

Code Administration Code of Practice (CACoP) Meeting 006

27 November 2018 at 10:30am
Wallacespace Spitalfields

Attendee	Company	Code
Alison Beard [AB]	Gemserv	SECAS
Chris Shanley [CS]	Joint Office	UNC
Chris Wood [CW]	ELEXON	BSC
Elliott Harper [EH]	ELEXON	BSC
Eugene Asante [EA]	Gemserv	MRASCo
Fraser Mathieson [FM]	ElectraLink	SPAA
Joy Mhonda [JM] (Part Meeting)	Future Thinking	N/A
Mark Dunk [MD] (Part Meeting)	ENA	D Code
Rachel Bird [RB]	Gemserv	iGT UNC
Rachel Hindsley [RH]	National Grid	CUSC/Grid Code/STC
Rachel McGrail [RM] (Part Meeting)	Future Thinking	N/A
Richard Colwill [RC]	ElectraLink	DCUSA
Richard Wood [RW]	ENA	D Code
Roberta Fernie [RF] (Teleconference, Part Meeting)	Ofgem	N/A
Simon Fox-Mella [SFM] (Teleconference)	Gemserv	MRASCo
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 18 September 2018 were a true reflection of the discussions held. The group updated the Actions Log which can be found as Attachment 1.

2. Ofgem's Code Administrators' Customer Satisfaction Survey – Future Thinking

- 2.1 The Chair welcomed Future Thinking to the meeting. The two representatives walked CACoP through their published final report on the results of Ofgem's Code Administrator Customer Satisfaction Survey¹.
- 2.2 There were five key areas that were highlighted:
 - Satisfaction is generally high, and overall satisfaction remains unchanged from 2017. In regards to key aspects of Code Administrator services, there have been significant positive changes, particularly in the areas of support and interpreting information;
 - There are indications that smaller organisations are feeling more confident, supported and knowledgeable about dealing with the Codes than in 2017, but they are often still behind larger organisations;
 - The relevance of information received, and certain elements of email and website communications require further attention; and
 - The key influencers on satisfaction continue to be perceptions of the provision of support generally, support in relation to modifications and ease of interpreting information.
- 2.3 Future Thinking also noted that the results should not to be used to compare the Code Administrators, but rather to provide an overview of customer satisfaction across the Codes, and that this has been made clear by Ofgem. The Ofgem representative confirmed that this was the case, recognising variations across the Codes in terms of content, governance and commercial arrangements. CACoP members discussed that although this might be Ofgem's intention, it is likely

¹ https://www.ofgem.gov.uk/system/files/docs/2018/10/code_administrators_survey_2018_-_report_final.pdf

that industry will use the results to compare each Code Administrator as the data is presented in such a way.

- 2.4 The iGT UNC representative asked Future Thinking how they know whether participants in the survey are engaged enough with the Code to be able to provide robust answers. It was noted that iGT UNC provided contact details for 20 participants for the survey to Future Thinking but 34 participated. Future Thinking confirmed that they use tiers of engagement to determine whether a participant engages with the Code enough to be able to take part in the survey. These tiers will be forwarded to CACoP members on request.

ACTION 06/01: Future Thinking

- 2.5 It was also noted that smaller businesses occasionally do not believe that there is a level playing field in terms of Modifications – i.e. that larger organisations are better equipped to raise and sponsor modifications and may do so to further commercial / competitive advantage. CACoP members expressed concern that this could be interpreted as bias by Code Administrators and requested Ofgem give consideration the potential impact of the findings and issue clarification where required.
- 2.6 The Future Thinking representatives highlighted that there were four main recommendations for Code Administrators to consider:
- Ensure Code Administrators are held to a consistent standard of service even if they cannot operate in a consistent manner;
 - Information should be developed so it can be easily digested and flagged for action if required;
 - Where information is provided, ensure it is kept up to date and relevant; and
 - Continue to support smaller/new entry organisations so they can actively participate.
- 2.7 Members agreed that the next annual CACoP Review should focus on these core areas (see Section 10 below).
- 2.8 One CACoP member questioned whether Future Thinking would be willing to present their findings to individual Code Panels. It was confirmed that they would be happy to do so but the direction would need to come from Ofgem.

