

CACoP Forum meeting 13

14 April 2020, 10:00-13:00

Teleconference

Minutes

Attendee	Representing
Paul Rocke (PR) (<i>Chair</i>)	IGT UNC
Holly Burton (HBu) (<i>Secretary</i>)	SEC
David Kemp (DK)	SEC
Eugene Asante (EA)	MRA
Matthew Woolliscroft (MW)	BSC
Jennifer Groome (JG)	CUSC, Grid Code, STC
Fraser Mathieson (FM)	SPAA/DCUSA
Jonathan Coe (JC)	Ofgem
Jonathan Hawkins (JH) (<i>part</i>)	Gemserv

1. WELCOME AND INTRODUCTIONS

The Chair welcomed everyone to the meeting.

The Chair noted apologies had been received from Neil Brinkley (NB), Richard Colwill (RC), Kirsten Shilling (KS), Helen Bennett (HB) and Loraine O'Shaughnessy (LOS).

2. MEETING 12 MINUTES

The Forum approved the minutes from the last meeting.

3. ACTIONS UPDATE

Ref	Action	Update
10/02	Gemserv to confirm to ElectraLink if it would be willing to contribute to the cost of the central CACoP website	It was noted in meeting 11 that 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.
10/05	Each Code Administrator to provide information on its market entry process to the Joint Office	No Joint Office representative was available to provide an update. This action will remain open.
11/05	Each Code Administrator to consider what steps are needed to bring the REC into the process for identifying cross-Code impact.	It was noted in meeting 12 that the integration of the REC would be expedited once Code Managers are appointed beyond June 2020. This action will remain open until decisions have been confirmed.
11/06	ElectraLink to prepare a paper providing the justification, solution and business case for a central CACoP website.	This agenda item has been deferred until May 2020. This action will remain open.
12/01	Gemserv to prepare an updated copy of the CACoP document on the new template with updated contact details noted in previous meetings for agreement by the Forum	The updated copy was provided for discussion and sign-off at this meeting. This action can now be closed.
12/02	ELEXON to contact SECAS and begin cross-Code collaboration over the solution for BSC modification P379	An update was provided Agenda Item 4. This action can now be closed.
12/03	National Grid ESO to forward its new templates to the Joint Office	The relevant people were not available to provide an update. This action will be left open.
12/04	The Joint Office to circulate the current Market Entry Guidance Note to the Forum	The Chair confirmed the Market Entry Guidance Note was received by the Joint Office on Friday 10 April 2020, therefore will be circulated to Forum members post-meeting for review and comment. This action will remain open.
12/05	Forum members to review and provide feedback on the draft Market Entry Guidance Note to help shape discussion at the next meeting	The update is the same as Action 12/04. This action will remain open.

Ref	Action	Update
12/06	Code Administrators to provide cross-Code updates and newsletter items to SECAS by 31 March 2020	No additional items have been received. This action can now be closed.
12/07	Code Administrators to consider how their proposal forms can be simplified	An update was provided under Agenda Item 8. This action will remain open.
12/08	Ofgem to confirm if it would be willing to ask further questions on behalf of the CACoP Forum as part of the CACoP survey	JC confirmed based on the length of the survey, there was no great appetite to ask further questions. The survey was due to be launched within the next few weeks, however it is expected to be delayed due to the impacts of COVID-19. The Forum will be kept updated of progress. This action can now be closed.

In discussing Action 12/08, the Chair queried if it would be easier if the Forum was to suggest questions it felt would be valuable to ask. Due to the delay with issuing the survey, the Forum has time to provide written thoughts to Ofgem. FM noted it seemed sensible to keep the survey on hold as it is likely not a high priority for respondents.

ACTION 13/01: The Chair to collate potential survey questions to send to Ofgem.

4. CODE UPDATES

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

IGT UNC

PR provided the following updates:

- All modifications discussed at the last meeting as live are currently being progressed. However, a number of modifications had not been progressed at the Modification Working Group meeting on Thursday 9 April 2020 due to Proposer unavailability.
- [IGT 139 'Introducing a new User type to the IGT UNC and the Data Permissions Matrix of Electricity System Operator \(ESO\)'](#) has been raised to recognise ESO as a User type within the Data Permissions Matrix. This change has been raised to align with UNC 0715.
- The Chair informed the Forum of the current BEIS consultation on changes to standard conditions of Gas and Electricity supply licenses, conditions of DCC license, the SEC, the UNC and the MRA. The consultation outcome will implement changes to the UNC; however, consequential impacts on the IGT UNC were not identified. The IGT UNC workgroup will meet to consider the impacts on the IGT UNC and what actions are required to ensure continued alignment.

