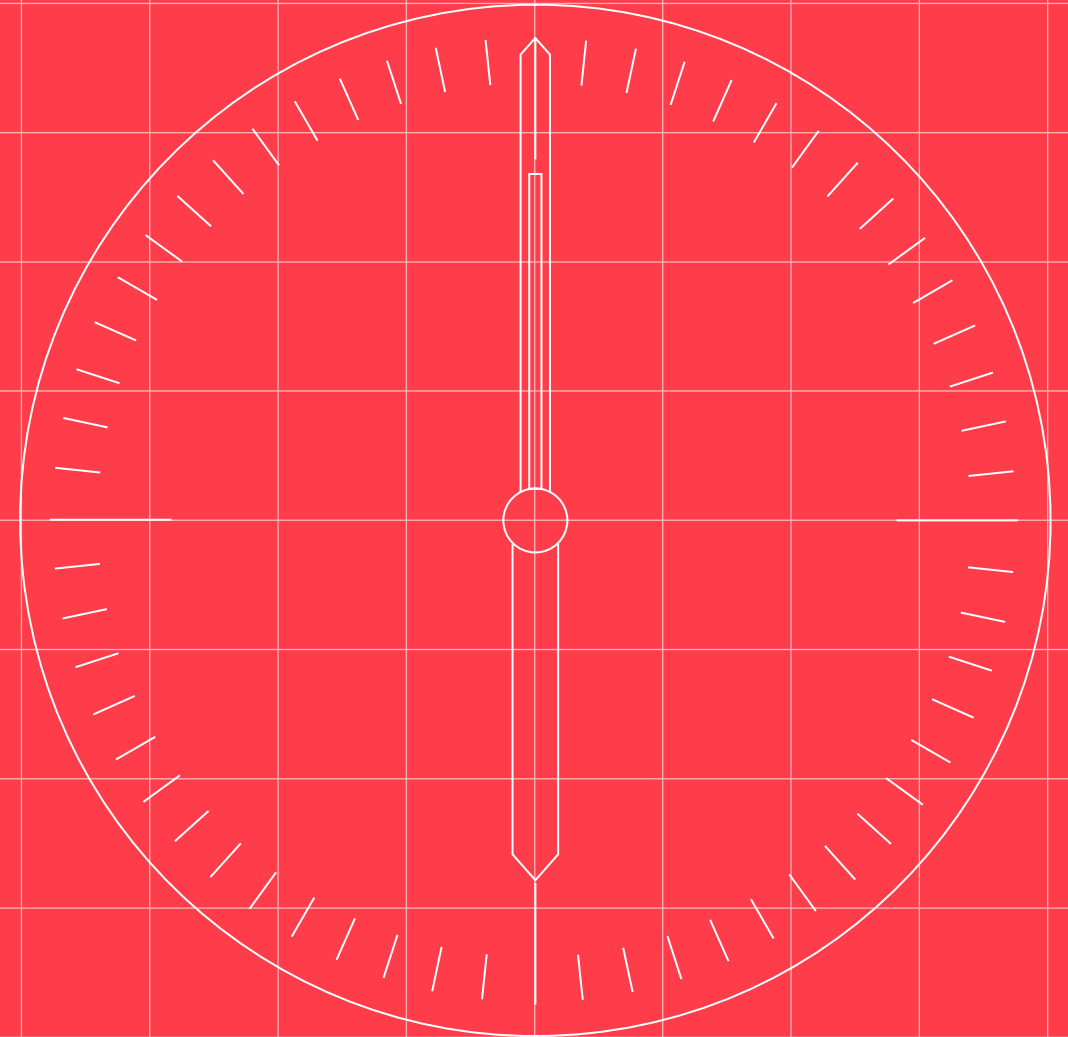
Objectives

1. Review the summary of CR003 Impact Assessment Responses (see Attachment 2)

2. Make a decision for a recommendation to submit to Ofgem. Ofgem will then make a decision on the Change Request

Points to note

- CR003 must be recommended to Ofgem as is OR not at all

- Any feedback from CR003 Impact Assessment and the CCAG can feed into the post-M5 replanning activity. There is further opportunity to rework the dates and content of the CCAG code draft plan in the replan

- Further detail on the CCAG code draft plan is already underway, such as on the consultation and review process (see agenda item 6) and on the code draft topic areas

