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Code Administration Code of Practice
(CACoP) Meeting 001

CACoP   Meeting Number: 001

Date:	29/01/2019	Location:	1-3 Strand, London WC2N 5EH
Start:	10:00 AM	End:	15:00 PM

Attendee	Company	Code
Rachel Hinsley	National Grid ESO	CUSC/Grid Code/STC
Mark Dunk (MD)	Energy Networks Association	DCode
Alison Beard (AB)	Gemserv Ltd	SEC
Eugene Asante (EA)	Gemserv Ltd	MRA
James Rees (JR)	Gemserv Ltd	ENA
Chris Shanley (CS)	Joint Office	UNC
Craig Murry (CM)	Elexon	BSC
Richard Colwill (RC) Dial in	ElectraLink	DCUSA
Fraser Mathieson (FM)	ElectraLink	SPAA
Chris Wood (CW)	Elexon	BSC
Matthew Wilcot (MW)	Elexon	BSC
Abigail Hermon (AH)	Gemserv Ltd	SEC
Colin Down	Ofgem	
Apologies		
Rachel Clarke	Gemserv	iGT UNC
Neil Brinkley	ElectraLink	SPAA
Secretariat		
Rob Marshall	National Grid ESO	Chair
Rashpal Gata-Aura	National Grid ESO	Technical Secretary

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1. Introductions/Apologies for Absence

1.1 The Chair welcomed the members to the first CACoP meeting hosted by National Grid, followed by introductions by all.

2. Competition Law Dos and Don'ts

2.1 The Chair, highlighted that the group should be mindful in their discussions around industry sensitive information and be vigilant of the Competition Act throughout the meeting.

3. Minutes and Actions from previous meeting

3.1 The group agreed that the minutes from the previous meeting held 27 November 2018 were a true reflection of the discussion held and can be found here

3.2 The group updated the Action log which can be found here

4. Industry Updates

Ofgem

4.1 The Ofgem representative stated that in connection with code governance, The Secretary of State announced a joint review by BEIS and Ofgem into the industry codes and code governance. There is scope for more fundamental reform than that set out in the CMA recommendations. Workshops are planned in for February.

4.2 He further stated that the Terms of Reference for the Review are available on the Ofgem website.

4.3 Ofgem approved the proposed changes to the CACoP Principles.

4.4 Ofgem representative went on to say that they are reviewing supplier licensing. A consultation looking to strength the criteria used to assess supply licence applications was published and closed on 23 January 2019.

4.5 Ofgem representative further stated that in preparation for Brexit licence changes, a consultation was launched on 14 January 2019 and responses are due back on 15 February 2019. In the event of a no deal Brexit, Ofgem modify the licences, with the aim of ensuring that the retained EU law will function effectively at the point of exit. Subject to clarity from the Government on a "no deal" outcome, Ofgem's intentions are to publish their direction ahead of exit day.

4.6 With regards to the Code Changes a meeting was held in December 2018 with all code administrators to discuss progress on "no deal code" changes. Ofgem stated that the responsibility is on the licensees and code administrators.

4.7 It was made clear that "no deal" changes should be prioritised and progressed to enable regulatory framework to be updated as close to exit day as possible.

4.8 The Ofgem representative further went onto say that the changes identified by the code administrators are largely non-substantial and can be progressed as self-governance. Ofgem expect this work to be prioritised to minimise uncertainty for market participants.

CUSC/Grid Code/STC

4.9   The CUSC representative notified the CACoP group, that a BSUoS taskforce has been set up and Ofgem 'minded to' to position on the TCR/SCR

UNC

4.10 UNC representative discussed the Brexit modification being raised as self-governance and also with urgent criteria. He stated that National Grid are aiming to have UNC the modification implemented by 29 March 2019. There were concerns raised within the group regarding implementation before the exit date dates across as it was their understanding the Ofgem expected implementation to be as close to the exit date as possible and that an April or May implementation date was more realistic. The Ofgem representative mentioned that the CACoP group were previously trying to implement across the Codes at the same time and confirmed the understanding of the group was correct. The UNC representative said he would inform National Grid of the discussions, so that they could take them into consideration.

