

CACoP Forum meeting 11

11 February 2020, 10:00-15:00

Gemserv offices, 8 Fenchurch Place, London EC3M 4AJ

Minutes

Attendee	Representing
Paul Rocke (PR) (<i>Chair</i>)	IGT UNC
David Kemp (DK) (<i>Secretary</i>)	SEC
Eugene Asante (EA)	MRA
Matthew Woolliscroft (MW)	BSC
Kirsten Shilling (KS)	CUSC, Grid Code, STC
Loraine O'Shaughnessy (LOS)	UNC
Helen Bennett (HB)	UNC
Neil Brinkley (NB) (<i>teleconference</i>)	SPAA
Richard Colwill (RC) (<i>teleconference</i>)	DCUSA
Jonathan Coe (JC) (<i>teleconference</i>) (<i>part meeting</i>)	Ofgem

1. WELCOME AND INTRODUCTIONS

The Chair welcomed everyone to the meeting.

The Chair highlighted a letter that had been received from the SPAA Executive Committee. The key points raised had been around ensuring the CACoP's purpose had been defined and that the Forum listened to the industry, without blockers to industry innovation. The SPAA Executive Committee also sought for the Forum to define its vision and strategy each year, and noted it was happy to help develop this. The SPAA Executive Committee saw value in the CACoP and applauded the central products the Forum had produced. It also reiterated its desire for a central CACoP website.

The Chair noted that the Forum had already agreed the 2020 Forward Work Plan at the last meeting. The Chair agreed to respond to the SPAA Executive Committee acknowledging the comments made and seeking feedback on the 2020 Forward Work Plan.

ACTION 11/01: The Chair to respond to the SPAA Executive Committee's letter.

2. MEETING 10 MINUTES

The Forum approved the minutes from the last meeting.

3. ACTIONS UPDATE

Ref	Action	Update
038-2019	FM to obtain quotes for website	An update was given under Item 5, where a quote was provided. This action will be closed.
10/01	Each Code Administrator to review their contact details in the CACoP and inform the Secretary of any updates required	Updates were received from some Code Administrators. This action will be closed. Further updates should be sent to the Secretary as and when they arise.
10/02	Gemserv to confirm to ElectraLink if it would be willing to contribute to the cost of the central CACoP website	PR noted this is dependent on other factors, including whether other Code Administrators will be contributing. A decision will be made once more details are available. This action will remain open.
10/03	The Secretary to recirculate the draft central website requirements	These were recirculated to members. This action will be closed.
10/04	Each Code Administrator to review who should be on the mailing list and provide any updates to the Secretary	Updates were received from a Code Administrator. This action will be closed. Further updates should be sent to the Secretary as and when they arise.
10/05	Each Code Administrator to provide information on its market entry process to LOS	Input has been received from some Code Administrators, but LOS is still awaiting input from the rest. This action will remain open.

The Forum queried if changes could be made to the CACoP document to update contact details in response to Action 10/01 without needing Ofgem's approval.

ACTION 11/02: JC to confirm whether the contact details in the CACoP document can be updated without Ofgem approval.

4. CODE UPDATES

Each Code Administrator representative provided an update on notable activities under their Code(s).

PR commented on inconsistencies between the different updates. He felt it would be useful if there was more consistency between the Code Administrators, and that some updates felt like a list of modification numbers. He proposed to define some criteria for updates ahead of the next meeting.

ACTION 11/03: The Chair to propose some criteria for the updates to be provided by Code Administrators.

CUSC

KS provided the following updates:

- The latest version of the prioritisation stack was looked at following the January 2020 CUSC Panel meeting. Following Ofgem's decision on the Transmission Charging Review (TCR), three new modifications, [CMP334 'Transmission Demand Residual – consequential definition changes \(TCR\)'](#), [CMP335 'Transmission Demand Residual - Billing and consequential changes to CUSC Section 3 and 11 \(TCR\)'](#) and [CMP336 'Transmission Demand Residual - Billing and consequential changes to CUSC Section 14 \(TCR\)'](#), have been raised and have been recommended to progress as Urgent. These modifications have been placed at the top of the stack. Seven other modifications have also been prioritised. No further changes were made to the prioritisation stack, so the remaining modifications will be progressed whenever gaps arise. Five new modifications have also been raised too, to be slotted into the stack.
- An update was provided on the European Electricity Balancing Guideline (EBGL). A meeting was held on 10 February 2020 to discuss the timings for cross-Code changes to ensure the timescales for decisions would align, and to see if a special Panel meeting in February 2020 is needed. A further update will be provided next month.

