

CACoP Forum meeting 25

13 April 2021, 10:00 – 11:30

Teleconference

Final Minutes

Attendee	Representing
David Kemp (DK) (<i>alternate Chair</i>)	SEC
Holly Burton (HBu) (<i>Secretary</i>)	Gemserv
Eugene Asante (EA)	MRA
Amie Lauper-Bull (AL-B)	IGT UNC
Claire Kerr (CK)	BSC
Matthew Woolliscroft (MW) (<i>part</i>)	BSC
George Crabtree (GC) (<i>part</i>)	BSC
Kirsten Shilling (KS)	CUSC, Grid Code, STC
Richard Colwill (RC)	DCUSA
Fraser Mathieson (FM)	SPAA
Roberta Fernie (RF) (<i>part</i>)	Ofgem

1. WELCOME AND INTRODUCTIONS

The Alternate Chair welcomed attendees to the meeting.

The Alternate Chair noted apologies from Paul Roche (Chair), Helen Bennett (UNC), Jennifer Groome (CUSC, Grid Code, STC) and Jonathan Coe (Ofgem).

2. MEETING 23 MINUTES

The Secretary noted no comments were received on the minutes from CACoP meeting 24 which took place on 9 March 2021. The Forum approved the minutes as written.

3. ACTIONS UPDATE

Ref	Action	Update	Status
24/01	Code Administrators to provide cross-Code updates and newsletter items to cacop@gemserv.com by 31 March 2021.	The items received have been added to the draft Newsletter, included in the meeting papers. This action has now been closed.	Closed
24/02	Code Administrators to nominate an appropriate individual to develop the Cross-Code Steering Group (CCSG) processes and inform the REC (JH and CB) at their earliest convenience.	The first meeting has been held, with nominated representatives in attendance. This action has now been closed.	Closed
24/03	Elexon (CK) to update National Grid ESO (JG) regarding its Working Group nomination process.	It was confirmed that both Elexon (CK) and National Grid ESO (JG) exchanged internal nomination processes offline. This action has now been closed.	Closed

4. NEW CROSS-CODE CHANGES UPDATES

FM reminded the Forum that due to the current wind down of the SPAA and the MRA, change is currently limited. However, work is still being undertaken with the UNC to implement new obligations in relation to reporting Gas Theft. The SPAA will continue to work with the UNC where issues are detected by Suppliers.

AL-B highlighted there are no new cross-Code changes but reminded Code Administrators to make use of the cross-Code tracker that is published on the IGT UNC website. This tracker is updated on a monthly basis and calls out all cross-Code related changes. In addition, it was noted that the IGT UNC is still experiencing quoracy issues with its Panel. This has been called out to Shippers in previous months, and the election process has been extended to seek interest in the vacant seats. Lastly, the IGT UNC has written to Parties requesting consent to opt in to the cross-Code survey and will highlight any issues to Ofgem prior to the deadline.

DK confirmed there are now new cross-Code impacting SEC modifications. SECAS is working to prepare for the Market wide Half Hourly Settlement (MHHS) modification and is liaising with the DCC and Ofgem to initiate this. RC noted that a question has been received in relation to the recent MHHS survey issued by SECAS in February 2021 around the Smart Meter switch with the DCUSA's randomised off-set basis. DK requested the question be sent offline so that internal subject matter experts can investigate and provide a written response.

ACTION 25/01: the DCUSA (RC) to contact the SEC (DK) in regards to the question on the SECAS MHHS survey that was issued by SEC in February 2021.

RF highlighted that Ofgem is in the process of contacting Code bodies within the scope of the Retail Code Consolidation (RCC) Significant Code Review (SCR), with responses sought by the end of April 2021. Individuals will be asked to flag any risks or concerns with the proposed timelines and processes for the consequential the modifications as soon as possible so that Ofgem can agree to implement any alterations that might be required. Ofgem also expressed its thanks to Code Administrators and their Panels that have provided support for drafting legal text for this SCRs.

The CACoP Forum noted the updates.

