

ELEXON

**Code Change and Development Group
Meeting 20**

Elexon

17 August 2021

Agenda

No.	Agenda item	Materials	Lead
1.	Introduction, apologies & meeting objectives	Verbal / Slides to be provided at meeting	Peter Frampton
2.	Other updates	Verbal	Alasdair MacMillan / Kevin Spencer
3.	Update on the MHHS Programme	Verbal	Ian Smith
4.	Discussion on the transition consultation responses	Verbal / Slides to be provided at meeting	Mark DeSouzaWilson
5.	Put-back and approach to the transition deliverable for Ofgem	Verbal	Kevin Spencer
6.	Update on the SDS subgroup discussions	Verbal / Slides to be provided at meeting	Mark DeSouzaWilson
7.	Discussion on the legal drafting and timescales	Slides to be provided at meeting	Kevin Spencer
8.	Update on Issue 91 (Action 14/03)	Verbal	Kevin Spencer
9.	Actions, summary & conclusions	Verbal	Peter Frampton

Introduction, apologies and meeting objectives

Meeting objectives:

- Provide an update on the MHHS Programme.
- Discuss the industry responses to the transition consultation.
- Discuss and agree an approach to the transition deliverable for Ofgem.
- Provide an update on the Smart Data Service (SDS) Friday morning discussions.
- Discuss progress on the legal drafting and associated timescales.
- Provide an update on Issue 91.

UPDATE ON THE MHHS PROGRAMME

Programme Design Team Update

- Discussions with OFGEM ongoing with regard to the decision in principle issued. Areas under focus are security and costs.
- Mobilisation continuing – team structure being refined and Senior Business Analyst and Solution Architect recruited.
- Gap analysis continuing analysing current state of design vs. Target set of design artefacts. To be completed by the end of August with proposal to be shared shortly thereafter.
- Vendor engagement to commence imminently with regard to the core event platform. Initial activity to focus on the capture of high level costs and delivery timelines in addition to understanding scope of potential suppliers and platforms

OTHER UPDATES

DISCUSSION ON THE TRANSITION CONSULTATION RESPONSES

Responses

We received:

- 20 public
- 1 mostly public with some confidential content

High level summary:

- Majority supportive of proposals
- Desire for more detail
- Concerns over timing and timescales

Question 1

Do you agree with the CCDG’s recommendation for early introduction of the new Registration Data Items and processes using existing interfaces to support migration?

Yes - 15	No - 3	Other - 3
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- Nov 2022 is too early because it conflicts with the faster switching changes, It is also very soon after the April 2022 baseline.
- Apr22 to Nov22 is insufficient time for parties to make dataflow changes.
- Activity would mean very many changes by Suppliers and MEMs and a lot of data transfer over the DTN. Should consider other bulk data transfer processes.

Question 2

Do you agree with the CCDG’s recommendation for a period of data cleanse activity of registration data items running from February 2023 to October 2024?

Yes – 16	No – 2	Other - 3
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- Inefficient to populate incorrect data into SMRS and then cleanse it.
- Data cleanse should have clear oversight and clear rules to ensure consistency eg. domestic flag for a mixed-use site.
- MOPs will need current views of Registration data to prevent repetitive work.

Question 3

Do you agree with the CCDG’s recommendation to mandate the moving of CT Advanced Meters settling NHH to Half Hourly Settlement using the existing Change of Measurement Class (CoMC) process?

Yes – 15	No – 3	Other - 3
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- Move to MC E being with it a change to site specific DUoS charging inc capacity charge. Maximum import capacity needs to be in connection agreement. Need to consider the impact on TNUoS NHH vs Triad charging.
- Should consider - exceptions where sites have no viable comms, domestic advanced load shape, new data item to flag sites with no viable comms etc.
- Should be encouraged and not mandated, so that a customer's entire portfolio could be migrated at the same time.

Question 4

Do you agree with the CCDG’s recommendation to introduce the “one way gate” from the start of migration (milestone M11 / M12) to prevent MPANs moving back to current arrangements once migrated?

