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## Headline report

Meeting name	<b>Code Change &amp; Development Group – MHHS SCR</b>	Purpose of paper	<b>Information</b>
Meeting number	<b>14</b>	Classification	<b>Public</b>
Date and time	<b>16 February 2021</b>		

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

To complete the agenda, this meeting was held across two dates: 16 February and 1 March 2021.

### 1. Introduction, apologies and meeting objectives

- 1.1 The Chair introduced CCDG14 and confirmed those in attendance.
- 1.2 The Chair confirmed that the meeting objectives were to:
  - Discuss the responses to the CCDG's consultation on the detailed Target Operating Model (TOM) design and Code Change Matrices, and agree any areas needing immediate action
  - Note updates on the progress of the transition straw men and the ongoing discussions with the Data and Communications Company (DCC) and Smart Energy Code (SEC).

### 2. Updates on other SCR work streams

- 2.1 Ofgem highlighted its [consultation on Market-wide Half Hourly Settlement \(MHHS\) Programme Implementation Principles](#), which closed on 5 March 2021. The consultation sets out Ofgem's plan to place responsibility for management and delivery of the implementation of MHHS with industry, with Elexon acting as the Senior Responsible Owner (SRO) and managing the central programme functions.
- 2.2 A CCDG member asked when Ofgem is planning to circulate its updated programme implementation plan. Ofgem advised that, over the next few weeks, it will be socialising the plan with a sample of industry stakeholders to gather stakeholder feedback. Ofgem plans to include the updated plan in its Full Business Case and Final Decision, due in Spring 2021.

### 3. TOM design & matrices consultation: Discussion of themes arising and next steps

- 3.1 Elexon [presented](#) a summary of the [public consultation responses](#) by subject area.

#### Overall key messages

- 3.2 Elexon advised that the overall key messages from the responses are that:
  - The CCDG's design work to date is consistent with the Design Working Group's (DWG's) preferred TOM.
  - The TOM should not include a process for correcting Settlement volumes as a result of Erroneous Transfers (ETs).
  - There is recognition that the CCDG's work in isolation cannot deliver all of Ofgem's Design and Development Principles, as many of these relate to the reference architecture being developed by the Architecture Working Group (AWG) and will therefore be the subject of a separate consultation.

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- The Code Change Matrices have captured the major changes to Industry Codes (noting the need to still capture requirements to support network charging, once there is more clarity on these).
- There is an opportunity to improve the usability of the impacted BSC Procedures (BSCPs) when drafting MHHS changes, but no real appetite for overhauling their fundamental structure or scope at this time.

### Categorisation of responses

- 3.3 The presentation and discussion focused on comments that fall within the CCDG's remit and are not awaiting requirements from other industry work. Elexon noted that there were two other categories of comments:
- Comments that fall outside the scope of the CCDG. Elexon is confirming with Ofgem how these will be considered under the wider Significant Code Review (SCR). These include comments on:
    - Ofgem's programme implementation plan/timescales
    - Suppliers' interaction with consumers (e.g. on Ofgem's opt-out regime)
    - Supplier billing
    - The reference architecture being progressed by the AWG
    - Ofgem's governance regime for third-party access to Half Hourly (HH) data.
  - Comments that fall within the CCDG's remit, but are awaiting the outputs of other industry work. These include comments on the following outstanding areas that are 'known unknowns' at this point in time and are already being progressed elsewhere:
    - Requirements for network charging
    - Details of the Performance Assurance Framework (PAF) and Trading Disputes processes
    - Areas of Retail Energy Code (REC) content that are still subject to consultation/decision (e.g. on metering services).
- 3.4 In response to questions from some CCDG members, Elexon clarified that although the CCDG is a cross-code group its remit is the meter-to-bank Settlement process set out in the Design Working Group's TOM. The DWG and CCDG therefore had/have a narrower scope than Ofgem's wider MHHS SCR, within which the TOM development is only one work stream. Ofgem noted the need to keep the meeting's discussions focused on those areas that were within the scope of the CCDG's consultation.
- 3.5 Elexon advised that, where decisions on Settlement requirements have consequential impacts on non-Settlement processes such as billing, it is discussing with Ofgem how to initiate REC discussions in these areas outside of the CCDG. For example, data items that are no longer needed for Settlement but are still required for billing could be in future be governed and maintained under the REC. Elexon noted that the intention is to retain these data items under the BSC until the end of transition, so a decision on their future governance is not needed immediately.
- 3.6 Of the areas to be discussed at the meeting, Elexon asked the CCDG to agree whether each area:
- Requires no action or only clarification/messaging back to respondents
  - Requires action now on the detailed TOM design
  - Can be addressed in the group's ongoing transition work, for inclusion in that separate consultation
  - Is less critical and can be addressed during the group's legal drafting, forming part of that later consultation.