BSC

MW provided the following updates:

- Following the UK's exit from the EU with a transitional agreement in place, [P382 'Amendments to the BSC in the event of no-deal Brexit'](#) will be proposed for rejection as it is no longer needed.
- Following the EGBR meeting noted by KS, a clarification letter has been received from Ofgem on the dates and times for this change, and the implementation date for [P392 'Amending BSC Change Process for EBGL Article 18'](#) has now been revised to 25 June 2020 (June 2020 Release). The Assessment Consultation is now being prepared.
- As part of [Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme'](#), reviewing the potential impacts of Ofgem's switching programme on the BSC

what areas of BSC impacted, ELEXON has been asked by Ofgem to prepare the changes needed to deliver these and present the first draft within the next month.

- ELEXON is continuing to engage with National Grid over the implementation of Project Mari, which will be subject to the post-Brexit arrangements.

PR noted he had received an email from a Code Party after the last Forum meeting who had identified three BSC Change Proposals, [CP1524 'Improving the communication methods in the fault rectification process'](#), [CP1525 'Improving the involvement of the LDSO in the fault resolution process'](#) and [CP1526 'Introduction of Service Level Agreements for rectifying Meter faults'](#), via the Central Modifications Register (CMR) that may need Data Transfer Catalogue (DTC) changes, but hadn't been marked as cross-Code impacting. MW responded that ELEXON is aware of the DTC changes needed and that these will be raised very soon, targeted for the June 2021 Release. PR noted the MRA is not expected to exist by then, having been replaced by the REC.

MRA

EA provided the following updates:

- The MRA is working with Ofgem on the two ongoing Significant Code Reviews (SCRs). As part of these programmes, the MRA is highlighting any current and new issues and modifications that may impact on these programmes to the Authority for a decision on how to proceed.
- Ofgem has asked for no further changes to be made to the MRA after the June 2020 Release, and it is currently expected there will be changes to the DTC after the November 2020 Release. This situation will be monitored during the transition period from the MRA to the REC.
- Two changes relating to the Secure Data Exchange Portal, [MAP CP 0322 'Changes to existing MAPs required for the implementation of the Secure Data Exchange Portal'](#) and [MAP CP 0323 'Introduction of new MRA Agreed Procedure for the Secure Data Exchange Portal'](#), were both voted upon and accepted for implementation on 25 June 2020 (June 2020 Release). These will affect the SPAA so it was assumed the SPAA will be updated and the new SPAA schedule introduced in line with this.
- Two issues were picked up under the BSC [Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme'](#) discussions relating to changes of Measurement Class. The MRA is awaiting the outcomes of the discussions at this group, but it is expected any changes will be progressed under the BSC not the MRA.

EA thanked the Code Administrators for providing their updates to the CMR. Updates for all Codes had been received on time and the updated register is due to be published on 12 February 2020.

One Party has requested that specific dates be provided in the register, for example the specific implementation date for a modification.

PR noted that from 31 March 2021 the MRA and the SPAA will cease to be in effect, with the content of these Codes and portions of some other Codes being transferred into the REC. He also noted the

other changes being developed under the SCRs. He queried if any modifications impacting on any of these were being marked on the register. EA noted it is not, but that this can be added in.

PR also noted it would not be long before the REC Manager is appointed and will need to begin engaging with the CACoP. He believed it would be beneficial to begin thinking about how to incorporate changes to the REC into cross-Code processes now. As an example, the BSC Change Proposals highlighted above that are targeted for the June 2021 Release would have a cross-Code impact on the REC as the DTC will be a REC product by then. He noted this should be discussed next month, after members have had a chance to think about how to incorporate the REC into their cross-Code processes.

ACTION 11/04: EA to add a column to the Central Modifications Register to highlight modifications that impact on the Significant Code Reviews.

