

Headline report

Meeting name	Code Change & Development Group – MHHS SCR	Purpose of paper	Information
Meeting number	17	Classification	Public
Date and time	18 May 2021		

Synopsis **Summary of the seventeenth CCDG meeting and actions arising**

1. Introduction, apologies and meeting objectives

- 1.1 The Chair introduced CCDG17 and confirmed those in attendance.
- 1.2 The Chair confirmed that the meeting objectives were to:
 - Discuss and agree the approach to the legal drafting.
 - Look at the skeleton consultation document and agree transition deliverable plan.
 - Provide an update on areas discussed by the CCDG Subgroup.
 - Review the outstanding actions from the Actions Log.
 - Discuss how the approach to Export Settlement will be progressed.

2. Updates on other SCR work streams

- 2.1 The Ofgem representative noted that Ofgem's Final Business Case was published on 20 April 2021 along with the approval of BSC Modification P413 placing Elexon as the Senior Responsible Owner (SRO) for the project. She also added that Ofgem also published a consultation on MHHS Implementation and Governance Arrangements outlining assurance principles as well as rules and responsibilities Ofgem will be undertaking; the consultation closes on 25 June 2021 and Ofgem is currently carrying out stakeholder engagement and various forum groups.
- 2.2 The Ofgem representative also noted that cost recovery for implementation of MHHS would be via a BSC obligation placed on Suppliers.
- 2.3 The Ofgem representative informed that Ofgem has issued a letter to DCC prompting them to raise the respective changes to the SEC to implement the MHHS TOM. A draft modification can be currently found on the SEC website.
- 2.4 It was also noted that a webinar was held with regards to the AWG consultation which closes on 24 May 2021.
- 2.5 Elexon added that, alongside the MHHS Programme, it has launched the BSC Central Systems Development which consists of a separate piece of work within Elexon. This project has a relatively busy timetable and the team is currently working on the Load Shaping Service (LSS), REC baseline documents and reviewing the MRA matrix. A CCDG member asked for more clarity around this piece of work Elexon is undertaking. The Ofgem representative explained that there are different roles for Elexon under Ofgem's selected governance framework; Elexon will have to create a separate Programme Management function for running the MHHS Programme and also fulfil its responsibilities as the BSCCo to make changes to its systems as a programme participant. She confirmed that delivery of Elexon's activities with regards to BSC central system developments will report to the Programme.

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3. Legal drafting and discussions on approach

- 3.1 Elexon noted that BSCP501 was omitted from the slides with regards to drafting Code Subsidiary Documents (CSDs) and Business Requirements.
- 3.2 A CCDG member asked whether there would be two drops of drafting i.e. one drop related to the registration data and another one with regards to appointment. Elexon advised that it will be working on these simultaneously with particular focus on changes to BSCP501 and materials from CSS go-live in order to move to the REC baseline. The same CCDG member asked about the associated planning and timelines of this project. He also pointed out that the industry should be able to follow this plan and see and comment on the work being done. Elexon advised that there is a plan and that changes should be visible on the CCDG MS Teams area once completed, however, for the overall changes there would be a need for industry consultation. The same member also asked whether any REC metering changes will be done according to the REC schedules. Elexon informed that it will look into metering related documents (e.g. BSCP504) and at Issue 91 which is currently running.
- 3.3 Another CCDG member asked about any related changes on the Service Description documents for BSC Central Services (BSC Agents). Elexon noted that changes will be made to those once changes in BSCPs are completed.
- 3.4 A CCDG member asked whether a baseline would be set for BSCP changes until April 2022. Elexon advised that as there are a lot of internal discussions of how the legal drafting will interact with the MHHS Programme, the plan will become clearer once the programme is mobilised. It added that the plan will require aligning with Ofgem's targets and milestones as well as internal organising and sequencing of tasks and that it should be able to bring something at the next CCDG meeting in June.

4. Transition deliverable plan

- 4.1 A CCDG member asked whether the BSC PAB had a chance to review the Assurance section strawman and offer its opinion. Elexon noted that a lot of the principles that informed the thinking around the strawman are consistent with what the PAB is already aware of; in addition, Elexon's Head of Assurance has been involved with the strawman drafting and he will be bringing additional information at the upcoming PAB meeting on 28 May trying to address any concerns. The level of detail on Assurance in the consultation will be sufficiently high level so as not to prejudice or constrain the development of individual techniques over the next six months.
- 4.2 Elexon noted that it will upload the consultation template form on the CCDG MS Teams area.