SEC

DK provided the following updates:

- There has been no further movement over [SECMP0046 'Allow DNOs to control Electric Vehicle chargers connected to Smart Meter Infrastructure'](#). SECAS is awaiting the Proposer to confirm how to move forward with wider governance, particularly under the DCUSA.
- SECAS previously agreed in principle with the MRA that [MP077 'DCC Service Flagging'](#) would be targeted for the June 2021 release. However, there is some confusion among SEC Parties as to whether there will or will not be a Data Transfer Catalogue (DTC) release in June 2021 due to ongoing work with the Retail Energy Code (REC). EA advised Ofgem has only confirmed the DTC releases up until February 2021. With MP077 looking to be sent to the SEC Panel in August 2020, this will give a six month lead time before the February 2021 release. This modification is realistically going to be released in June 2021 due to Data Communications Company (DCC) lead times but based on the current landscape is unlikely to be implemented in the DTC at that time. Discussions are currently underway to see if this can be aligned. From an MRA perspective, Parties want to look at the D0350 flow in its entirety. The Chair noted unless something happens preventing the REC Go-Live as currently planned, the MRA will not exist for June 2021, and it isn't clear where the governance would sit. Clarity is needed for how the DTC will sit in the REC and how this would change. It was noted that due to the number of Codes that have use of and rely on knowledge of the DTC, it would be beneficial to liaise with Gemserv representatives working on the programme to see whether there is clarity on how DTC governance will happen during the transition period of the REC.
- There is no further update over [MP101 'Large Meter Gas Displays'](#), this one continues to progress.

ACTION 13/02: EA to liaise with Gemserv/Ofgem Representatives working on the REC programme to seek clarity on DTC governance during the REC transition period and circulate a response to the Forum.

CUSC AND GRID CODE

JG provided the following update:

- It was noted that the Transmission Charging Review (TCR) modifications implementation date have been delayed by one year by Ofgem, meaning the modification timescales for these will now need to be re-profiled with other Codes, in particular the DCUSA.

MRA

EA provided the following updates:

- The Issue Resolution Group (IRG) recently took place, which looked at [MIF318 'D0350 Notification of DCC Services at Metering Point Location'](#). This is an issue that is being looked into alongside SEC Modification MP077 which was previously discussed.
- The MRA Development Board recently discussed [MAP CP 0328 'Earlier initiation of Supplier Agreed Meter Readings process'](#) which was initially raised to reduce the time a Supplier can

invoke the process to chase missing Change of Supply Reads from 30 Working Days to 15 Working Days. This is a BSC led change which will require changes to MAP08 and has been issued for Impact Assessment (IA). This will then be presented at the April MRA Executive Committee (MEC) Board meeting for vote. The BSC changes were due to be presented to the BSC Panel last week, which would determine whether this should proceed to vote. Concerns were raised that the MAP CP change under the MRA would be voted on and processed before the BSC change was approved.

FM noted the joint SPAA and MRA Secure Communications Data Portal that is currently due for implementation in June 2020. He queried whether industry Parties will want to delay the implementation in order to resource the training and requirements to use the system. EA noted that from an MRA perspective, given the questions received from industry Parties, the MRA changes were due to be implemented on time. The MRA has questioned Parties as to whether there is any benefit in pushing the implementation date back; there were discussions about whether this would be delayed but currently there is no change in timescale planned. Comments from Parties are due by the end of next week.

In response, the Chair noted this is being raised at the MEC to discuss whether this is something that should look to be delayed. There has been no formal request from Parties that there is currently a need to delay, and so this will continue as planned for the June 2020 release.

The Secure Exchange Data Portal was set up to help Parties comply with General Data Protection Regulation (GDPR), the risk of non-compliance was significant. Any delay to the initiation and implementation of this project would extend Parties risk around GDPR. The decision is down to industry to assess whether they require derogations or if there is reporting to rely on Force Majeure provisions. The SPAA will be looking to assess the changes that are due to be implemented in June 2020 including the Secure Data Exchange Portal and provide an impact assessment of the delays.