ACTION 11/05: Each Code Administrator to consider what steps are needed to bring the REC into the process for identifying cross-Code impacts.

UNC

LOS provided the following updates:

- The UNC continues to monitor the appeal received for modification 0692 'Automatic updates to Meter Read Frequency'.
- There are a lot of questions on modification [0708 'Re-ordering of the UNC in advance of Faster Switching'](#), which relates to central switching, about how the Code changes will be embedded in. These are being worked through the governance Workgroups and updates are feeding back up to the UNC Panel each month.
- Three modifications, [0680 'NC Changes as a Consequence of 'no deal' United Kingdom Exit from the European Union'](#), [0690 'Reduce qualifying period for Class 1'](#) and 0692 are being presented for decision on whether to proceed to the final consultation.
- New modification [0715 'Amendment of the Data Permission Matrix to add Electricity System Operator \(ESO\) as a new User type'](#) has been raised which could have an IGT UNC impact.

PR queried progress the current modification looking at the governance of the Joint Office. LOS didn't have a full update, but noted that a lot of the things being discussed will be related to the Forum's upcoming workshop. PR queried if any of the outcomes of the review may lead to discrepancies between the UNC and other codes. He thought it would be interesting if a vastly different approach was put forward, and whether that would be something other Codes may want to take on board, or whether the CACoP Forum would just need to acknowledge there will be discrepancies. LOS agreed to bring updates on discussions to the CACoP Forum each month.

SEC

DK provided the following updates:

- There continues to be a large number of new modifications being raised, with close to 50 open proposals currently being progressed.
- There has been no further movement over [SECMP0046 'Allow DNOs to control Electric Vehicle chargers connected to Smart Meter infrastructure'](#) with SECAS and the DCUSA awaiting the Proposer's decision on how they wish to proceed.
- SECAS has spoken to the MRA over [MP077 'DCC Service Flagging'](#), noting it is unlikely to be implemented before 2021. LOS confirmed there is no impact on the UNC arising from this modification and will send written confirmation over shortly.
- There has been no further movement on [DP101 'Large Gas Meter Displays'](#) since last month.
- [DP106 'CHISM update for Unknown WAN Variant'](#) was highlighted last month as potentially impacting the UNC. SECAS will be following up on this in due course.
- SECAS has been liaising with Ofgem over the SEC impacts from the two SCRs. Legal text for the Faster Switching Programme had been drafted last year and comments sought from SEC Parties prior to being submitted to Ofgem. SECAS is also working with Ofgem and the DCC on the changes needed for the Mandatory Half-Hourly Settlement reforms.

IGT UNC

PR provided the following updates:

- The IGT UNC is working with Ofgem to prepare the draft legal text for the SCRs. A plan has been submitted to Ofgem on how this text will be prepared and delivered for the 31 March 2020 deadline, but the IGT UNC changes will be dependent on the UNC changes being completed for those to be mirrored. LOS noted the UNC changes will hopefully be determined upon in mid-April 2020.

SPAA

NB provided the following updates:

- The Change Board is meeting on 11 February 2020 to vote on [SCP 478 'Removal of Non-Participating Suppliers and SOLR From Annual Reports'](#), which is expected to be issued for a 10 working day impact assessment before being voted upon in March, and is targeted for the June 2020 Release. The final vote on [SCP 485 'Consequential Amendments following SCP 472 'Web-based solution for sending Customer information securely''](#) is also being performed and is expected to be approved for the June 2020 Release. The SPAA and the MRA are now working on a communications plan so that Parties fully understand the requirements of this change.

- [SCP 476 'Obligations to pass Transporter compensation payments received from Shippers on to consumers'](#), which links to the UNC, has been around since last June and has just been resubmitted. Under this change a new charge code 822 has been created, and Shippers were notified of this last month that it will be effective from 1 April 2020. The legal review is underway before going to the March 2020 Change Board for progression to impact assessment. This change is targeted for the June 2020 Release.
- SEC DP101 was discussed at the SEG, who felt there will be a need for a minor change to note large gas meters will be exempt from the five-digit requirements. The SPAA is awaiting a sponsor for the change before it can proceed and will be in touch with the SEC to confirm details in due course.

