MHHS Cross Code Advisory Group (CCAG) Minutes and Actions

Issue date: 01/09/2022

Meeting number	**CCAG009**	Venue	**Virtual – MS Teams**
Date and time	**24 August 2022 10:00-12:00**	Classification	**Public**

Attendees

Chair	**Role**
Chris Welby (Chair)	Chair

Industry Representatives

Alex Travell (AT)	IDNO Representative
Andrew Green (AG)	I&C Supplier Representative
Ann Perry (AP)	RECCo Representative
Clare Hannah (CH)	Supplier Agent Representative
John Lawton (JL)	DCUSA Representative
Lawrence Jones (LJ)	Elexon Representative (as BSC/BSCCo Manager)
Matt Hall (MH)	Elexon Representative (as central systems provider)
Neil Dewar (ND)	NGESO Representative
Paul Saker (PS)	Supplier Representative (Domestic)
Tim Newton (TN)	SEC Representative (on behalf of Robin Healey)
Richard Vernon	DCC Representative
Sarah Jones (SJ)	RECCo Representative
Shaun Brundrett (SB)	Small Supplier Representative

MHHS IM

Andrew Margan	MHHS IM Governance Manager
Becca Fox (BF)	Code Draft Project Manager
Fraser Mathieson (FMa)	PMO Governance Lead
Nicole Lai (NL)	PMO Governance Support
Paul Pettit (PP)	Design Assurance Team
Pete Edwarde (PE)	PPC Lead
Simon Harrison (SH)	MHHS IM Design Assurance Lead su

Other Attendees

Sinead Quinn (SQ)	Ofgem

Apologies

Justin Andrews – MHHS Design Team
Matt McKeon – MHHS Design Team

Actions

Area	Action Ref	Action	Owner	Due Date
Minutes and Actions	CCAG09-01	Chair to follow-up with MHHS Testing Workstream regarding response to CH query on qualification	Chair	31/08/2022
	CCAG09-02	All Code Bodies to confirm approach to legal review of code text (e.g. will this occur during each drafting topic prior to consultation, or later, for example, during consistency review, etc.)	Code Bodies	14/09/2022
Horizon Scanning Log	CCAG09-03	BSC Representative to check whether recent BSC sandbox application affects MHHS	BSC Representative (Lawrence Jones)	14/09/2022
	CCAG09-04	CCAG to provide reminder to MHHS Design Team to resource attendance at CCAG	Chair	14/09/2022
Design Success Criteria	CCAG09-05	Highlight BSC MHHS success criteria to DAG	Programme (PMO)	14/09/2022
Code Drafting Approach Decisions	CCAG09-06	Programme to produce key code drafting dependencies relating to qualification to inform view of code drafting and text activation requirements	Programme (Andrew Margan)	14/09/2022
	CCAG09-07	Programme to update Programme plan with latest code drafting inputs through the MHHS replan activities.	Programme (Becca Fox)	09/09/2022
	CCAG09-08	Programme to engage with Ofgem regarding CCAG decision to link M7/M8 delivery to M10.	Programme (Andrew Margan)	14/09/2022
AOB	CCAG09-09	Programme to confirm where/how DIP data specification is hosted, managed, and owned.	Programme (Design Team)	14/09/2022
	CCAG09-10	CCAG members to discuss with constituents whether a pre-CCAG webinar would be of value and provide views to Programme to enable decision	CCAG members	14/09/2022
Previous Meetings	CCAG07-11	Consider the enduring referencing and hosting of design artefacts and how this should be brought into each code. Update the code draft principles for approval in July CCAG.	Programme (Andrew Margan)	20/07/2022
	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
	CCAG08-04	Meet with Justin Andrews (DAG chair) to discuss CCAG member concerns that some	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
		design artefacts are not sufficient to draft code from		
	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: 1. Whether the design will be maintained post go-live (and if so, how) 2. 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

Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC17	Minutes of meeting held 27 July 2022 approved
Items for approval	CCAG-DEC18	Code Drafting Working Group (CDWG) Terms of Reference approved

RAID items discussed/raised

RAID area	Description
Code Drafting Approach	Add assumption to RAID that code bodies will determine legal review requirements for code drafting as required for their code.