BSC

MW provided the following updates:

- Sub-Committees voted to reject [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'](#). The groups didn't think the benefits outweighed the costs; therefore they were rejected. The groups welcomed the work that had been put in and are going to seek a more efficient way to carry out some of these changes that are not going to involve changes to the database.
- [P402 'Enabling reform of residual network charging as directed by the Targeted Charging Review'](#) was raised to introduce new reporting requirements on Licenced Distribution System Operators (LDSOs) and ELEXON that will ensure provision of data to enable National Grid to set Transmission Network Use of System (TNUoS) demand residual tariffs and enable accurate billing of subsequent charges.
- [P403 'BSC Arrangements in the event that the TERRE Market is suspended by National Grid ESO'](#) looks to align the BSC with the Grid Code and NCER requirements and will provide

clarity to Market Participants on the settlement arrangements in the occurrence of TERRE market suspension.

- The BSC is moving its Self-Assessment document as part of qualification to its own category document, which changes the governance and provides the Performance Assurance Board (PAB) with a better control over change to mitigate risks.
- [Issue 89 'Ensuring Demand Control Event \(DCE\) procedures remain fit for purpose'](#) seeks to examine efficacy of the Settlement Adjustment Process (SAP) introduced by [P305 'Electricity Significant Code Review Developments'](#) in 2015 in light of the outage event last summer.
- [P397 'Assessing the costs and benefits of adjusting Parties' Imbalances following a demand disconnection'](#) seeks to introduce a mechanism through which ELEXON determines whether certain Parties should carry out the Settlement Adjustment Processes following a DCE. Ofgem sent back this proposal last month due to a lack of information being provided in the report.
- [P400 'BSC Panel Modification Business via Video/Teleconference'](#) which seeks to enable the BSC Panel to pass determinations on Modifications Business via video/teleconferencing and [P401 'Governance arrangements for BSC Panel Alternates'](#) which clarifies the governance arrangements for BSC Panel Alternates in respect of their contribution to quoracy and voting at BSC Panel meetings were both implemented last week.
- [P354 'Use of ABSVD for non-BM Balancing Services at the metered \(MPAN\) level'](#) which seeks to allow National Grid to provide Applicable Balancing Services Volume Data (ABSVD) volume at the MPAN level and have the Settlement Administration Agent (SAA) allocate it to the appropriate Supplier BM Unit was implemented on 1 April 2020.

SPAA & DCUSA

FM provided the following updates:

- It was advised that most cross-Code impacting SPAA changes affect the UNC and the Central Data Service Provider in gas. As the UNC representative was not present, an update will be provided directly to the Joint Office and at the next CACoP meeting on Tuesday 12 May 2020.
- [SCP 472 'Web-based solution for sending Customer information securely'](#) which seeks to mandate all Parties to send escalations and operational queries that include personal data via a web-based platform rather than via email is expected to be implemented in June 2020.
- Slight changes have been made to Theft and Gas arrangements in the SPAA and the DCUSA. Issues will be clarified regarding the incentive schemes in relation to Supplier of Last Resort (SoLR) events.

UNC

There was no UNC representative at the meeting, however the following updates were circulated pre-meeting:

- [Modification 0672 'Target, Measure and Report Product Class 4 Read Performance'](#) seeks to reduce Unidentified Gas (UIG) volume by incentivising read submission performance for Product Class 4 sites. This Modification proposes to target and measure performance against an agreed percentage for energy reconciled after a defined period and provide the PAC with a report which will enable them to target Shippers whose performance is below the target threshold.
- [Modification 0674 'Performance Assurance Techniques and Controls'](#) seeks to provide an effective framework for the governance of industry performance that gives industry participants mutual assurance in the accuracy of settlement volume allocation. The existing ancillary documents have been merged into two documents:
 - A PAC Constitution Document subject to governance under V12 by the UNCC (and only following prior PAC approval); and
 - A consolidated Performance Assurance Framework Document subject to PAC Governance.
- [Modification 0693R 'Treatment of kWh error arising from statutory volume-energy conversion request'](#) seeks to review the treatment of the error in kWh that arises from statutory volume-to-energy conversion factors in order to mitigate the impact on gas settlement, reconciliation and Annual Quantities (AQs).
- [Modification 0697S 'Alignment of the UNC TPD Section V5 and the Data Permissions Matrix'](#) is a Self-Governance Modification which seeks to rationalise UNC TPD Section V5 and remove inconsistency with the Data Permissions Matrix.
- Modification [0702S 'Introducing 'Research Body' as a new user type to the Data Permissions Matrix and UNC TPD Section V5'](#) is a Self-Governance Modification which seeks to further realise the benefit of the Data Permissions Matrix reflecting the direction to greater data openness by adding 'Research Body' as a new user type to UNC TPD Section V5 and the Data Permissions Matrix.
- Modification [0704S 'Re-ordering of the UNC in advance of Faster Switching'](#) is a Self-Governance modification which seeks to amend the existing Transporter theft of gas reporting requirements following discussions at the Modification 0677R 'Shipper and Supplier Theft of Gas Reporting Arrangements' Review Group. The Workgroup Report is going to the April UNC Panel and is expected to go out to consultation.
- Modification [0708S 'Re-ordering of the UNC in advance of Faster Switching'](#) is a Self-Governance Modification which proposes to realign the UNC to match the re-ordering that is in the proposed legal text developed for the Switching Programme and discussed at the Workgroup for Modification 0630R 'Review of the consequential changes required in UNC as a result of the Ofgem Switching Programme'. This will ensure that the UNC structure and ordering matches in both the current UNC and the proposed legal text produced for the Faster Switching programme, so that it is easier to (i) maintain both versions, (ii) identify specific changes that are in the Central Switching Service (CSS) version that is due to be introduced as part of Faster Switching and (iii) Identify potential impacts on the legal text developed for Faster Switching. The Workgroup Report is going to the April UNC Panel and is expected to go out to consultation.

