

# Code Administration Code of Practice (CACoP) Meeting 002

19 March 2018 at 10:30am

2 Stephen Street, Fitzrovia, London, W1T 1AN

Attendee	Company	Code
Alexandra Moore [AM]	ElectraLink	DCUSA/SPAA
Chris Wood [CW]	ELEXON	BSC
Colin Down [CD]	Ofgem	N/A
Dan Fittock [DF]	ElectraLink	DCUSA
David Spillett [DS] (Teleconference, Part meeting)	ENA	DCode
Fraser Mathieson [FM]	ElectraLink	SPAA
Naomi Davies [ND]	National Grid	CUSC/Grid Code
Penny Garner [PG]	Joint Office	UNC
Rachel Bird [RB]	Gemserv	iGT UNC
Scott Laczay [SL] (Part meeting)	Ofgem	N/A
Simon Fox-Mella [SFM]	Gemserv	MRASCo
Talia Addy [TA] (Teleconference)	Gemserv	SEC
<b>Secretariat</b>		
Elizabeth Lawlor [EL] (Chair)	ElectraLink	DCUSA
Hollie Nicholls [HN] (Secretariat)	ElectraLink	DCUSA

Apologies	Company	Code
Teresa Thompson	National Grid	CUSC

## 1. Administration

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- 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 29 January 2018 were a true reflection of the discussions held. The group also went through the actions log which can be found as attachment 1.

## 2. Ofgem Innovation Principle

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- 2.1 Ofgem attended the meeting to provide an update on its Innovation Link programme and seek support from Code Administrators (CAs) to develop a cross-code process to facilitate, support and identify changes to the Code that may support innovations.
- 2.2 Innovation Link is a 'one stop shop' offering support on energy regulation to businesses looking to introduce innovative or significantly different propositions to the energy sector. Many innovators' needs extend beyond Ofgem's regulation and into the realm of the codes. Ofgem therefore considers that a joined-up approach is needed to deliver innovation in the sector.
- 2.3 Members noted that under the proposed process, Ofgem will maintain responsibility for receiving enquiries from innovators, assessing them against criteria and understanding their proposal as well as coordinating and managing throughout. The cross-code process would be used to help inform innovators with relevant feedback.
- 2.4 Ofgem aims to offer a regulatory sandbox, which allows temporary derogations from licences to allow innovators to test a new product or service. Members noted that ELEXON is currently modifying the BSC<sup>1</sup> to allow for this approach, and Ofgem would like to extend it across all relevant codes.
- 2.5 Ofgem proposed introducing a new CACoP principle to standardise the process across codes and encourage CAs to:
  - Engage with the industry who have queries about regulation, innovation and business models whilst looking at supplier hub work; and
  - Offer a sandbox for the innovation regulatory space to allow for model-based industry-wide testing.

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<sup>1</sup> [P362 'Introducing BSC arrangements to facilitate an electricity market sandbox'](#)

- 2.6 The majority of CAs were supportive of introducing a Principle into CACoP.
- 2.7 One member questioned how the system operators would be able to get involved e.g. where proposals impact systems as well as regulations. Ofgem agreed that there are wider considerations around system operators but that the CACoP Principle is related to the regulatory space. The BSC representative highlighted that its main role as a central industry service provider will be to facilitate the derogations under the Code rather than developing system solutions.
- 2.8 The DCUSA representative questioned how this would fit in with the RIIO Price Control and the innovation funding that is contained within it, noting that under RIIO there are already benefits for network innovations. The Ofgem representative confirmed that the NIC and NEA funding has been successful and there would be no cross-over with this process and it would be introducing something new.
- 2.9 The DCode representative highlighted a concern with duplication of effort and explained that Energy Networks Association (ENA) hosts a Smarter Networks Portal<sup>2</sup> whereby parties can share innovation ideas and sign up to projects. Ofgem acknowledged this existing process and identified the proposed Principle as complementary.
- 2.10 The Chair of the group highlighted that the aim of today was to open the door to the idea of introducing the Principle into the CACoP. The Ofgem representative took an action to update the cover note and draft Principle to reflect discussions at the meeting. All members agreed to present the revised document to their Code Panels for comment and feedback via the CACoP Secretariat in advance of the next meeting.

**ACTION 02/01: Ofgem**

**ACTION 02/02: All Code Administrators**

### 3. 2017 End of Year Review

Principle 12 – The Code Administrators will report annually on agreed metrics

- 3.1 Following discussion at the January meeting, the Ofgem representative confirmed that all CAs will be required to continue to submit KPI data on a quarterly basis.

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<sup>2</sup> <http://www.smarternetworks.org/>

- 3.2 Members reiterated previous concerns regarding the way data is gathered and collated. A number of members commented that the populated matrix does not fully represent the time, effort or resource utilised to progress modifications and that it is not appropriate compare CAs based on this data.
- 3.3 The UNC representative proposed establishing a CACoP Sub-group to review the reporting template. The UNC agreed to lead on this piece of work, subject to internal resourcing.

