

MHHS Cross Code Advisory Group (CCAG) Minutes and Actions

Issue date: 02/11/2022

Meeting number **CCAG011**

Venue

Virtual – MS Teams

Date and time **26 October 2022 10:00-12:00**

Classification

Public

Attendees

Chair

Chris Welby (CW)

Role

Chair

Industry Representatives

Andrew Green (AG)

John Lawton (JL)

Jonny Moore (JM)

Lawrence Jones (LJ)

Paul Mullen (PM)

Paul Saker (PS)

Sarah Jones (SJ)

Tom Chevalier (TC)

I&C Supplier Representative

DCUSA Representative

Elexon Representative (as central systems provider)

BSC Representative

CUSC Representative

Domestic Supplier Representative

RECCo Representative

Supplier Agent Representative (Independent Supplier Agent)

MHHS IM

Andrew Margan (AM)

Becca Fox (BF)

Fraser Mathieson (FM)

Kevin Spencer (KS)

Jason Brogden (JB)

Martin Cranfield (MC)

Paul Petit (PP)

Simon Harrison (SH)

Governance Manager

Code Drafting Project Manager

PMO Governance Lead

Design lead

Industry Expert

PMO Governance Lead

Design lead

SI Design Assurance Lead

Other Attendees

Andy MacFaul (AMF)

Ofgem

Observers

Gemma Dixon

Shaun Brundett

Terri Hamilton

RECCo

ESG Global

SSE

Apologies

Clare Hannah

Stuart Scott

Tim Newton

Supplier Agent Representative

DCC Representative

SEC Representative

Actions

Area	Action Ref	Action	Owner	Due Date
Minutes and Actions	CCAG11-01	Share the mapping of design artefacts to code drafting and the process for tracking which artefacts have been translated into code. Share the level of detail artefacts will be tracked at (e.g. document, paragraph etc). Consider how consequential change design artefacts will be included in this (<i>subject to RECCo Change Request</i>)	Programme (Becca Fox)	23/11/22
Horizon Scanning	CCAG11-02	Raise at TMAG supplier concerns on new export MPANs and confirm how suppliers will be mandated on import/export MPAN transfers	Programme (Chris Welby)	16/11/22
Regulatory Code Freeze	CCAG11-03	Summarise the proposed approach for a regulatory code freeze. Review with code bodies and then bring back to CCAG	Programme (Andrew Margan)	23/11/22
Delivery of M7/M8	CCAG11-04	Provide a view on which elements of code drafting may be required to be brought in ahead of M10	Programme (Jason Brogden)	23/11/22
Previous Meeting(s)	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	17/08/2022
	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 (Andrew Margan)	17/08/2022
	CCAG09-01	Chair to follow-up with MHHS Testing Workstream regarding response to CH query on qualification	Chair	31/08/2022
	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
	CCAG09-09	Programme to confirm where/how DIP data specification is hosted, managed, and owned.	Programme (Design Team)	14/09/2022
	CCAG10-03	Programme to discuss when settlement timetable drafting should be undertaken with MHHS Design Team, Elexon, and RECCo	Programme (Andrew Margan)	26/10/2022

Decisions

Area	Dec Ref	Decision
Minutes	CCAG-DEC21	Amended minutes of CCAG meeting held 28 September 2022 approved
M5 Success Criteria	CCAG-DEC22	The CCAG approved the two CCAG M5 Success Criteria as input to the M5 decision at the Design Advisory Group (DAG)

RAID Items

RAID area	Description
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No new items raised. Updates were provided on items in the CCAG Horizon Scanning log, some of which are managed via the Programme RAID management framework. The CCAG also discussed the dependency between M7, M8 and M10.

Minutes

1. Welcome

The Chair welcomed attendees to the meeting and outlined the meeting agenda.

2. Minutes and Actions

FM noted a change-marked version of the minutes of the meeting held 26 September with updates from RECCo had been shared with the meeting papers.