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Code Drafting Principles and Approach

DECISION: Agree code draft approach and principles, and review detailed code drafting and review process

Andrew Margan

25 mins

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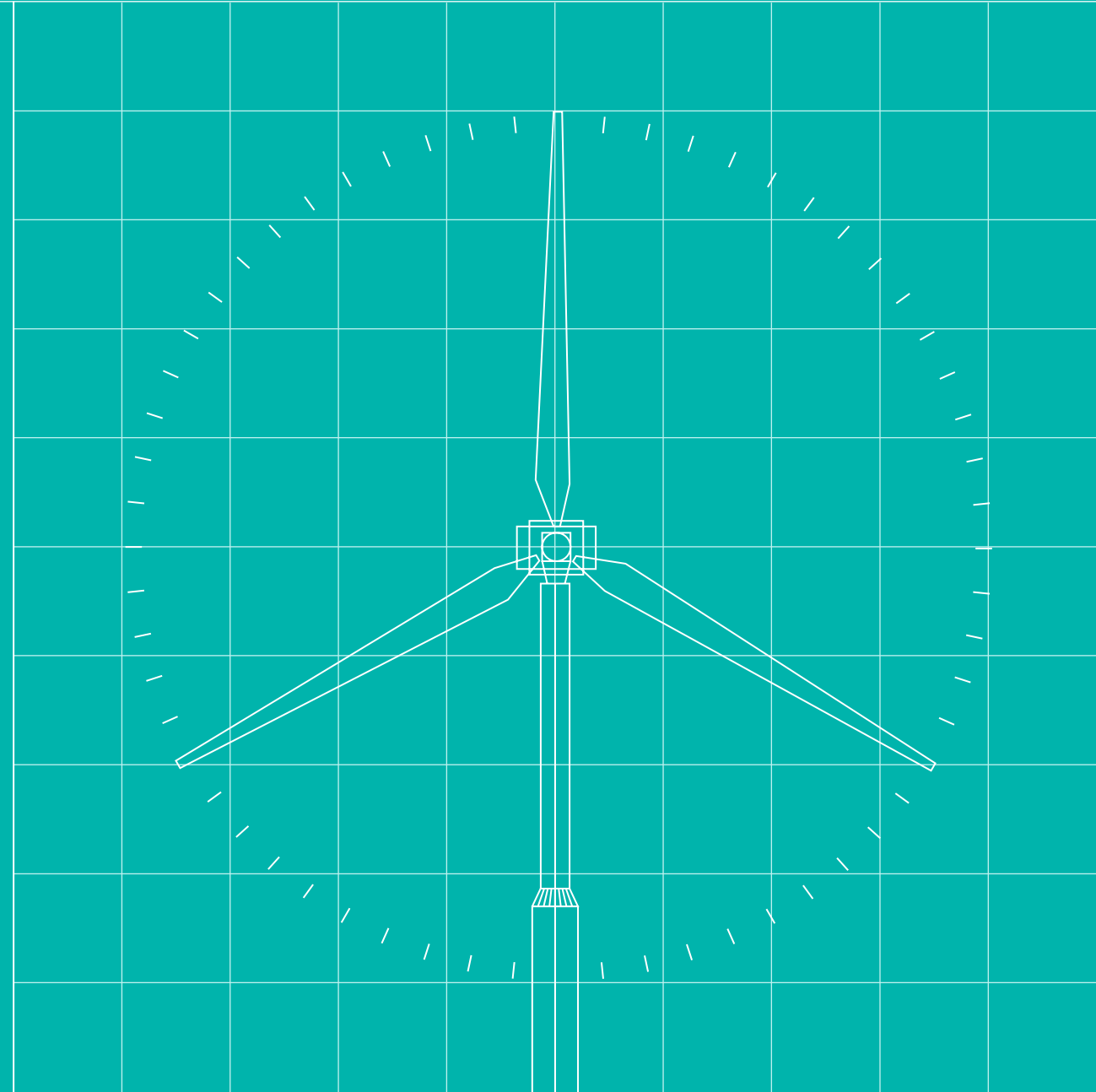
Code draft principles and approach

Across the last few months, the CCAG has discussed a number of principles for the approach to code drafting. We would like to agree these principles today. The principles and approach will be reviewed on an ongoing basis by the CCAG.

