

Code Administrator Meeting Summary

CMP430 /CMP431: Workgroup Meeting 3

Date: 19/03/2024

Contact Details

Chair: Deborah Spencer (Deborah.spencer@nationalgrideso.com)

Proposer: Neil Dewar (neil.dewar@nationalgrideso.com) /Keren Kelly (keren.kelly1@nationalgrideso.com)

Key areas of discussion

The Chair welcomed all attendees to the Workgroup and outlined the agenda for the meeting.

Actions Log Review

The Workgroup reviewed the outstanding actions and agreed to close action 3 and 4.

Action 5 will remain open, as the Proposer is still waiting for internal data and will give a more in-depth update in the next Workgroup meeting.

Terms of Reference Review

The Proposer went through the ToR and explained to the Workgroup the interactions between them and how they are being considered within the work being developed for the modifications.

The Proposer advised that ToR d) and c) needs to be further considered together with the Workgroup.

Number of Sites Impacted

The Proposer shared with the Workgroup a slide about the number of sites impacted and the feedback from DCUSA about the subject.

The Proposer advised that some groups of sites have been identified as being impacted through the proposed solution, as they will be subject to different charging arrangements and could be at risk of double charging:

- a) Sites that are settled as Measurement Class C pre -MHHS migration that will have Domestic Premise Indicator = True post- MHHS migration
- b) Sites that are settled as Measurement Class A pre-MHHS migration that will have a Connection Type Indicator = L or H (meaning they are CT Metered) and a Domestic Premise Indicator = False post - MHHS migration

The Proposer explained that conversations were held outside of the Workgroup to try to obtain data on the number of sites that could fall into these categories, but they have been unsuccessful, and asked the Workgroup if they were aware of data available in the industry that could help answer the question.

A Workgroup member advised that due to the fact the Domestic Premise Indicator is relatively new (introduced around 2021 for Faster Switching) and wasn't really used until very recently, the data isn't available. These sites will have always been charged under Triad arrangements and it feels like the numbers are low, but there is nothing to base this on.

A Workgroup member questioned if there are Line Loss Factors (LLFs) dedicated to Domestic sites on Measurement Class C. Another Workgroup member advised that the LLF would not provide this information.

The Proposer asked the Workgroup if there was any merit in adding this as a Workgroup Consultation question to see if the industry could offer any data, a Workgroup member advised that it is very limited and wouldn't offer a national view.

A Workgroup member questioned if similar data has been provided to Ofgem by RFIs. The Proposer will speak with Ofgem on the above to see if there is any data available.

Through discussion of the data available from other modifications, a Workgroup member advised that P432 is only Advanced Meters, stating that it means that the meter has to be remotely connecting meter or have the ability to get the data out of the meter remotely. The Workgroup member stated that DCP414 can cover the Advanced meters and the non-Advanced meters that will be facilitated through the MHHS migration. The Proposer agreed and advised that P432 suggested around 50,000 sites (data taken in 2018).

The Proposer advised that DCUSA provided the non-confidential responses for DCP 414, and all but two DNO responded and without those two DNOs it was around 51,000 sites.

A Workgroup member suggested that the only way to get the exact numbers is to wait for the outcome for the MHHS migration data cleanse. Another member clarified that the end is expected on the M10 milestone (7th of March 2025).

A Workgroup member suggested that the numbers given are enough to give the Workgroup an understanding of the impacts.

The Proposer talked about drawing some examples of the double charging risks for the next Workgroup meeting and a Workgroup member stated that those would be helpful for the Workgroup and for the Workgroup Consultation as it would offer information to the industry.

Legal Text Update

The Proposer shared with the Workgroup the plan to approach the Legal Text and explained the reasons behind it, advising that a new CUSC baseline is to be out by the 28th March.

The Proposer confirmed that Option 1 will be used for the development of the Legal Text as agreed by the Workgroup in the previous meeting.

The Proposer explained that the proposed changes to the legal text for CMP430 and CMP431 need to be introduced by the 30 September 2024, and that the BSC changes (in which the CUSC changes will be based) won't be implemented until March 2025 under the MHHS Significant Code Review Modifications.

The Proposer advised that during the course of the MHHS Code Drafting MOP up 2 consultation, errors were identified in relation to BSC Annex S-3: Supplier Volume Allocation Rules for Migrated MHHS Metering Systems and X-2. The drafting included in the BSC was inconsistent with the MHHS Design approved through MHHS CR32. They have been presented back to the MHHS Programme and Elexon and will be included as an amendment.

The Proposer advised the group that if the proposed legal text for the CUSC is being based on the BSC legal text which has not been agreed and won't be agreed until sometime in the future, this is a risk.

The Elexon representative clarified that the Legal Text for BSC will be approved in August/ September 2024, not in April 2025.

A Workgroup member stated that the BSC Legal Text won't be final until the Authority approves it, so changes can still happen. The Elexon representative clarified that within the BSC process, once they agree the final Legal Text under MHHS Programme governance, no more changes will happen, but agreed that is not concluded until the Authority gives the final approval.

The Proposer will speak with Ofgem regarding Legal Text alignment between the BSC and CUSC.

Possible WACM

A Workgroup member advised that they are considering raising a WACM that instead of maintaining the status quo, defers everything to the residual by removing the demand locational element of TNUoS completely. The Workgroup member confirmed that they will have decided by Workgroup 4, whether to raise the WACM or not, as they would like to consider any further information from the Charging Futures Forum event on 21 March 2024.

Next Steps

- Circulate Summary and actions log to Workgroup members.
- Circulate Workgroup 4 Papers.

Actions

For the full action log, click [here](#).

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
3	WG2	Proposer	To speak with DCUSA about DCP 414 data (RFI directly to DNOs)		WG3	Close
4	WG2	Proposer	To consider including a definition for “domestic premise indicator” in the legal text		WG3	Close
5	WG2	Proposer	Consider if there is any insight available into impact of Triads over winter 2023 and if this has changed following implementation of the Targeted Charging Review (TCR)		WG3	Open
6	WG3	Proposer	To speak with Ofgem about possible data available through previous RFI		WG4	Open
7	WG3	Proposer	To speak with the Revenue Team to work on information relating to impacted sites		WG4	Open
8	WG3	Proposer	To draw some examples of the double charging risks		WG4	Open
9	WG3	Proposer	To meet with Ofgem and MHHS Programme about the interacting timescales and the certainty needed around the Legal Text		WG4	Open

Attendees

Name	Initial	Company	Role
Deborah Spencer	DS	Code Governance, ESO	Chair

Catia Gomes	CG	Code Governance, ESO	Tech Sec
Neil Dewar	ND	ESO	Proposer
Keren Kelly	KK	ESO	Proposer Alternate
Lee Stone	LS	Npower Commercials Gas Limited	Workgroup member
Hugh Boyle	HB	EDF Energy	Workgroup member
Gareth Evans	GE	WWA	Workgroup member
James Knight	JK	Centrica	Workgroup member
Andrew Colley	AC	SSE Generation	Workgroup member
Karl Maryon	KM	Drax	Workgroup member
Keith Aldwinckle	KA	Ecotricity	Workgroup member
Neil Geddes	NG	Scottish Power Transmission	Observer
Gareth Williams	NG	Scottish Power Transmission	Observer
Colin Berry	CB	Elexon	Observer
Chris Welby	CW	Elexon	Observer
David Tooby	DT	Ofgem	Authority Representative