

HEADLINE REPORT

MEETING NAME	Code Change & Development Group – Market-wide Half Hourly Settlement SCR
Meeting number	05 Part B
Date of meeting	1 May 2020
Purpose of paper	Information
Classification	Public
Synopsis	Summary of Part B of the fifth CCDG meeting and actions arising.

1. Introduction, apologies and meeting objectives

- 1.1 The Chairman confirmed that the objectives of the meeting were to:
- Review the Code Change Matrices completed by ELEXON and other code bodies, which tabulate the impacts on BSC documentation and other impacted Industry Codes
 - Answer ELEXON's questions on aspects of the BSC legal drafting approach, which will help determine the final content of the matrices.
- 1.2 The Chairman advised that the presentations draw out the key themes/questions by Industry Code. Members agreed to send any detailed comments on the matrices to CCDGSecretary@elexon.co.uk. Ofgem and ELEXON agreed to set up further offline discussions as needed to address these with the relevant code bodies.

ACTIONS 05/07 & 05/08

2. Process followed by Code Bodies Subgroup

- 2.1 Ofgem explained the process followed by the subgroup to complete the matrices, noting that these have been completed in a common template provided by ELEXON.
- 2.2 Ofgem advised that there needs to be more clarity on the [Targeted Charging Review](#) (TCR) requirements before National Grid ESO can complete the matrix for the Connection and Use of System Code (CUSC). Ofgem's Market-wide Half Hourly Settlement (MHHS) and TCR teams are discussing this internally. All CUSC changes are expected to be to the Non Half Hourly (NHH) transmission charging regimes.

3. Review of Code Change Matrices

Distribution Connection and Use of System Agreement (DCUSA)

- 3.1 ElectraLink [presented](#) an overview of the impact of the MHHS Target Operating Model (TOM) on the DCUSA.
- 3.2 A CCDG member noted that Settlement Class, mentioned in the housekeeping definition changes, is not a BSC defined term (although the DCUSA implies that it is).
- 3.3 The CCDG discussed the potential interactions between the MHHS TOM and Ofgem's Significant Code Review on [Reform of network access and forward-looking charges](#). ElectraLink suggested setting up further CCDG subgroups to look at the Distribution Use of System (DUoS) charging methodologies and load managed areas. The Chairman noted the need to keep the number of subgroups manageable.
- 3.4 The Chairman suggested that it would be useful to map out the work currently being undertaken on the TCR and Forward-looking charges review (e.g. milestones, timescales and governing Code(s)). This will enable the CCDG to make a list of all outstanding TOM questions related to this work, for example on the future of Standard Settlement Configurations (SSCs) and Line Loss Factor Classes (LLFCs). Once the dependencies and timings are understood, the CCDG can then agree how and when to take these questions forward. ELEXON, Ofgem and ElectraLink agreed to discuss this offline in the first instance.

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ACTION 05/09

- 3.5 The Distribution member volunteered to help act as liaison with Distributors on their requirements, if needed.
- 3.6 A CCDG member commented that they believe the transitional question on slide 14 is a good one, and could potentially be addressed by making the text more generic now. For example, existing Unmetered Supplies (UMS) definitions could be rationalised.

Master Registration Agreement (MRA)

- 3.7 Gemserv (MRASCo) [presented](#) an overview of the impact on the MRA. It highlighted that it has added an extra column to indicate where impacted MRA clauses will be located in another Industry Code after the Go-Live date for the Central Switching Service (CSS), and whether the new location will be the Balancing and Settlement Code (BSC) or the Retail Energy Code (REC). Gemserv advised that this mapping is based on the latest MRA traceability matrix for the [Switching Programme](#).
- 3.8 The CCDG noted the question on slide 19 about retrospective amendments to Metering Point Administration Data (MPAD). It clarified that it was not possible to make retrospective amendments in the CSS; however Registration data items like Energisation Status can be changed. In response to the question on the same slide about refreshes, ELEXON clarified that the TOM requirements already state that there will be refreshes of data from the Registration Service to the Data Services. The work being undertaken by the joint subgroup of the CCDG and Architecture Working Group (AWG) will clarify if these refreshes are needed.
- 3.9 ELEXON noted the reference on slide 20 to the BSC Panel report and advised that this report, or an equivalent/enhanced replacement, is still required. ELEXON noted that there are existing questions over whether the report's content fully meets the BSC's needs (e.g. to support the Performance Assurance Framework) and that ideally it would be enhanced. ELEXON noted that the TOM needs a single view into Registration data, so that it can be established what the Registration data was at any point in time.
- 3.10 While ELEXON noted that the MRA drafting regarding the BSC Panel report is currently locked down for the Switching Programme, Gemserv clarified that this text will eventually move to the BSC. ELEXON and Gemserv agreed to discuss offline how any improvements to this report can best be progressed.