CCAG-DEC21: Minutes of CCAG meeting held 26 September 2022 approved

FM provided an update on the actions as per the slides. The following actions were discussed in further detail:

CCAG07-11: FM invited views from CCAG members to confirm the action could be closed. TC agreed with the update, noting process diagrams were no longer in the BSCPs and process diagrams may be used to deliver code drafting but may not end up in the code itself. CW responded that how this would be delivered would be addressed during drafting. LJ queried what would be used to map design artefacts to code to demonstrate to CCAG what design artefacts had been translated into code drafting and what level of detail would be used (e.g. document, paragraph, sub-paragraph), as this would be key evidence to show that the design had been satisfactorily discharged into code. BF responded that design artefacts would be tracked throughout drafting and that this could be shared.

ACTION CCAG11-01: Programme to share the mapping of design artefacts to code drafting and the process for tracking which artefacts have been translated into code. Share the level of detail artefacts will be tracked at (e.g. document, paragraph etc). Consider how consequential change design artefacts will be included in this (*subject to RECCo Change Request*)

CCAG08-01: TC noted the question for this action was broader, including how the design work-off list would be captured (e.g. consequential changes and how ambiguities found through code drafting would be managed). There would need to be a clear process for tracking any changes to the baseline after M5 and its impacts on code drafting, particularly given the volume of change likely after M5 with large volumes of people reviewing the design. CW responded that changes would go through the change control process. FM confirmed that the formal change control process would be used and that a further post-M5 change process would be put in place on top to manage design change (including smaller changes). More information on this would be shared soon. TC noted they had concerns on this process. FM responded that TC should await the full process as this would provide confidence. SH added that there was a change process under development and that further information would be shared over the coming weeks, including via a dedicated webinar. CW proposed bringing this item back to a future CCAG, should the webinar not provide clarity.

CCAG08-07: LJ noted the BSC had done some further thinking on the enduring hosting of the design, adding that conversations were ongoing and no agreement had been made. The BSC did not see huge value in maintaining the design artefacts post-go live but welcomed feedback from industry. If the BSC were to maintain the design after go-live, there would be questions to answer due to the E2E nature of the design (e.g. on operations and resource) and, if the design artefacts were being incorporated and discharged through legal documents, the value there would be in maintaining the design artefacts on top of the legal baselines.

CCAG09-06: AM noted they wanted to keep this action open until the consequential change agenda item had been closed.

CCAG09-09: FM noted the action had been updated in a new version of the papers which were now available on the MHHS website. JM queried the reference to BSC Issue Group 101, as it was unclear why this was referenced. AM responded this was added to provide visibility on Data Integration Platform (DIP) discussions and the issue group. TC noted the transition from the data transfer catalogue to EMAR would create challenges with step changes for things like data definitions and multiple transfers over the code drafting and go live periods. SJ responded that the expectation was for this to be delivered in code drafting – the Programme would define the interfaces in the design and these would be managed via Programme change control, and code bodies would discharge this in code drafting. Any issues with things

like interfaces would be ironed out through the design process. TC noted it was important for definitions for interfaces to be clear.

CCAG10-03: AM noted they intended to have an answer on this action for November CCAG.

3. Programme Updates

FM shared a short update on wider Programme activity, noting SEC MP162 was being discussed at the Programme Steering Group (PSG) and Design Advisory Group (DAG) and that upcoming decisions were planned on moving to Round 3 of consultation on the Programme replan and for the M5 design baseline.

4. Horizon Scanning log

FM introduced the item noting it would be run slightly differently to previous meetings with code bodies providing their own updates against their slides as submitted.

SEC updates

FM noted apologies from the SEC Representative and that the key update was on SEC MP162. The modification report was due to go to change committee last week, with the SEC change panel taking place at the same time as CCAG (and being attended by the Programme). The Programme had provided a consultation response.

