ELEXON

Headline report

Meeting name	**Code Change & Development Group – MHHS SCR**	Purpose of paper	**Information**
Meeting number	**11**	Classification	**Public**
Date and time	**17 November 2020**	Venue	**By webinar**

Synopsis	**Summary of the eleventh CCDG meeting and actions arising.**

1. Introduction, apologies and meeting objectives

1.1 The Chairman introduced the meeting and noted apologies from members.

1.2 The Chairman confirmed that the meeting objectives were to:

- Note the update on the new migration deliverable
- Agree approaches for design questions arising since CCDG10
- Agree the key messages and questions for the group's forthcoming consultation on the detailed Target Operating Model (TOM) design and Code Change Matrices
- Agree the final BSC[1], DCUSA[2] and MRA[3] Change Matrices for inclusion in the consultation.

1.3 The Chairman advised that Elexon will then update the draft consultation document with the comments from the meeting and upload it on MS Teams, for the CCDG to review during the week commencing 23 November 2020.

ACTION 11/01

1.4 The Chairman noted the importance of receiving all material comments during November's review, as the consultation needs to be issued within a couple of days of CCDG12.

ACTION 11/02

1.5 The Chairman also informed the CCDG members that Elexon is planning to host a short industry webinar on 13 January 2021 to give an overview of the consultation and answer questions. CCDG members noted that a morning session that day would clash with the MRA's Issue Resolution Expert Group (IREG) meeting. Elexon agreed to move its webinar to the afternoon.

2. Update on new transition/migration deliverable

2.1 The Chairman noted that Elexon is continuing to re-plan the CCDG's deliverables with Ofgem, alongside Ofgem's own re-plan of its wider MHHS activities. She noted that the addition of the new transition deliverable requested by Ofgem is likely to give the following revised milestone timings, although these are still to be confirmed with Ofgem:

- Consultation on end-state TOM design & Code Change Matrices – Q4 2020
- Consultation on transition (migration, Settlement run-off, assurance) – Q2 2021
- Interim report to Ofgem on transition deliverable – Q3 2021
- Consultation on redlined changes (legal text) to Industry Codes – Q1 2022

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[1] Balancing and Settlement Code.
[2] Distribution Connection and Use of System Agreement.
[3] Master Registration Agreement.

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- Final report to Ofgem on all deliverables – Q2 2022.

2.2 A CCDG member asked if it was possible to complete the deliverables quicker by running activities in parallel. Elexon confirmed that it has put parallel activities in the plan wherever possible, for example by starting work on the transition deliverable at the January 2021 CCDG meeting while the end-state design consultation is still out with industry. Elexon agreed to share a more detailed work plan for the new transition deliverable at CCDG12.

ACTION 11/03

2.3 Ofgem confirmed that, while it is not in a position to publish its revised MHHS SCR/Programme plan just yet, the re-planned CCDG milestones are unlikely to impact the timescales for either its Full Business Case decision or the implementation of MHHS.

2.4 A CCDG member asked whether the AWG's work has any dependencies on the new transition deliverable, suggesting there are areas of this work where the AWG may need more detail. Elexon responded that it did not believe there are any significant dependencies and that the end-state business requirements are more important to the AWG. However, the AWG is not due to issue its consultation until Q2 2021, so any transition considerations of particular interest to the AWG could potentially be front-loaded in the plan.

2.5 A CCDG member asked if the reference to 'assurance' in the transition deliverable means Industry Code assurance around the migration process (e.g. BSC and SEC[4] Qualification milestones) or wider implementation programme assurance. Elexon confirmed that it is the former, noting the wider Programme Party Co-ordinator role proposed by Ofgem for the MHHS implementation programme. Similarly, Elexon noted that the transition deliverable will set out a logical ordering of migration milestones but will not be a detailed programme implementation plan, since this planning will be undertaken by the MHHS Programme Manager function. The CCDG member asked when Ofgem intends to appoint the Programme Management roles and Ofgem confirmed that this is likely to be around the same time as its Full Business Case decision.

2.6 A CCDG member noted that it is difficult to review the CCDG work plan in isolation of the wider Ofgem re-plan and asked when this would be available. Ofgem confirmed that it intends to socialise its revised plan as soon as possible.

3. Updates on other SCR work streams

3.1 Ofgem confirmed that it is still going through the responses to its Draft Impact Assessment Consultation. Ofgem is also re-planning on the Significant Code Review (SCR) / Programme timelines and working on the arrangements around the Programme Management roles.

4. Design questions arising since last meeting

Exception Reporting

4.1 Elexon presented an update on the exception reporting discussions held on 12 November 2020 with interested CCDG members and the Architecture Working Group (AWG) Technical Lead. It highlighted the proposal to scale back exception reporting by the BSC Central Settlement Services, based on the requirement for upstream Data Services to validate their own data against Registration data before submitting it to the BSC central services.