ACTION 05/10

- 3.11 The CCDG confirmed that the Disputed Change of Supplier Readings process will still be required for Supplier billing purposes. It discussed whether the frequency of Erroneous Transfers (ETs) would fall under the TOM and agreed that there is an outstanding question about how these will be corrected. However, the process (or a new equivalent) will need to be retained. ELEXON agreed to consider this further.

ACTION 05/11

- 3.12 Gemserv asked if amendments are needed to the Supply Number included on customers' bills, since these includes data items (like Profile Class and Meter Timeswitch Code) that will/may no longer exist under the TOM. The CCDG confirmed that it had already noted this as a potential consequential impact of the TOM. It noted that there is a question as to whether Parties still use the full Meter Point Administration Number (MPAN) that appears on bills, or if they just use the 'core' MPAN and look up the rest in the Meter Point Administration Service. ELEXON and Gemserv agreed to discuss which existing governance forum (e.g. the MRA's Issue Resolution Expert Group) is the best place to progress this.

ACTION 05/12

- 3.13 The CCDG noted that it needs to confirm if Related MPANs are still required under the TOM, and that this has already been raised in its discussions.
- 3.14 ELEXON noted that the BSC matrices do not currently include impacted MRA clauses that will move to the BSC and its subsidiary documents as part of the [Retail Code Consolidation](#) Significant Code Review (SCR). It also needs to identify any BSC clauses that will be moving to other Industry Codes.

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ACTION 05/13

BSC

- 3.15 ELEXON [presented](#) an overview of the required BSC changes, along with a list of questions for the CCDG.
- 3.16 A CCDG member asked if there are any criteria for what requirements should be in the BSC itself versus Code Subsidiary Documents (CSDs). ELEXON confirmed that the [CSD Architecture Principles Document](#) sets out principles about what should be in different types of CSDs, as well as how requirements should be documented. It also references the requirement in BSC Section F3.1 that provisions should not be included in CSDs unless they:
- Are consistent with the BSC provisions; and
 - Do not impose new material obligations on Parties or Party Agents that are not authorised or envisaged by, or subsidiary to, the BSC provisions (i.e. there must be a 'hook' from the BSC to the CSD provisions).
- 3.17 ELEXON noted that, although the CSD Architecture Principles Document sets out the information to be included in BSC Procedures, it is not specific on the structure, format or presentation of this information. The Architecture Principles Document can also be amended if appropriate.
- 3.18 The CCDG agreed with ELEXON's proposed approach of creating new BSC Sections or Annexes for the new TOM requirements, to enable existing NHH provisions to be removed at the end of transition. ELEXON noted that there will need to be an overall description of how to use the old and new rules during transition.
- 3.19 A CCDG member asked if Section L 'Metering' would be impacted. ELEXON ran through the changes to this section that it has identified in the matrix, noting that these are mostly minor.
- 3.20 The CCDG agreed to remove the concept of the Small Scale Third Party Generating Plant Limit (SSTPGPL) from the BSC. The SSTPGPL is the capacity threshold above which generation that is metered for Settlement must be settled Half Hourly (HH). The CCDG agreed that the original intention of this related to the costs of HH metering, which is no longer an applicable consideration for smart Meters since the cost of these is being socialised through customer bills. It agreed that there may be a need to further consider how/when the SSTPGPL is removed.
- 3.21 The CCDG discussed Export Settlement, noting that the [Smart Export Guarantee](#) (SEG) only applies to new connections. Ofgem highlighted that its [draft Impact Assessment consultation](#) (see item 5 below) proposes that all Export is registered/metered for Settlement and is settled HH. ELEXON noted that the TOM already supports HH Settlement of registered Export.
- 3.22 The CCDG discussed ELEXON's question about the existing BSC Section K2.4.6 requirement to obtain customer consent to register customer-owned Meters. It agreed that this requirement seems strange but that ELEXON should check with its legal team what the original intention of this was.