Yes – 15

No - 3

Other - 3

- Non-domestic suppliers experience large volume of CoS at the start of October and introducing the one-way gate at this time would affect ability to onboard customers.
- Need to manage resource for the Qualification process and apply penalties to parties not prepared by the start of migration (except where reasons are outside their control).
- One way gate should be extended to pre-migration activity for non-domestic.

Question 5

Do you agree with the CCDG’s recommendations for the registration and migration of export MPANs?

Yes – 13	No – 1	Other -7
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- Need to manage the addition of 870,000 MPANS to CSS.
- Increase in export MPAN requests would risk suppliers meeting the 30 day timescale. This risk could be mitigated by taking a managed approach.
- How does import supplier notify export supplier where export is not registered?

Question 6

Do you agree with the CCDG's recommendations for coordinating the migration to MHHS?

Yes – 16

No – 2

Other - 3

- Should recognise the issues faced by agents where the agent works for multiple suppliers.
- Might be better for small suppliers to migrate their entire portfolio in a short amount of time rather than spread over the year.
- ESO should have visibility of NHH->HH plans, with DNO area granularity, as this affects TNUoS tariff setting. Would like to see plan by Dec 2021 as the migration of CT Advanced meters is Oct 2022.

Question 7

Do you agree with the CCDG’s recommendations for the runoff of current settlement arrangements?		
Yes – 10	No – 3	Other - 8

- Do not support cutting short settlement to R2 in Feb 2026 because need to support NHH settlement of 15% of meters (on-smart). Suggest R3 and a date of April 2026.
- Need to manage the risk of big GSP meter errors coming to light after R2
- BSUoS an TNUoS are reconciled at RF, so a CUSC change would be necessary.

Question 8

We would like to know Supplier views on the UMSO preferred approach to using one of the existing NHH MPANs. We would like to understand UMSO views on the system implications of either option.

Yes – 2	No – 1	Other - 18
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- Both approaches are complex and would require a lot of manual resource from industry participants.
- Simplest starting point might be to end the multi-MPAN relationships and map one inventory to one supply number.

Question 9

Do you agree with the CCDG's recommended approach for the Unmetered segment?

Yes – 11

No – 2

Other - 8

- If large inventories, they might not all be updated at the same time - so preference is to use existing MPANs.
- Should consider commercial implications and customer contracts.
- Changing between HH and NHH during a TNUoS charging year requires a CUSC mod to avoid overcharging. There will still be similar issues under new arrangements from Apr 23 onwards.

Question 10

Are there any additional areas that should be considered as part of the next phase of Assurance activities?		
Yes – 10	No - 4	Other - 7

- Should explore separate performance assurance measures for export.
- Need to engage with REC over MEMs/metering obligations.
- Use evidence based approach for each segment. Performance Assurance should be proportionate and targets achievable.

Question 11

Is there anything else that you think the CCDG should consider for transition?		
Yes – 13	No – 2	Other - 6

- More clarity on migration process for an MPAN (eg. de-appoint using DTN then appoint using EDA).
- How are complex sites treated during transition?
- How will LTV process be impacted by new settlement timetable?

PUT-BACK AND APPROACH TO THE TRANSITION DELIVERABLE FOR OFGEM

Put-back and Transitional Deliverable

Proposed Approach:

- ❑ Document the CCDG discussion in the meeting headlines and publish a put-back on the CCDG webpage.
- ❑ Use the headlines to create a wrapper around the consultation recommendations as amended to form the Transitional deliverable.
- ❑ Provide the Transition Document with attachments:
 - The Consultation
 - The non-confidential Responses

The deliverable is due in September but we do not have a fixed date.

UPDATE ON THE SDS SUBGROUP DISCUSSIONS

CCDG Outstanding Design Areas

- 30 July, 6 Aug, 13 Aug – informal subgroup to discuss SDS topics requiring further attention.
- Strategy was to firstly consider further detail we could add to the processes shown in AWG's Business Process Models (including data and interfaces at a high level)
- This led to a consideration of functional requirements with a view to compiling information required for BSCP.

