
MHHS-DEL529 CCAG 27 July 2022

Attachment 3 – Programme Responses to CCAG Member Comments on Code Draft Plan presented at CCAG 22 June 2022

Description:

This document provides visibility to CCAG members of the Programme's responses to feedback on the Code Draft Plan presented at the CCAG 22 June 2022, as provided by the CCAG Supplier Representative (Domestic). With the agreement of the commenter, the responses are provided as they may be of value to other CCAG members.

Action:

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

Feedback and Responses:

From: Saker, Paul <Paul.Saker@edfenergy.com>
To: MHHS PMO <PMO@mhhsprogramme.co.uk>
Subject: RE: MHHS: Cross Code Advisory Group 22 June 2022

Fraser,

As requested, below is some feedback ahead of the CCAG meeting – I hope this all looks OK but please let me know if you have any questions.

Horizon Scanning Log

- MP200 has already been approved by Ofgem for implementation – however this is not reflected in the Log. [Noted. We will update change log and report back to July CCAG](#)
 - It is also concerning that the MHHS Programme impact assessment for this change has not been completed even though this change goes live on the 18th July.
- Should REC Change R0024 (EAC information in the EES API) be on the Log as EACs are a settlement data item? [We will review and update change log and report back to July CCAG](#)
 - This change refers to EACs which will no longer exist, but the underlying issue is that access is required to consumption data to support accurate quoting in the switching process.
 - As consumption data is usually created and shared as part of the settlement process the MHHS design could actually support delivery of this requirement – or could create a risk to effective switching if it doesn't. [We will review, update change log and report back to July CCAG](#)
- Is there any feedback from the MHHS Programme discussions/CCAG meetings to the CACoP register or the discussions on the changes taking place under the various codes? [Codes are responsible for updating the CACoP via the normal BAU code change process.](#)

Code drafting steps and review cycles

- Slide 11 (Code drafting steps and review cycles)
 - The timescales being set out for the process seem to be quite ambitious with little room for delay – it is impossible to know at this stage whether they are realistic or not, but they certainly appear to be very challenging.
 - Are the timescales for each topic able to flex to reflect the complexity/volume of work required for each topic? [The timelines have been established with those who will complete the drafting, with support from the SRO and PMO function. The code drafting stage is fairly fixed. Within reason, there should be more options to flex the review steps. Through CCAG we plan to review the plan at 3 months to validate if the process is working.](#)



- This seems to be a very similar process for drafting and review used in the design process – are the lessons learnt from that process (regarding timescales, managing review comments etc.) being fed into the planning for the code drafting process? [The approach has been developed with CCAG members. The key lesson learnt from Design is to send the docs straight for consultation, rather than having multiple and repeated reviews. This will mean the CDWG are more focused on specific issues. Further lessons learnt such as signoff criteria are in development and planned to be discussed at July's CCAG.](#)
- It is hard to say whether two weeks will be long enough for industry consultation - this will depend on the amount of material being issued, how easy it is to navigate and understand, and the quality of the code drafting. [Two weeks is the standard consultation timeline. If documents can be issued early to consultation they will, \(without bringing forward the consultation submission day\) so we may be able provide more consultation time. We will be mindful that if we put out a particularly large or complex set of materials it may require some additional time to review.](#)
- What steps are being taken to ensure the initial phase of code drafting for each topic is of the relevant quality to ensure that consultation doesn't flag up high volumes of issues – what sort of code drafting resource is being used (experience, industry background etc.) and how will it be ensured that they have the requisite understanding of the design to translate it accurately into legal text. [Code drafting will be reviewed internally within the central Programme control with MHHS Design, Elexon and REC \(and potentially by other codes\) subject matter experts and legal, for QA before being published. The drafting team will include design team members to ensure continuity. Additional time has been planned in the first topic areas to allow for teething issues. A drafting trial/prototyping exercise is planned ahead of M5 to develop the drafting process.](#)
- It is critical in the consultation/review process that people are able to understand how their feedback has been treated – and especially if a comment/suggestion has been rejected why that is the case. [All comments will be recorded and tracked, so responders can track their comments and understand what action has been taken. This is a lesson learnt from Design.](#)
- Should there be a step between Step 7 ('Code drafters update following CDWG') and step 8 'CCAG approve topic drafting' for the CDWG to check that they are happy with the updates? [The CDWG if required will have a second meetings to review and sign off the changes.](#)
 - How will the CDWG be able to recommend something that is still subject to change – would this be an 'approval subject to'? [The change should be agreed at the meeting, and the update reflects that discussion/decision. Subject to approval is an option.](#)
- At what point does CDWG recommend approval to the CCAG (is this in the meeting in Week 11) and how is this recommendation achieved – does there need to be consensus at the CDWG meeting and if not, who makes the call to recommend approval despite objections/outstanding issues? [The CDWG decision making, will follow other programme decision making, as it should be agreed by consensus.](#)
- Slide 12 (Code draft plan to M6)
 - There seem to a lot of parallel running and overpaying activity – as noted above timescales being set out for the process seem to be quite ambitious with little room for delay. [This timeline has been set by the code drafters and confirmed against their resource plans. MHHS has taken an action to engage the drafters again to check there is sufficient time to deliver these changes. The approach is open to review after 3 months at step F.](#)
 - Does this approach of parallel running mean that the industry consultations and CDWG processes for the two topic areas running in parallel will occur at the same time – if so, it is unlikely that parties will be able to support two consultations/reviews at the same time as they will frequently use the same resource. [The intent is to publish similar subjects in a single consultation at the same time, so parties are not asked to review them separately, which is likely to create more work and create concern to sign off one subject, without seeing the other. We intend to review the volume of documentation under each topic area to provide confidence that sufficient time has been allowed for review under each topic.](#)
 - Suppliers really need to see the plan at the next level down to be able to see exactly when they need to make specific resources available for consultation and CDWG meetings on specific topics. [The main plan and the code drafting level 3 plan will be shared with all parties.](#)
 - Any changes to the plan will also be communicated as early as possible so that suppliers can re-plan – for example if a consultation is likely to be delayed this needs to be flagged up as far in advance as possible – not the week before. [Agreed. The 3 month review process output will be communicated to CCAG for discussion. Plus CCAG will be updated monthly re progress.](#)
 - The plan also needs to recognise and react to other industry activities that are happening – for example, requiring suppliers to respond to a consultation on code drafting where there is already an Ofgem or BEIS consultation in progress would create a significant resource challenge. [As per the CCAG action, we will try to accommodate industry activities into the plan, providing we know about them. However, we would like](#)