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

CCAG-DEC17: Minutes of meeting held 27 July 2022 approved

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

A further update will be provided in the next meeting.

JB noted a useful reference point for the group was the mapping of Data Integration Platform (DIP) flows and existing Data Transfer Network (DTN) flows, recently published with the design artefact release.

Action ongoing.

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

CW said the meeting had been held, but a follow-up was needed.

AM noted the importance of the design team knowing which design artefacts aren't sufficient so they can assess and address them. CW advised CCAG members to share examples of design artefacts they are concerned about, and to raise these specific examples before the consultation in September.

SJ noted their constituency had provided examples of areas where the code had resulted in difficulties, such as the lack of clarity and progression around the DTN / DIP spreadsheet. JB advised SJ to raise their constituency's issues through consultation responses.

Action ongoing.

ACTION 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.

The Chair stressed the importance of CCAG members to confirm if they wish to provide their view.

CH raised they were still awaiting a response on their comment from the previous CCAG. The Chair agreed to follow up on CH's query.

ACTION CCAG09-01: **Chair to follow-up with MHHS Testing Workstream regarding response to CH query on qualification.**

CH noted their constituency held diverse and strong views on whether they believed further qualification was required after System Integrating Testing (SIT).

CH considered the need for clarity on what qualification would entail. JB confirmed the definition would be further discussed in the Qualification Working Group (QWG) and summarised the latest elements of qualification:

1. The testing element, which is equivalent to what participants will be executing under SIT.
2. The administrative and governance element, where workflows are associated with the administration of going through qualification. This will not be done in SIT.
3. The assurance and evidence element around testing of back-office systems, which is yet to be scoped.

TC expressed SIT testing did not replace qualification testing. JB agreed and noted these discussions would be held within the QWG and any future working group related to SIT.

Action ongoing.

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

SJ posited if a consistent approach was needed, then a discussion would be necessary to confirm REC's position.

LJ noted previously, the CCAG agreed legal input would be discussed on a case-by-case basis, since some areas would be impacted more so than others. The CCAG considered the need for code-bodies to confirm this approach.

ACTION CCAG09-02: All Code Bodies to confirm approach to legal review of code text (e.g. will this occur during each drafting topic prior to consultation, or later, for example, during consistency review, etc.).

Action ongoing.

3.   Programme Updates

FMa shared updates for PSG, TMAG, and DAG. FMa noted PSG had approved a recommendation to Ofgem that CR009 be implemented.

Regarding wider Programme updates, there was significant work on the Programme re-plan, with another round of consultation to open in September. Numerous design playback sessions were taking place, and any CCAG members interested in joining were advised to contact PMO@mhhsprogramme.co.uk.

JB noted re-plan drop-in sessions had been scheduled for Thursday 25 August and Friday 26 August.

4.   Horizon Scanning Log

FMa introduced the item and invited code bodies to provide feedback on the efficacy of the horizon scanning log process. FMa noted there were gaps for both the Programme assessments and population of columns by code-bodies.

AM added this was on Ofgem's radar, as there had been criticism of CCAG, and the process was not working well.

PS noted the log was not up to date and does not reflect when end-changes are approved or rejected. They observed the log did not add value to the Code Administration Code of Practice (CACoP) Central Modification Register.

AM clarified the purpose of the process was so the Programme could be informed of any industry change that may impact the Programme and triage the changes. The process was a modification of the CACoP process for CCAG purposes.

LJ stressed the importance of code-bodies to maintain the process and revisit changes as they progressed. LJ considered if more discussion between relevant code-bodies and the Programme was needed. AM raised FMa's suggestion for the Programme to attend CACoP. LJ agreed with the suggestion, as code-bodies had to be held to account. SJ agreed CACoP would be a good session for the Programme to attend.

