

# Code Administration Code of Practice (CACoP) Meeting 004

## CACoP Meeting Number: 004

<b>Date:</b>	21/05/2019	<b>Location:</b>	Faraday House, Gallows Hill Warwick, CV34 6DA
<b>Start:</b>	10:00 AM	<b>End:</b>	16:00 PM

Attendee	Company	Code
Andrew Bard (AB)	Gemserv Ltd	MRASCO
Alison Beard (AB)	Gemserv Ltd	SECAS
Richard Colwill (RC)	ElectraLink	DCUSA/SPAA
Rachel Hinsley (RH)	National Grid ESO	CUSC/Grid Code/STC
Chris Shanley (CS)	Joint Office	UNC
Chris Wood (CW)	Elexon	BSC

### Apologies

Rachel Clarke (RC)	Gemserv	iGT/UNC
Colin Down (CD)	Ofgem	Authority
Vincent Hay (VH)	ENA	DCode
Fraser Mathieson (FM)	ElectraLink	SPAA
Lesley Nugent (LN)	Ofgem	Authority

### Secretariat

Gareth Davies (GD)	National Grid ESO	Chair
Rashpal Gata-Aura (RGA)	National Grid ESO	Technical Secretary

## 1 Introduction/Apologies for Absence

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

## 2 Competition Law Do's and Don'ts

- 2.1 The Chair highlighted that the group should be mindful in their discussion 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 the minutes from the previous meetings held 19 March 2019 and 24 April 2019, incorporating comments received. The Minutes are saved on our website can be viewed [here](#) <sup>1</sup>
- 3.2 The group discussed the Action log which can be found [here](#) ESO took an action away to clarify intent of current actions and whether they are still valid.

## 4 Industry Updates

### CUSC/Grid Code/STC

The representative for the above codes presented the following industry updates to the group members: -

- 4.1 Grid Code – GC0117 –Grid Code were staying close with Open Networks to factor in each other's thinking. There are potential D Code implications for the new EU Code emergency and Restoration Modifications:
- 4.2 Grid Code – GC0127 EU Emergency & Restoration: Requirements resulting from System Defence Plan.
- 4.3 Grid Code – GC0128 EU Emergency & Restoration: Requirements resulting from System Restoration Plan.

However the representative advised the group members that there is nothing concrete until the first Workgroup meeting has taken place – part of the Terms of Reference of the Workgroup is to identify cross code impacts.

- 4.4 CUSC – CMP311 – credit mod – CUSC team been liaising with other Code administrators with regards to the credit arrangements throughout the industry.
- 4.5 CUSC – CMP315 - TNUoS: Review of the expansion constant and the elements of the transmission system charged for – the representative advised the group members that this is a large modification looking at the expansion constant. This modification has capacity to be bigger and needs the (Distribution Networks) DNs engagement to review the impacts.
- 4.6 CUSC – CMP 316 -TNUoS Arrangements for Co-located Generation Sites – Co-location charging. New modifications are on the horizon – one for the cap gen and a few for the TCR/SCR modifications.
- 4.1 STC – Work in STC code is increasing due to the legal separation.

### UNC

The UNC representative presented the following industry updates to the group members: -

- 4.2 0678 Amendments to Gas Transmission Charing Regime (and its 10 alternatives) is to go to a special UNC Panel on the 23 May 2019 for a recommendation decision. Over 30 parties responded to the recent consultation.
- 4.3 The UNC representative told the group that the Joint Theft Reporting Review (UNC and SPAA) had its third meeting in May and analysis of its 26 identified issues is being undertaken to identify potential solution options. An extension is likely to be requested to allow sufficient time to undertake this analysis.

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<sup>1</sup> Where documents are published

4.4 The UNC representative further went on to tell the group that there are a number of new IGT UNC Modifications that are looking to mirror changes being raised to the UNC.

## **SPAA**

The SPA represented presented the follow industry updates to the group members: -

### **SPAA Change Proposal 467 – Mitigation of Market Participant MDD to UNC Governance:**

- 4.5 This is a cross-code change with impacts on SPAA, UNC, IGT UNC and Xoserve's Data Services Contract
- 4.6 SCP 467 was approved at the May SPAA Change Board for implementation in Feb 2020
- 4.7 The implementation date is hardcoded as February 2020, and we'll now need to keep a close eye on the implementation dates for the associated changes to ensure they remain aligned
- 4.8 Each change is Authority Consent in any case, so they will all be called in by Ofgem and this will provide a backstop against any non-alignment of the dates – but we are working closely with other codes and the Proposer, to ensure Ofgem can turn the decision around quickly