These principles should be complimentary to the content in the CR003 Change Request.

Principles

1. Code drafting with take a **lean approach** - new wording and content changes will be minimised, simple and direct.
2. Code draft will be **only to reflect the content of the design** and not to re-open the merits of each design solution (the Programme is design-led).
3. BSCPs (or equivalent) will reference the Enterprise Architect tool, rather than duplicate design artefacts. **Design artefacts will be referenced wherever possible**, using a "point at" model.
4. Code drafting will be **colour coded/change marked**, to support drafting and assurance review.
5. The **code with the largest impact will lead/dictate code drafting activity** and other codes will dove tail into their work; e.g. REC/MHHSP will drive code draft activity and DCUSA presents their consequent changes at the same time.
6. **New BSCPs will create series 7**. There may be an option to place legacy text into a separate code section.
7. **Code drafting and review will take place offline**. Comments from review will be addressed in the working group by exception (i.e. only where specific comments require discussion)
8. The **decision to send text for mini-consultation will be delegated from CCAG to the L4 workgroup**. Code changes will be presented to the L4 WG by topic
9. **CCAG will retain control to recommend implementation and request Ofgem SMAPs**.
10. **Mini-consultation will be by all Programme Participants** via their principal contacts.
11. Mini- consultation, drafting reviews, and code drafting itself will occur in parallel where possible
12. In accordance with Ofgem timetable, code drafting will not change settlement timetable until transition is complete

Approach

1. **Topic areas to be drafted in order by largest first** (to be validated by BSC and REC matrix planning activity and with final outputs of the design). **Time required to draft for each topic area will flex** depending on the volume of drafting required. The topic areas will be: 1) Data Services, 2) Metering, 3) Registration, 4) Interfaces/Data Specification, 5) BSC Central Services, 6) Governance, 7) Transitional text
2. A **consistency check** will provide assurance and gap analysis to cross reference code sections to design artefacts. This will ensure all artefacts are codified
3. **CDWG will be the only formal working group**. The CCAG will maintain mid-month meetings with code bodies only (not formal L4 WGs) for the next [two/three] months and communicate output/recommendations to CCAG.
4. **Some code draft can be 'warm started'.** This includes transitional text (as each topic area completes) and consequential changes for non-REC/BSC
5. Draft text will require a number of internal **reviews** before being sent to mini-consultation (please see slide 13 for a more detailed view)

Code drafting steps and review cycles

- **The plan detailed in CR003 indicates 1.5 months per topic area: 2-3 weeks code drafting, 2 weeks mini-consultation and 1 week code updates**
- **Feedback since CR003 was issued indicates further steps are required through internal and external review cycles. The following timeline shows the proposed review process for one topic area**
- **Drafting and review would still happen concurrently where possible, minimizing any delay caused.**
- **The full impact of this approach on the M6/7/8 plan can be determined when the topic areas are known - the steps for each topic area can be collated all together**
- **The approach will need to be dynamic. For example, some code may require multiple internal reviews, or some topic areas may be drafted with less time/resource**

Topic area drafting and review process

		Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11
1	**Code drafting takes place offline** by relevant drafting lead(s)	Up to 3 weeks										
2	Drafted code is issued for **internal review by CDWG and CCAG members**				1 week							
3	**Outputs of internal review** are: • **Actioned offline** • **Discussed at CDWG** where required					1 week	CDWG					
4	**Outputs of CDWG are actioned offline.** Assurance is provided to CDWG that any updates have been actioned.						0.5					
5	Code draft is **issued to industry for mini-consultation**						2 weeks					
6	**Outputs of mini-consultation** are: • **Actioned offline** • **Discussed at CDWG** where required									1 week	CDWG	
7	**Outputs of CDWG are actioned offline.** Assurance is provided to CDWG that any updates have been actioned.										0.5	
8	Final code draft goes to **CCAG for approval**										1 week	CCAG

Next topic area drafted in parallel

All available drafting resource

Drafting resource moves on to next topic area, with minimum resource remaining to update code following reviews

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Consequential Change

The term Consequential Change has been used at CCAG, but the term is undefined and based on the context the meaning is different. The next slides sets out how Consequential Change could be defined.