4.2 The CCDG noted the need to use architecture-neutral terminology like 'make available' in the consultation, so as not to pre-suppose any particular technology solution (whether existing, amended or new). Similarly, wherever possible, documentation should refer to 'services' rather than 'systems'.

4.3 The CCDG noted the architectural assumptions in the slides. It agreed that the consultation document should make clear that it is for the AWG to tell the CCDG if these assumptions are incorrect, or if its business requirements are inefficient.

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[4] Smart Energy Code.

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Requirement for Meter Advance reconciliation against daily consumption

4.4   Elexon presented an update from its offline discussions with interested members of the CCDG, some original Design Working Group (DWG) members and the Data and Communications Company (DCC). Elexon advised that the DWG originally agreed a requirement for the Processing Service to undertake this validation, and that the DCC has since raised concerns about the impact on its capacity. However, although the DWG's requirement refers to validating against daily consumption, it is silent on the frequency with which this validation should be undertaken.

4.5   Elexon proposed that there is no action for the CCDG to take at this point in time, as the requirements are based on what the DWG believed is best for Settlement. Elexon suggested that it is for the DCC to set out whether/why this requirement is cost-prohibitive and, if there is a capacity constraint, what frequency of validation it can support. The CCDG agreed. It also agreed that this discussion could continue offline without needing to be captured in the consultation at this stage.

4.6   A CCDG member asked whether the requirements are overly prescriptive in terms of the accuracy risk, noting that any Meter Type fault should be dealt with separately. The CCDG agreed a need to collect Register Reads periodically. It also agreed that any switch from HH level data to Register Reads would need to have an up to date Register Read from the end of the HH period, implying that a cumulative read was taken alongside the HH consumption data.

4.7   A CCDG member agreed to circulate some statistics on their organisation's mini-MAR validation failures, believing that these generally reveal Meter faults.

ACTION 11/04

4.8   Elexon agreed to double-check the DWG's original requirements on triggering the Meter fault process.

ACTION 11/05

Treatment of domestic Advanced Meters that have opted out of sharing HH data

4.9   Elexon presented two options for accommodating Advanced Meters where customers have opted out of sharing their Half Hourly (HH) data for Settlement purposes. Elexon noted that the original TOM design assumed that the ability to opt out would only apply to smart Meter customers. Advanced customers can currently opt out of sharing their data at finer than monthly granularity. The CCDG noted that Ofgem's data access policy decisions made to date for domestic customers have not differentiated between Smart and Advanced customers. Ofgem advised that it is however considering whether there are any particular groups of domestic customers who should not be able to opt out of sharing HH data for Settlement purposes, and will set any decisions on this out in due course.

4.10   The CCDG expressed a preference for Option 2, which would keep the opted-out Meters within the Advanced Market Segment but would require the Advanced Data Service (ADS) to apply load shapes for these Meters. The CCDG considered that this is simpler than Option 1, which would treat opted-out Advanced metered domestic customers as non-Smart. The CCDG noted that Option 1 would create complexities around Change of Segment if the customer's opt-out preference (but not their Meter) changes.

4.11   A CCDG member commented that an additional advantage of Option 2 is that it caters for Export capability, since customers cannot opt out of sharing HH Export data.

4.12   The CCDG considered that the potential downside of Option 2 is that the additional ADS requirements will apply to only a small number of opted-out domestic Advanced Meters. However, members believed that the ADS would have the capability to support daily midnight reads and so the requirements are unlikely to be cost-prohibitive.

4.13   The CCDG noted that Option 2 will require a decision on how to flag data. It noted that it will also require the Meters to be included in one of the existing Advanced Consumption Component Class (CCC) Ids, as well as the creation of more estimation categories.

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4.14   A CCDG member asked if Option 2 could drive out different performance measures. Elexon confirmed that it is unlikely that a single performance standard will be applied to a particular Market Segment, given the DWG's agreed principle that the Performance Assurance Framework (PAF) should not penalise Suppliers for customer choice.

4.15   The CCDG agreed that the consultation should emphasise that this approach has been developed in parallel with Ofgem's policy work and that, while the group's preference is currently for Option 2, there remain some outstanding questions for Ofgem. One of these questions is whether domestic customers with Current Transfer (CT) Advanced Meters can opt out. Elexon agreed to discuss this further with Ofgem.

ACTION 11/06

4.16   Elexon also agreed to consider if there is any way to quantify the issue (e.g. number of domestic CT Meters). It is possible that this could be derived from looking at the CT counts spreadsheet and cross-referencing with the recently obtained ECOES[5] extract, which contains the domestic/non-domestic indicator and Meter Type.