3. Industry Updates

BSC

- 3.1 The consultation for BSC P370² 'Allowing non-BSC Parties to raise Modification' has now closed, and responses have been reviewed. The Modification seeks to amend the governance arrangements to allow non-BSC Parties to raise changes to the BSC.
- 3.2 It was also noted that Issue 72³ is still progressing. The issue is looking at ensuring measurement transformer assets installed by a Non-BSC Party are successfully commissioned within BSC timescales.
- 3.3 It was also highlighted that there is an event coming up regarding Project TERRE and what it means for industry on 11 December 2018. There will also be a WebEx hosted in January 2019.

CUSC/Grid Code/STC

- 3.4 It was noted that CUSC had received a letter from BEIS to ensure that CMP280⁴ and CMP281⁵ are progressed as quickly as possible.
- 3.5 It was also noted that National Grid will be raising Modifications in relation to Brexit and CACoP Principle 14. CACoP members recommended that any Brexit related modifications should be managed in accordance with the agreed CACoP communication lines and timescales as indicated by Ofgem.

DCUSA

- 3.6 It was noted that DCP 319⁶ and DCP 321⁷ that were seeking to remove the residual charging for embedded generators in the CDCM and the EDCM have officially been withdrawn following a direction from Government for the changes to only focus on the storage element.
- 3.7 There is also a consultation that will be issued shortly regarding DCP 326 'Introduction of Load Diversification Identifiers for Load Managed Areas'⁸ which is seeking to introduce a simplified process for retaining the diversification of demand in Load Managed Areas during the replacement of Radio Teleswitch System controlled metering equipment.

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

³ <https://www.elexon.co.uk/smg-issue/issue-72/>

⁴ [CMP280](#)

⁵ [CMP281](#)

⁶ [DCP 319](#)

⁷ [DCP 321](#)

⁸ [DCP 326](#)

- 3.8 It was also highlighted that three new Change Proposals (DCPs 332, 333 and 334) had just been submitted in to the change process that have been raised following some work being conducted by Ofgem to align the DCUSA to the electricity distribution licence in regard to Supplier of Last Resort.

Distribution Code

- 3.9 It was noted that there were currently two housekeeping modifications going through for G98 and G99, a modification for the legal separation of National Grid and a fast-track storage modification.
- 3.10 There is also a significant review of EREP 130 ongoing, however, the decision regarding P2/7 is still waiting for Authority determination.

IGT UNC

- 3.11 It was noted that the governance review group was closed at the last iGT UNC Panel. The group was looking at the iGT UNC templates for modifications and therefore no Code modification will be raised following the review.

MRA

- 3.12 It was noted that there have been two MRA Development Board (MDB) meetings since the September CACoP meeting where a number of changes had been raised.
- 3.13 It was also noted that there is an Invitation to Tender (ITT) out until 14 December 2018 seeking proposals from potential solution providers to develop a secure communications tool for transfer of data between parties. This arose following a SCWG meeting where a GDPR issue was raised regarding MPAN and MRPN data being shared via email. Members noted this could have a series of cross-code impacts / common areas of interest and asked to be kept informed of developments.

Ofgem

- 3.14 The Ofgem representative noted the upcoming workshop focussing on the licence modifications and next steps in regards to Brexit. Code Administrators will be expected to feedback the outcomes of the workshop to the Code Panels in December.
- 3.15 It was also highlighted that Ofgem and BEIS will be conducting an Energy Codes Review. Invitations to join a workshop are currently out and the Terms of Reference⁹ for the group have been published.

⁹ https://www.ofgem.gov.uk/system/files/docs/2018/11/tor_revised_final_301118.pdf

SEC

- 3.16 It was noted that modification SECMP0046 'Allow DNOs to control Electric Vehicle chargers connected to Smart Meter infrastructure'¹⁰ is still progressing and any cross-Code impacts are still being identified.