ACTION 05/14

- 3.23 The CCDG considered the best replacement terminology for existing Metering System definitions. It agreed to use the term 'Supplier Volume Allocation (SVA) Metering System(s)' where the same rule applies to all SVA Meters, and otherwise to potentially identify Meters by TOM Market Segment.
- 3.24 For existing references to Meter Operator Agents (MOAs), the CCDG noted the need to check the terms being introduced/used under the Retail Code Consolidation SCR. It noted that the terminology used will also need to support any Qualification and assurance requirements for specific roles. However, it expressed a preference for continuing to use the term MOA unless there is a pressing reason not to – as this term is widely used elsewhere.
- 3.25 Overall, the CCDG was in favour of keeping terms generic where possible and only breaking down into Market Segments when needed (e.g. for different Qualification requirements). A member suggested replacing the term 'Equivalent UMS' with just 'UMS'.

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- 3.26 The CCDG noted that there are outstanding questions on how Settlement data under the TOM will be used to support other existing BSC processes that currently use data provided by Data Aggregators (such as the Capacity Market, [TERRE](#) and Demand Disconnection Events). Ofgem suggested investigating whether there is potential for these to have a common solution. ELEXON agreed to keep a watching brief on [Issue 89](#) 'Ensuring Demand Control Event procedures remain fit for purpose' and flag where there are dependencies.

ACTION 05/15

- 3.27 ELEXON highlighted the need to agree how long Settlement data will be retained under the TOM. The Chairman advised that the CCDG only needs to define how long data should be kept to support the Settlement process/timetable. She noted that Ofgem has yet to define the separate governance regime by which third parties (e.g. innovators, academics, public interest groups) can access/use HH Settlement data for non-Settlement purposes. The Chairman commented that the TOM must therefore not create any barrier to keeping data longer if this is needed to support these other uses. She noted her understanding that there is no architectural barrier to the BSC Central Settlement Services retaining data indefinitely.

BSC Procedures (BSCPs)

- 3.28 ELEXON [presented](#) an indication of the impacts on existing BSCPs, as well as where new BSCPs may be needed/appropriate.
- 3.29 The CCDG agreed that the approach chosen for the MOA BSCP may depend on what MOA obligations end up in the REC.
- 3.30 The CCDG noted that there are different ways to approach the scope of BSCPs, each of which has pros and cons:
- Including all obligations for one service/role in a single BSCP, which can be an advantage for auditing but can lead to processes being split or duplicated across multiple BSCPs; or
 - Including all aspects of a single process or set of processes within one BSCP, which resolves the duplication issue but makes it potentially harder for a service/role to identify all of its obligations.
- 3.31 ELEXON noted that the existing set of BSCPs uses a mix of both approaches, with some split by role and others by process. A CCDG member suggested potentially splitting by process but with the ability to tag obligations by service/role so that these can be identified easily.
- 3.32 A CCDG member commented that creating new BSCPs gives an opportunity to consider whether their requirements and processes can be presented in a more effective and user-friendly way. The Chairman noted that, at [CCDG02](#) in January 2020, ELEXON had sought feedback from members on what BSCP improvements would be most beneficial to participants. She noted that the time-constraints of the TOM work may limit what can be done under MHHS and that some improvements may need to be considered as part of wider digitalisation work.

BSC Service Descriptions

- 3.33 ELEXON [presented](#) an overview of the potential changes to BSC Service Descriptions, as well as a list of other types of CSDs which may also need to change.
- 3.34 A CCDG member believed that instruction processing could be dealt with by using sunset clauses.
- 3.35 The Chairman noted an opportunity to consider whether User Requirements Specifications still add value as, at [CCDG02](#), members had indicated that they do not use these documents.

4. Update on Smart Energy Code / Data and Communications Company impacts

- 4.1 Ofgem [presented](#) an update on how the Data and Communications Company (DCC) and Gemserv (SECAS) are working to agree the DCC solution to implement the TOM. This needs to be confirmed before Gemserv can complete the Code Change Matrix for the Smart Energy Code (SEC).