Items discussed:

- Inputs to SECMP162
- BPM for Data Collection
- Appointments process
- DCC TRTs
- BPM for Date Processing (Validation and Estimation)
- SDS Functional Requirements for Validation and Estimation
- Ofgem initial proposal for Data Access when switching supplier/new smart meter

Next three weeks to focus on Registration Service outstanding areas however there is a need to progress with areas of the SDS estimation process and the Meter Faults process.

DISCUSSION ON THE LEGAL DRAFTING AND TIMESCALES

CCDG Terms of Reference

The CCDG have been working to the Terms of Reference set out by Ofgem which sets out the following deliverables:

- ❑ The CCDG’s recommendations on the development of the outstanding TOM areas, with accompanying evidence and rationale ;
- ❑ Feedback on the PAB’s and TDC’s MHHS PAF/disputes work, including the CCDG’s recommendation on which (if any) supporting industry code changes and/or subsidiary documents in this area should be delivered using MHHS project governance;
- ❑ Tabulation of impacts on industry codes and industry-facing code subsidiary documents, with clear and easy to understand explanations of the impacts;
- ❑ Draft legal text for each relevant industry code in preparation for implementation;
- ❑ Work carried out on the transition approach for the developed areas;
- ❑ Assessment of the recommendations against the TOM Design Principles and the TOM Development Principles;
- ❑ Any dependencies on other work areas under the Significant Code Review on Electricity Settlement Reform, other Significant Code Reviews or other industry initiatives; and
- ❑ The consultation responses received by the CCDG on the above areas.

Key: Completed Partially Completed Not Started

Legal Drafting Approach

The CCDG had previously agreed that once the Transitional Deliverable had been provided to Ofgem that we would initially work on the following BSCPs:

- ☐ BSCP501 (Supplier Meter Registration Service)
- ☐ BSCP700 (Unmetered Supplies Data Service)
- ☐ BSCP701 (Smart Data Service)
- ☐ BSCP702 (Advanced Data Service)
- ☐ BSCP703 (Volume Allocation Services)

The MHHS programme is now mobilising and we believe that resource should be focussed on the **outstanding design area's** in the near term until the CCDG Transitions into the MHHS Programme (in October?).

At that point we believe that Terms of Reference should be amended to set the focus on delivering the document artefacts for the end to end design. These would include:

- ☐ The Business and Functional requirements and Business Rules;
- ☐ The detailed Business Process Models;
- ☐ The Logical Data model; and
- ☐ Interface Requirements Specification.

At that point the Architectural detail should be better developed and understood.

We believe that those documents could then be used to draft the required BSCPs and other Code Changes.



UPDATE ON ISSUE 91

Issue 91 - Registration and Settlement of Smart Export Guarantee (SEG) sites

- ❑ It was agreed that after reviewing the sections in BSCP504 identified by the Proposer, no changes would be required to BSCP504 and that proposed changes to BSCP514 would need to be progressed through the REC change process.
- ❑ A change to the D0155 Data Flow will be required, with the exact requirements to be confirmed, to include the associated Import MPAN when notifying the NHHMOA of the Export MPAN, be used. The solution should not be constrained to Smart/Export only.
- ❑ It was pointed out that Market-wide Half Hourly Settlement (MHHS) will address a number of issues considered in Issue 91 and that currently there are only a small number of Export MPANs in the market (5- 6,000). Another Workgroup Member explained that facilitating SEG sites is a licence condition and also that there are currently approximately 1 million Export sites within FiT which don't currently have an MPAN which are expected to fall under SEG arrangements in future, and therefore if the issues identified in Issue 91 are not addressed this could become a bigger issue in future.
- ❑ It was noted that changes to existing BSC Guidance Notes would be required and Elexon confirmed that amendments are required due to REC changes related to P420 'Retail Code Consolidation Significant Code Review'. Some Workgroup Members kindly volunteered to help review the existing relevant BSC Guidance Notes;

'Microgeneration and the Balancing and Settlement Code' and 'Metering Demand Sites with generating equipment installed (Import Export metering systems)'.

ACTIONS, SUMMARY AND CONCLUSIONS