PS queried export MPANs and Ofgem's decision on the MHHS Target Operating Model (TOM), noting this currently was not to be settled under MHHS. PS queried if there was anything that would require suppliers to register new export MPANs and what would enact this obligation on suppliers, as it had not been clear if this would be a requirement under MHHS and where the mandate would be delivered. PS noted the Ofgem decision document said Ofgem would 'help'. PS had not seen a response from the Programme since this was shared. AMF noted they would review the position with Ofgem colleagues. TC added they had raised this at the Migration Working Group (MWG) and that it seemed the Programme did not have a clear position. CW proposed taking this to the Testing and Migration Advisory Group (TMAG).

Action CCAG11-02: Programme to raise at TMAG supplier concerns on new export MPANs and confirm how suppliers will be mandated on import/export MPAN transfers

TC queried if modification DP206 was required and where this was in relation to the MHHS TOM - was it worthwhile to make this change as it would be subsequently resolved via MHHS? JM responded that the intent was for a generator to register export MPANs using existing processes. The detail behind this was still to be discussed and there would be an impact across lots of codes. The modification may not be progressed, and part of the assessment was to determine if this should be included in MHHS. JM added that the modification proposer wanted to be able register MPANs. CW thanked those for their comments noted this would continue to be managed through the Horizon Scanning process.

DCUSA updates

JL provided an overview of the DCUSA changes as per the slides (noting this update was not shared last month). On DCP328, this was being discussed on 28 October 2022 and an update could be provided at CCAG in November. DCP411 was a new change that would impact the Data Integration Platform (DIP) flows. JL queried if the DIP flow and related design artefact were going to be amended to reflect this change. JL added that a new change DCP414 would be coming to CCAG next month – this would support P432. KS noted that relevant design artefact had been adjusted to account for DCP411.

REC updates

SJ explained that on modification R32, the code manager had been struggling to justify the change. RECCo were awaiting clarity on MHHS data cleanse activity and roles and responsibilities. The decision on the change had therefore been deferred. On R34, this was linked to SEC modification MP162 for the process for ERDS to notify the CSS of new data retrieval and onward flows to the DSP. This was due for industry consultation and impact assessment and would go for decision in early December. SJ added that R34 was inconsistent with the design artefacts, and that RECCo were concerned that the design artefacts may be baselined without adjusting them for R34. RECCo were taking this to the upcoming design discussions for clarification. CW queried where the mandate for export sites would be and if this was

R65. PS responded that this was not the case – R65 had come from a BSC issues group on making current export processes work more effectively.

FM noted that all changes submitted had been updated to the Horizon Scanning log and that some had been impact assessed by the MHHS design team. New items would be triaged by the design team. FM invited questions.

KS queried if the count of de-energised MPANs on the DUOS response was a count of all de-energised MPANs for which ECS had registration data, or only a count of those where actual data was submitted. JL responded it was all MPANs de-energised but also traded. KS confirmed this had been captured in the design (where ECS had received actual data on a de-energised site).

5. Regulatory Code freeze

AM noted this item was a request from Ovo and the Programme had agreed to discuss at CCAG. AM summarised the item as per the slides and explained that they wanted the CCAG's views on how a code freeze may be managed, how long a freeze may be and what the impacts may be. AM provided an overview of the code freeze approach from the Faster Switching Programme (FSP). PS added that this was about how industry may manage and limit change and make changes at the most appropriate time when getting close to go live. Wider changes may have broader impacts and a freeze may help with things like version control of baselined code and managing change implementation. The freeze may include pushing changes to the design until after go live and would help mitigate the impact on parties of change during the freeze window. PS invited feedback from code bodies.

SJ noted that RECCo would have an open position as per the FSP and requested that this was fed into the code managers consideration of Change Requests. RECCo did not have a hard position on a code freeze – the SCR allowed for open considerations to be considered. LJ noted that from the BSC perspective, the BSC needed to go to Ofgem to get a view whether the modification fell under the SCR. This did not apply to CPs and it would be up to the BSC to discuss this with the raiser and deliver the right decisions/outcomes through the consultation process. On a BSC code freeze, the BSC would be nervous to do a full freeze as not all of the BSC was required for MHHS and therefore it may not be right to stop changes on other areas. LJ added that there would be a natural 'cool down' period and that it was important for the horizon scanning process to apply proper scrutiny and forecasting.