Code Definition

Consequential 'Code' Change (CCC) is the process or impact of updating one energy code and the impact it has on other energy codes

Examples:
Defined terms or when one code points to another code and the text changes, incl. references change

Owner:
CCAG and related work groups

Design Definition

Consequential 'Design' Change (CDC) is the MHHS Programme impacting existing design or processes

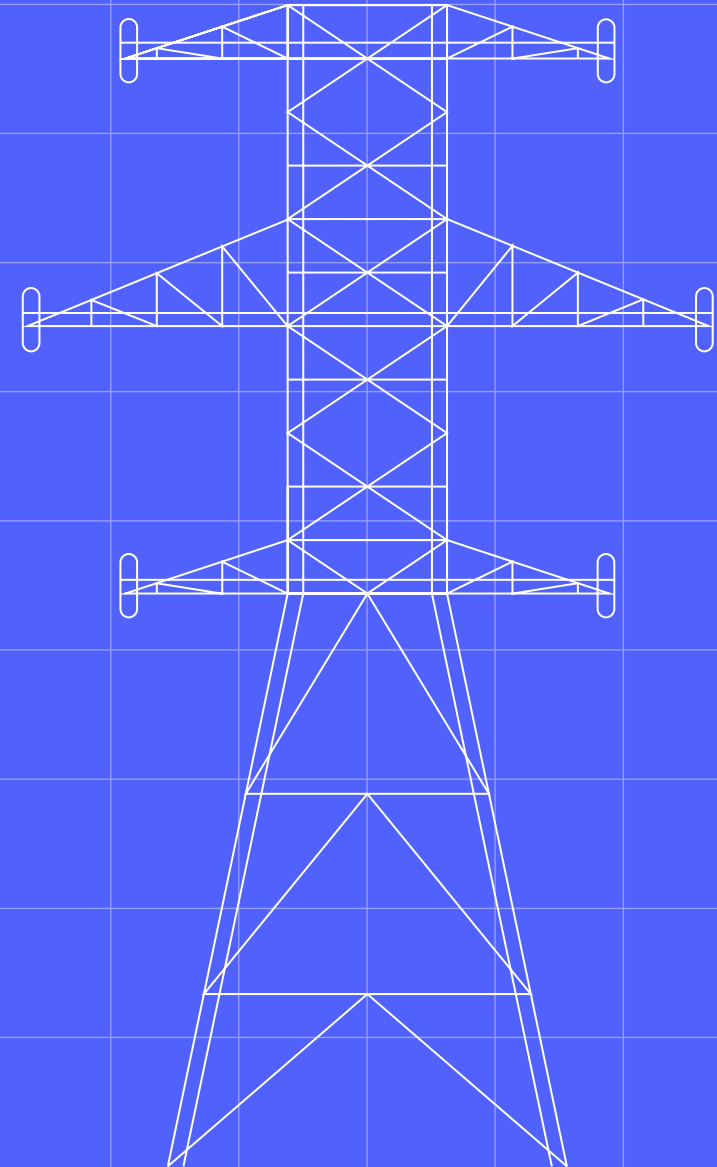Examples:
The removal of EAC on systems and processes

Owner:
DAG and related work groups

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Data Service Provider Governance

DISCUSSION: Discuss CCAG approach to governance of the Data Service Provider

Andrew Margan/Jason Brogden

10 mins

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Introduction

We have been approached by a Programme Party to consider whether Data Service Providers should be signatories under Code arrangements, rather than just qualified agents. We considered that this should be discussed at CCAG.

Issue Raised

- The existing roles of BSC Data Collectors, Data Aggregators and Meter Administrators are eliminated by MHHS with new Data Service roles with new obligations and responsibilities under MHHS
- It has been raised with the Programme that it should be considered whether the Data Services should be signatories to a code governance arrangement, as opposed to just qualified under a code arrangement like the previous Supplier Agents
- BSC Modification P332 'Revisions to the Supplier Hub Principle' was raised in 2016, and was rejected by Ofgem in March 2022. One of the many reasons for its long life was the consideration of MHHS SCR impacts
    - The final rejection by Ofgem dated 25 Mar 2022 states: "If the industry feels that this issue remains, we encourage them to discuss and develop a solution at an appropriate forum and provide sufficient evidence in support of any solution. As part of this, we would suggest liaising with the Market Wide Half Hourly Settlement programme."
    - P332 originally was going to impact Meter Operators, but in 2021 their governance changed to the REC and therefore fell out of the scope of the BSC modification
    - One of the original intentions of P332 was to make Data Collectors and Meter Operator signatories to the BSC. In was recognised early that making this change to the BSC for incumbent Supplier Agents was going to be difficult and costly to implement.
    - However, in 2021, meter operators became signatories to the REC, and now MHHS is creating the new roles of Data Service. So the opportunity arises whether to design the new Data Service role as a party to a Code