#### **ACTION 02/03: UNC**

##### Main Body

- 3.4 The DCode representative presented the revised CACoP, updated to reflect the changes made from the 2017 customer feedback survey and agreed at the January meeting. Members agreed that the updated CACoP document will be presented to each Code Panel following the revisions to Principle 12.

#### **ACTION 02/04: All Code Administrators**

- 3.7 The DCode representative requested that the track changed version of the CACoP document be circulated for final feedback by close of play on Wednesday 4<sup>th</sup> April 2018. The track change version of the CACoP can be found as attachment 2.

## **4. CACoP Website Proposal**

- 4.1 At the January meeting, members expressed support in principle for the development of a CACoP microsite to aid transparency of the CACoP and cross code initiatives for parties. The DCUSA representative highlighted that the idea has been presented following stakeholder feedback from DCUSA and SPAA parties. It was suggested that the website could include a central calendar, modification list and a copy of the CACoP Principles as well as meeting papers and minutes
- 4.2 At this meeting the DCUSA representative presented a proposal setting out the proposed site, which included the layout and key areas that would need to be included.
- 4.3 Support for the proposal was mixed. Some members considered it would be better for each CA to review the CACoP page on their own website and to consider adopting a standardised template for all CAs to use. Other members could see the benefit of a single source but raised a number of concerns including:
- Costs and Funding;
  - IPR;
  - Contractual terms and arrangements;
  - Whether / how responsibility for the website would be migrated with the Secretariat each year; and

- Benefit to industry.

- 4.4 The BSC representative also suggested that it would be better to produce a joint CACoP communication strategy rather than simply develop a website in isolation.
- 4.5 The Chair concluded that although there seems to be general support for the website, there are still a number of matters that require further detail. The DCUSA representative took an action to consider the development of a wider communications plan, potentially to include a website.

#### **ACTION 02/05: DCUSA**

## **5. Horizon Scanning**

- 5.1 The horizon scanning document was reviewed by the group. Members noted that the structure of the document makes it hard to identify key issues and that there is some duplication. The CUSC/Grid Code representative took an action to review the structure and layout of the template in advance of the next meeting. It was agreed that the item should be moved up the agenda for further meetings.

#### **ACTION 02/06: CUSC/Grid Code**

## **6. Industry Updates**

### **BSC**

- 6.1 The BSC representative informed the group that the P344 'Project TERRE implementation into GB market arrangements'<sup>3</sup> was reaching the end of the assessment phase and will be presented to the BSC Panel in April.
- 6.2 ELEXON is also carrying out a review of Balancing Mechanism (BM) Units, looking to move away from a tick list to a more principles-based approach which could potentially have cross-Codes impact.
- 6.3 P365 'Enabling ELEXON to tender for the Retail Energy Code (REC)'<sup>4</sup> was issued to the Authority for decision on 14 March 2018.

### **DCUSA**

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<sup>3</sup> <https://www.elexon.co.uk/mod-proposal/p344/>

<sup>4</sup> <https://www.elexon.co.uk/mod-proposal/p365/>

- 6.4 The DCUSA representative informed the group that DCP 268 'DUoS Charging using HH Settlement Data'<sup>5</sup> has been reviewed again from a demand and generator customer point of view, since being sent back from the Authority for further development. The CP will be issued to Parties for voting April.
- 6.5 It was also noted that the majority of charging methodology changes are going to be issued in the next DCUSA release on 01 April 2018 for the next charging year from 01 April 2019. There will be a further special DCUSA Release if the Authority approves the DCP 288<sup>6</sup> Modification.

#### **Grid Code**

- 6.6 It was noted that the legal separation change will be completed by April/May 2018. There has also been a lot of work driven by EU network codes and there should be consultations issued to industry.

#### **iGT UNC**

- 6.7 A number of Modifications have been raised to review the iGT UNC data permissions and the wider governance arrangements for the iGT UNC.

#### **MRASCo**

- 6.8 It was noted that there will be a special Issue Resolution Expert Group meeting on 28<sup>th</sup> March 2018, with an open invite to SPAA and BSC, to consider scoping a change and determining a RFI for MIF259 'Update Contact Types and their mandatory status'.
- 6.9 It was also highlighted that the BATS changes were rejected by Ofgem. However, this work showed good cross-Code working with SPAA.

#### **Ofgem**

- 6.10 The Ofgem representative highlighted that there had been publications issued to update industry on the work being conducted on half-hourly settlement and the switching programme.

#### **SEC**

- 6.11 It was highlighted that the SEC Release policy has been approved and is now available on the SEC Website.
- 6.12 A consultation has been published following the SEC Section D Review Workshop, seeking industry feedback on proposed changes to the Modification Process.