4.11 UNC stated that 0621 modification was rejected by Ofgem and a new modification has now been raised. Urgency has been granted by Ofgem. There have been 11 workgroups planned between now and 6 March 2019.

4.12 He also told the group that a UIG taskforce has been progressing which will result in one new modification, further Shipper engagement and reporting into the Gas Performance Assurance Committee.

SPAA

4.13 SPAA representative advised the group that they are working jointly with UNC and have established a new Joint Theft Reporting Review Working Group. This group will review the various theft reporting requirements across suppliers, shippers and transporters and the first meeting is to be held on 1 March 2019.

4.14 SPAA representative further advised that a Workgroup with potential cross-code impacts is seeking to oblige Suppliers to send customer contact information to a secure repository held by Xoserve, for use by Transporters in dealing with supply issues.

4.15 SPAA representative further advised the group that the Joint MDD Migration Working Group is also ongoing, seeking to migrate the existing Market Participants MDD proves from SPAA and UNC governance in anticipation of Central Switching Service (CSS) Implementation.

4.16 SPAA representative stated that they are implementing changes for Brexit on 28th March 2019.

4.17 SPAA representative finally advised the group that they are reacting to SEC Modification 0006, which standardised the number of digits displayed by a SMETS 2 smart meter and required SPAA parties to react and amend code to ensure Suppliers were aware. SPAA are also looking at issued guidance document on this matter to assist parties in ensuring readings from smart meters are consistent.

D Code

4.18 D Code representative told the group that they have started to review the Brexit work and consider most of the changes are housekeeping only, these modifications can be self-governance. They will send their modification/s to Ofgem for final approval. The Ofgem rep questioned whether they need to go to Ofgem for approval. The D Code rep thought Ofgem would appreciate seeing them, and noted he is in regular contact with the Ofgem policy lead for the D code.

4.19 P27 will be circulated in next 2 weeks and submitted to Ofgem in February 2019.

4.20 0118 is ready and will be submitted to Ofgem for approval.

4.21 D Code representative said that they should be able to do the changes without going out to stakeholders, however, he is seeking advice/guidance from the D Code Ofgem representative.

BSC

4.22 BSC representative stated that P379 modification was raised with Cornwall Energy to enable splitting metering and allow consumers to have multiple suppliers. First workgroup is being held February 2019 and there has been much interest shown here with 40 participants already signed up.

4.23 P378 –this modification raised last year, Consultation on this modification closed 29 January 2019.

4.24 BSC representative also told the group that a modification has been raised to use BSC arrangements for the DM capacity Market to 'keep money moving'.

4.25 A further modification re Assets and BM units is also being progressed.

4.26 BSC representative mentioned that consultations are to be held for a month on Article 18 – any changes which have a derogation with the European Code and this could have impact on BSC. However, it is the responsibility of the Grid Code to ensure the framework is in line with this. They are waiting for direction from Ofgem and whilst the workgroup is going ahead, legal advice is also being sought.

MRA

4.27 MRA representative advised the group that a Development Board meeting was held and changes that impact on SPAA are being progressed.

4.28 He further advised the group that four modifications had been accepted with various code interest, 3 due to implemented in June 2019 with one scheduled for February 2019.

4.29 MRA representative informed the group that the Secure Communications Work Group (SCWG) met to decide the next steps within the process following the closure of the ITT issued to identify potential solutions for the secure transfer of personal data between parties.

4.30 During the meeting the group reviewed the proposed telephone verification guidance drafted by a SCWG member, which introduces suggested verification questions to be used when ascertaining identities prior to disclosing personal data via telephone.
After review the group agreed that the proposals drafted were fit for purpose and should form the basis for a MRA and SPAA guidance.

iGT UNC

4.31 iGT representative told the group that "Faster Switching Consequential Change" modification has been raised and they are cross working with UNC.