### Comments on appointments process

- 3.7 The CCDG agreed that the concerns raised by respondents (primarily Suppliers) were not about the principles behind the new appointments process, which are based on the Registration Service acting as the 'single source of truth'. They also do not appear to be about the complexity of the end-state design, since the new process is simpler than the current one and removes many current-world issues. Elexon advised that Suppliers will need to do less, not more, than now under the new process. The CCDG agreed that the concerns raised appear to be about the proportionality of the impacts involved in moving to this new process.

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- 3.8 The CCDG noted that the DWG's preferred TOM requires other TOM services to interface with the Registration Service (Supplier Meter Registration Service (SMRS)). It discussed whether the costs of moving to the new appointments process are therefore sunk as a result of this new interface, or whether they arise from specific elements of the detailed process design that could be amended to lessen the impact. The CCDG noted that any fundamental redesign of the proposed appointments process would have a significant impact on the TOM design and potentially the AWG's architecture recommendations. Elexon suggested that the CCDG could consider as part of its transition work how and when the new process is introduced, if this could help reduce the impact.
- 3.9 Some CCDG members suggested that respondents may not have understood the benefits of the new appointments process, since the original discussion of these took place under the DWG's earlier consultations. Other members suggested that the AWG's forthcoming consultation on the reference architecture may address the concerns.
- 3.10 Elexon agreed to speak to the relevant respondents to discuss the above points and clarify which specific parts of the process are causing concern. It will then bring these back to the CCDG, for the CCDG to revisit whether any changes are needed.

**Action 14/01**

- 3.11 The CCDG noted that the regulation of the process will be addressed partly through the architecture and partly through the legal drafting.

### Comments on Change of Market Segment process

- 3.12 The CCDG noted the suggestion of a respondent that this process is not needed as the Meter Point Administration Number (MPAN) would be disconnected and replaced by a new one. The CCDG noted that, while this might be true for some market segments (e.g. a change from metered to unmetered or vice versa) it was not the case for all segments and therefore the process is required to cater for this.
- 3.13 The CCDG agreed that the following questions are still outstanding regarding metering roles under the TOM:
- Does the TOM require segment-specific metering roles with different requirements?
  - What processes are needed?
  - What is the interaction between Metering Equipment Manufacturers (MEM) under the Retail Energy Code (REC) and the Advanced Metering Service (MSA) / Smart Metering Service (MSS) under the BSC?
- 3.14 Elexon agreed to work offline with interested members (Seth Chapman, Terry Carr and Tom Chevalier) on these questions, before bringing them back to the CCDG.

**Action 14/02**

### Comments on CT connections without Advanced Meters

- 3.15 The CCDG agreed that, in terms of the numbers of current transformer (CT) connections without Advanced Meters, this is a question about the timing of the relevant licence requirements relative to migration milestones. The CCDG noted that this is already being addressed as part of its Advanced segment transition straw man.

### Comments on the Settlement of Export

- 3.16 The CCDG noted that this is being considered under [BSC Issue 91](#). Elexon agreed to update the CCDG on the Issue 91 discussion as needed.