TC considered the reference to SCR modifications and the sandbox application from Good Energy. TC noted while it may have no reference to SCR impact, the sandbox application was affected by MHHS, resulting in the sandbox becoming irrelevant. LJ replied there would be consultations on sandboxes where feedback should be given and took an action to follow up on this.

ACTION CCAG09-03: BSC Representative to check whether recent BSC sandbox application affects MHHS.

JB noted the sandbox application and its impact on MHHS had been fed into the Programme for further consideration.

Regarding the Horizon Scanning Log process, TC noted P432 had been rejected by the panel yet there were no updates on the log. TC wondered at what stage should the CCAG consider this and the implication for MHHS. AM replied internal monitoring was fed in through design work. The Chair noted they are in discussion with Ofgem about P432 and are looking at potential options.

AT expressed surprise that P432 was not on the CCAG agenda, as they assumed CCAG was the group to discuss such issues. LJ noted the panel recommended rejection.

Following AT's point, AM noted the importance of Design to be on CCAG calls, as areas such as P432 needed updates. AM summarised when there is a new change raised under a particular code area, that change must be presented by the code body and the code body should explain how this change impacts the Programme. The triage findings of that change should then be presented to the group.

CH considered how the views of the Programme were represented in the consultation process. AM confirmed the consultations were open. The Chair noted Programme representation would be especially important once the design is baselined.

SJ considered the role of the Programme's governance groups. The Chair noted the CCAG would work with the design team to triage changes, and a design team member would need to attend Mod groups since they understand the consequences of certain changes. AM considered the technicality of certain changes and the need to involve Design CCAG meetings moving forward to provide insight into these changes.

ACTION CCAG09-04: CCAG to provide reminder to MHHS Design Team to resource attendance at CCAG.

5. Design Success Criteria

JB introduced the item and reviewed the approved set of criteria that Design Advisory Group (DAG) would assess ahead of M5. As code bodies were required to deliver the code drafting, and confidence is needed to ensure design transition, a CCAG meeting would need to be held ahead of the DAG meeting on M5.

TC shared the MHHS success criteria published by the Balance and Settling Code (BSC) as referenced in the digitised code. TC recommended the DAG should refer to the BSC criteria, to the agreement of the CCAG.

ACTION CCAG09-05: Highlight BSC MHHS success criteria to DAG

LJ asked if there would be an equivalent set of criteria for code-drafting ahead of sign-off. AM and JB noted this was on the roadmap. The planned activity was to deliver a set of documentation and artefacts on the approach to code-drafting, so there is a set approach to take into the code-drafting process itself.

6. Code Drafting Approach Decisions

AM provided updates on several code drafting areas, opening the floor for discussion and feedback from the CCAG.

Prototyping

AM noted the code-drafters had put a plan together to prototype how they will conduct code-drafting. The decision on how, and if, they would use iServer for design artefact hosting is key to mobilisation.

AM noted they would bring any findings back to the CCAG

Legal text activation

AM noted the L3 Plan of Consultation states the code-drafting delivery (M6) would be complete before qualification starts. They have received feedback that it does not need to go in as early as planned, which results in the following two model options:

1. Code-drafting delivery should be done as early as possible.

2. Code drafting delivery should be done as late as possible.

AM noted, as long as CCAG had approved code documents and it was sat under Programme governance, then other code does not need to be in place until M10 and participants can commence internal activities. Since this would fall under the second model of code-drafting being delivered at the latest opportunity, this would feed into replan opportunity and require a change to the code drafting plan.

AM opened the floor to CCAG members to advise when they believe the text should go into the code.

PS noted the view of their constituency was if it was baselined by CCAG and had stability around it - there would be no benefit to bringing the code-drafting into effect prior to qualification. Bringing it in early would create risk since it would be out of the control of the Programme. AT agreed, stressing the need for participant visibility and clarity within the change process.