ACTION 11/07

Approach to SSCs and TPRs

4.17   Elexon presented its proposal that Standard Settlement Configurations (SSCs) and Time Pattern Regimes (TPRs) are frozen at the start of transition so new ones cannot be created. Elexon proposed that the existing SSCs/TPRs are kept for a certain period of time after the end of transition, to support non-Smart Meters with switched load, before being discontinued. Elexon initially proposed five years; the CCDG agreed to word this in the consultation document as 'at least five years after the end of transition'. The CCDG agreed that the consultation should be clear that the intention is to remove SSCs and TPRs in the long term. The CCDG also noted that the Meter Technical Details (MTDs) approach proposed in the slides will need the same end date, after which the D0149/D0150 flows would need to change for non-Smart Meters.

4.18   A CCDG member asked if there is an opportunity to remove any existing SSCs and TPRs that are unused, ahead of MHHS. They suggested that the BSC's Supplier Volume Allocation Group (SVG) could lead this exercise. Elexon agreed to suggest this to the SVG the next time it updates it on the CCDG's work.

ACTION 11/08

5.   Agree key messages for consultation document

5.1   Elexon presented its suggested key messages for inclusion within the consultation document's Executive Summary. Elexon noted that the messaging focuses on clarifying the scope of the CCDG's consultation, including what's out of scope and will be addressed elsewhere (e.g. through subsequent CCDG deliverables, the AWG or Ofgem policy work). It also focuses on highlighting changes to existing arrangements or parameters with which the industry is familiar.

5.2   The CCDG agreed that the consultation document needs to:

- Be clear on what the AWG is and isn't delivering on architecture (Elexon agreed to craft appropriate wording with the AWG Technical Lead)

- Refer to services, not systems, wherever possible so as to remain architecture-neutral

- Refer to the 'Registration Service (SMRS)' to avoid any potential confusion with the Central Switching Service (CSS)

- Be clear that the Change of Segment process will replace Change of Measurement Class (CoMC) at the end of migration

- Include the agreed key messaging on the approach to SSCs/TPRs (see item 4 above)

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[5] Electricity Central Online Enquiry Service.

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- Explain that only key industry-facing BSC process documentation, and not all BSC Configurable Items, are included in the Code Change Matrices – and that the other required changes to BSC Configurable Items will be developed and implemented later

- Explain that the Industry Code Changes will be made by Ofgem using its SCR or Smart Meters Act powers rather than through the normal Code change processes

- Highlight the impact of the proposed new Service Appointment process, noting that the design has used this as an opportunity to design out the D0155-D0011-D0148-D0205 process by including the additional non-Settlement data items in the Registration Service

- Be clear that the Metering Service (Advanced) and Metering Service (Smart) are expected to be two independent Market Roles (although the same entity can provide both roles if it wishes). The earlier DWG consultation implied that these would form two different levels of Qualification but full separation of Market Roles is necessary to implement the CCDG's recommended appointment process, as it will need to check whether an MSA or MSS is valid.

6. Agree assessment against Ofgem's Design & Development Principles

6.1 Elexon noted that it has not received any further comments from members on this since CCDG10. It has therefore included the assessment within the draft consultation document.

7. Agree consultation questions

7.1 Elexon presented the latest draft consultation questions, updated with the comments from CCDG10. Elexon apologised for omitting an additional question agreed at CCDG10, which is 'Are there any non-Settlement reasons why your organisation would require new Related Meter Point Administration Numbers (MPANs) to be created in the target end state?'

7.2 Ofgem advised that it had some comments on the wording of Questions 1 and 2. Elexon and Ofgem agreed to discuss these further offline.

ACTION 11/09

7.3 Elexon also suggested adding the following extra question: 'For consistency we have adopted the existing BSCP structure when producing the BSCP Matrix. Do you think there are any drivers for changing the scope and structure of these documents?' CCDG members noted that participants are familiar with the existing BSCP scope/structure and are therefore likely to want to keep this. Elexon agreed that this is a likely preference, but commented that it would be useful to test this assumption before starting work on the legal drafting. The CCDG agreed to include the question, along with an explanation of why it is seeking views.

8. Update on REC and interaction with matrices

8.1 Ofgem advised the CCDG that it is still considering which Meter Operator Agent (MOA) provisions should move to the REC.[6] Ofgem will consult on its preferred option shortly. Whichever option is chosen, it is likely to be a straightforward 'lift and shift' of the processes, with any changes likely to be to governance arrangements. Therefore, as long as the CCDG continues to work to the latest REC traceability matrix, there is no further action for it to take currently regarding the Code Change Matrices. Elexon noted that the exact nature of the MOA obligations split was still being debated, and that the BSC Panel and BSC Performance Assurance Board (PAB) have raised concerns about the potential risk to Settlement of splitting the process and data exchanges between MOAs and DCs between Industry Codes. This risk is greatest in the Advanced (HH) market segment.

