

Code Administration Code of Practice (CACoP) Meeting 005

18 September 2018 at 10:30am
Wallacespace, St Pancras

Attendee	Company	Code
Alison Beard [AB]	Gemserv	SECAS
Chris Shanley [CS]	Joint Office	UNC
Chris Wood [CW]	ELEXON	BSC
Colin Down [CD]	Ofgem	N/A
David Kemp [DK]	Gemserv	SECAS
Fraser Mathieson [FM]	ElectraLink	SPAA
Heather Stewart [HS] (Part Meeting)	Ofgem	N/A
Jon Dixon [JD] (Part Meeting)	Ofgem	N/A
Kate Norton [KN] (Part Meeting)	ELEXON	BSC
Katherine Hamblin [KH] (Part Meeting)	ELEXON	BSC
Laura Asnong [LA] (Part Meeting)	Ofgem	N/A
Mark Dunk [MD]	ENA	D Code
Rachel Bird [RB] (Teleconference, Part Meeting)	Gemserv	iGT UNC
Richard Colwill [RC] (Part Meeting)	ElectraLink	DCUSA
Simon Fox-Mella [SFM]	Gemserv	MRASCo
Teresa Thompson [TT]	National Grid	CUSC/Grid Code
Secretariat		
Elizabeth Lawlor [EL] (Chair)	ElectraLink	DCUSA
Hollie Nicholls [HN] (Secretariat)	ElectraLink	DCUSA

1. Administration

- 1.1 The Chair welcomed the members to the meeting.
- 1.2 The Secretariat highlighted that the group should be vigilant in their discussions and be mindful of the Competition Act throughout the meeting.
- 1.3 The group agreed that the minutes from the previous meeting, held on 23 July 2018 were a true reflection of the discussions held. The group updated the Actions Log which can be found as Attachment 1.

2. Ofgem EU Exit Code Update

- 2.1 Representatives from Ofgem's EU Exit team were welcomed. The purpose of the agenda item was: i) for Ofgem to provide CACoP members with an overview of the work being carried out by the EU Exit team, ii) for the Code Administrators to provide an update on their own preparations and iii) to discuss next steps.
- 2.2 On 06 July 2018, a letter was published confirming that the initial assessment of both licences and Codes had not identified any provisions that would become inoperable on Exit Day. However, modifications to both licences and the Codes may be required to reflect the post-EU Exit legal framework. The letter highlighted that we expect industry to lead changes to industry codes, including via the self-governance route where appropriate.
- 2.3 Ofgem are preparing for all eventualities., this includes preparing for a "no-deal" outcome. This prioritisation is not prejudice to the on-going negotiations, but a reflection of the process and time required to update the regulatory framework as soon as practical if the UK leaves the EU without a deal on 29 March 2019. Their objective is to ensure that there is as much regulatory continuity from day one. Ofgem are engaging regularly with BEIS due to the link with the Statutory Instruments.
- 2.4 In light of this, Ofgem has begun preparations for drafting no-deal licence changes to support the framework being updated as soon as is practically possible. A trawl of the Ofgem licences and the individual Codes by Code Administrators identified no inoperabilities and the modifications should be relatively straightforward.
- 2.5 Due to tight time lines, there is a risk that licence changes may not be in force by a No-Deal Exit Day. The Ofgem representative highlighted that, while no inoperabilities have been identified, some parties had raised concern for non-compliance and confusion that could arise from legal absurdities between UK law, licence conditions and the Codes. Ofgem will strive to take a pragmatic approach and work with industry parties to address any unforeseen issue that could arise in that respect.

- 2.6 It was agreed that there needs to be a co-ordinated approach to updating the Codes to avoid confusion across the industry and Ofgem should use the CACoP group to discuss any potential Code modifications. Code Administrators agreed CACoP was a good forum for coordinating the code changes process and Ofgem agreed to engage with the group to discuss on-going modifications.
- 2.7 Following an update from the Code Administrators, Ofgem indicated that additional information was required on preparations and expected processes for the code changes. Ofgem confirmed they would circulate a list of questions for Code Administrators to complete and Ofgem agreed to provide updates on the licence change work to Code Panels and Administrators.