- Modification [0710 'CDSP provision of Class 1 read service'](#) proposes that the Central Data Service Provider (CDSP) provides the Class 1 Supply Meter Point read service. It will remove the Transporter obligation to provide a Daily Read service to Shippers for non-telemetered Class 1 Supply Meter Points. This does not affect arrangements for directly connected telemetered Supply Meter Points on Distribution Network Operators (DNOs) or National Transmission System networks.
- Modification [0713S 'Amendments to TPD V3.1.7 Independent Assessment table'](#) is a Self-Governance Modification which seeks to make changes to a UNC mapping table to reflect changes to the way Graydon determines credit ratings. Workgroup Report is going to April UNC Panel and is expected to go out to Consultation.
- [0715S 'Amendment to the Data Permission Matrix and UNC TPD Section V5 to add Electricity System Operator \(ESO\) as a new User type'](#) is a Self-Governance Modification which seeks to amend the Data Permission Matrix to add Electricity System Operator (ESO) as a new User type to the Data Permissions Matrix.

OFGEM

JC provided the following updates:

- A message was re-iterated from Ofgem's CEO thanking Parties for engaging when information has been requested in regards to COVID-19 arrangements, such as Force Majeure provisions.
- Ofgem is currently under a publishing moratorium which started on 25 March 2020. A decision was taken to not publish the majority of publications, including decisions, for an initial period of two weeks, but this is still ongoing due to reprioritisation.
- National Grid ESO requested consent to withdraw CUSC Modification Proposal [CMP332 'Transmission Demand Residual bandings and allocation \(TCR\)'](#) and to review the implementation timeline for the new Transmission Demand Residual (TDR) charges for the TCR. Ofgem consented to this withdrawal and a Direction to raise a new CUSC modification that (i) enables TDR charge reforms to be effective as of 1 April 2022 and (ii) complies with the 2019 TCR Direction in all other respects.
- Ofgem has been working with Industry Working Groups to progress the development of the Market-wide Half-Hourly Settlement (MHHS) Target Operating Model (TOM). Engagement has been received from Code representatives within the SEC, the MRA, the BSC and the CUSC on the impacts for moving to the new TOM in the Codes. A newsletter was published onto the Ofgem website confirming the various MHHS Working Groups' progress made to date. A draft impact assessment has been delayed due to the publishing moratorium.
- The REC and Code-consolidation SCR remains on track, with the aim of consulting in November 2020 ahead of REC go-live in April 2021.

5. MARKET ENTRY GUIDANCE NOTE

The Chair provided an update on behalf of UNC Representative HB who could not attend the meeting. It was confirmed that the draft Market Entry Guidance document had been received by the Secretary on Friday 10 April 2020 and as such the Chair had not yet had a chance to review and circulate this document to the Forum. The request from the Joint Office was for Parties to provide feedback on whether the document meets what is being asked. As a result, it was agreed that the Market Entry Guidance Document will be circulated to the CACoP Forum in order to review and provide general feedback/additional information to HB.