TC noted that they agreed with PS's comments and that they could see the logic of a code freeze as it would be challenging to track all of the changes at the time of go-live. TC added that constraining unnecessary change would help with Participants managing wider industry challenges. Code bodies would need to consider how the SCR would work in practice (e.g. where impacts fall). LJ responded that when a modification was proposed, there were sections for SCR impacts. FM added that SCR impacts were in standard templates for all codes.

SJ noted a difference between a regulatory code freeze and not allowing changes to be raised. SJ felt this was different to the need for a design freeze – this would not be a regulatory freeze but a point for participants to have stability on what was to be in MHHS and what would be left for after go-live. PS responded there were three things: the process for raising changes under the SCR before and after go live, and also a period between any changes and go-live – this was due the complexity of implementation by industry, and therefore the need to maintain baselines during implementation.

AM summarised that the CCAG could request a 'code cool down' for a higher threshold for codes to be implemented during a period, but that the CCAG could not instruct a code freeze (this would need to be a request by Ofgem). CW agreed this would be the case, given Ofgem's role in approving changes was outside the CCAG's powers. CW added that this would be for code bodies to manage. AMF responded that they agreed there was a logic behind the proposal and that they needed to talk to their colleagues from the FSP to understand the approach and any learnings.

JL added that DCUSA had no rights to raise a Change Request and would require an Ofgem direction. JL queried if a design freeze was specific to the Programme or anything to do with code impacted changes, and therefore that the Programme could only propose a design freeze for the Programme's design. AM responded that this approach only applied to the FSP design, and therefore the Programme change process may allow for a control on this. PS added that the concern was for wider changes outside of MHHS and their impact on bandwidth – PS did not want to necessarily restrict all change but that there needed to be a consideration of risk for overall change and the implications for Participants. Changes in baselines would create challenges when the baselines were being implemented. PS suggested

'raising the bar' on changes (rather than stopping them all altogether) to push unnecessary changes until post go-live to de-risk this period. JL responded that this was in industry's own gift to manage by not raising changes themselves.

ACTION CCAG11-03: Programme to summarise the proposed approach for a regulatory code freeze. Review with code bodies and then bring back to CCAG

6. Delivery of M7/M8

JB introduced the item and noted that the CCAG had concluded in September that M8 should be aligned with M10. The Programme has since discussed the implications of this alignment and what it would mean for code releases. This could either mean an extraordinary code release or aligning the release of MHHS codes to a future date. JB advised discussions had found this was consistent with FSP, but that the Programme may be a need to look at enforcement options around getting parties onboard. JB noted a REC sequential release had been used to build powers around FSP and asked if the same was needed for MHHS (e.g. to give ePAB faith on requirements for qualification and the approach implementation).

The CCAG concluded that the alignment of M8 and M10 should still hold and to continue with this as the assumed position, but that there may be a need to look at code items which may need to come in earlier. TC noted they would appreciate early sight of which things could be required to come in early (e.g. qualification regulations for PAB).

ACTION CCAG11-04: Programme to provide a view on which elements of code drafting may be required to be brought in ahead of M10

7. M5 Success Criteria and Prototyping report

JB introduced the item and thanked SJ and MH for their work on testing whether design artefacts could be translated into code through the recent prototyping activity. JB noted a second sprint (Sprint 2) prototyping activity would now look at how we use prototyping to better inform the code drafting approach.

JB provided an overview of Sprint 1 prototyping activity. Sprint 1 had demonstrated that the design artefacts could be translated to code. Elexon had completed SDS while the REC had done MDS. Elexon had also looked at whether iServer could be used for the baseline for code drafting. In general, the conclusion was that iServer could not be used as a defined enduring governance baseline for code drafting for issues including the need to make the tool industry approved and legally enforceable for drafting (which would take considerable time) and that using iServer would be a big change to the way the legal baseline is currently defined. JB added that there could be some merits in using iServer, but the Programme was now not intending to use it as part of code drafting for the enduring code baseline.