SPAA

- 3.17 SPAA highlighted that they are working with UNC on the migration of Market Participant Market Domain Data to UNC governance and to review theft reporting within central systems.
- 3.18 Work is also continuing with the MRA on joint initiatives such as the Debt Allocation Protocol and REC.

UNC

- 3.19 The UNC representative informed the group that the Theft of Gas Working Group should be established in January 2019.

4. Horizon Scanning

- 4.1 CACoP members reviewed the updated version of the horizon scanning document. All members agreed to continue to review the document on a regular basis and ensure that all information included is up to date and relevant for other Codes.

5. Central Modifications Register

- 5.1 It was confirmed that there had been no publication of the Central Modifications Register this month, but updates will be requested shortly so that an updated version can be published.

6. Horizon Scanning CACoP Lines

- 6.1 The BSC representative confirmed that he received no comments on the draft horizon scanning CACoP Lines.
- 6.2 The group agreed that these were fit for purpose and should be used when promoting the horizon scanning document.

¹⁰ <https://smartenergycodecompany.co.uk/modifications/allow-dnos-to-control-electric-vehicle-chargers-connected-to-smart-meter-infrastructure/>

7. Faster Switching and the REC CACoP Lines

- 7.1 The SPAA representative walked the group through the faster switching and Retail Energy Code (REC) CACoP lines.
- 7.2 The group agreed that the content needed to be more CACoP specific as they currently focussed on SPAA and MRA only. The SPAA representative agreed to review the lines and amend accordingly.

ACTION 06/02: SPAA

8. Roles and Responsibilities of Code Panels

- 8.1 The National Grid representative walked the group through their draft presentation slides (Attachment 2) regarding Ways of Working for Grid Code and have decided that they would like to highlight areas of responsibility, success criteria and a behaviour charter for Panel members.
- 8.2 The group agreed that it was an interesting area of work and should be reviewed further in the CACoP 2019 work plan.

9. CP Prioritisation

- 9.1 The National Grid representative highlighted the paper regarding the need for Code Modification prioritisation (Attachment 3).
- 9.2 It is proposed that Modifications should be prioritised dependent on their complexity, importance and urgency. It was highlighted that National Grid are using this as an information gathering exercise at the moment to see whether any other Code Administrator is doing something similar.
- 9.3 One CACoP member suggested that it would be useful to receive the feedback that was received by National Grid as stated in the paper. The National Grid representative agreed to share this with the group.

ACTION 06/03: National Grid

- 9.4 The group agreed that this should be a concept that all Code Administrators should be aware of but would prefer to leave as a watch and wait item for now.

10. 2018 End of year review

- 10.1 As discussed at previous meetings, the Chair of the group proposed that the next annual review of CACoP should not be a page turning exercise and should use the Ofgem Customer Satisfaction Survey results to determine specific areas to focus on, as set out in Section 2 above.

- 10.2 It was also noted that the Chair will be sending an end of year report to Ofgem, highlighting the achievements of the group this year, its work plan for 2019 and a recommendation on better utilisation of the group for the future.

11. Website development

- 11.1 The Chair wanted to ensure that all CACoP members had seen a copy of the letter that was sent to CACoP from the SPAA Executive Committee requesting permission to attend a future meeting to understand the objections to the development of a single CACoP website.
- 11.2 The group noted that they were not opposed to the development of a CACoP website, however, they would need to see a business case. Members proposed that a standard page in common format on each website may be a better approach. The DCUSA representative agreed to look the options and provide a paper for the next CACoP meeting in January.

ACTION 06/04: DCUSA

12. Chair/Secretariat Transition to Grid Code

- 12.1 The Secretariat confirmed that the November CACoP meeting will be the last meeting hosted by ElectraLink on behalf of DCUSA.
- 12.2 The next Code to take over the Secretariat and Chair duties will be Grid Code. The DCUSA Secretariat will provide a thorough handover with the Grid Code representatives for their cycle from January 2019.

13. Any Other Business

- 13.1 SFM informed the group that he is moving roles within MRA and therefore the November CACoP meeting will be his last representing MRASCo. EA will be the representative going forward.