

Code Administrator Meeting Summary

CMP430/CMP431: Workgroup Meeting 6

Date: 15/04/2024

Contact Details

Chair: Deborah Spencer (Deborah.spencer@nationalgrideso.com)

Proposer: Neil Dewar (neil.dewar@nationalgrideso.com) / Keren Kelly (keren.kelly1@nationalgrideso.com)

Key areas of discussion

The Chair welcomed Workgroup members and talked through the agenda.

Actions Log Review

Action owners discussed the remaining actions.

Action 6 - Still ongoing, the Authority Representative advised that probably the data required already exists in standing data notwithstanding, there's a question about the domestic indicator. Suggesting that without putting out an RFI to the entire market, it's going to be very difficult to identify the number of measurement classes that are domestic, indicating that this could be done through an Elexon or MPath data dump. The Authority Representative will check about the data from the RFI from other modifications.

Actions 7 – The Proposer presented the Workgroup with the analysis for the sites that might be subject to different charging arrangements, the Proposer explained that all analysis done is based on a series of assumptions due to the lack of available data. A Workgroup member stated that the analysis illustrates a slight cost uplift in most of the areas impacted and suggested that this has been a bit of an eye opener for him as he did not consider it from the angle presented in the analysis.

A Workgroup member asked if 5 to 8 are still existing over this period due to P272 only impacts advanced metre types. The ESO SME advised that a very few of 5 to 8 should still be existing, and that he will do an analysis to represent what each of those profile classes would look like in 5 to 8. The Workgroup agreed to include the analysis into the Workgroup Consultation document.

Actions 9 - The Proposer will give an update on the legal text and try to arrange the meeting with Elexon and Ofgem for next week.

Action 11 – To be closed.

Action 10 – Will be closed after this meeting, the Proposer will share some slides with the Workgroup.

Actions 5 and 12 are to the left open. Actions 12 be allocated only to the Proposer.

Questions from Industry – Workgroup members discussion

The Proposer presented the Workgroup with some questions received from the industry.

Unmetered Demand - The Proposer explained that the expectation was that there is no Domestic Unmetered Demand. Advising that the solution is written with based on that assumption, the Proposer stated that there is always a possibility in the industry for it to happen and asked the Workgroup members if they have knowledge of this area, and if it would ever be any scenarios where we could get domestic unmetered sites. The Workgroup was under the opinion it does not happen and that it will be an exceptionally rare scenario if it does.

Implementation Approach - The Proposer explained that industry questioned the clarity on the approach to the implementation and clarified that the solution is proposed to be implemented from the start of Charging Year 25/26 and that the intent of the proposed solution is for the change to be applied when the site migrated to MHHS arrangements. The Proposer asked the Workgroup to consider if this is clear in the solution. A Workgroup member stated that his understanding was that it takes effect on migration, in line with the Proposer explanation.

Legal Text Update

The Proposer gave the Workgroup an update on the legal text and advised that with all the difficulties in planning meetings during the holiday period, the difficulties in trying to hinge the proposed legal text into the BSC legal text that is not approved by the Authority yet and the legal advice received regarding the new text suggested by Elexon not being able to hold legal stance, the Workgroup Consultation will go out to industry without the draft legal text.

The Proposer advised that meetings are arranged with the legal team to try to look for ways to introduce the new terms and potentially looking into more looser descriptions for the different terminologies. The Authority Representative confirmed to the Workgroup that the legal text is not required for the Workgroup Consultation, but it is essential for the Code Administrator Consultation, advising that the risk around the legal text at the moment is that it relies on some terms that haven't been approved in the BSc, so some of the definitions that are proposed under CMP430 and CMP431 will only work if the Authority also approves some proposed in the BSCPS, stating that we can't be in a position where the definitions in CUSC are contingent on a later and separate decision from the Authority on an unrelated matter.

The Elexon Representative advised that he feels that Elexon is not going to be able to define the measurement classes before and after the transition period, asking if this modification can go forward without that definition. Explaining that effectively they are not changing the measurement classes themselves, apart from that A and B will disappear as a result of the transition.

The Authority Representative explained that it will come down to the level of specificity that is going to be used in CUSC.

A Workgroup member raised a question about the definitions only being needed or being out of sync with BSC proposals because there is a segmentation in TNUoS charging between different customer's types. Stating that an Alternative Request has been raised and voted against by the Workgroup that looked into this, asking that if charging everyone 04:00 to 07:00 PM is a workaround on the time scales that we have?

The Authority Representative advised that is a valid point, and that are several ways to deal with this issue, advising that if people wanted to raise a modification around this matter, they will need to do it quickly and clearly assess all on merit and timing perspectives.

The Authority Representative stated that the industry needs clarity as soon as possible and it is her intention to make and publish the decision for these urgent proposals within three weeks of the receipt of the FMR's, advising the Workgroup that timescales can be pushed if needed.

The Proposer will share the draft legal text with the Workgroup once the legal team has reviewed it and offered alternatives to the issues presented.

Workgroup Consultation Review

The Chair shared the Workgroup Consultation documents for CMP430 and for CMP431 with the Workgroup members and went through each section.

The Workgroup members provided feedback and suggestions, changes to the document were made live. All the suggested alterations that need to be considered by the Proposer will be circulated to the Workgroup once confirmed.

Next Steps

- Chair to circulate the Workgroup consultations for Workgroup members to review and provide comments.

Actions

For the full action log, click [here](#).

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
5	WG2	Proposer	Consider if there is any insight available into impact of Triads over winter 2023 and if this has changed following implementation of the Targeted Charging Review (TCR)		WG3	Open
6	WG3	Proposer	To speak with Ofgem about possible data available through previous RFI		WG4	Open
7	WG3	Proposer	To speak with the Revenue Team to work on information relating to impacted sites.		WG4	Closed
9	WG3	Proposer	To meet with Ofgem and MHHS Programme about the interacting timescales and the certainty needed around the Legal Text		WG4	Open
10	WG4	Proposer/ HB	To meet with HB to consider the scenarios for contracts from October.		WG5	Open
11	WG4	Proposer/ Elexon Representatives	To meet to discuss the correct terms to use in the legal text.		WG5	Closed
12	WG5	Proposer/ Elexon Representatives	CUSC Section 14 changes 14.17.41. To consider if a further table is required to include export.		WG6	Open
13	WG6	Ofgem Representative	To discuss with Elexon about the information that was provided through DCD414 process in respect of CT/VT sites.		WG7	Open
14	WG6	DH (ESO SME)	To conduct and analysis on the profiles for 5 to 8		WG7	Open

Attendees

Name	Initial	Company	Role
Deborah Spencer	DS	Code Governance, ESO	Chair
Catia Gomes	CG	Code Governance, ESO	Tech Sec
Neil Dewar	ND	ESO	Proposer
Keren Kelly	KK	ESO	Proposer Alternate
Lee Stone	LS	Npower Commercial Gas Limited	Workgroup member
Hugh Boyle	HB	EDF Energy	Workgroup member
James Knight	JK	Centrica	Workgroup member
Andrew Colley	AC	SSE Generation	Workgroup member
Gareth Evans	GE	WWA	Workgroup member
Neil Geddes	KM	Scottish Power Transmission	Observer
Colin Berry	CB	Elexon	Observer
Chris Welby	CW	Elexon	Observer
Daniel Hickman	DH	ESO	ESO SME
David Jones	DJ	Ofgem	Authority Representative
Harriet Harmon	HH	Ofgem	Authority Representative