6. CROSS CODE ENGAGEMENT DAY PROPOSAL – JUNE 2020

JH presented a proposal to hold a cross-Code engagement day in June 2020. JH had spoken to ELEXON last month and has since been working with respective Codes on the changes required for the Faster Switching and the Retail Code Consolidation SCRs. Several Codes have submitted their draft changes to Ofgem in which a deadline was given for the end of March 2020.

Gemserv has been working closely with ElectraLink and ELEXON on the DCUSA and BSC front for coordinating where the MRA drafting will be positioned. Some of these discussions will be taken to Industry Working Groups due to several complicated changes being a result.

The question for the Forum was whether it would be beneficial to hold a cross-Code engagement day which, by having end to end operational explanations of the changes after the spring consultation, will provide clarity for the respective Code Parties.

The Chair believed a co-ordinated approach under CACoP would add significant value to Parties as opposed to individual sessions. It is also an opportunity to highlight the benefits that the CACoP Forum can provide to Market participants in providing consolidated information.

The expectations and effort requirements for Code Administrators would differ for each Code based on the size and scope of the changes to that particular Code. For example, based on the Retail Code Consolidation aspect, changes to the DCUSA theft provisions are being transferred along with expansion of the disconnections process. Whereas, within the BSC there are wider reaching fundamental changes to that Code.

The Forum requested a summary of the expectations and outcomes should Code Administrators participate in the engagement day. JH clarified that the spring consultation will be circulated with a substantial amount of legal drafting. The output of the engagement day would therefore provide the clarity and explanation to Parties of what the legal drafting actually means in practice.

FM noted the value for Industry in attending this engagement day. He noted the engagement day would be REC focused and asked which Code Administrators would be required to attend. The Chair confirmed several Codes are impacted by the Retail Code Consolidation. With regards to IGT UNC, the impact of the REC may be minor, but there are still changes to the Code and therefore, a version of the IGT UNC changes is being prepared before sending to Ofgem to include in the consultation.

FM noted from a UNC perspective, it is not necessarily the case that all Code Administrators will be in a position to provide their own analysis/interpretation of those impacts, therefore will be relying on their Code signatories.

JG asked for clarity in that, would this this engagement day cover the switching SCRs as there was a consensus that National Grid ESO would not be required to attend due to not being impacted by this SCR.

MW noted to consider Party resource in that, due to COVID-19 there is uncertainty on changes to consultations and whether business would continue as usual. Several Parties are re-prioritising where they are placing resources, particularly with regards to billing. He queried how this may affect Parties' ability to engage with the consultation or attend an engagement day. It was also noted that there is a risk that the potential engagement day is seen as a continuation from last year's session, and that progress and work achieved to date could be scrutinised or questioned.

The Chair noted that the separation will be clear and that this session would be solely to provide an opportunity for cross-Code matters linked to this consultation. This session should not reflect on the effectiveness of CACoP or what the goal of CACoP is.

JH noted discussions were underway to hold an engagement day before COVID-19 measures were in place. There is an expectation that the impact of this will delay the publication of the spring consultation even though an official statement hasn't yet been confirmed by Ofgem. The content of the engagement day has been baselined, and each Code understands the changes or at least what the changes would be.

There is potential to split this engagement session over two days, with the first focusing on electricity impacts, the second day would focus on gas impacts. The Forum recognised the value of holding such engagement day but felt an idea of what the structure of the day would look like is required. JH agreed to write and circulate a paper before the next CACoP meeting on 12 May 2020 to outline the key structure of the engagement day and confirmed timelines, so that Code Administrators can seek the relevant subject matter experts.

ACTION 13/03: Gemserv to prepare a plan for the potential engagement day in June 2020, confirming the scope, outcome and feasible timelines.

7. APRIL 2020 CACoP NEWSLETTER

The Forum reviewed the draft Newsletter content that had been circulated prior to the meeting.

Content includes an update on the outputs of the workshop which took place in February 2020, links to the latest Forum discussions which have been approved and published onto the website, and a look at CACoP Principle 3, which requires information to be made promptly and publicly available to Users. Information relating to cross-Code developments includes an update on the arrangements during COVID-19 and an update relating to the CACoP document.

DK requested if Code Administrators could provide a short paragraph in relation to either the Secure Data Exchange Portal or the TCR with a link to this information. This will display that cross-Code work is still taking place.

The intention was to have the newsletter ready for circulation for the week commencing 20 April 2020. As a result, the Forum was asked to provide additional information for the newsletter by midday on Thursday 16 April 2020.