5. Update from the transitional subgroup

One-way gate

- 5.1 A CCDG member expressed his concerns to the Ofgem representative about creating a two-way gate. He noted that this will be burdensome for industry participants to build systems to cope with that. The Ofgem representative said that the one-way gate period could be three months and only for the Smart/Non-Smart segment but it could take longer for more complex qualification processes. She also noted that the reverse migration procedure is in place due to some potential complication in meters hence allowing more time to migrate. The CCDG member suggested that practices should be in place to ensure meters work effectively with not having to reverse them. The Ofgem representative advised that if a party agent has not qualified by the set date then they will not be able to take on any new customers; for example, the reverse migration period could reverse meters should a change of Supplier occurs within the three months. She added that Ofgem does not want to encourage any reverse migration to happen but that period is there to try and balance risks and make the process as flexible as possible without restricting competition; Ofgem is open to any suggestions and arguments about this.
- 5.2 Elexon said that when registration data items change from the old to the new world, some legacy fields are repopulated; however, if an MPAN moves back to the old world then it could become messy. Elexon and the

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group agreed to build some arguments to put forward within the transition consultation. The Chair confirmed that the subgroup discussion continues.

Change of Supplier

- 5.3 Elexon pointed out that Change of Supplier (CoS) should be a cross-code matter as part of the MHHS Programme as changes in one code could impact Settlement; this should then enable the creation of a cross-code workgroup. A CCGDG member added that Supplier readings is something that gets disputed and that discussion about the various impacts of this could be useful. He also noted that the cross-code workgroup should explore the impact on retail/consumers. Elexon said that discussions about the impacts on consumers sits more with REC and REC Parties and that it will keep monitoring this process. Another CCDG member suggested that CCDG should be clear about CoS from a settlements point of view, and make it clear to Suppliers what data would be available to them so that they could make progress towards a solution for billing issues.

Metering roles

- 5.4 A CCDG member pointed out the Qualifications workbook on the Elexon Portal and noted that previous conversations about this matter indicated that there are two codes about the metering roles i.e. one for MSS and another one for MSA relating to qualification. Elexon added that the Portal also accommodates the CT attributes and recorded demand. The same CCDG member also noted that MSS appointment from Smart Meters would be acceptable but not from CT and suggested to include a table in the consultation document to show this. Elexon noted that a new ISD table will be set which will map the MOA MPIDs to the Market Segment Indicator.
- 5.5 A CCDG member said that that the Change of Meter/Change of Market Segment process is simpler if you have one MOA who is qualified in both segments as there will not be a need to deal with pending appointments. Another CCDG member noted that there is a trade-off with validating appointments. Elexon agreed that arrangements are needed for change of segment procedures.. Elexon also advised that instead of introducing new Market Roles for the MSA and MSS, a new ISD table could be created with the Market Segment Qualification held as an attribute of each Metering Service MPID. This could achieve the same effect by providing a list for the Registration Service to use to validate appointments, but without the impact on Supplier systems and potentially the REC of having to account for new Metering Service Market Roles.

Consent Granularity and access to Data Framework

- 5.6 Elexon confirmed that this item is included on the Outstanding Requirements list with Suppliers updating the new registration items.

Data for Supplier Demand forecasting

- 5.7 A CCDG member commented that there would not be any EACs from Settlement for forecasting and that those would be received from Suppliers. He also added that the lack of SSCs and profile classes means that all Suppliers will have the same initial shape. Another CCDG member said added that Suppliers will be faced with more forecasting risk when getting new customers hence requiring more information for developing a view of customers' annual consumption. Elexon said that the risk is small with Smart Meters as the new Supplier would be able to get readings more quickly. It was argued that Suppliers could get information from price comparison sites but that has not been clarified yet. Elexon noted that with Suppliers offering bespoke tariffs it would be difficult to estimate demand; Elexon advised that it would be useful to document what data Suppliers would be losing. It also added that, essentially, MHHS offers the opportunity for Suppliers to build up new smart tariffs for consumers.

5.8 Registering of export for Settlement

- 5.9 The group discussed import/export migration further and more specifically about mandating responsibilities. A CCDG member asked whether this mandate should be included either in the SEC and/or within a SEG tariff. He added that there are some customers not getting paid for unregistered export given that they have a Smart

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Meter installed. Elexon advised to discuss this issue during the Programme and pass it on to Ofgem to place obligations in licences. Other members suggested to carry out a cost/benefit analysis to guide Ofgem's decision. The Ofgem representative agreed that this should be an activity for the Programme however the industry should provide a proposal in a timely manner in order for Ofgem to make a decision. Both Elexon and the group decided to pick this issue up again on the Friday morning subgroup meeting.

6. Actions Log review and outstanding areas

- 6.1 Elexon and the group have revisited the Actions Log as of 10 May 2021 and updated pending actions and discussed outstanding areas.

Action 15/06 – Elexon to check with St Clements about the impacts on data flows after moving SMETS version from MDD to DTC

- 6.2 A CCDG member noted that there should be coordination with between MDD and DTC from an early stage. Elexon advised that this action depends on developments with REC.

- 6.3 The group agreed this action to be captured on the Outstanding Requirements list.

Action 15/05 – Ofgem to feed back to its team working on the opt-out framework

- 6.4 The group agreed that the Ofgem representative has followed this up internally at Ofgem and will provide more information in due course.