DCUSA

RC provided the following updates:

- As under the CUSC, [DCP 358 'Ofgem Targeted Charging Review Implementation: Determination of Banding Boundaries'](#), [DCP 359 'Ofgem Targeted Charging Review Implementation: Customers – who should pay?'](#), [DCP 360 'Ofgem Targeted Charging Review Implementation: Allocation to Bands and Interventions'](#) and [DCP 361 'Ofgem Targeted Charging Review Implementation: Calculation of Charges'](#) have been raised as a result of the TCR. The DCUSA is working with the CUSC to align changes where needed, and conversations are underway to set up any cross-Code Workgroups needed. Consultations are likely to be issued in mid-March 2020, although the one for DCP 361 may come later due to modelling work on the calculation of charges needing to be undertaken first.

5. CENTRAL CACoP WEBSITE

NB provided an update on progress with work on assessing a central CACoP website. ElectraLink has now received a quote from its service provider. The total for development, content importing, testing, management and provision of resource would come to a one-off cost of £10,000. On-going annual fees of £3,600 would also be incurred for technical support and server hosting and maintenance. These costs are exclusive of VAT.

PR noted that Gemserv had carried out its own assessment with its service providers based on the requirements. This assessment had given similar prices, and so Gemserv is comfortable that ElectraLink's quote is appropriate.

NB highlighted that support is needed from all the Code Administrators to fund the cost. PR noted the biggest remaining challenge is not having a documented and detailed justification for why the website is needed or what the solution would cover. It is not currently clear what benefit this website would provide over current status quo, and there is the risk of duplication of effort. Several Code Administrators had stated they would need to see this information before they could come to a decision. Any business case would also need to be scrutinised by Panels.

LOS queried who would manage the funding for the website when the chairmanship passes to other Codes. PR confirmed that the logistics need to be resolved before proceeding. He felt it would be easier for one Code Administrator to own the contract with a service provider, but a clearly documented approach is needed.

HB highlighted the SPAA Executive Committee's letter, and believed the Forum needs to refocus on why this website is needed. PR noted the letter had said the website had been consistently requested by Parties, but highlighted that some Parties have pushed back, so there is not universal support for this.

NB agreed that the business case for why a central website would be better than the current baseline is needed. ElectraLink will work on a paper providing justification for the website, what it will include and the costs and benefits, and will present this to the April 2020 Forum meeting.

ACTION 11/06: ElectraLink to prepare a paper providing the justification, solution and business case for a central CACoP website.

PR commented that it would be good to keep the momentum going on this piece of work. He would want to go into the second half of the year with a clear implementation plan for this website if it is agreed to proceed with it, in line with the Forward Work Plan.

MW highlighted the need to look at the risk for reputational impact which could arise from having multiple sources of the same information, should these sources become misaligned.

6. BEST PRACTICE WORKSHOP

The Forum discussed the following areas to identify whether any areas of best practice could be identified. The discussion was held under the principle that views and discussions would not be attributed to individual people, in order to ensure all ideas could be drawn out. These minutes capture only the headline discussion points and conclusions.

The Forum will review the output of this workshop at the next meeting to understand the different baselines and key areas to investigate further with Ofgem.

MODIFICATION PROCESSES

Several Code Administrators use checklists to ensure they cover all the necessary steps and ask all the necessary questions. This works especially well for new starters, as it helps them to ask the right questions on new modifications.

Each Code's modification process contains provisions for some form of pre-modification process. For some Codes, such as the SEC, these are formal steps in the process, while for others these are optional, and Proposers can proceed straight to a full modification. For some Codes, such as the MRA and the UNC, the issues discussed at the pre-modification process can effectively filter out any modifications with little support, so that almost all proposals that make it further in the process get approved, and reach decision much quicker due to the initial work.

The timetables for modifications are usually set by the Panel, who will agree details such as the number of Workgroup meetings to be held. This usually covers the anticipated timetable for the whole process, and any extension to the timetable must be agreed by the Panel. The SEC has moved to a more flexible 'work package' approach, where the SEC Panel agrees a package of work over the next two or three months. At the end of that period the Panel is updated on progress and agrees the next package. This has worked well so far and has mitigated the risk of modifications falling into a 'black hole'.

