

Code Administration Code of Practice (CACoP) Meeting 001

29 January 2018 at 10:00am

ElectraLink Offices, Northumberland House, 303-306 High Holborn,
London, WC1V 7JZ

Attendee	Company	Code
Andy Marsh [AM]	ElectraLink	SPAA
Chris Wood [CW]	Elexon	BSC
Colin Down [CD]	Ofgem	N/A
Dan Fittock [DF]	ElectraLink	DCUSA
Mike Oxenham [MO]	National Grid	CUSC
Rachel Bird [RB] (Teleconference)	Gemserv	iGT UNC
Richard Colwill [RC]	ENA	DCode
Simon Fox-Mella [SFM]	Gemserv	MRASCo
Talia Addy [TA]	Gemserv	SEC
Secretariat		
Elizabeth Lawlor [EL] (Chair)	ElectraLink	DCUSA
Hollie Nicholls [HN] (Secretariat)	ElectraLink	DCUSA

Apologies	Company	Code
David Spillet	ENA	DCode
Teresa Thompson	National Grid	CUSC

1. Administration

- 1.1 The Chair welcomed the members to the meeting.
- 1.2 The Terms of Reference for the meeting were reviewed and the CACoP members agreed that these were a fair and accurate representation of the group's objectives and agreed to be bound by them for all future meetings. It was noted that if the remit of the group may change and the Terms of Reference may require updating to reflect any future changes.
- 1.3 The Chair highlighted that the main focus of the group needs to improve transparency and further convergence across the Code modification processes. The Chair informed the group that she had met with Ofgem to discuss the work that is currently being conducted by Ofgem and the ways in which CACoP and the Codes can fit in with this. With this in mind, it was agreed by the group that CACoP will endeavour to become more proactive in its approach to aiding industry Parties and continuing to work collaboratively for the betterment of the industry.
- 1.4 It was acknowledged that Code Administrators (CAs) are under a lot more strain and are prone to more criticism due to the increasing magnitude of innovation and subsequent change, and so the group agreed that a more proactive approach should encourage smaller Parties to engage with CAs to ensure a transparent and productive way of working.

2. 2017 End of Year Review

- 2.1 The CACoP members reviewed each comment on the tracked changed version of the CACoP document which included all comments from industry.
- 2.2 The Working Group agreed with the first comment to include "Ofgem" in the introduction, however, highlighted that the use of Ofgem, Authority or GEMA should be consistent throughout the document and it should be updated throughout.
- 2.3 The Group discussed the addition of adding "Helping users to understand modifications raised by other Codes" in Principle 1. The group highlighted that they understood that they could detail the potential connection to other Codes for a modification but would not feel comfortable in trying to answer a query on another Code as they would not be experts, which could result in Parties making material business decisions based on non-factual information or second-degree interpretation of change. The group asked the DCode representative to inform them who had suggested the amendment and why they think their proposed approach would be needed, requesting what exactly they would want to see in practice. The CACoP members also suggested that adding "Where possible..." at the beginning of this bullet would be an acceptable compromise.
- 2.4 The group also suggested that DCode needs to update the document for consistency whereby "Organisation" is stated, it should be amended to state "Participant" for a consistent approach throughout the document.
- 2.5 The group agreed that the 4th bullet point "Code Administrators will avoid disseminating unnecessary emails" was a negative statement and it should be reworded for a more positive spin which reflects the collaborative nature of CACoP.