AT considered what constitutes qualification, as previously, it had focused on the BSC process. AM replied this comes back to discussions that need to be had in the QWG. There would need to be approval of qualification prior to migration.

LJ noted more detail was needed for the code-drafting options analysis before they could decide what code documents had to go live and when. AM thanked LJ for the prompt and noted they would take an action to follow this through.

ACTION CCAG09-06: Programme to produce key code drafting dependencies relating to qualification to inform view of code drafting and text activation requirements

Code drafting from artefacts outside the baseline design

CH considered the nature of complicated change within the industry and the inevitability of gaps when working on design and implementation system. AM noted the importance of building against design baseline, and a formal change should be raised if there is a flaw in the design.

CH considered the difficulty of visualising qualification without a time scale. Since changes are constantly happening in the background, CH raised the question of what criteria participants should qualify to for the design baseline. The Chair replied they hope to mitigate changes, but testing raises challenges, which is why it is so important for participants to review the design.

ACTION CCAG09-08: Programme to engage with Ofgem regarding CCAG decision to link M7/M8 delivery to M10.

SJ considered the importance of transparency in the change process given DAG is a closed group. SJ noted the key topic of entry gates to qualification and the need for design stability so changes would come through SIT and any testing issues are considered and reflected. JB replied they are taking all this into account, but a definition of enduring governance design approach is still in progress.

JL asked for clarification on M8 and M10 delivery dates. The Chair replied M10 is the start of migration.

SJ noted they would like to start co-drafting as soon as possible.

On Option 2, AT noted the longer the period is, the longer consequential change and other codes would have to be kept up to date. AM said this is their biggest concern with Option 2, which is why post M-5, it is crucial the CCAG horizon scanning process is monitored and managed effectively.

CCAG members collectively agreed Option 2 was the preferable approach.

The Programme agreed to explore the enduring solution for hosting design artefacts after the Programme.

ACTION CCAG09-07: Programme to update Programme plan with latest code drafting inputs through the MHHS replan activities.

7.   RAID review

FMa reviewed the item and noted the RAID review was a live, dynamic document that is continuously updated.

JB encouraged CCAG participants engage with the RAID review and dPMO tool.

FMa reviewed the RAID Log Input Form: a single point of entry for CCAG participants to update RAID items in the log.

8.   dPMO tool

FMa introduced the item and demonstrated where to find the tool on the Collaboration Base. Any CCAG members requesting access were encouraged to contact PPC@mhhsprogramme.co.uk.

FMa illustrated the risk dashboard specifically, demonstrating how to filter the items to view the most pertinent risks.

9.   CDWG Update

AM said the co-drafting work was yet to start and recommended to stand down the September CDWG. The group agreed.

Regarding the latest ToR updates, the group reviewed the comments. CH queried the use of the word 'may' to the CDWG's obligation to review code. The group agreed to change the wording to 'shall' and decided to approve the ToR.

10.   Summary and Next Steps

FMa summarised the meeting actions as per the table above.

AM provided an overview of upcoming agenda items for CCAG.

LJ queried about the DIP having its own data specification, considering where it would sit and how this decision is being made. The Chair took an action to confirm this.

ACTION CCAG09-09: Programme to confirm where/how DIP data specification is hosted, managed, and owned.

JB noted DIP would implement what had been set out in design.

LJ asked where the DIP's data spec would be held and where this is being decided. JB said this should be flushed out in prototyping activities.

LJ asked if this would be a CCAG or a Design decision. The Chair replied DIP governance would sit under enduring service operators.

The Chair noted PSG had asked whether L3 groups should have a pre-meeting webinar, in the same way PSG does. The Chair took an action for CCAG members to consider this with constituents.

ACTION CCAG09-10: CCAG members to discuss with constituents whether a pre-CCAG webinar would be of value and provide views to Programme to enable decision

Date of next meeting: 28 October 2022