DCUSA

4.32 DCUSA representative confirmed to the group that they are ready for Brexit and do not see this as a major issue. They are currently drafting a modification to go to March 2019 Panel and will not need to consult on that.

4.33 PP326 - areas have been identified where there may be potential damage to network. They have had a consultation on this and will be releasing responses shortly. There is a meeting scheduled for 5 February to review the responses and they will be happy to share this information.

4.34 DCUSA have launched SCR impacting on charging and DNOs

SEC

4.35 SEC representative advised the group that SECMP0046 was progressing, however, they do not believe it has any cross-code impacts. Modification has been prepared for Brexit and is due to be presented to their Panel on 15 February 2019.

4.36 SEC representative further updated the group on what they were doing with regard to SoLR. SECAS were facilitating a number of workshops with the DCC and Ofgem to identify the processes that should be followed for the successful appointment of a SoLR, ensuring customers remain on supply at all times. SEC were aiming to provide an end-to-end process map, which will ultimately include Cross Code interactions that occur during such an event.

5.   Horizon Scanning

5.1 Updates to be provided to Elexon within the next 5 days. At the next meeting, there will be a review of the topics that may have been started to see what updates are required.

6.   Central Modification Register

6.1 The Central Modification Register was issued and responded to with an update on the MRASCo website. The group were advised that all closed or implemented modifications will be removed. A uniform way to update the spreadsheet will be communicated and a request made to update the calendar with meetings. Next meeting the group to review the modification register.

7   Website Development

7.1 SPAA are keen to progress with the proposal to host a CACoP website. There has been push back from CACoP parties with regards to the need for it, questioning whether there is an appetite in the industry for it. How the website will be maintained and funded is also unclear. SPAA are required to come up with a more thorough in-depth proposal. There was a request for the website to be justified before it is progressed. This led to a wider conversation around what the scope of the group is and how outputs are communicated to the industry and this will be discussed during the 2019 work plan workshop.

7.2 Joint Office representative asked questions on how the website ownership would work – who owns the contract with the website provider and would all parties sign up to the contract? They suggested that this could potentially be overcome by using a Memorandum of Understanding (MoU)where one party pays and then collects from others. Although supportive in principle of a CACoP website the ongoing maintenance and funding question is also a concern for them.

7.3 BSC representative stated they are not convinced there is a need for the website, and questioned whether there was any quantitative or qualitative evidence for the need.

7.4 SEC representative asked if these questions could be asked in the cross-code survey.

7.5 Ofgem representative noted it may be possible to add it to this year's survey, but would need to think about it, and noted that the timings may not be useful.

7.6 BSC representative questioned whether this should be part of a wider communications strategy, and if the website is that the best way to deliver the strategy, then they were in agreement to go ahead with it.

7.7 SEC representative stated that they were open to this suggestion but questions on billing and branding still remains.

7.8 MRA representative stated they too were open to the website but with similar questions to other representatives.

7.9 Grid Code/CUSC/STC representative mentioned that more details are required and the ongoing question of maintenance of the site is not clear.

7.10 DCode representative questioned if there was a clear benefit to stakeholders for the website.

8 Supplier of Last Resort (SoLR)

8.1 There has been a significant increase in the number of Suppliers entering SoLR events - 10 since March 2018. There was a request from SPAA to consider whether CACoP wish to do anything in this space. Ofgem are taking steps to review the licensing i.e. scrutinising the entry requirements and what can be done. Within UNC the current processes are working well – the DSC Credit Committee and the Energy Balancing Credit Committee. There was a suggestion for SPAA to liaise with Ofgem.

8.2 **Action 001:** Ofgem to respond to questions from FM and to consider how CACoP could support in this area.

8.3 **Action 002:** Lines to Take to be proposed by FM for adoption by CACoP. To be revisited in the March 2019 meeting.