- 2.6 In regards to the 8th bullet point, the group would like to know who provided this additional bullet point. The group agreed that they would be happy to keep the first half of the bullet point but would like to remove "...what their job role is and how to contact them." This will be discussed again once the background information has been sought at the next CACoP meeting.
- 2.7 One other addition was to include "Code administrators have a standardised manner in dealing with information requests." The group have requested background information as to why this was suggested as it was agreed that it would be difficult to standardise this over all CAs due to specific contractual requirements between Code Bodies and CAs.
- 2.8 One suggested amendment to Principle 4 was to replace the annual review of the CACoP to a review on a regular basis. The group agreed that they should keep reviewing the CACoP annually to keep consistency with the newly agreed Terms of Reference for the CACoP.
- 2.9 The Ofgem representative highlighted that the Ofgem customer surveys should be conducted in Spring 2018 and therefore the group can discuss the annual review again as a part of the customer feedback.
- 2.10 The group agreed that they were comfortable with the changes to the title of Principle 9 but would like clarification on why the 2nd bullet point was included in this section. In the 3rd bullet point, the working group requested that "minor" should be removed from the sentence. DCode agreed to find out the background as to why the 2nd bullet has been included.
- 2.11 The group agreed that they were happy with the changes made to the title of Principle 12. The Ofgem representative confirmed that they expect field work for the 2018 survey to commence in Q2. Some CAs confirmed that they were still looking to contact their customers to run their own surveys to ensure their customer service levels are maintained. It was agreed that Principle 12 would focus on Ofgem's survey noting that it does not stop others from completing their own if they wish to do so.
- 2.12 The group questioned what Ofgem do with the reporting data that is provided to them from all CAs on a quarterly basis. It was considered that understanding how the data is used would better help define the submission requirements. Members noted the resource impacts of providing the data on such a regular basis as well as the disparity in the way the data is collected and interpreted. . The Ofgem representative agreed to raise the matter internally and report back to the next CACoP meeting. The group will review the changes to Principle 12 following Ofgem's response.
- 2.13 The group agreed with Principle 13, however, noting a comment from Npower that it does not believe that the cross-Code co-ordination is working effectively. The DCode representative agreed to follow up with Npower to gather any more specific feedback.
- 2.14 The Ofgem representative discussed that Ofgem although will be setting up a consultative board in the future to enable a more efficient cross-Code working, there may be benefit in the CACoP group adopting this way of thinking in the interim. Members were supportive of the principle.
- 2.15 All CACoP group members agreed that they would review the contact details at the end of the CACoP document and provide any updates to the DCode CA.

ACTION 01/01: All CACoP Members

ACTION 01/02: DCode

3. Industry Updates

BSC

- 3.1 The BSC representative highlighted that there are a number of modifications going through the BSC Change Process currently that are looking at potential changes to licence conditions in regards to Brexit and the changes to the European legislation. These will have knock on effects to other Codes and it was suggested that the CACoP would be a good route to facilitate these changes.
- 3.2 It was also highlighted that the BSC Modification P365¹, raised by Hudson Energy has been raised to allow ELEXON to bid for the Retail Energy Code (REC) and other commercial contracts.
- 3.3 Members further noted that P362² is being progressed and there is likely to be a requirement to consider a cross code market entry requirement. Whilst work is being primarily led by Ofgem's Innovation Link team, members agreed that this group could provide a useful forum to develop cross code procedures.

CUSC

- 3.4 The CUSC is currently looking at the Code journey from a customer touchpoint view to see how to make it more customer friendly.
- 3.5 CMP285³ is ongoing and is looking to reform CUSC governance to enhance the independence and diversity of Panel members and ensure wider engagement from CUSC signatories.
- 3.6 There are also modifications being raised as a consequence of the National Grid legal separation. Each Code that will be affected would have already been contacted.
- 3.7 There is also anticipation for the outcomes of the Charging Futures Forum (CFF) and associated task forces that could potentially have huge impacts on the CUSC, however, there is still uncertainty on how these potential changes will be put forward into the relevant Modification processes.

DCode

¹ [P365 'Enabling ELEXON to tender for the Retail Energy Code \(REC\)'](#)

² [P362 'Introducing BSC arrangements to facilitate an electricity market sandbox'](#)

³ [CMP285 'CUSC Governance Reform – Levelling the Playing Field'](#)

- 3.8 The DCode representative highlighted that there is quite a substantial consultation out at the moment that is reviewing the P2/6 engineering recommendation. The deadline for responses to this consultation is Monday 12 February 2018.