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- 4.2 The CCDG noted that the two options being considered for the Meter Data Retrieval Service (creating a new DCC user or adapting the existing 'other user' role) were the two options identified previously by the Design Working Group (DWG). The DWG had not expressed a strong preference between these options, but had considered that the other user role may not give access to the daily data needed for the TOM. CCDG members reiterated this concern. Some members suggested that the other user role may also give rights to send other types of DCC request that may not be appropriate for the MDR from a security and/or privacy perspective.
- 4.3 However, the CCDG noted the advice on the slides that creation of a new user role may require a firmware update. It agreed that it would be preferable to avoid this if possible and asked for confirmation that using the other user role would avoid a firmware impact. Ofgem agreed to confirm with the DCC whether this is the case and to provide a further update after the SEC's Technical Architecture and Business Architecture Sub-Committee (TABASC) has discussed the options at its meeting on 7 May 2020.

ACTION 05/16

5. Summary, next steps and plan for CCDG06

Matrices next steps

- 5.1 The Chairman noted that, as the CCDG is still working on the detailed TOM solution, there will need to be a second pass of completing/reviewing the matrices later in the summer once this work is complete. The matrices can then be included in the CCDG's postponed consultation on the detailed TOM design. The Chairman noted that, until the consultation has been completed, drafting will not begin on any legal text that is dependent on its outcome.
- 5.2 The Chairman noted that the discussion had highlighted a number of outstanding questions. The CCDG agreed that Code Bodies should record these in their matrices so that they can be tracked and revisited.

ACTION 05/17

- 5.3 The Chairman suggested that questions relating to the legal drafting can be progressed later than those that affect the TOM design.

Plan for CCDG06

- 5.4 ELEXON confirmed that CCDG06 will be held by Skype on Tuesday 19 May 2020, from 10:00-13:00. The current planned agenda for this meeting includes:
- An ELEXON Q&A on the scope of the AWG's work (including what the AWG needs from the CCDG and the joint CCDG/AWG subgroup)
 - Confirming the work plan for the CCDG/AWG subgroup
 - Agreeing the remaining detail of the Registration and Run-off straw men
 - Closing off the other outstanding TOM design actions as far as possible
 - Agreeing transition requirements for Grid Supply Point (GSP) Group Correction.

Adjustments to CCDG and AWG work plans

- 5.5 ELEXON advised that it has updated its [CCDG's](#) and [AWG's](#) web pages to reflect the adjustments made to their work plans in light of COVID-19. ELEXON highlighted that Ofgem has confirmed that the CCDG and AWG can continue work providing that the groups:
- Retain sufficient cross-section of representation / member resources
 - Regularly review / agree activities, to ensure they remain achievable

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- Don't undertake any formal consultations at this time (the CCDG's June 2020 consultation will be postponed until a future date which is to be agreed with Ofgem)
- Don't progress any activities that could be seen to materially pre-judge the results of any CCDG/AWG consultations not yet undertaken.

Recent Ofgem MHHS publications

- 5.6 ELEXON noted that, on 30 April 2020, Ofgem published its [draft Impact Assessment consultation document](#). Ofgem has not set a deadline for responses at this time.
- 5.7 Ofgem has also published an [open letter](#) to clarify issues around access to data for Settlement purposes. ELEXON noted that these publications can be discussed at CCDG06.

ACTIONS

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 – Open – Update provided at CCDG02. Ofgem is still considering this, and a representative from Ofgem's REC team will be attending future Code bodies meetings.

02/05 – ELEXON to clarify what data item outputs the AWG needs from the CCDG and when – Open – ELEXON gave updates at CCDG03 and CCDG04 Part A. This is also being considered by the new joint CCDG/AWG subgroup. ELEXON to provide a Q&A session at CCDG06.

04/02 – ELEXON to work with the relevant CCDG members to draw out the pros and cons of the three options for Settlement run-off (including quantifying any associated risks), before bringing the outputs to CCDG05. ELEXON to send the relevant STAG paperwork to the volunteer CCDG members – Open – ELEXON sent the STAG paperwork to relevant members on 26 March 2020. Offline discussion held on 6 April 2020. ELEXON gave a verbal update at CCDG05 Part A and will bring the outputs to CCDG06.

04/10 – ELEXON to write up, in one of the Working Documents, the solution for adjusting Load Shapes for Register Read Meters with switched load. Write-up to clarify which types of switched load the solution covers – Open – ELEXON will capture this in Working Document A and bring it to CCDG07. Due date revised accordingly.