- parties to prioritise appropriately with limited resources and make MHHS a priority if it is more important than other industry consultations.
- As noted above the plan needs to be able to flex to be able to react to events not only within the MHHS Programme, but also external to it – the MHHS Programme is not operating in a bubble. See comment directly above, but we would encourage parties to ask the same of other bodies when resources are stretched.
 - There is a big overlap in expertise within supplier and other organisations between Data Services and Metering Services – running these two topics in parallel is highly likely to create a resource conflict that will only be exacerbated if the two consultations/CDWG processes are running at the same time. We believe these subjects because of their nature need to be reviewed side by side, so we plan to issue at the same time.
 - Similarly Governance and Qualification would seem to have a lot of commonality and would also mean resource issues if these two processes run at the same time. See comment above.
 - Does this whole plan move to the right if/when M5 is delayed, or will there be consideration of further parallel running/overlap in order to achieve the M6 milestone? As per CR003 and as the Programme plan currently stands, M6 and M7 are linked to M5 plus 9 and 10 month respectively. So yes, they will move to the right following any delay to M5. Please note this CCAG plan will inform the Programme re-plan activity, which may mean the 9 and 10 months is amended as per the critical path defined by this CCAG planning activity and I would expect fixed dates post the re-plan.
 -
 - How will progress against the plan be monitored and reported – will there be regular updates to the CCAG (such as a dashboard) to enable us to monitor and manage progress? Agreed. CCAG must be kept regularly informed through monthly reporting. We intend to bring a draft of this report to CCAG ahead of the start of code drafting
 - Is M6 specific date a date or a fixed period (i.e. 12 months) from M5? See answer above under 'Does this whole plan move' question.
 - How will these timescales be impacted by the proposed re-panning exercise due after the completion of M5? See answer above under 'Does this whole plan move' question.
 - This plan seems to be driven by the need to achieve an implementation date of November 2023 – if that is the case then it is not clear whether is that really necessary. Part of the qualification process will be compliance with the code. For many parties it is likely, compliance with the code is a contract requirement which are likely to need to be in place before qualification. Therefore, the driver for M6, M7 and M8 is completion before qualification.
 - Why do these code changes need to be 'live' almost a year before go-live and commencement of migration? See comment directly above.
 - Slide 13 (Release plan for M7 and M8)
 - This slide indicates that legal text needs to be 'live' in the codes for qualification to occur – is this actually required? See comment directly above.
 - Could the legal text just be 'approved' at this stage and then go-live closer to the actual go-live date? There is CCAG action to clarify this position. The current position is text go-live will be M8, which is pre-qualification.
 - How will changes be managed if the code is implemented in November 2023? There is CCAG action to clarify this position. The current position is M8 will closely align to when Design and Build is complete. This mitigates the risk of any changes to design and code. Therefore future changes will be managed through the individual code change process (outside of MHHSP).
 - Once the legal text is live then it would usually be subject to the BAU code change processes (i.e. modifications) – will that be the case? As above, future changes will be managed through the individual code change process (outside of MHHSP). However, MHHSP will continue to horizon scan and raise concerns if they impact the process of migration.
 - If so, what involvement (if any) will the MHHS Programme have in those change processes? We will continue to horizon scan these changes and if necessary, alert the sponsor of any issues.
 - Would it be better to keep the legal text as approved but not live and have it subject to the MHS Programme's change process instead – rather than potentially having two change routes for MHHS changes? Our understanding is parties require the 'legalisation' of this text for areas identified above. This proposal would carry uncertainty risk, which is better managed, and the risk removed by making it live.
 - Is 14 weeks enough for Ofgem consultation and decision – it depends how much material there is and what feedback is being sought. The MHHSP consultation process should have identified and resolved all issue prior to the Ofgem process. This process is to enable Ofgem to fulfil its statutory obligations.
 - If the process leading up to consultation is robust and people are happy with the material approved by CCAG then the Ofgem consultation should be straightforward. Agreed. This is the plan.