DCUSA

- 3.9 The DCUSA representative informed the group that there are lots of modifications looking at the charging methodologies currently going through the change process and lots of anticipation from the Distribution Charging Methodology Development Group (DCMDG) regarding the outcomes of the CFF and associated task forces.
- 3.10 DCP 268⁴ was returned from the Authority for further review by its Working Group. A further consultation is currently being drafted for consideration by industry.
- 3.11 The DCUSA Representative requested that the CUSC representative update their colleagues on DCP 295⁵ as DCUSA has been waiting for a query to be answered by CUSC since October 2017. The unanswered query was now holding up the DCUSA Change Process. The CUSC representative agreed to chase this and report back.

ACTION 01/03: CUSC

iGT UNC

- 3.12 Although there is not a lot of Cross-Code work at the moment, there has been a conscious effort to try and align more closely with the UNC.

MRA

- 3.13 There is currently ongoing work with SPAA looking at debt assignment changes and as part of the faster switching programme, one issue will be looking at data quality. There is also a reconciliation on some technical details and there will be more information available at the next CACoP meeting.

SEC

- 3.14 The SEC Panel has requested a review of Section D of the SEC, which governs the modification process. It was agreed it would be useful for the lessons learnt from this project to be tabled at a future CACoP meeting.
- 3.15 The SEC representative highlighted to the group that a modification will shortly be raised proposing that DNOs will be able to slow down the load at high peak times, allowing the DNOs to be more of a

⁴ [DCP 268 'DUoS Charging Using HH settlement data'](#)

⁵ [DCP 295 'CVA Registrants acceding to DCUSA'](#)

system operator. This will definitely be considered as a cross-code modification and therefore there will be an open invitation to the first Working Group meeting.

- 3.16 The SEC representative also requested that all CAs share the information on SECMP 0041⁶ to their contract managers, as they had not received much interest. The SEC representative agreed to forward the information to all CAs so that it can be shared.

ACTION 01/04: SEC

ACTION 01/05: All CACoP Members

SPAA

- 3.17 The SPAA representative explained that the review of the new Schedule 24 of the SPAA was still being completed. An online contacts form will be introduced to the SPAA website in early February with the aim that Parties will be able to update their contact information themselves.
- 3.18 The SPAA representative also explained that the online data flow catalogues should be completed by late February, early March time

4. Horizon Scanning

- 4.1 The CACoP members reviewed the horizon scanning document and agreed that it needed to be tidied up. There were duplications and some unclear timescales. All members agreed to review their respective sections in the horizon scanning document and email their amendments to National Grid by close of play on Friday 09 February 2018 so that it can be updated.

ACTION 01/06: National Grid

5. Central Modification Register

- 5.1 The MRASCo representative highlighted to the group that from feedback received so far, the industry is impressed by the detail included in the Central Modification Register. However, it has been pointed out that there have been some minor accuracy errors in the document.

⁶ [SECMP 0041 'Amending the Change Board decision making rules for Modification Proposals'](#)

- 5.2 All CACoP members agreed to review this and provide feedback to MRASCo so that the most recent information is included within the documentation.

ACTION 01/07: All CACoP Members

6. Any Other Business

- 6.1 The DCUSA representative highlighted to the group that the DCUSA Panel has expressed support for a CACoP website with access to an industry wide meeting calendar.
- 6.2 The CACoP members were supportive of the principle, however noted concerns regarding costs and maintenance. The DCUSA representative noted that the focus of the CACoP should be on the ease of access to information for all industry Parties and agreed to produce a proposal and present it at the next CACoP meeting, including provisions to address the concerns raised.

ACTION 01/08: DCUSA

- 6.3 The BSC representative questioned whether other Codes include provisions to allow non-parties, who are bound by Code obligations, to participate in the modifications process. The Chair of the group highlighted the MAMCoP Change Process under the SPAA as an example.

ACTION 01/09: BSC

7. Date of the Next Meeting

- 7.1 The following meeting dates have been proposed for the 2018 meetings:
- Monday 19th March 2018 at 10:30am
 - Tuesday 22nd May 2018 at 10:30am
 - Monday 23rd July 2018 at 10:30am
 - Tuesday 18th September 2018 at 10:30am
 - Tuesday 27th November 2018 at 10:30am