Links to each of the changes are provided below for reference:-

[SPAA Change Proposal 467 - Market Participant MDD Migration to UNC Governance](#)

[UNC Modification 0682 - Market Participant MDD Migration to UNC Governance from the SPAA](#)

[IGT UNC Modification 124 - Market Participant MDD Migration to UNC Governance from the SPAA](#)

[DSC Change Proposal XRN4851 - Moving Market Participant Ownership from SPAA to UNC/DSC](#)

### **Joint Theft Reporting Review Group (JTRR)**

- 4.9 Cross code group with UNC parties to review gas theft reporting arrangements
- 4.10 Group is progressing well, with SPAA and UNC Code Administrators working closely together
- 4.11 Regular catch-up are being held between ElectraLink and the Joint Office and the split of work/resourcing has been agreed in line with the CACoP joint working guidance document
- 4.12 This group is an excellent example of good cross-code working and represents a good instance of Code Admins working together to engage industry participants in discussing multi-party, cross code issues that may otherwise not receive joint discussion or review

### **SEC MP 0006 – Specifying Digits on SMETS2 device display**

- 4.13 Whilst not a cross-code change, this Smart Energy Code modification had an impact on SPAA parties
- 4.14 This led to the approval of SCP 457 - Standardising the Number of Register Digits (A0121) for SMETS2 meters – which amended code to make clear that, where a SMETS2 device is installed, the reading will be provided in five digits
- 4.15 A further change, SCP 469 - Treatment of remotely retrieved meter readings from SMETS2 meters, is currently at consultation and seeks to include a guidance document in code, providing advice to Suppliers on how to treat readings received from SMETS2 devices that are not five digits

## **D Code**

4.16 There was no representation from D Code at the 21 May 2019 meeting.

## **BSC**

The BSC representative presented the following industry updates to the group members: -

- 4.17 P374 was progressing and may impact consultation length if implemented but, BSC were still waiting on Ofgem's decision on EBGL terms and conditions as submitted by NGENSO.
- 4.18 P375 and P376 were progressing together and BSC were looking at use of Asset metering rather than insisting that Parties install Settlement Metering in addition to their own metering already in place for other purposes.
- 4.19 Issue 75 was looking at communication methods for Metering Systems but, existing communication technology was likely to become redundant in the next 5 – 10 years and, unless industry finds a solution then Code Administrators will need to look into the issue further.

## **MRA**

The MRA representative presented the following industry updates to the group members: -

- 4.20 **Erroneous Transfer Change Proposals**  
Three Erroneous Transfer related CP's were issued for Impact Assessment and are to be voted on at the MRA Development Board meeting on 30<sup>th</sup> May 2019. SPAA are also in the process of progressing similar CP's to align with the MRA. Details of the Erroneous Transfer Change Proposals are as follows:
- 4.21 MRA CP 0258 – ET Performance Assurance Board Powers – This CP seeks to introduce an obligation into the MRA to formally delegate decision-making power to the Erroneous Transfer Performance Assurance Board (ETPAB) as a sub-committee of MRA Executive Committee (MEC) (and SPAA EC), to allow the ETPAB to be able to exercise these powers autonomously (i.e. without the MEC/SPAA EC ratification each time).
- 4.22 MRA CP 0259 – ET Performance Assurance Board Powers – This CP seeks to introduce an obligation into the MRA for Suppliers to collectively procure reporting on Erroneous Transfers (ET) which will be used within a new Erroneous Transfers Performance Assurance process.
- 4.23 MAP CP 0310 – ET Performance Assurance Board – This CP seeks to introduce a new MRA Agreed Procedure (MAP) setting out the responsibilities of the Erroneous Transfers Performance Assurance Board (ETPAB) for the administration of an Erroneous Transfer (ET) performance assurance framework.
- 4.24 SCWG (Secure Communication Work Group) – SCWG met on 5<sup>th</sup> April for possibly the last time to discuss the required associated Change Proposals.
- 4.25 Following the summary paper put to MEC following the SCWG meeting on 14<sup>th</sup> February 2019 – MEC (MRA Executive board) decided the ECOES solution would be the option delivered. The SPAA Executive Committee were provided full details of the procurement process but did not confirm its decision to engage with either proposal, as it sought impact assessment on the solution from SPAA parties as part of the normal SPAA change process before a decision on a solution provider was finalised.
- 4.26 At the April meeting E.ON presented an initial draft of an MRA Change Proposal it intended to sponsor, that would seek to mandate the use of a secure web-based solution for the exchange of personal data. E.ON

noted that it did not intend to specify ECOES as the means of data exchange; rather, they proposed to draft a solution that would allow for either the ECOES or the DTN solution.