8.2 Elexon and Ofgem confirmed that version 2.0 of the REC (containing the code consolidation aspects) is planned to become effective in September 2021, when the Energy Market Data Specification (EMDS) will come into effect, replacing the Data Transfer Catalogue (DTC). The EMDS will catalogue a wider set of market messages than the DTC, which only defined what could be sent over the Data Transfer Service (DTS).. The

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[6] Retail Energy Code.

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CSS and REC v3.0 are now planned for implementation in mid-2022. The CCDG agreed that its legal drafting will have the most dependency on the REC v2.0 baseline. As the CCDG's legal text consultation is now planned for Q1 2022 (see item 2 above), this can therefore be taken into account.

9. Agree BSC Change Matrices (BSC, BSCPs, Service Descriptions, PSL)

9.1 Elexon noted that no material changes have been made from the versions it presented at CCDG05 Part B in May 2020.

9.2 CCDG members had no comments on the matrices, which will now be included in the consultation. The CCDG agreed to leave the list of outstanding questions in the matrices to show that it has considered them, but is not in a position to answer them yet.

10. Agree MRA Change Matrix

10.1 Gemserv presented various outstanding questions, which the CCDG answered as follows:

- The outstanding detail on Registration Data items will come from subsequent AWG deliverables
- There will be no complete refresh process for Registration Data – data will be made available as it is updated
- Any MRA references to specific Settlement Run timescales should be future-proofed to refer to the run timing 'as defined in the BSC'
- The CCDG's intention is to avoid Retrospective Amendments wherever possible
- The Settlement aspects of the Change of Supplier (CoS) process will be different and, even if Suppliers settle on HH data, Suppliers may not use HH data for billing since there are outstanding questions about what data items Suppliers need on a CoS for billing purposes (these fall outside the CCDG's remit and need a separate REC/MRA discussion)
- Similarly, the question about whether Data Services exchange Register Reads between themselves or whether the Supplier passes Register Reads to the Data Service is a billing question and requires a separate discussion.

10.2 After the meeting, Gemserv confirmed that no changes are required to the matrix as a result of the CCDG's comments. The matrix will now be included in the consultation.

11. Agree DCUSA Change Matrix

11.1 ElectraLink presented the changes made to the matrix since CCDG05 Part B, which reflect other recently-approved DCUSA changes. ElectraLink noted that further clarity is needed on the Access and Forward-Looking Charging (A&FLC) SCR before all detailed changes can be determined.

11.2 CCDG members had no comments on the matrix, which will now be included in the consultation.

12. Agree consultation messaging on CUSC changes (TNUoS)

12.1 Elexon presented its suggested messaging on the Transmission Network and Use of System (TNUoS) charging interactions between the BSC and the CUSC[7], noting the dependency on understanding the requirements of the A&FLC SCR.

12.2 The CCDG agreed the messaging for inclusion in the consultation document. Ofgem advised that its minded-to decision on the A&FLC SCR is now planned to occur during 2021; its exact timing is still to be determined and will be communicated shortly.

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[7] Connection and Use of System Code.

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13.   Agree consultation messaging on DUoS interactions

13.1   Elexon presented its suggested messaging on the Distribution Use of System (DUoS) charging interactions between the BSC and the DCUSA. It noted that, as with TNUoS, there is a dependency on knowing the A&FLC SCR requirements.

13.2   The CCDG agreed the messaging for inclusion in the consultation document. However, it asked that the document more clearly references the fact that the Targeted Charging Review (TCR) SCR will use the existing P222 data flow for Non Half Hourly charging, meaning that a replacement HH data approach will be needed.

14.   Summary and next steps:

14.1   The Chairman agreed the following next steps with the CCDG members:

- Elexon will update the consultation document with the comments from the meeting and post it on MS Teams.
- Members to review and comment from 23-27 November 2020 using MS Teams.
- Elexon to send the near-final draft to members on 7 December 2020 (CCDG12 paper day).
- CCDG to sign off the final consultation document at CCDG12 on 15 December 2020.
- Consultation to be issued on 17 December 2020, closing 26 January 2021.
- Elexon is planning an industry webinar for 13 January 2021.

14.2   A CCDG member commented that, at some point, the CCDG will need to determine whether BSC Parties require access to central BSC Settlement data (e.g. if Suppliers need access to this data for forecasting, and/or Distributors require it for charging purposes).