5. OFGEM UPDATE

RF provided an update on Code modification decision timings and Code governance which has been presented to some Code Panels already, and be taken to the rest of the Code Panels over the coming month. Ofgem highlighted it has reviewed its Key Performance Indicators (KPIs) in making Code modification decisions and intend to adopt a new approach for a trial period. Ofgem is also seeking views and discussions against the different initiatives seen across Codes already, and set out areas where there may be scope for the industry to deliver proportionate and beneficial changes ahead of more fundamental reform.

Ofgem's current KPI for making Code modification decisions is to issue 90% of decisions within 25 Working Days after the Final Modification report is received or the closing date of the Impact Assessment consultation and, where relevant, to issue an IA or consultation three months after the Final Modification Report is received. Ofgem does not feel this KPI is providing the benefits around transparency in the decision making approach, nor is it providing the best level of certainty to industry. Therefore, an alternative approach is being trialled.

Each modification received will be assessed by Ofgem before setting an expected decision date. The expected decision date will be based on the importance, urgency and impact of the modification whilst taking into account the strategic priorities. These dates will be published on Ofgem's website and if missed, Ofgem will aim to provide a new date. The targeted and any updated dates will also be available via the daily Ofgem email alerts. Each year a report will be published highlighting performance measures against these KPIs.

KS questioned if the targeted decision date has been published and the date then changes, will Code Administrators receive an email notification informing of the change. RF clarified the aim is to update the document that gets published and new versions of this would be included in their Ofgem daily alert.

Ofgem highlighted the joint consultation with the Department for Business, Energy & Industrial Strategy (BEIS) that was issued in 2019 on Reforming the Energy Industry Codes, which consulted upon different options for an approach to the Governance of Industry Codes. Code Administrators and industry are already taking forward changes to make existing arrangements work better and Ofgem supports change that delivers positive improvements to existing arrangements. Key points included:

- Ofgem sees Code modernisation encompassing a range of actions including Code Rationalisation. As part of the previous consultation, it was suggested that the complexity and length of Codes could act as a barrier alongside resources needed to engage in the

process. Code Administrators have already agreed to work by removing unnecessary and redundant content which will become clearer and more accessible.

- Ofgem has published the Diversity and Inclusion Strategy setting its ambitions to build a diverse and inclusive workforce and to make the workplace more culture inclusive. As part of this, Ofgem has committed to working with other organisations across the sector to improve diversity and inclusion, and has already seen steps by Code Administrators to improve. Ofgem will still encourage work to continue initiatives to remove gendered language in Codes and to ensure websites, publications and content aim to meet the latest accessibility standards where possible and are written in Plain English.
- Again, as part of the 2019 consultation, Ofgem noted several Code Administrators were reviewing future plans to enhance Code access on their websites. Improving access to Code documents through digitisation is something that many Code Administrators and Panels have taken forward or are working on.
- Improved cross-Code working has already seen the addition of CACoP Principle 13 (Code Administrators will ensure cross-Code coordination to progress changes efficiently where modifications impact multiple Codes). Ofgem has seen examples of effective cross-Code working that have allowed modifications to progress smoothly, but also have seen examples where this has not been done.

Ofgem is continuing to work with BEIS on the issues set out in the July 2019 consultation and expects to consult further this year. The reforms set out in its consultation propose significant change to the existing regulatory framework for gas and electricity markets. To achieve the aims set out Ofgem expects that implementation of reforms will take a number of years, and that the delivery of some elements may need to be staged.

Ofgem encourages Code Administrators and the industry to continue to consider improvements to existing governance arrangements ahead of any future fundamental reform.

The CACoP Forum noted the update.

6. APRIL 2021 CACoP NEWSLETTER

DK highlighted that the proposed content for the April 2021 Newsletter had been circulated as part of the meeting papers and includes the following items:

- News and Developments (such as major cross-Code modifications, activities, developments or innovations)
- Principle Focus on CACoP Principle 7 (which relates to Code Administrators facilitating alternative solutions to issues being developed to the same degree as an original solution)

DK agreed to include an item on the issues raised regarding the lack of quoracy received at IGT UNC Panel meetings subject to receiving proposed content from AL-B. A templated copy will then be circulated in the week commencing 19 April before finalising and issuing that week.

The CACoP Forum noted the update.

7. CENTRAL CACoP WEBSITE

DK provided an update following the previous BSC agreement to proceed with the central CACoP website development if success criteria and how this would be measured were developed.