**Action 14/03**

### Comments on the Bulk Change of Agent process

- 3.17 The CCDG noted the comment from a respondent on the need to cater for a Bulk Change of Agent (CoA). It highlighted that SMRS currently contains a volume constraint and asked Elexon to check if the AWG's recommended architecture will remove this. It noted that, regardless, the Performance Assurance Board may still wish to keep a threshold to help minimise Settlement Risk. Elexon agreed to discuss this with the AWG Technical Lead and its PAF team.

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### Action 14/04

3.18 The CCDG agreed that these questions are not urgent but need answering before beginning the legal drafting.

#### Comments on Measurement Classes

3.19 The CCDG agreed that there needs to be a way of recording when an MPAN has migrated. It agreed that, rather than setting the Measurement Class to Null at that point, it might be clearer to set it to something else (e.g. 'X') with an Effective From Date.

3.20 The CCDG agreed that the current 100kW threshold for requiring HH Settlement is no longer meaningful or required under the TOM. It noted that there are other TOM identifiers that could be used instead, such as Market Segment or Connection Type.

3.21 Regarding the comments about Measurement Classes currently being used in performance measures, the CCDG noted that the PAF will flex/change as necessary to cater for the TOM requirements.

3.22 Elexon noted that Measurement Classes will be retained for transition. However, at some point they will need to be severed from the Settlement process. For example, Measurement Class A is Non-Half Hourly which will no longer make sense under the TOM.

#### Comments on Meter Technical Details (MTDs)

3.23 The CCDG agreed that clarity is needed from Distributors on why they wish to retain access to MTDs, as this does not appear to be for Settlement reasons. Ofgem agreed to pick this up in its ongoing discussions with Distributors on their requirements for Settlement data.

### Action 14/05

3.24 The CCDG discussed the concerns raised over the quality of existing MTDs. It recognised that the existing data is imperfect but agreed that a data cleanse is not required for the TOM implementation. The intention is to populate with the best information available initially and improve accuracy over time.

#### Comments on Globally Unique Identifier (GUID)

3.25 CCDG members noted the comments from respondents regarding the relationship between the GUID (aka Smart Device ID) held by the DCC, Meter Serial Numbers (MSNs) and MPANs. Members believed that there is a one-to-one relationship between the MSN and the GUID, but a many-to-many relationship between GUID and MPANs. The CCDG agreed to investigate further whether the GUID needs to be included as an item in Registration Data (SMRS), as it is already held by the DCC. Elexon agreed to discuss this offline with the respondent, Ofgem and interested members (Paul Saker, Seth Chapman and Tom Chevalier), before bringing it back to the CCDG.

### Action 14/06

#### Comments on Demand Control Events

3.26 Elexon agreed to double-check the calculation of disconnection volumes with a CCDG member (Seth Chapman) outside of the meeting.

### Action 14/07

#### Comments on Load Shapes

3.27 The CCDG agreed that no change is required to its approach to Advanced domestic Load Shapes, which will be calculated using Smart domestic HH data. It agreed that the only alternative would be to use less-accurate default data. The CCDG agreed that it is for the AWG to decide the most efficient way to share Load Shapes with the Advanced Data Service (ADS).

#### Comments on Industry Standing Data (ISD) and Registration Data

3.28 Elexon advised it had inadvertently omitted some of the new TOM data items from the consultation, due to a filtering issues with the AWG's master list. It noted that this had caused confusion for respondents.

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3.29 Elexon agreed to confirm which data items were missing and consider how best to share the corrected full list with industry (potentially as part of the AWG's forthcoming consultation).

**Action 14/08**

3.30 The CCDG clarified that where Active Export is missing for Unmetered Supplies (UMS), it should be defaulted to zero.

3.31 The CCDG agreed that the question of who populates the Registration Service (SMRS) when the customer contracts with the Data Service will be addressed by the AWG's outputs and CCDG's subsequent legal drafting.

3.32 Elexon agreed to investigate whether the existing SMETS Version data item in Market Domain Data (MDD) is still serving a Settlement purpose, or whether this can be set to a 'Won't Have' for the TOM.