Lunch

9 Workplan

9.1 **2019 Forward Work Plan**

Three top themes came out of the Workplan which are listed below: -

9.1.1 Purpose of CACoP / clear objectives and scope – it was discussed that this needs to be discussed with Ofgem. All Code Administrators are taking an action to think of the long-term view and scope of CACoP. At the 19 March meeting this will be discussed in the morning and then Lesley Nugent (Ofgem) will be invited in to discuss the outcomes in the afternoon. Doodle poll has been issued with some proposed dates for a workshop to convene in the first week of March.

9.1.2 **Action 003:** All Code Administrators to seek feedback from their stakeholders through panels or any other stakeholder interaction points on:
- How well they understand what CACoP is
- What value they think CACoP can add to industry
- How they would like to be communicated and engaged going forwards

9.1.3 Engagement / communication / branding – requested to be discussed following the understanding of the purpose of the group.

9.1.4 Analysing survey results – suggestion was made to review the results and comments from the last survey to respond to them and to share best practice and to review the survey.

There was a request to ensure that this work results in outputs and a workplan that can be tracked and delivered against.

9.2 The workshop/meeting at the beginning of March will focus just on the top two work plan items. The scheduled meeting on the 19 March, Lesley Nugent from Ofgem will be invited for further comments/guidance.

10 AOB

10.1 There was feedback that being sent the documents direct rather than a link to the webpage is better.

10.2 There was a brief discussion about alternatives. The BSC only allow one alternative; the workgroup can raise an alternate but only one with the full workgroup approval. The alternate must be better than the proposed. CACoP principles encourage the use of unlimited alternative proposals.

11. Date of next Meeting

Workshop to convene 8th March 2019 at The Strand, London.

Next Full CACoP meeting will be held on 19 March 2019 – location to be confirmed.

Appendix 1

Work Plan 2019

Theme 1 – The Purpose of CACoP

- "Clear objectives"

- "Short Term goals – a purpose"

- "What is CACoP?"
  - review our scope to ensure adding value
  - review CACoP scope to be broader than modifications.

- "Strategic Direction."

- Role in Energy code review
  - "BEIS/Ofgem Code Review - how to support/practicalities/strategy."
  - "Understand scope of government review and identify any cross-code responses."

Theme 2 – CACoP Engagement and Communications Strategy

- "Development of common website and communication strategy"

- "Agree communication and engagement strategy and branding"
- "Communications strategy including single template or minutes, agenda etc."

Theme 3 – Analyse Survey Results

- "Focus on the outputs from Ofgem's survey"
- "Analyse cross-code survey results and identify cross-code improvements"
- "Review CACoP scope to be broader than modifications"

Areas with one vote

- **"**Continued cross-code working, industry update and CRM"
- "Use CACoP as sounding board for Ofgem initiatives (vice versa)"
- "Scope"
- "Are we a group for Code Administrators or the industry?"
- "Achieving 14 Principals"
- "Sharing best practice"
- "Direction from Ofgem"

Areas with no votes

- "Customer feedback re best practice (invitation to join a meeting)"
- "Review "End of Year" paper/lessons learnt from Electralink Chair"
- "Review attendee list to meet objectives - guest speakers"
- "Identify best practice in delivering CACoP Principles"
- "Identify uniform terms."
- "Review use of working groups and best practice."
- "REC delivery/SCR faster switching – can CACoP support delivery?"
- "Maximise transparency in process – as much as possible"
- "Can the modification proves be streamlined?"
- "Code Review Consultation Responses?"
- "Aligned Modification templates."
- "Funding and Governance of CACoP."
- "Develop common process of assessing industry changes."
- "Using Brexit as an example of good practice and building on it."
- "Empowerment of members of the group."
- "Cross code working and complications i.e. funding/principles."
- "Updates – review by exception/only where cross code impacts."
- "Doing things quicker e.g. Horizon scanning/annual review."
- "Simplicity – less administration."

- "Engagement."
- "Working practices review."
- "Review and input questions on the survey."