Some Code expert groups used to be formed of industry experts, whose CVs were scrutinised before they could join. Over the last decade these have become populated with more regulatory people, and the groups are now reliant on a very small number of experts who can provide effective challenge. The Forum agreed this loss of industry expertise is being seen across the board, and the Code Administrators are needing to upskill their staff in response.

Several Code Administrators work to draft proposal forms and other documentation on behalf of the Proposer, but this support is not universal. In some cases, such as under the SPAA, a Proposer can submit an issue and work with an industry group to draft the subsequent Change Proposal together.

Each Code takes different approaches to prioritisation. The CUSC has recently produced a prioritisation stack, as noted under the Code updates above. Other codes prioritise changes based on industry need. The BSC has established an internal group that reviews all change to BSC systems and seeks to prioritise these.

The BSC now allows for non-BSC Parties to raise modifications as long as they have the support of the BSC Panel. All other Codes are limited to Parties to that Code, although some, such as the MRA and the SPAA, do allow non-Parties to raise modifications as long as they can find a Party to sponsor their change.

SHARING OF INFORMATION

The Forum noted that work was done a few years ago to make proposal forms more consistent. Since then different forms have diverged depending on the information needed under that Code for a modification. For example, the SEC process requires only the issue to be submitted at the beginning, and not a proposed solution.

The Forum agreed it was acceptable for the forms to diverge if there was good reason. Information required by one Code may be irrelevant to another. The Forum agreed to do a review of the current proposal forms at the next meeting and provide comments on the different approaches.

ACTION 11/07: Each Code Administrator to provide a link to their modification proposal form to the Secretary.

Several members highlighted occasions where Proposers used older or incorrect versions of the forms and wondered how to better ensure Proposers use the correct form each time.

The Forum considered that while the industry seeks greater consistency in the documentation and the processes, it is likely individual Parties would prefer the Code they engage with the most to be used as the baseline for this. Therefore, by aligning all Codes to one model, it is likely more Parties would be unhappy than happy with the changes required.

The Forum also believed it unclear what Parties are looking for greater consistency in – for example, the language used, the content included in documents, the documentation structure, or the processes followed. Each of these would require different levels of work to achieve.

It was felt that there are genuine reasons for inconsistencies, and that where these exist these reasons should be clearly explained, for example through central guidance notes.

There are differences in the use of email communications, with some Codes issuing emails in batches while others issue individual emails per change. Some Parties would like to see more guidance from Code Administrators on which modifications will impact them. Some Code Administrators provide this, but others were nervous of the risk of liability if this information was incorrect.

Members felt Parties did not fully understand what the CACoP is and the role of the Forum, and assume it is there to pick up all cross-Code change. In many cases, the representatives on the CACoP Forum are not always the right people to pick up on any cross-Code impacts; this is better done by the technical experts. A new approach to identifying these is required.

PROVISION OF EXPERT SUPPORT

The Forum considered whether Parties have access to the right people to help develop a modification. It is not always clear who to speak to, and a central contact is a good idea. Some Code Administrators publish the name, contact details and even the pictures of their Lead Analysts to aid in this.

Members felt the Lead Analyst is the best person to act as the central point of contact. They can then draw in other consultants and technical experts from their organisations to the conversations as required. A central mailbox for queries is also a good idea, in case any named contact is out of the office for an extended period of time.

The pre-modification processes are seen as an opportunity for Parties to flag they need expert input and to receive this. Experts are usually asked to attend Workgroup meetings where it is known they are needed. As the industry moves towards having Code Managers, it will be important to bring a lot more experts into the Code bodies rather than relying in industry representatives.

PROVISION OF CRITICAL FRIEND SUPPORT

Code Administrators generally cover the basic validation checks for a new modification, including asking the basic questions, querying likely cross-Code impacts, looking at consumer impacts and checking any impact on ongoing SCRs.

It was considered that the Critical Friend role should cover the whole lifecycle of a modification, including post-implementation support. It was asked how often Code Administrators perform a post-implementation review, and whether there is a role for them to help with the roll-out and training for changes.