The Chair noted the importance to include the impacts of COVID-19, noting the resilience of Code Panels and Code Administrators, and the ability and intention as Code Administrators have of running business as usual. Best practice has been shared with the CACoP Forum around maintaining services and approaches to Force Majeure.

The Forum agreed the content of the April 2020 CACoP Newsletter. This will now be finalised and issued next week subject to comments being received from Code-Administrators .

8. SIMPLIFICATION OF PROPOSAL FORMS

PR noted that in the last two meetings a discussion had been had as to how Modification proposal forms could be simplified. At the last meeting there was a consensus that there seems to be barriers in place for Parties to submit a proposal form, and it was queried whether the current measures in place are proportionate. As a result, members were asked to consider how their proposal forms could be simplified which could then be shared.

JG advised National Grid ESO has changed its Working Group report templates but has not yet examined the proposal form as this a CACoP template.

The SEC provides three fields to be completed by the Proposer focusing on the issue identified, and there is no desire to change this proposal form as it was designed to meet the complex nature of requirements within the SEC. MW advised changes similar to the SEC approach have been included into the BSC's proposal form. ELEXON would have preferred to make its form even simpler but had been limited as the BSC has basic requirements of what a proposal form must contain. Any further changes to what have already been done would require a new Modification.

The Chair suggested holding an ad-hoc workshop which will focus solely on the simplification of Modification proposal forms and agreeing what a baseline template should look like. The template will not be completely aligned across all Codes, due to the variations in the information and process required under each Code, but it would be sensible to spend time collating a baseline of the expectation for a Party raising a change.

In order to receive a positive output, Code Administrators were requested to look at each of their Modification proposal forms and assess against the CACoP principles. The Chair agreed to provide a formal instruction of the ask before setting up the workshop, as pre-work would make the actual session more useful.

ACTION 13/04: The Chair to provide a clear instruction for Forum members on what they need to look at when reviewing each of their Modification proposal forms ahead of an ad-hoc workshop.

9. USE OF ENERGY DATA IN THE ENERGY INDUSTRY

JC previously noted that the Energy Data Task Force has changed expectations for use of data within the energy sector which has an effect on Code Administrators. This was discussed at the BSC Panel which resulted in Ofgem trying to coordinate the work across Code Administrators to make sure there is not a duplication of effort.

Ofgem proposed to hold a workshop as part of the May 2020 CACoP Forum meeting to discuss points which were circulated in a paper prior to this meeting. Code Administrators were asked to identify the right individuals from their organisations to attend this session so they can then be invited to part of the meeting. The Chair highlighted the importance of knowing the outcomes and objectives in order to appoint the right subject matter expert.

Forum members agreed it would be sensible to hold this workshop as part of the CACoP Forum, and agreed having the right representation is important. Therefore, Ofgem was requested to produce a paper in advance of the next CACoP meeting in May 2020 highlighting the specific objectives in order to highlight and engage.

ACTION 13/05: Ofgem to produce a paper highlighting the specific objectives and outcomes of a potential workshop in order for Code Administrators to seek the right subject matter experts to attend.

10. APPROACHES TO FORCE MAJEURE

The Chair circulated a note following a request that Gemserv had received from Ofgem within its role of supporting three Codes, Ofgem had been keen to understand views on the application of force majeure provisions within each Code and whether there were any ongoing requests for force majeure to be engaged. Gemserv had provided a response to Ofgem with its views and perspective as to how force majeure was being addressed.

The Chair sought clarification around the consistency of communication and provisions in place for force majeure within each Code. Within the MRA, a Party raised requested the MEC consider granting Parties derogations against certain obligations on an all-Party level rather than applying individually, given the unusual circumstances with COVID-19.

The MRA has created a secure workspace on Huddle to populate a log of communications that Parties have sent to bilaterally agree a deviation for a normal procedure for a period of time. This allows the MRA to monitor alternative processes as they are being circulated to ensure the Code Administrator is at ease with the alternative processes being put in place.

FM noted the derogation process places the responsibility on industry Parties to raise requests. The SPAA is examining a possible derogation by Party class given the impacts of COVID-19. If the impacts of COVID-19 are common across the Parties in a given class, then a single derogation request will be raised. Ultimately, if Parties do not comply with the Code then they will be a breach of their license, which would be escalated to Ofgem, although it was felt Ofgem would be pragmatic under the current situation.