- 4.27 SCWG agreed that the draft changes should also be reviewed by the MRA Issues Resolution Expert Group (IREG) to ensure there were no major issues before formally entering the change process. IREG reviewed the draft CP at its meeting on 8<sup>th</sup> May 2019 and subject to the agreed amendments decided it should be tabled at MRA Development Board on 30<sup>th</sup> May 2019 to be issued for Impact Assessment. A proposed implementation date of June 2020 was also agreed at the meeting. The SPAA equivalent changes were due to be considered by an expert group within SPAA.

## **DCUSA**

The DCUSA representative presented the following industry updates to the group members: -

- 4.28 DCP 326 Introduction of Load Diversification Identifiers for Load Managed Areas” - Change Report will be submitted to June DCUSA Panel
- 4.29 DCP 328 Use of system charging for private networks with competition in supply” – Second consultation to be released early June
- 4.30 Ongoing review/ support of SCR which will impact DCUSA Charging Methodologies
- 4.31 New DCUSA website under development

## **SEC**

- 4.32 SECMP0046 (Electric Vehicles) - The SEC representative advised the CACoP group members that they have been working with DCUSA to identify y cross-code impacts. There do not appear to be any that need urgent attention, however, DCUSA are monitoring for consequential change.
- 4.33 SEC representative advised the group that they were also working with MRA to identify any consequential changes required to the SEC in light of changes to the ‘withdrawn’ status for meters.
- 4.34 SEC are also working with the BSC where they are monitoring the progress of P379 for any consequential changes that might be needed.

## **5 Central Modification Register**

- 5.1 A full review of the Central Modification Register was undertaken by the group and a copy of the register can be viewed [here](#)

## **6 Horizon Scanning**

- 6.1 CW completed a review of the Horizon Scan with the group. All group members participated and a copy of the Horizon Scan can be viewed [here](#)

## **7 Ratify Forward Work Plan**

- 7.1 RH presented and walked through the draft final version of the Forward Work Plan (FWP) following comments received from the CACoP group members. The group members were encouraged to ratify the FWP at this meeting with the amendments being made and agreed by all group members present. Once it was approved by the CACoP group members then the FWP could then be published on the CACoP website for the industry to view.
- 7.2 At the CACoP March 2019, meeting it was indicated by some group members that bi-monthly meetings were too far apart and the momentum can be lost. Following this discussion, it was agreed by all members that interim

shorter WebEx meetings will be held, the first of these meetings was held on 24 April 2019 via WebEx.

- 7.3 RC mentioned to the group members at the meeting, they did not see any merit in having monthly meetings.
- 7.4 The Chair addressed the group members reminding them that it was indicated by some group members in March 2019 meeting, that they would welcome the interim meetings to keep up to date with information. There is no obligation on any group members to attend the interim WebEx meetings. Going forward if these meetings are not required and all the group members agree, then these meetings will be cancelled and only the bi-monthly face to face meetings will be held.
- 7.5 The FWP was ratified at the meeting and can be viewed [here](#) under the tab “CACoP Principles”.

## 8 Self-Audit Check List

- 8.1 All parties completing an individual review of their practices against the 14 CACoP principles. CACoP parties shared their learnings in areas such as legal text, approaches to alternative modifications, implementation costs and the innovation principle.
- 8.2 RH said that her understanding was that the self-audit was carried out by all codes for internal assessment of the 14 principals. Following internal reviews, it would give all an opportunity to share any comments, findings or questions with the group for further discussion.
- 8.3 CW stated that as standard, the 14 principles should be embedded in our governance. The purpose of having this separate document is that there is a quick single point of reference. As such the self-audit should not create any issues re competition. This exercise is for internal identification/assurance and if any best practices can be shared then these can be brought to the meeting to share and only what the group members feel comfortable sharing.
- 8.4 CS agreed that when this document is brought to the CACoP meeting for discussion/sharing best practices, the discussions are verbal only.
- 8.5 Discussions followed by all group members on the way the modifications are processed. All the codes have a Similar process in place but follow different routes.
- 8.6 CS told the group members that in their Code they have a “Review Group” whereby all options are explored and then it goes to industry for their views.
- 8.7 CW advised the group members that they too have a similar process called the “Issue Group”.
- 8.8 RH also told the group members that whilst “Issue Groups” existed within the codes, industry did not support them. If there is value in this process, then there is no reason why these groups cannot be raised again.
- 8.9 CS commented that if only the important modifications came forward, this would save time for all. We may all do things differently but adhere to the code at all times.
- 8.10 CW told the group members that their Panel has power to remove disruptive members/proposers as they see fit.
- 8.11 Discussions continued around alternatives as some Codes have many whilst others only have a few and various options were discussed.
- 8.12 The Chair advised the group that whilst all the Codes have different processes, they all comply with the CACoP principles and asked if there was further appetite to do more/share best practices/all map their own processes and bench mark common areas.
- 8.13 CS asked the question if it was worth getting the stakeholders views to drive this process further.