There is inconsistency in how the impacts of a modification are drawn out and reported. It was felt this information comes out from Workgroup discussions and consultation responses. The Forum considered whether a list of questions could be prepared to drill down on the specific impacts of a

change and wondered whether people are taking (or have) the time to complete this part of the report.

The REC Manager will be expected to comment on whether a modification should proceed. It should also be able to say if a change will need consequential changes to other Codes. A good Critical Friend should be able to support on any consequential change, to ensure this delivers the original modification's intent, and could do the bulk of the work in preparing this.

The Forum debated what is expected from a Critical Friend regarding shaping the modification's solution. A Code Manager would be expected to provide constructive challenge to the Proposer and put forward potential alternative options to deliver the intent in a better way. To be clear, CACoP Principle 6 places the final decision on any solution with the Proposer; the Code Administrator's job is to help them come up with the best option to take forward. However, not all the Code Administrators felt they have the expertise or capability to be able to provide this input and see their role as simply administering the modification process.

The Forum was queried whether the inconsistencies people see in the process is down to the different level of support and work the different Code Administrators provide. It was considered this comes down to how each Code Administrator interprets their role, but if the Forum is unable to come to a clear view then it would be difficult for the industry to have such clarity.

The Forum felt it would be good to draw out where the Codes differ in the service provided, and ask the industry what it is expecting to see. Guidance on what support is provided as a Critical Friend could also be developed, to provide transparency and warn Proposers of the likely questions that they could be asked. A concern was raised that if Proposers know the Code Administrators will investigate these questions then they may feel they don't need to do so themselves. It would be beneficial to ask in the next CACoP survey what each respondent thinks is meant by a 'Critical Friend'.

WIDER ENGAGEMENT

The Forum believes embracing digital technology will be important. It noted the SEC Modcasts and the BSC consultation podcasts, both of which seem well received by their respective Parties. The Joint Office uses Twitter to highlight when minutes are available, although it is not clear how much traffic this is generating. It also sends out notifications to Parties as decisions are being made by the Panel, although this complex to manage.

The Forum queried whether a platform like Microsoft Teams could be used to improve industry collaboration, providing a single portal for information.

MRA Parties are required to nominate representatives to receive communications, with their role being to disseminate the information within their organisations. Others can also join the mailing list as interested industry parties.

The BSC noted it had provided some guidance on its modification process to Energy UK, to help it support Parties.

One approach could be to prepare a list of potential categories of people (Parties and non-Parties) who could be interested in modifications, to help a Code Administrator consider whether any of

those would be impacted by a particular modification. Sending targeted communications to those categories could also be done if it is known the modification will impact on them.

The Forum felt it needed to reach out to the normal Parties who are involved in change, but in a better way. A degree of impact assessment is also needed before consultation, as not all Parties will have the capability to respond and provide input.

WORKGROUP QUORACY

The IGT UNC noted the full Panel membership consists of three Transporters and three Shippers, and two of each is needed for quoracy. However, there has been a scenario where the Panel only has one Shipper member. This is causing issues with scheduling meetings. It was felt that if Parties are not putting names forward for Panels then Ofgem could take further action.

Around half the Codes now have set Workgroup dates (e.g. monthly sessions), which is helping people to plan ahead. The greater use of teleconferencing is also enabling more people to join meetings remotely.

SEEKING RESPONSES TO CONSULTATIONS

The Forum considered that the discussions under 'Wider Engagement' would cover this area too.

7. ANY OTHER BUSINESS

MW sought members' views on their plans for the end of the Brexit transition period and what contingency planning is needed depending on whether energy is or is not included in any agreed deal. The recent changes to the MRA, the SEC and the SPAA mean these Codes are now fully aligned with Brexit and no further changes are expected. LOS noted that the UNC will be discussing this at the Panel meeting next week. PR noted that BEIS and Ofgem had taken the lead on Brexit co-ordination before and queried whether they would do the same here.

8. SUMMARY AND MEETING CLOSE

The Chair confirmed the next meeting would be on 10 March 2020 at the Gemserv offices.

The Chair thanked everyone for attending and closed the meeting