JB noted that the positive from the prototyping activity was that the design artefacts were fit for translation into code.- the conclusion was that the design as set out can be drafted into code and provides a solid and firm set of artefacts to guide the code drafting processes. JB added that the prototyping exercise was a narrow but deep exercise – it did not cover the full breadth of design artefacts but an appropriate sample. The exercise did highlight some comments on the design and these were raised into the dissensus process. The key output of this process was that it supported the CCAG M5 Success Criteria to be input into the M5 decision at DAG on 31 October.

WF summarised that the approach to design translation to code drafting works and that the Success Criteria acted as a control for when code drafting commences. The M5 Success Criteria for approval today had been suggested by the Programme (not DAG/CCAG specifically) and was in place to avoid the worst case of fundamental flaws in the ability to draft code from the design.

The Chair summarised that while not that all design artefacts and drafting was guaranteed, the sample did shows that the process can work and that there were no fundamental issues with the design artefacts.

TC noted there were points raised by SJ into design process and queried if the samples used in prototyping were representative. TC had reviewed the REC outputs and noted there seem to be assumptions in this, and wondered if the Programme had found the same in something more complex than changing SDS. TC added they were conscious that the Programme would have certain views given their ownership of the design development, and noted they believed SJ's view may be more representative. TC added that overall the approach did demonstrate that code can be drafted from

artefacts, although there may be ambiguities in the baseline demonstrating the importance of the post-M5 design change process.

SJ advised the prototyping completed by REC had resulted in assumptions to be picked up with design. Whilst the BSC SDS drafting was wholly new, REC's had been more of a lift and shift. This meant that REC comments/ clarifications were higher than if they were augmenting an existing service.

JB referred to TC's point on a disclaimer about prototyping and agreed the post-M5 change process would be vital (and that the Programme was ready to take this on). JB added the important point was that code can be drafted from the design artefacts, and that there was agreement that it was very likely queries on the design would come up from design and build.

WF noted the 'M5 Success Criteria' process had been a control and that the Programme could have been more specific with criteria in hindsight. None-the-less it was an important criterion as it had prompted testing and cleared concerns.

SJ noted they agreed with WF's position. Prototyping had demonstrated in principle that code drafting was possible, although there were other areas which were design-related and may be troublesome. The resolution of design comments and relevant work-off plans was important. The prototyping highlighted that design artefacts can be translated into code, although it did not give the full view of all changes required for MHHS.

PS noted discussion with their constituents and that it was useful to see the output of the prototyping exercise. A concern was the code drafting may be different from parties' interpretation of the design, and that there were still issues to resolve. This was not something that would prevent agreement against the M5 Success Criteria. PS noted there may be risks of having to build twice if code drafting was any different to Participant's interpretation of the design.

The Chair asked for a decision on whether the CCAG approved the two M5 success criteria

In favour: SJ, LJ, PS, TC, JM, JL, AG

Against: None

Abstain: None

DECISION CCAG-DEC23: The CCAG approved the two CCAG M5 Success Criteria as input to the M5 decision at the Design Advisory Group (DAG)

8. Consequential change Code drafting approach

JB introduced the item as per the slides, noting broader conversations had taken place with the Programme and Programme Participants and that the Programme were looking to make efficiencies while protecting Programme scope. The intention was to provide a clear position at CCAG on consequential change and Programme scope while looking for alternative approaches to support efficiencies for industry as a whole. JB noted the approach had been developed working with RECCo. JB explained that the current CCAG scope was to translate the MHHS Programme Design baseline into code and that the CCAG was not there to make decisions or approvals for design or code drafting outside the Programme TOM. JB noted the Consequential Change Impact Assessment Group (CCIAG) was a discussion forum and not a decision-making body nor governance forum for external consequential change.

JB talked through the process map for delivery of the MHHS design and subsequent code drafting within the scope of MHHS as per the slide. This included the process for developing and approving the MHHS Design from the TOM, and then developing and approving subsequent code through the CCAG.