- 8.14 AB commented that they were happy with their process – with right focus alternatives are just a different way of doing things. Their Workgroups are often reluctant to provide alternatives.
- 8.15 Discussions then moved to Legal text and implementation costs.
- 8.16 RH suggested that that costs should be visible and transparent.
- 8.17 CW told the group members that they have an internal system for costs and the decision rests with the Workgroup. Elexon do not list time spent on the modification, costs are covered as part of their budget and industry time is not calculated by Elexon.
- 8.18 CW told the group members that their workgroups review the modifications as small, medium and large and give industry an indication what their costs would be, and these can vary somewhat.
- 8.19 CS advised the group members that they do not calculate development costs.
- 8.20 AB told the group members that they do not always provide costs as this is a sensitive area.
- 8.21 RH told the group that Ofgem have said that we need to speak to the Panels, however it should be system costs.
- 8.22 CS made the suggestions that we should refer to the CACoP principles if and when we are questioned why certain things are done.
- 8.23 Code Administrators were left to reflect on whether they wish to change anything within their workings following these discussions.
- 8.24 Discussions continued around the legal text and who should be producing it.
- 8.25 CW told the group members that Elexon have lawyers who produce the legal text once the solution has been fully developed. Lawyers will produce the legal text based on requirements and judgement call is made depending on the complexity. Workgroup will review the legal text and depending on the complexity may have to have a teleconference or if it is straight forward then by email. The legal text is then agreed by the workgroup.
- 8.26 CS advised that in UNC the proposer can provide the legal text and given to transporters, the back stop is when the report is going to Panel then legal team have fifteen days to provide the legal text.
- 8.27 AB stated that MRA have a similar process depending on what is required.
- 8.28 RC also told the group members that DCUA/SPAA have a similar process whereby it goes to the legal team and then to workgroup if there are any changes.
- 8.29 CS suggested that maybe we look at the CACoP principles after the survey with what stakeholders/customers think.
- 8.30 This item is going to be kept as a standing item going forward.

## **9 Charging Futures Report**

### **Lessons learnt by ESO through the delivery of Charging Futures**

- 9.1 The Chair presented the slides and talked through them briefly. The slide pack is available to view on the Website [here](#).
- 9.2 AB expressed to the group members that whilst the Charging Futures Forum was a really good idea, the question here is how much work is involved and is there value in these forums?

- 9.3 CW also questioned if there was any benefit as a result of these forums.
- 9.4 The Chair advised the group members that the forum was very well received, there was positive feedback which has been invaluable.
- 9.5 Nationalgrid ESO have been engaged in making short podcasts aimed at the smaller market players. Small suppliers are really engaged in this approach as they do not have time/resource available to engage in other ways. This method is for sharing ideas and is available to all prior to the Webinars. This method could potentially provide quick wins whilst others could take a bit longer.
- 9.6 The Chair further advised the group members that as the information was in small chunks it was easily digestible. This project is supported by Ofgem who have provided the funding and from lessons learnt what can be done by Code Administrators to improve.
- 9.7 CS agreed with the Chair that the idea of podcasts is really good and could work well as these can be listened to at people's own leisure.
- 9.8 The Chair invited any questions out there can to be sent in to National Grid ESO.

## 10 First CACoP Newsletter

- 10.1 AB circulated a draft version of the first newsletter and invited all codes for contribution to the contents and also welcomed any feedback. This newsletter is to be published quarterly and the first one will be at the end of May 2019.
- 10.2 **Action 023 - 2019** – all CACoP group members to send to Gemserv items they would like to be added to the first Newsletter to be produced by Gemserv by the end of May 2019.
- 10.3 CW commented on the Brexit content in the newsletter and agreed to send to Gemserve further material on Brexit.
- 10.4 **Action 023 – 2019** – Elexon to supply Gemserv with any further material they may have in relation to Brexit to be included in the first Newsletter due to be published in May 2019.
- 10.5 CW suggested that when the newsletter is finalised, Gemserve to send to all the codes and the codes to then circulate to their own distribution lists and publish on the CACoP Website.
- 10.6 The Chair requested all CACoP group members bring any feedback they may have to the next meeting following the roll out of the first newsletter.

