

NEW CACOP PRINCIPLE 13

MEETING NAME BSC Panel Meeting

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Purpose of paper Decision

Classification Public

Summary At its December 2014 meeting the BSC Panel asked ELEXON to work with other industry Code Administrators to introduce a new Principle on cross Code coordination into the Code Administration Code of Practice. We present a draft of the new Principle for comment before consultation.

1. Background

- 1.1 The Code Administration Code of Practice (CACoP) defines high level Principles that electricity and gas Code Administrators (CAs) should endeavour to follow in order to facilitate convergence and transparency in Code modification processes, and to help protect the interests of small market participants and consumers.
- 1.2 The CACoP is reviewed at least annually providing the opportunity for CAs to discuss how the CACoP Principles are met, to share best practice and to recommend amendments to the current CACoP.
- 1.3 ELEXON presented the 2014 review report to the BSC Panel on 11 December 2014 ([Panel 231/08](#)) and the Panel subsequently recommended the proposed changes to the CACoP to Ofgem for approval. Ofgem published its [decision letter](#) and approved all the proposed changes to the CACoP on 26 February 2015.
- 1.4 During the December 2014 meeting, the BSC Panel believed it was important to include a Principle within the CACoP to ensure better cross Code coordination. ELEXON took an action to discuss cross Code coordination with other CAs and developed a new CACoP Principle (Principle 13). This Principle is as follows:

Principle 13: Code Administrators will ensure cross Code coordination to progress changes efficiently where modifications impact multiple Codes

Principle description

Code Administrators will endeavour to communicate, coordinate and work with each other on modifications that impact multiple Codes to ensure changes are progressed efficiently.

Guidance on meeting the Principle

To achieve this principle Code Administrators should:

- proactively identify and discuss related cross Code changes and their impacts, by (but not limited to) seeking views from Code Panels and Workgroups.
- proactively update the Code Panels regularly on relevant cross Code changes.

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- inform the Code Panels about any related cross Code changes when they make a decision on any modifications.
- have joint or back to back Workgroup meetings as much as possible on related cross Code changes.
- work together to coordinate the progression and implementation timetables of related cross Code changes.
- if practically possible, encourage representatives from other Codes to join the Workgroup meetings when there are cross Code impacts.
- if practically possible, coordinate to send a package of related cross Code changes to the Authority.
- encourage Workgroups and Code Panels to not unduly delay changes due to related cross Code changes.

2. Next steps

- 2.1 Draft Principle 13 will be provided to all CA Panels for comments. If any CA Panel suggests material change to the draft, ELEXON will work with other CAs to make the required amendments before the new Principle is issued for consultation.
- 2.2 ELEXON, as the lead CA for the 2014 CACoP review, will host a central consultation for 15 Working Days and collect the results on behalf of all the CAs. To ensure that the industry and interested parties are informed about the consultation, all CAs will circulate a link to the relevant ELEXON consultation webpage to their change mailing recipients.
- 2.3 The CAs will review the consultation responses and consider any changes to the draft of Principle 13 if any suggestions are received. The final draft will be presented to each CA Panel, who will be invited make a recommendation to Ofgem on whether the new Principle should be approved.

3. How will the Principle work?

- 3.1 In order to give the Panel an understanding of how Principle 13 will function we have included a high level overview of the working practice that will support the Principle. It should be noted that this working practice builds upon existing procedures.
- 3.2 To date, out of the 320 BSC Modifications raised, approximately 60 have had cross Code impacts. In almost every case the assessment and implementation of these changes has been completed with no issues, and as such we should not reinvent those practices that work. However, we acknowledge these practices need to be made more robust in order to deal with increasingly complex cross Code issues such as [P272](#).
- 3.3 In essence the new Principle will be underpinned by more regular structured meetings between CAs and increased reporting designed to provide greater clarity and transparency of issues.

Upcoming Change

- 3.4 CAs will hold monthly informal meetings to share information about upcoming change and to identify where there might be a cross Code impact.

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- 3.5 Where issues are identified these will be captured in the Change Report and highlighted to the Panel. The Change Report will also provide a high level timeline of when these issues are likely to be raised as changes and/or what mitigating actions are being taken across the industry.
- 3.6 ELEXON will also support this process by using those members of staff who sit on the other CA Panels to ensure consistency and that the right messages are being sent.

Initial Written Assessment

- 3.7 Where a cross Code impact is identified before a Modification is raised, the CAs will discuss the most appropriate timetable and approach to progress the necessary Modifications. This information will be captured in the Initial Written Assessment (IWA) which will be presented to the Panel in order to detail what the cross Code impacts are and what the intended plan and timetable will be.
- 3.8 The IWA will also allow the Panel to set the scope of discussions which should ensure that Modifications do not become ever increasing in size, nor bogged down in perpetual assessment.
- 3.9 As a Modification progresses through the Assessment Procedure, the Panel will be kept up to date with its progress via the Change Report and any required amendments to the timetable appropriately discussed and approved or rejected as required.

During Assessment

- 3.10 Where a cross Code impact is identified during the assessment of a Modification, the panel will be notified at the next available meeting. The relevant CAs will meet to discuss the potential impact and agree a pragmatic way forward. An updated timetable for the Modification will be presented to the Panel for approval. This timetable will also include the steps being undertaken to resolve the cross Code issue.
- 3.11 We are currently in discussions with other CAs to provide detail behind the working practice and ensure it can be implemented in the most efficient manner possible. Once we have confirmed these working arrangements we will gladly share them with the Panel.

4. Recommendations

- 4.1 We invite you to:
- PROVIDE** any comments on the draft CACoP Principle 13; and
 - AGREE** that ELEXON consult the industry on the draft CACoP Principle 13.

Attachments

None

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