Action 15/03 – BSC PAF to explore whether it is possible to quantify the current-world issues with appointments

- 6.5 Both Elexon and the group agreed to close this action as it was felt to be sufficiently covered by [SVA Risk 14: Agent not appointed correctly](#)

Action 14/19 – Elexon offline discussions with SECAS and DCC about how to manage readings from disconnected Smart Meters part-way through the day

- 6.6 Both Elexon and the group agreed to close this action and move it to the Outstanding Requirements list.

Action 14/16 – CCDG members to review the CoS readings straw man developed by the joint CCDG/AWG subgroup

- 6.7 Both Elexon and the group agreed to close this action and move it to the Outstanding Requirements list. Elexon will pick this up at a later stage with REC with regards to billing.

Action 14/11 - Elexon to update the CCDG on the progress of its discussions with Energy UK on Load Managed Areas

- 6.8 Both Elexon and the group agreed to close this action.

Action 14/04 - Elexon agreed to discuss the ongoing need for a Bulk Change of Agent threshold with the AWG Technical Lead and its PAF team

- 6.9 Elexon will keep this action open and update the group at the next CCDG meeting in June 2021. It was also agreed that part of this action will be added to the Outstanding Requirements list.

Action 14/03 - Elexon to update the CCDG on the Issue 91 discussions on Export

- 6.10 Elexon will keep this action open and continue to report its progress back to the CCDG.

Action 14/02 – Elexon to work with CCDG members offline on outstanding questions about metering roles under the TOM

- 6.11 Both Elexon and the group agreed to close this action.

Action 14/01 – Elexon to speak to relevant consultation respondents about their concerns with the new appointments process and report back to the CCDG

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- 6.12 Elexon clarified that this action has been discussed at the CCDG15 meeting but it will be revisited after the AWG consultation.

Action 13/01 – Elexon and Ofgem to discuss how timescales for introducing Ofgem’s opt-out framework interact with MHHS transition/migration activities

- 6.13 Both Elexon and the group decided to close this action and move to the Outstanding Requirements list.

Action 05/12 – Elexon and Genserv to discuss which existing governance forum is the best place to replace consequential changes to the Supply Number

- 6.14 Elexon noted that the best place to host these discussions would be the REC.

- 6.15 Both Elexon and the group agreed to close this action and move to the Outstanding Requirements list.

Action 05/09 - Elexon, Ofgem and ESO to discuss how to map out the dependencies between the TCR, SCR on Access and forward-looking charging, and the MHHS TOM

- 6.16 Elexon noted that there is still dependency on understanding the requirements and that P418 ‘Amendments to the P383 legal text for Additional BM Units’ will address some of the discussions. The Chair added that the challenge remains with the current set of registration requirements and that MHHS will be trying to align those pieces of work under a more future-proofed scenario.

- 6.17 Both Elexon and the group agreed to close this action and pick it up again during the design phase.

Action 01/02 - Ofgem to clarify whether the legal text for MHHS should be drafted against the current Industry Codes baseline or new consolidated REC baseline

- 6.18 Both Elexon and the group agreed to close this action on the basis that the REC baseline is now available.

7. Update from MHHS Programme Director

- 7.1 The MHHS Programme Director provided members with an overview of the SCR and Programme Mobilisation progress since April 2021 as well as an overview of the next stage of the end-to-end design. He also expressed his gratitude towards all the hard work members undertook over the last 18 months and that the feedback from the industry is that people are pleased and pleasantly surprised from the amount of work both the CCDG and AWG have gone through.
- 7.2 The Chair asked whether there will be a more detailed plan and timetable with regards to mobilisation activities. The MHHS Programme Director noted that the internal team is currently working on the plan but the priority for now is filling up the service provider roles. He ensured that the internal team will work on the end-to-end design plan and establish workgroups alongside with the Programme Steering Group (PSG) to process the design.
- 7.3 A CCDG member commented that Ofgem has placed an activity on the CCDG to deliver the associated BSCPs under a 10-month plan but these should be achievable within the next few weeks. He added that the BSCPs need to be delivered by September 2021 and that a plan is needed by the MHHS Programme team to prioritise tasks. The MHHS Programme Director agreed with this and noted that there is a level of complexity with doing the legal drafting and coming up with business requirements. He added that, as a matter of priority, the team should focus on what can be done now i.e. the BSCPs.
- 7.4 The MHHS Programme Director added that the Programme will set a strategy and engagement role to establish the different contacts within the industry aiming for a robust communication and involvement in any step of this process. He then asked the CCDG members whether they have initiated these discussions within their organisations. A number of CCDG members noted that they have started discussing this and some members said they are also dealing with the Faster Switching Programme at the same time.
- 7.5 The MHHS Programme Director closed this section and noted that he will be joining the CCDG regularly in the future for more Programme updates.

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8. Summary and next steps

- 8.1 Elexon asked the CCDG members to consider any likely questions that should be included in the transitional consultation.
- 8.2 The Chair summarised the key discussions and closed this meeting.