## 11 CACoP Face to Face Event

- 11.1 CW circulated the draft agenda for discussion by the group and to invite agenda items. Some discussion followed in connection with contents and CW expressed that this was a draft and any suggestions would be welcomed. The branding would be neutral.
- 11.2 Some members were concerned that having the CEO of Elexon welcome the participant may potentially portray that the event was not a CACoP event. The participants should be welcomed by the Chair of CACoP.
- 11.3 CW pointed out that if the welcome was done by the Elexon CEO the immediate optic would be how serious CACoP is to all codes.
- 11.4 AB mentioned that this event would be too close to other events on Gemserv's calendar,



- 11.5 It was pointed out that all group members had agreed in previous meeting that this event would take place before the CACoP Annual Review for the survey to be more meaningful.
- 11.6 The Chair suggested the date of the July 2019 meeting could potentially be the CACoP face to face event as this date is already in the diary of CACoP members.
- 11.7 CW suggested a WebEx is held on the 11 June 2019 to do further planning on the agenda.
- 11.8 The Chair suggested that all codes take two weeks to think what they would like to be discussed, send in their ideas to Elexon and then this could form the basis for discussion on planning in the June WebEx.

## 12 CACoP Annual Survey Update

### Ofgem

- 12.1 Ofgem were not represented at the May 2019 meeting, however template of the contact details requested by Future Thinking was sent in and discussed by the group members. There were some concerns regarding the GDPR (General Data Protection Regulation).
- 12.2 The Chair took an action away to contact Ofgem regarding issues raised by the group members.
- 12.3 **Action 025 – 2019** National Grid ESO Chair to speak to Ofgem regarding feedback received from CACoP group members, in relation to information requested in the template forwarded to all to assist with the CACoP Annual Review.

## 13 Ofgem suppliers licencing review

### Request for information sharing across codes.

- 13.1 AB expressed that Gemserv would like to get views of other codes in relation to what they are doing in respect of Ofgem carrying out a licence review. Concerns were raised by their Panel members as to what it would mean or them.
- 13.2 CW replied that his understanding was that Ofgem will take longer to issue licences. They have a team dedicated purely to deal with this issue as it is a very detailed process. This will involve partly stakeholder engagement and partly investigators to investigate.
- 13.3 AB advised the group that work needs to be done and will continue to be done, and if Ofgem delay issuing the licence there could be financial implications involved.

## 14 Supplier of Last resorts

### Mapping of similarities and differences across the codes to identify if there may be merit in making any cross-code changes

- 14.1 AB advised the group members that they have mapped out the comment scenario and are hoping to finalise the document soon.
- 14.2 AB told the group members that they were seeking input from all codes regarding potential changes to address a risk to consumers arising from the SoLR event impacting a Supplier with consumers with smart meters in prepayment mode. Gemserve are investigating with Ofgem, DCC and BEIS a range of possible solutions. Gemserv would like the support of each Code Administrator to nominate an individual who will be able to support this work over the next month or so. Provide any high-level thoughts e.g. major impediments to fast-tracking a CoS for a subset of customers and initial thoughts on impacts.

- 14.3 **Action 026 – 2019** All Code Administrators to nominate an individual who will be able to support some work over the next month or so in connection SoLR. Provide any high-level thoughts e.g. major impediments to fast-tracking a CoS (Change of Supplier) for a subset of customers and initial thoughts on impacts.
- 14.4 AB highlighted that in a SoLR event, the relevant Supplier may no longer be operating and unable/unwilling to send prepayment top-ups to maintain a consumer's energy supply. The validation means that no other organisation would be able to send an instruction to maintain the consumer's supply. Possible solution could be including speeding up the SoLR process to minimise time taken for the SoLR Supplier to be able to service all the customers of the failed supplier; and determining the feasibility of fast-tracking a standard Change of Supplier for only the customers of a failed Supplier who have smart meters in the prepayment mode.
- 14.5 **Action 027 – 2019** All to look at and feed back to Gemserv possible solutions which including speeding up the SoLR process to minimise time taken for the SoLR Supplier to be able to service all the customers of the failed supplier; and determining the feasibility of fast-tracking a standard Change of Supplier for only the customers of a failed Supplier who have smart meters in the prepayment mode.

## 15 AOB and date of next meeting

- 15.1 The Chair closed the meeting - there was no other business to discuss from any group member.
- 15.2 The next meeting is a WebEx scheduled for 11 June 2019.