Approach to Discussion

- We have considered what the current position is for the MHHS Programme and then what alternative models might look like.
- We have pulled this into a straw man Options Analysis table on the next page very much as a starting point for discussion.
- We believe that the default position for the Programme is for Data Service providers to be Qualified under the BSC but not to be obligated to become signatories to any Code.
- Other options are set out below with an early view of Pros & Cons
- For any alternative model to be progressed, we believe that a Change Request would have to be raised.

- We suggest that the CCAG discusses:
    - What the options are
    - What the pros and cons for those options are
    - Whether there is merit in a further discussion
    - Agree appropriate forum for discussion/decision
    - Next steps

Options Analysis

Option	Pros	Cons
Data Services Qualified under BSC but not signatories and monitored for compliance under BSC PAB [Currently Defined Arrangements]	No change Consistent with existing arrangements, therefore well understood	
Data Services Qualified under BSC obligated to become BSC signatories and monitored for compliance under BSC PAB	As per MEMs going under REC? Opportunity to bind Data Services under firm obligations with more enforcement opportunities Focus on settlement performance	Additional costs for Data Service Agents to be under increased regulatory obligations Additional BSCCo cost to administer Further programme activity to investigate what is required to implement.
Data Services Qualified under REC, signatories to REC and monitored for compliance under REC PAB	Opportunity to bind Data Services under firm obligations with more enforcement opportunities Consistency with treatment of Meter Equipment Managers [note how will MEM role interact with the currently defined Metering Service role in the MHHS Programme?]	Additional costs for Data Service Agents to be under increased regulatory obligations Additional REC Co cost to administer Further programme activity to investigate what is required to implement. Reduced focus on settlement performance
Data Services Qualified under BSC and signatories to REC and monitored for compliance under REC PAB	Consistency with current and defined Qualification processes Opportunity to bind Data Services under firm obligations with more enforcement opportunities Consistency with treatment of Meter Equipment Managers	Additional costs for Data Service Agents to be under increased regulatory obligations Additional BSC Co & REC Co cost to administer Further programme activity to investigate what is required to implement. Reduced focus on settlement performance Lack of continuity between Qualification and PAB monitoring reduces effectiveness Increased cost of knowledge transfer