**Action 14/09**

3.33 Elexon agreed to pick up the questions around the contract reference / service levels with respondents as part of its appointments discussions. The CCDG agreed that this will be a free text field and asked Elexon to clarify with respondents how they intend to use this field and whether this addresses their concerns.<sup>1</sup>

**Action 14/10**

3.34 The CCDG clarified that the proposal to retain Standard Settlement Configurations (SSCs) for five years beyond the end of transition is to support the time-limited solution for Non-Smart Meters with switched load (see further discussion on switched load below). It also clarified that the five years is only a suggestion at this stage.

3.35 Elexon noted that SSCs will not be a workable mechanism for notifying load switching once the Radio Teleswitch Service (RTS) no longer exists. It advised that it is currently discussing with Energy UK how to develop a replacement mechanism for Load Managed Areas and agreed to update the CCDG as these discussions progress.

**Action 14/11**

3.36 The CCDG agreed on the need to clarify whether its proposed Auxiliary Load Control Switch (ALCS) data item conflicts with similar data items mastered by the DCC under the SEC, and whether it is actually needed for Settlement. Elexon agreed to discuss this with the respondent, Ofgem and interested CCDG members (Paul Saker, Seth Chapman and Tom Chevalier) before bringing it back to the CCDG.

**Action 14/12**

3.37 The CCDG agreed that the AWG's reference architecture will provide a standardised mechanism for sharing and populating Registration Data. New data items will be populated initially using other existing data items but then mastered independently over time. In response to other specific comments, the CCDG clarified that:

- Connection Type is imperfect; however a cleanse of this data item is not required to implement the TOM
- Discussions around how the DCC will identify the appointed Meter Data Retriever (MDR) / Smart Data Service (SDS) are currently ongoing under the SEC
- The Central Switching Service (CSS) will not be required to populate any Import/Export mapping.

### Comments on Related MPANs

3.38 The CCDG recognised the reasons given by respondents as to why Related MPANs are still required under the TOM. It agreed to keep the ability for existing and new Related MPANs in the end state.

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<sup>1</sup> Post-meeting note: Once it has spoken to respondents, Elexon plans to bring this to the joint CCDG/AWG subgroup meeting on 19 March 2021 for discussion.

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- 3.39 Some CCDG members raised the need to cater for twin-element Smart Meters. These members were concerned that the estimation processes for these Meters could result in energy misallocation, restricting Suppliers' tariff offerings. Elexon noted the desire to avoid replicating all of the existing complexity. Elexon agreed to discuss this offline with interested CCDG members (Derek Weaving, Dom Bradbury, Paul Saker, Seth Chapman and Tom Chevalier) before bringing it back to the CCDG.

**Action 14/13**

### Comments on Time of Use (ToU) Scaling Weights

- 3.40 The CCDG noted the reasons why it had previously decided not to include ToU Scaling Weights in the TOM design and that these are not needed in transition. It reconfirmed this decision but noted that it could be reconsidered after the TOM implementation, once Ofgem has reviewed its opt-out regime and there is outturn data on which to base Scaling Weights.

### Comments on Non-Smart Meters with switched load

- 3.41 The CCDG noted that Elexon is already discussing Load Managed Areas with the SEC, Energy Networks Association (ENA) and Energy UK.
- 3.42 Elexon clarified that the proposed domestic Load Shape already caters for different profiles and the CCDG agreed that no change is required. Elexon also noted that more Load Shapes can potentially be introduced in the future if needed for Non-Smart Meters with switched load, once Ofgem has reviewed its opt-out regime.
- 3.43 A CCDG member (James Murphy) agreed to speak to one of the respondents about the numbers of Non-Smart Meters that have more than two rates associated with the same MPAN.

**Action 14/14**

### Comments on Unmetered Supplies

- 3.44 The CCDG noted the suggestion by a respondent that the UMS Data Service (UMSDS) could have a reference Photo Electric Control Unit (PECU) in each GSP Group, to improve the Settlement profile. The CCDG noted that this was not required to implement the TOM. While it could be progressed at any time, the CCDG noted the need for an answer before beginning the legal drafting. Elexon and a CCDG member agreed to raise the suggestion with the BSC's UMS User Group (UMSUG).