It was suggested to include within the April CACoP newsletter that all Code Panels are acting pragmatically. Code Administrators are aware of the issues Parties may have complying with all obligations during this period, and Code Panels are therefore taking steps to act proportionately with Parties. Parties are encouraged to look at the derogation processes set out within each Code for information about how obligations could be relaxed formally during this period.

MW noted the value of Code Administrators reviewing how their derogation processes apply and whether there is anything that can be done through signatories or Panels. The BSC has taken a pragmatic approach in that the PAB has suspended performance assurance techniques. Two modifications have also been raised, one to temporarily turn off Supplier charges to alleviate financial pressures that Suppliers are facing and the second is to allow the BSC to send notifications via email as well as post.

The Chair noted the message is that all Code Administrators and Code Panels recognise the need to be pragmatic and proportionate as not all Parties will meet obligations during this time period. Code Administrators and Code Panels should be taking steps to support Parties in meeting a proportionate level of obligation and giving support to those that cannot meet the criteria.

11. UPDATE TO CACoP DOCUMENT

DK noted changes have been made to the CACoP document to update contact details for each Code Administrator and re-template the document on the new CACoP branding. He confirmed the drafted document had been circulated to the Forum on 7 April 2020 but requested for any final changes or updates to details be sent by Thursday 16 April 2020. After this, the document will be sent to Ofgem and Code Administrators who can then upload to their websites.

PR noted the MRA email address has since changed to 'support.mra@gemserv.com'. JC noted that National Grid ESO was still referred to as Electricity Transmission in the document, so will need to be updated. He also queried, based on comparison against the older document, why the version control had been moved to an appendix. DK advised he had felt the version control was better kept in an appendix. PR noted this also aligned with Gemserv's templates providing version control as part of an appendix.

ACTION 13/06: CACoP Administrators to inform the Secretary of any final updates or changes to the CACoP document by 12pm on Thursday 16 April 2020.

12. ANY OTHER BUSINESS

An item of business was raised by HBU on behalf of KS regarding how each Code communicates to each Code Party.

- PR noted that under the IGT UNC, newsletters are not sent but communication is circulated when required via email using a distribution list.
- EA noted the MRA has a newsletter which is circulated regularly. Communication is sent via email and Huddle workspace for the different contracts and MRA Development Board.

Distributions lists are updated regularly with Parties sending requests to be added to a particular list.

- DK confirmed a SEC newsletter is circulated on the first and third Thursday of every month and that, emails are heavily relied on for communication. The SEC owns several distribution lists for each Sub-Committee and other central lists for relevant Parties or for specific types of information (e.g. Modifications).
- MW confirmed a BSC newsletter is circulated weekly in which Parties can sign up to themselves via the BSC website. The Modifications team look after distribution lists and these are updated on an ad-hoc basis. Twitter and LinkedIn are also used for published articles.
- FM noted that under the SPAA and the DCUSA, a CRM system is in place to automatically manage different distribution lists. Contract managers have access to an online portal for updating contact information of people within the organisation. Monthly newsletters are circulated, with Parties requesting to be added to a specific distribution list via the website.

JG confirmed the CUSC is reviewing its current communication procedures, with the view to use a new email provider. A newsletter is also looking to be generated across National Grid's Codes.

The Forum was asked whether consultation timelines are being looked at given the current circumstances with COVID-19, with a view to extending these. PR noted the IGT UNC had received no request from Parties, and therefore the current level of service will continue until otherwise notified. Other members agreed with this stance.

DK noted one SEC Party had asked how the SEC define materiality under the Self-Governance criteria, and queried if other Codes had approaches to determining this. FM advised the SPAA has specific provisions in place, with certain changes and schedules that automatically require Authority consent. PR noted it is the same under the MRA, and that the Authority can 'veto' a Code Panel's decision on Self-Governance. JC noted that each Modification should be Self-Governance unless it can be shown to need an Authority decision. He notes something similar had arisen at the STC Panel in the past, and National Grid had provided some guidance. JG offered to send this across after the meeting. PR commented it would be good for guidance to be included or linked to in the proposal form templates for Proposers to use.

No further items of business were raised.

13. SUMMARY AND MEETING CLOSE

The Chair confirmed the next meeting would be on 12 May 2020 and, based on recent measures in place with regards to COVID-19, this meeting will be held fully by teleconference.

The Chair thanked everyone for attending and closed the meeting.