ACTION 05/01: Ofgem

3. Ofgem Cross-code Survey

- 3.1 Ofgem confirmed that all Codes should have received their individual reports and they should be publishing their finalised report in the next few days as it is currently going through final sign off internally. Content within individual Code reports will be updated slightly to align with the publication of the finalised report.
- 3.2 It was confirmed that Ofgem have experienced delays with the survey due to internal resourcing and having to prioritise other work. However, it has been agreed that the survey will be conducted for the next 3 years and it should still be referenced within Principle 12 of the CACoP document. Any feedback on the cross-code survey results should be forwarded to CD.
- 3.3 The Chair questioned whether Ofgem were planning to direct the CACoP group on what to focus on in their 2018 review, as it had been agreed previously that the group should steer away from a line by line review. The Ofgem representative agreed to determine whether they had any specific suggestions on useful areas to focus on.

ACTION 05/02: Ofgem

4. Industry Updates

BSC

- 4.1 It was highlighted that P344 'Project Terre'¹ has been authorised by the Authority and is now waiting to be implemented, with the first part due to be implemented in February 2019. This modification is the single biggest change to the BSC, however, if there is no-deal with the European Union then the modification could potentially be withdrawn.
- 4.2 The BSC representative noted that work on P370 'Allowing non-BSC Parties to raise Modifications'² is still ongoing. The modification is looking at allowing other industry participants to be able to raise a modification to the BSC.
- 4.3 The BSC representative explained that they are also looking at changing their terms of reference to state that a party has to have attended 50% of the meetings to be able to vote for a modification to be recommended to go to the BSC Panel.

CUSC/Grid Code

- 4.4 The CUSC representative highlighted that there were currently 25 modifications in flight and they are expecting 3 to 5 more being raised in October 2018.
- 4.5 It was also highlighted that the EU network changes in the grid code is now down to 15 modifications and there has been a prioritisation mechanism but in place, however, grid code are having occasional quoracy issues.

DCUSA

- 4.6 DCUSA modifications are slowing down at the moment as industry are awaiting some outputs from Ofgem's Charging Futures Forum (CFF). Once these are known the modifications raised will increase rapidly.
- 4.7 DCP 319 and DCP 321 joint Working Group is still ongoing and there are talks with Ofgem to distinguish whether these should be considered under Ofgem's Targeted Charging Review.
- 4.8 It was also highlighted that DCUSA will be conducting a small-scale change process review to ensure that it is efficient as it can be.

Distribution Code

- 4.9 It was highlighted that there are a number of subtle changes being made to the Distribution Code to align with some changes being made to the Grid Code.

¹ <https://www.elexon.co.uk/mod-proposal/p344/>

² <https://www.elexon.co.uk/mod-proposal/p370/>

- 4.10 The work ongoing with P2/7 is still with Ofgem for them to make their determination. As a part of this, the ETR130 document is also under review and there will be a consultation issued to industry shortly.

IGT UNC

- 4.11 The IGT UNC representative explained that the governance review group met to review the RFI responses that came back from industry. There was a spread of different responses, however, the consensus was that there should be a full merge with UNC arrangements, although it is not a good time to do this. The IGT UNC panel will be reviewing a paper that recommends that the working group be extended for a further two sessions so that the next steps can be decided.

MRA

- 4.12 One area of work for the MRA is looking at the registration rules for smart meters which has been raised following on from a rejected DCC modification. The change will be able to link smart meters with DCC registration details.
- 4.13 There are also 3 changes raised for MAPs regarding Erroneous Transfers and 3 changes to help plot addresses.
- 4.14 It was explained that there is also a follow-on DAP change which will have cross-over impacts for the SPAA. The change will be looking at whether the existing arrangements are kept or whether new ones need to be created.

Ofgem

- 4.15 It was confirmed that Ofgem has approved the inclusion of principle 14 within the CACoP document. In light of this it was requested that all Code Administrators report back to Ofgem on how they have implemented the requirements of principle 14.

ACTION 05/03: ALL CAs

- 4.16 Following on from the request to drop question 12 from the quantitative data that Code Administrators submit to Ofgem, it was confirmed that this could be removed from the matrix. In light of this, the other modifications to the CACoP document, including the changes to principle 12 will be submitted to Ofgem for their determination.

SEC

- 4.17 It was highlighted that there are currently 30 modifications that are going through the modification process for the SEC at the moment.

- 4.18 SECMP0046³ is still ongoing and the solutions are still being developed. Once a solution is known, it can be raised again at CACoP to discuss any potential cross-code working.
- 4.19 It was also noted that a transition from BEIS determination to Ofgem determination for SEC modifications will be taking place in November 2018.

SPAA

- 4.20 The SPAA representative informed the group that there are still lots of modifications going through the process at the moment, including the mirrored Erroneous Transfers modifications that are being progressed by the MRA.
- 4.21 There is also some cross-code work with the IGT UNC which is looking at gas transporters being able to obtain telephone data from suppliers.
- 4.22 It was also noted that there will be a joint IREG and SEG meeting that will be established to discuss issues across the SPAA and MRA.