**Action 14/15**

### Comments on other data processes/requirements

- 3.45 Ofgem highlighted that the joint CCDG/AWG subgroup has developed a straw man on Change of Supplier (CoS) readings. CCDG members agreed to review this using MS Teams.

**Action 14/16**

- 3.46 The CCDG noted the benefits if Meter Operator Agents (MOAs) are able to access HH data for fault investigations, commissioning and Proving Tests. It agreed that Elexon should add this business requirement to the TOM and inform the AWG.

**Action 14/17**

- 3.47 The CCDG queried Distributors' need for the D0010 flow and asked for clarity on the specific scenarios in which Distributors require this data. Ofgem agreed to pick this up with Distributors under Action 14/05 above.

- 3.48 The CCDG discussed a respondent's comment on catering for Export Meters with communication failures, noting that currently data would be estimated to zero until a Meter Advance is available. It agreed that it would not be appropriate to estimate non-zero Export data but that there might be alternative mechanisms to submit actual readings in this situation. Elexon agreed to speak to the respondent to clarify the different possible scenarios, with the aim of then addressing this during the legal drafting.

**Action 14/18**

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- 3.49 A CCDG member noted the comment from the DCC that disconnection of a Smart Meter can occur part-way through a day. They clarified that the DCC's proposed solution assumes that the Supplier makes an on-demand read request in this situation, as the solution only allows batched requests from the MDR/SDS. However, the CCDG noted that the TOM solution assumes that the MDR/SDS makes the on-demand request after liaising with the MOA. The group noted the incompatibility of these two solutions and queried the impact of estimating consumption for part of the day. Elexon agreed to discuss this offline with the DCC, SECAS and Ofgem before reporting back to the CCDG.

**Action 14/19**

### Comments on Erroneous Transfers (ETs)

- 3.50 The CCDG agreed that the responses raised no new arguments. It therefore reconfirmed its decision that the TOM will not include a process to correct ET Settlement volumes. The CCDG agreed that it is for the REC's assurance regime to monitor ET volumes following implementation of Faster Switching and to recommend any action.

### Comments on Exception Reporting

- 3.51 The CCDG agreed that the responses raised no new arguments. It therefore reconfirmed its decision that the TOM will not include central exception reporting beyond defaulted data. It agreed to continue reconfirming this as the architecture evolves.

### Comments on scope and structure of BSCPs

- 3.52 The CCDG noted that there was no strong appetite for change among respondents. There were also no new arguments or suggestions to those that the group had considered previously. The CCDG agreed to use the opportunity to make usability improvements during the legal drafting process, where these do not increase the drafting timescales. However, it agreed not to fundamentally overhaul the scope or structure of the BSCPs for MHHS.
- 3.53 The CCDG noted the need to keep the drafting process manageable and timely, and that further improvements could be considered under any wider Elexon digitisation project. It also noted that the BSCPs will not necessarily be the only source of guidance for participants, as communications and guidance can also be published by the implementation programme to add clarity on new/amended processes and requirements.

## 4. Update on progress of transition straw men

- 4.1 Elexon advised the CCDG that it is still struggling to obtain UMS contacts at Suppliers, which is hindering its ability to get Supplier input on the straw man. It reminded Supplier members of the group to provide it with details of any relevant contacts within their organisations (existing Action 13/04).

## 5. Update from discussions with DCC/SEC

- 5.1 Due to time constraints, Elexon and Ofgem agreed to defer this update to CCDG15 – noting that the discussions with DCC/SEC are still ongoing.

## 6. Summary & next steps

- 6.1 The Chair noted that the next CCDG15 meeting will be held on 16 March 2021, and that the agenda for this meeting will be confirmed shortly. She noted that the meeting is likely to focus on:
- Next steps following the consultation, including updates on the above actions and agreeing how to communicate the CCDG's discussions and decisions back to industry
  - Continuing the transition straw men discussions/development.