JB talked through the process map for the current process for delivery of consequential changes that sat outside the scope of the TOM. JB noted consequential change meant any change required for the delivery of MHHS that sat outside the Programme TOM. Code bodies would be required to develop and approve the designs for their consequential changes and then develop and approve the code for them through usual code governance (and not the CCAG). The Programme would monitor consequential change activity and require it to be delivered against Programme timescales, but delivery was not an MHHS responsibility (neither the design solution, the translation into code, or the release into the code). The assumption had always been that the Programme would monitor (e.g. via the Programme's RAID management framework). JB noted the consequential change process introduced risks for delivery as activities would occur in parallel (MHHS design code drafting and consequential change code drafting) before coming together at M8 (risks such as management of parallel baselines and separate governance routes).

JB talked through the process map for bringing code drafting of consequential changes and the MHHS Programme design together. This would ensure a consistent and coherent picture of code change for the period following approval of the MHHS baseline design, with a single code drafting approval body. Changing the approach would mean CCAG take on additional responsibility for approval of both the MHHS design and any design approved via code governance for consequential changes. This would be an increase in the scope of the Programme to include consequential change drafting and for CCAG Terms of Reference (ToR) to approve drafting of the design solution approved by external code bodies. JB invited SJ to comment.

SJ noted that RECCo were creating a Change Request (CR) to implement the proposal presented by JB. The CCAG did not currently cover the approval process for drafting outside the scope of the Programme. SJ noted they had previously assumed this was how the code drafting process would be working, given the plan shared previously via CCAG containing elements of consequential change. The CR would make it clear what text is being produced in the drafting process and mean there was a single set of text being produced under MHHS.

AM noted a recommendation for the Programme to set up a process to highlight what consequential changes there were and then to track these through code drafting (to make it visible for industry members). **See action CCAG11-01**. SJ noted this traceability had been included in the CR.

TC agreed with the approach and noted that the definition of consequential change should be changed to be anything outside of the scope of the baselined design at M5, as this would make it clearer for participants. TC queried whether 'consequential change' was broad enough, given that there would be other changes outside the TOM between drafting and implementation that would need to be kept up to date in the code accordingly.

PS approved of the approach to bringing the code drafting together in a single place, noting this would be supported by suppliers. JM added there may be another type of consequential change that may not fit this process and would have to go via the usual code governance processes, but was supportive of the approach for the type of consequential change discussed.

JL was also supportive of the approach and queried the approach to approving the design for consequential changes. JB confirmed this would need to be via existing code governance processes – code bodies would still need to baseline their own consequential change designs to then go into the CCAG process for code drafting and approval. JL responded that this would be cutting existing code body processes mid-way and may not work for all code body governance processes - a different approach may need to be considered to consequential change designs in some circumstances.

JL added a further concern that they believed the Programme Steering Group (PSG) did not have sight of this. JB responded that it was up to RECCo how the content discussed today was translated into the CR and that the CR would go to the PSG for decision as it was a change to the governance framework.

SJ noted the diagrams presented in the CCAG pack did not apply for all code bodies for how consequential change designs were approved and hence the diagrams were not included in the CR. SJ added that the aim was for the CR to go through Change Board and to PSG as soon as possible.

FM noted feedback from Clare Hannah offline. Clare's opinion was that the Programme should look to avoid scope creep and ensure anything outside the MHHS design baseline is managed outside Programme. Clare also queried how the consequential change content should be managed and prioritized against the Programme's priorities.

CW summarized that the CR should now be updated following the conversation at the CCAG and that the next step was for this to go to Change Board ahead of going to PSG. SJ noted that they thought the CR had already been raised to Change Board and this would be clarified offline.

9. CDWG update

FM shared that some agenda items (e.g. the code draft prototyping report) had been proposed for the November Code Draft Working Group (CDWG) and queried if CCAG members wanted a meeting. Several members were supportive of a November CDWG. TC asked that expected deliverables in the code workstream from January could be added to the agenda.

10. Summary and next steps

FM noted four actions from the meeting. CW thanked attendees for their contributions and closed the meeting.

Date of next meeting: 23 November 2022