- What is the process for making any changes in response to feedback received through the Ofgem consultation process? [At this stage we are not planning for additional feedback at this stage. If there is feedback, MHHSP will work with Ofgem to agree how best to address it. I expect all updates will be communicated to CCAG. It is worth noting this is equivalent to a statutory consultation, so we expect any changes at this stage would have to pass a high bar of impact.](#)

Code Drafting Resourcing Model

- Are the Code Bodies happy that they can provide the appropriate resources (not just people but people with the relevant industry and code drafting expertise) to meet this resource plan? [We have assurance they can provide the required resources.](#)
- Are the costs of these resources covered by the existing code budgets – suppliers are very concerned about being asked to provide extra funding over and above the budgets already approved (especially for the REC which requires the most resource). [I believe these costs are within existing budgets. This is the case for BSC changes. RECCo are to confirm separately if this is correct.](#)

Thanks and regards,

Paul Saker

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From: MHHS PMO <PMO@mhhsprogramme.co.uk>

Sent: 15 June 2022 15:35

To: Chris Welby (MHHSProgramme) <Chris.Welby@mhhsprogramme.co.uk>; Matt Hall <Matt.Hall@elexon.co.uk>; Lawrence Jones <lawrence.jones@elexon.co.uk>; Richard Vernon <richard.vernon@smartdcc.co.uk>; Robin Healey <robin.healey@gemserv.com>; sarah.jones@sjw-energy.co.uk; Paul Mullen <Paul.j.mullen@nationalgrideso.com>; John Lawton <John.lawton@electralink.co.uk>; Saker, Paul <Paul.Saker@edfenergy.com>; Andrew Green <greenandrewgreen@yahoo.co.uk>; Tom Chevalier <Tom.Chevalier@PowerDataAssociates.com>; Clare Hannah <clare.hannah@imserv.com>; Fungai Madzivadondo <Fungai.Madzivadondo@energynetworks.org>; Ed Rees <Ed.rees@citizensadvice.org.uk>; Andrew Margan (MHHSProgramme) <Andrew.Margan@mhhsprogramme.co.uk>; Jason Brogden (MHHSProgramme) <Jason.Brogden@mhhsprogramme.co.uk>; Fraser Mathieson (MHHSProgramme) <fraser.mathieson@mhhsprogramme.co.uk>; Lewis Hall (MHHSProgramme) <Lewis.Hall@mhhsprogramme.co.uk>; Martin Cranfield (MHHSProgramme) <martin.cranfield@mhhsprogramme.co.uk>; Miles Winter (MHHSProgramme) <miles.winter@mhhsprogramme.co.uk>; Andy MacFaul <Andrew.MacFaul@ofgem.gov.uk>; Rachel Clark <Rachel.Clark@ofgem.gov.uk>; David Gandee <david.j.gandee@pwc.com>; Richard Shilton <richard.m.shilton@pwc.com>; Keith Clark (MHHSProgramme) <Keith.Clark@mhhsprogramme.co.uk>; Rosie.Knight@gemserv.com; sarah.jones@SJW-Energy.co.uk

Subject: MHHS: Cross Code Advisory Group 22 June 2022


This Message originated outside your organisation.

Hi All,

Please note, the [Meeting Papers](#) for the extraordinary Cross Code Advisory Group (CCAG), to be held **Wednesday 22 June 2022 at 10am**, have been published on the [MHHS Programme website](#).

The meeting will be held via Teams and joining details are provided in the calendar invite. Please confirm your attendance by responding to the calendar invite if you have not done so already.

All CCAG Members are asked to review the updated Code Drafting Plan and provide feedback prior to the meeting where possible.

Code Bodies are requested to update the live  [CCAG Horizon Scanning Log](#) prior to the meeting and add any new modifications/change proposals relevant to MHHS. Code Bodies are also asked to populate any missing information such as expected implementation dates, proposer information, etc.

As always, please do contact us if you have any questions.

Kind regards,
Fraser Mathieson

MHHS PMO
Email: PMO@mhhsprogramme.co.uk

Market-wide Half-Hourly Settlement Programme

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