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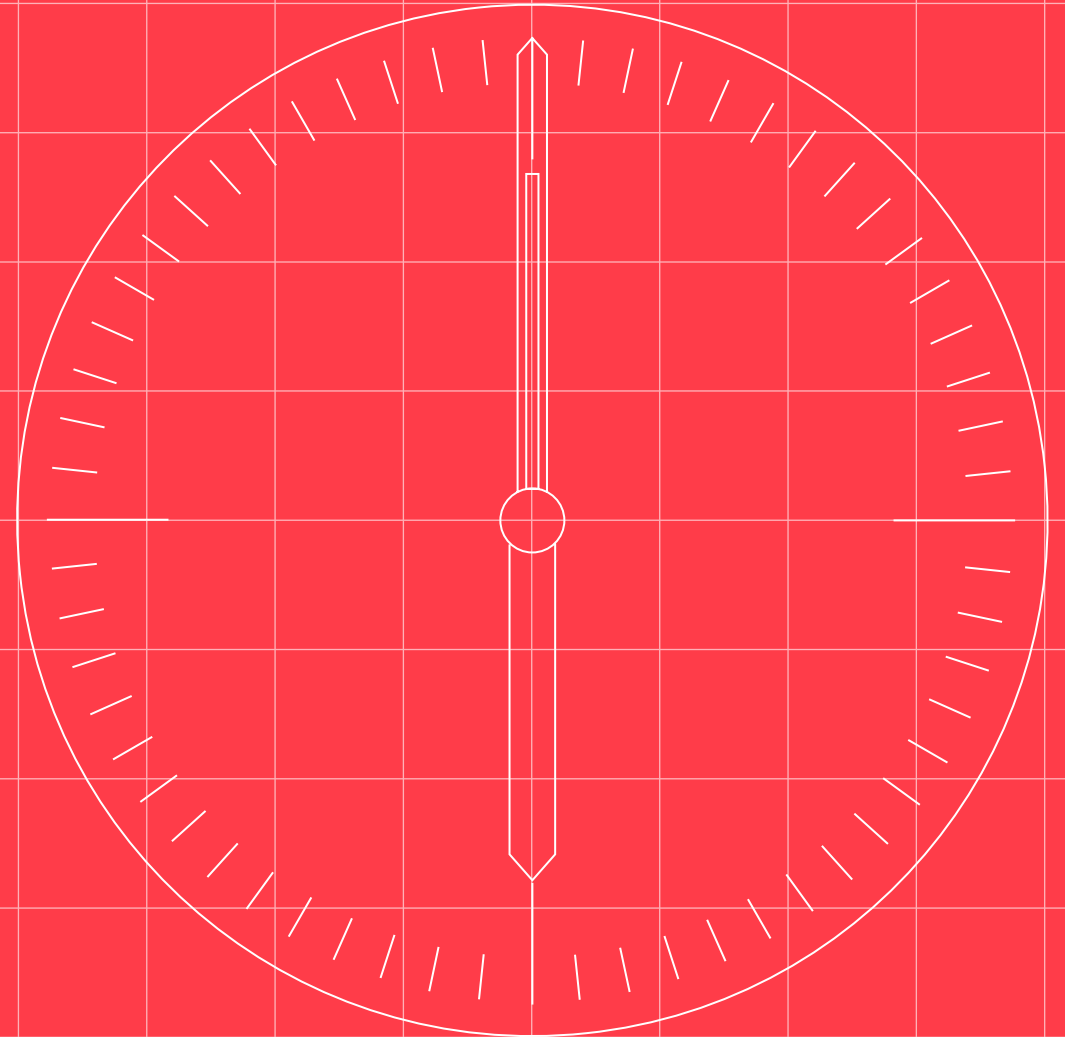**Further Points for Consideration**
- Review the rationale for Ofgem moving Meter Equipment Managers under the REC to see applicability to Data Services
- Are there any directions of travel from Ofgem from the Energy Code Reform that we should consider?
- How will MEM role interact with the currently defined Metering Service role in the MHHS Programme?

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MP162 implications on MDR

DECISION: Agree term to describe the Meter Data Retrieval (MDR) service in the SEC

SEC/DCC - Richard Vernon

10 mins

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The legal text of MP162 means that that **a term will need to be introduced into the SEC to describe the MDR service.**

We would like to **discuss and agree this term today**.

Two possible options have been proposed:

1. **Meter Data Retrieval Service**

2. **A less precise description in the SEC**: Means the BSC service that retrieves metering data for the purposes of market wide half hourly settlement