The Forum was asked to think of robust areas and what the potential success criteria could look like and how this should be measured, whilst using this in comparison with Code Administrators own websites. The thoughts raised would be used to develop proposed criteria which would be brought back for discussion at the next CACoP meeting in May 2021.

FM noted that similar questions were raised within the SPAA on how success criteria is measured. The SPAA had responded that the number of hit rates and downloads are recorded against certain documents and feedback on its website is gathered annually via a survey. This provides a mix of metrics and qualitative input.

KS highlighted that National Grid ESO has recently done some work on its webpages for its Codes. The internal website team has provided high level information on what should be tracked for success criteria. KS agreed to take an action to investigate how this success criteria is measured and how these Codes track what documents are being viewed and downloaded and would feed these back to Gemserv to consider. KS also considered that Codes could measure how traffic moves from their own webpages to the central website post go-live.

ACTION 25/02: KS to investigate how the National Grid ESO Codes track and populate success criteria of their websites and feed this information to Gemserv (PR).

AL-B noted comments were received from the previous IGT UNC Panel meeting highlighting they reluctantly recommended to support the use of the website and will be discussing this at their next INA meeting on 26 April 2021. The IGT UNC will then follow up with the Forum Chair post meeting.

The Forum noted the update.

8. HORIZON SCANNER

MW completed a line by line review of the Horizon Scan with the Forum. All members took an action to review changes made to the spreadsheet and provide any further updates and comments ready for publication to the industry before the next CACoP Forum meeting.

ACTION 25/03: Code Administrators to review proposed changes to the Horizon Scanner and provide remaining updates and comments to bsc.change@elexon.co.uk by Friday 30 April 2021.

9. HANDLING DEROGATIONS

DK reminded the Forum of a request that had circulated on behalf of the UNC, seeking support as part of a discussion on UNC modification [0760 'Introducing the concept of derogation for Net Zero innovation into Uniform Network Code'](#). The UNC was looking for feedback on questions relating to how Codes dealt with derogations.

The Forum was requested to provide their comments on the questions raised to the UNC helpdesk as their earliest convenience.

10. ANY OTHER BUSINESS

One item of business was raised by DK on behalf of Paul Rocke in regards to the REC User Group. It was noted that this group is a forum of stakeholders from industry representatives (such as Codes and trade associations) to receive regular updates on relevant aspects on REC mobilisation to socialise with their constituencies. Paul Rocke attends these meeting on behalf of the CACoP Forum.

Key points from the first meeting are as follows:

- RECCo gave an update on key achievements so far during mobilisation. Sid Cox has been appointed as RECCo CEO. The ETTOS contract has been finalised and transferred to RECCo effective 01/04. Theft asset transfer agreements agreed with SPAA and DCUSA.
- Regarding change management, the REC Code Manager gave an overview of proposed change processes, including development of a prioritisation matrix to drive decision making around timescales and urgency. There was some discussion around how the interactions between the REC and other Codes would work when it came to appointment of lead Codes, and it was noted that the CACoP Code Administrators were being engaged to develop process rules for the CCSG.
- The REC Code Manager noted that various REC Committees (change, metering, Green Deal, technical, performance assurance) were being readied to stand up from September 2021. The terms of references for these groups are being baselined, and industry communication is going out to seek representative nominations in May 2021.
- The REC Code Manager provided update on the digital REC Portal, noting it would be the hub of all REC information post-go-live. All Code Administrators will have access to the Portal.

KS raised an item of business, noting that the National Grid ESO Codes were seeking feedback regarding the engagement of the Code Governance process. KS questioned whether there would be an appetite to put forward a Code of Conduct in Workgroups which would set the scene in terms of expectations from attendees. CK noted the BSC has drawn up a general terms of reference document for its Workgroups, which might be useful given it highlights the duties and expectations of the Working Group, membership, voting, frequency etc. It was agreed that this discussion should be brought back to a future CACoP meeting as part of a specific agenda item.

No further items of business were raised.

11. SUMMARY AND MEETING CLOSE

The next CACoP Forum meeting will be held on 11 May 2021.

The Alternate Chair thanked everyone for attending and closed the meeting.