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<sup>5</sup>

[https://www.dcuda.co.uk/Lists/Change%20Proposal%20Register/DispForm.aspx?ID=293&Source=https%3A%2F%2Fwww.dcuda.co.uk%2FSitePages%2FActivities%2FChange-Proposal-Register\\_USL2.aspx%23InplviewHasheedde852-0231-4b85-87ff-0f14d79826f5%3DP](https://www.dcuda.co.uk/Lists/Change%20Proposal%20Register/DispForm.aspx?ID=293&Source=https%3A%2F%2Fwww.dcuda.co.uk%2FSitePages%2FActivities%2FChange-Proposal-Register_USL2.aspx%23InplviewHasheedde852-0231-4b85-87ff-0f14d79826f5%3DP)

<sup>6</sup> [DCP 288 'Introduction of the Electricity Theft Detection Scheme'](#)

- 6.13 General Data Protection Legislation Modifications are being made and will be going to the SEC Change Board on Wednesday 21 March 2018, before being sent to the Authority for determination. Members noted that two alternatives have been proposed as the DCC has proposed alternative solution legal text.

## SPAA

- 6.14 SPAA is continuing to develop its online 'Operational Contacts' Schedule. As part of this work, escalation points will be being reviewed and there could be potential cross-Code work with the MRA in this area.
- 6.15 There has also been cross industry working between SPAA, UNC and the CDSP to review how Priority Services Register domestic customers are identified.

## UNC

- 6.16 The UNC representative informed the group that the Joint Office will be moving offices and will be located in Solihull from the beginning of April.
- 6.17 The Joint Office has commenced a review of the governance of the UNC Panel and noted that feedback from other CAs on their Panel governance procedures (e.g. voting, attendance, appointment / de-appointment, duties, expenses) would be appreciated. Members took an action to engage offline.

## **ACTION 02/07: All Code Administrators**

- 6.18 It was also highlighted that UNC is currently undertaking a charging methodology review on the transmission side. Ofgem had issued a letter to National Grid about the timescales adopted for this change. At the moment, ten different alternative modification proposals have been raised. The UNC representative will provide feedback to the group about how the large number of alternatives is being managed and any lessons learned.

## **7. SECMP0046 'Allow DNOs to control Electric Vehicle chargers connected to Smart Meter infrastructure'**

- 7.1 The SECAS representative presented SECMP0046 'Allow DNOs to control Electric Vehicle charges connected to Smart Meter infrastructure'<sup>7</sup> noting significant cross code impacts are expected. TA asked members to contact SECAS to be added to the distribution list and Working Group invitation list as required.

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<sup>7</sup> <https://smartenergycodecompany.co.uk/modifications/allow-dnos-to-control-electric-vehicle-chargers-connected-to-smart-meter-infrastructure/>

## 8. Central Modification Register

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- 8.1 The MRASCo representative asked all Working Group members to ensure that there are no errors, typos or missed meeting dates in their sections of the document.

## 9. 2018 Work Plan

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- 9.1 The Chair highlighted that it would be good practice for the group to agree its plan of work for the year, to be presented to all Code Panels and Parties. The group agreed to deliver the following:
- A CACoP communication strategy;
  - A cross-Code Brexit strategy; and
  - Horizon scanning co-ordination.

## 10. Frequency of Meetings

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- 10.1 The Chair highlighted that the group has a number of significant activities to deliver in its plan, as well as the standing agenda items such as the annual review. She noted that the current cycle of bi-monthly meetings might be detrimental to the group being able to achieve what they want over the year as the momentum can be lost in between meetings.
- 10.2 The group agreed to keep the existing cycle of standing meetings but introduce focussed workshops in between to address individual matters (e.g. Review of Principle 12, Horizon Scanner Review, Brexit Planning). Members further committed to increased offline activity to move actions forward between meetings.

**ACTION 02/08: Secretariat**

## 11. Any Other Business

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- 11.1 The DCUSA representative informed the group that this would be his last CACoP meeting and that new DCUSA representative will be Alexandra Moore.
- 11.2 The BSC representative noted that a number of CAs had included ELEXON employees in the data sent to Future Thinking for the Customer Satisfaction Survey. CW confirmed that ELEXON would not be providing feedback on the performance of other CAs. Members agreed that no CAs should participate in the survey in this way.
- 11.3 The MRA representative requested an extension from Ofgem for providing contacts. He noted that all contacts for the MRA, SEC and iGT UNC have been asked to confirm in writing that there are willing to participate in the survey and, as such, uptake has been very low. Ofgem agreed to obtain timescales from Future Thinking and let the MRA representative know the final date to submit their contacts.



## ACTION 02/09: Ofgem

11.4 The MRA representative informed the group that MDB has been asked whether Release dates could be aligned across all Codes. Members agreed to feedback their scheduled Release dates and times to allow a common picture to be formed by the MRA.

## ACTION 02/10: ALL

## 12. Attachments

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- Attachment 1 – CACoP Actions Log
- Attachment 2 – Track Changed version of the CACoP