UNC

- 4.23 The UNC representative highlighted that there are two modifications looking at data revision access whereby there are corresponding modifications to the IGT UNC required too.
- 4.24 It was also highlighted that the UNC are working with SPAA to look at theft of gas. An unidentified gas task force has been established that will be looking at theft of gas in more detail.

5. Horizon Scanning

- 5.1 CW walked CACoP members through the updated version of the horizon scanning document. There were a couple of areas that required clarification which were updated during the meeting.
- 5.2 CW agreed to finalise the document and circulate to members by close of play on Tuesday 25 September 2018.

ACTION 05/04: BSC

6. Central Modifications Register

³ <https://smartenergycodecompany.co.uk/modifications/allow-dnos-to-control-electric-vehicle-chargers-connected-to-smart-meter-infrastructure/>

- 6.1 One CACoP member suggested that the group may need to look at refreshing the document and ensure that it is fulfilling its requirements. A more in-depth review will be included on the next CACoP meeting agenda.

7. Ofgem Faster Switching update

- 7.1 JD was welcomed to the meeting to provide the group with an update on the faster switching programme and the retail energy code (REC).
- 7.2 One of Ofgem's main aims at the moment is to determine what the impacts are on the Codes that aren't necessarily going to be pulled into REC. the REC was necessitated by the need to provide governance around the new CSS market role and provides the opportunity to simplify retail governance more generally.
- 7.3 Ofgem's presentation to the group, including a timeline for drafting of the REC can be found as Attachment 2.
- 7.4 The MRA representative explained that there is currently no Ofgem engagement with the IREG and it would be beneficial in the run up to the REC being established. JD informed the group that Ofgem may need to revisit their stakeholder engagement so that they are aware of the all industry issued regarding the establishment of the REC.
- 7.5 One group member questioned when Ofgem were going to decide on who will take up the role of the Code Manager for the REC and whether they would have any input into the development of the code. JD confirmed that the coordination would be a part of what the new code manager would be asked to do. Procurement of the REC Company needs to be in place before a code manager can be appointed, however, Ofgem are hoping for revenue to begin on 01 April 2019.
- 7.6 JD highlighted that Ofgem would want to use the CACoP group as a conduit for the work that needs to be completed before the REC is fully established. There should be a common plan in place for phase 2 of the project which requires CPs to be raised to the Codes and what Ofgem should do with them if they impact on the Significant Code Review.
- 7.7 The Chair agreed to liaise with JD to obtain further information on what Ofgem require the CACoP group to do.

ACTION 05/05: Chair

8. CACoP Communications Strategy

- 8.1 The group agreed that they should be creating joint communications about Brexit, Faster Switching Programme/REC, Horizon Scan and what has been achieved by the group in 2018 and what they aim to achieve in 2019.

Brexit

- 8.2 The group discussed that their joint communication for Brexit should be quite generic to state that all Codes are different, require different levels of intervention and should include that timescales are paramount.
- 8.3 The BSC representatives agreed to draft some wording and circulate to the group before Tuesday 25 September 2018. CACoP members should share their feedback before Thursday 27 September so that the publication can be published on Friday 28 September 2018.

ACTION 05/06: BSC

Faster Switching and the REC

- 8.4 The MRA and SPAA representative agreed to draft words for a joint CACoP publication regarding faster switching and the REC as they are the two Codes that are going to be directly affected by it. A draft of the publication should be circulated to CACoP members before the next meeting being held on 27 November 2018.

ACTION 05/07: MRA & SPAA

Horizon Scanning

- 8.5 The BSC representative agreed to draft a joint CACoP publication regarding the horizon scan work that has been completed by CACoP members. A draft of the publication should be circulated to the group for review at the next meeting being held on 27 November 2018.

ACTION 05/08: BSC

2018 Achievements and 2019 Goals

- 8.6 The Secretariat agreed that they would produce a joint CACoP publication regarding what the group had achieved in 2018 and what they are planning to achieve in 2019. This will need to be completed by the end of the year as the group still need to decide their aims for 2019.

ACTION 05/09: DCUSA

9. Any Other Business

- 9.1 One CACoP member questioned whether there was anything that Code Administrators can do when a Supplier of Last Resort is assigned. It was highlighted that this was raised at a previous DCUSA Panel meeting and Ofgem confirmed that there was nothing that the Code Administrators could do currently.
- 9.2 It was requested that the plan for the group in 2019 and a review of how often the group meeting should be considered at the next meeting.