Summary and Next Steps

INFORMATION: Summarise meeting actions and next steps

Chair & Secretariat

10 mins

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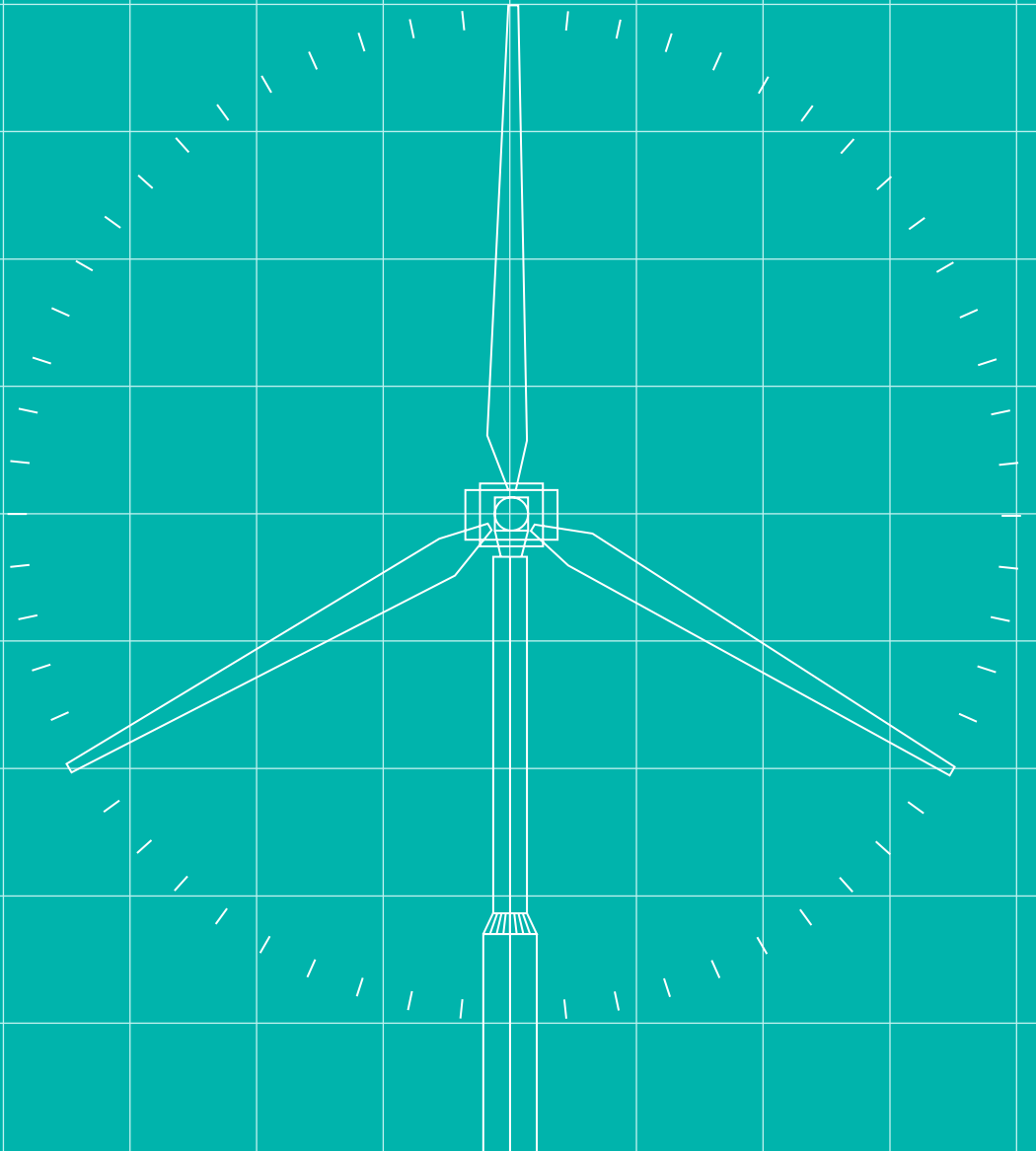
Next steps

- **Confirm actions from the meeting**

- **CCAG Agenda Roadmap – CCAG dates and planned agendas:**

Please can code bodies prepare to present their code draft resourcing plans at May's
CCAG

Meeting dates	27-Apr	25-May	22-Jun	26-Jul	24-Aug
Relevant milestone or activities				M5 (subject CR001 approval by Ofgem)	
Agenda items	*CR003 recommendation decision for Ofgem *Code draft principles and approach *DSP governance *MP162 and MDR	*Resourcing model: programme and code bodies *Approve code release strategy *Working group/sub-group forward look and ToR (inc. consultation process)	*Approach to transition text and consistency check *Finalise resource model * Qualification code changes	*M6: Code drafting commences *L4 Workgroup prep *Operational Choreography document review	*Commence L4 workgroup(s) (subject to M5)
Standing items	*Minutes & actions *Agenda roadmap *Horizon scanning log *Updates from other L2/3 groups	*Minutes & actions *Agenda roadmap *Horizon scanning log *Updates from other L2/3 groups	*Minutes & actions *Agenda roadmap *Horizon scanning log *Updates from other L2/3 groups *Working group highlight report	*Minutes & actions *Agenda roadmap *Horizon scanning log *Updates from other L2/3 groups *Working group highlight report	*Minutes & actions *Agenda roadmap *Horizon scanning log *Updates from other L2/3 groups *Working group highlight report

If you would like to request agenda items for the CCAG, please contact the PMO at PMO@mhhsprogramme.co.uk

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Attachments

Attachment 1 – CCAG Horizon Scanning Log v1.0
Attachment 2 – CR003 Impact Assessment Responses v1.0