04/11 – ELEXON and the CCDG to revisit the need for any TOM requirements for RTS Meters at a future meeting, once more information is available on any extension to the RTS arrangements – Open - ELEXON is maintaining a watching brief.

04/13 – ELEXON to continue updating the ISD tables and write-up in Working Document A to reflect the CCDG04 discussions and outstanding areas – Open – Updated with CCDG04 discussions. Due date revised to CCDG07 to allow for further discussion and updates from CCDG06.

04/14 – ELEXON to work with internal colleagues and a CCDG member to progress a potential solution to separate the LLF and LLFC data items, as discussed at CCDG04 Part B – Open – Email received from the CCDG member on 3 April 2020, containing suggested options for a LLF look-up table. ELEXON to give an update at CCDG06.

04/15 – ELEXON and a CCDG member to work up a decision tree, to help determine the best option for validating that a TOM Service Provider can operate in the Market Segment for the Meter to which they are appointed – Open – Email received from the CCDG member on 3 April 2020 with suggestions for a decision tree. ELEXON to present at CCDG06.

04/16 – ELEXON to continue finessing the Registration straw man for inclusion in Working Document A, incorporating the discussions from CCDG04 – Open – ELEXON to present at CCDG06.

04/17 – ELEXON to look into whether the Switching Programme has considered any ways of linking Import and Export MPANs to a single property – Open – Due date revised to CCDG07.

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05/02 – ELEXON to consider further the defaulting rules for each market segment and bring its suggestions to CCDG06 – Closed – Circulated on 1 May 2020. To be discussed at CCDG06.

05/03 – CCDG to revisit its discussion on exception reporting once ELEXON has an update from the CCDG/AWG subgroup's work, potentially at CCDG06 – Open – Due date revised to CCDG07.

05/04 – ELEXON to update the transitional Scaling Weights spreadsheet to use a theoretical volume of 1GW split across CCCs, so that members can attempt to establish the delta between old and new Scaling Weights before discussing this further at CCDG06 – Closed – Spreadsheet circulated on 23 April 2020. To be discussed at CCDG06.

05/05 – ELEXON to circulate a proposed table of valid Load Shape categories to CCDG members – Closed – Circulated on 1 May 2020. To be discussed at CCDG06.

05/06 – ELEXON to check that requiring the Load Shaping Service to calculate the Advanced Market Default Load Shape has no other knock-on impacts on the TOM requirements, for example those relating to timescales – Open – ELEXON will give an update at CCDG06.

05/07 – Members to send any detailed comments on the Code Change Matrices to CCDGSecretary@elexon.co.uk – Open – No comments received so far.

05/08 – Ofgem and ELEXON to set up further offline discussions as needed to address the CCDG's matrices comments with the relevant code bodies – Open.

05/09 – ELEXON, Ofgem and ElectraLink to discuss how to map out the dependencies between the TCR, Review of forward-looking charges and the MHHS TOM – Open.

05/10 – ELEXON and Gemserv to discuss how any improvements to the MRA's BSC Panel report can best be progressed – Open.

05/11 – ELEXON to consider the potential for, and process to correct, Erroneous Transfers under the TOM – Open.

05/12 – ELEXON and Gemserv to discuss which existing governance forum (e.g. the MRA's Issue Resolution Expert Group) is the best place to consider consequential changes to the Supply Number – Open.

05/13 – ELEXON to update the BSC matrices to include any impacted MRA clauses that will move to the BSC and its subsidiary documents as part of the Retail Code Consolidation SCR, as well as identifying any BSC clauses that will be moving to other Industry Codes – Open.

05/14 – ELEXON to check with its legal team what the original intention of BSC Section K2.4.6 was – Open.

05/15 – ELEXON agreed to keep a watching brief on Issue 89 and flag where there are dependencies with the MHHS TOM – Open.

05/16 – Ofgem to confirm whether using the 'other user' DCC role requires a firmware update, and provide a further update on the DCC solution after the TABASC meeting on 7 May 2020 – Open – Ofgem to provide a verbal update at CCDG06.

05/17 – ELEXON, ElectraLink and Gemserv to record all outstanding impact/drafting questions in their respective Code Change Matrices, so that these can be tracked and revisited – Open.