

Code Administrator Meeting Summary

CMP430/CMP431: Workgroup Meeting 8

Date: 29/04/2024

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 Workgroup members and talked through the agenda.

Action Review

Action 5 – Proposed to close. The Proposer advised that there is no observed difference between Demand at peak across the winter 2023 compared to other winters.

Action 6 and 13 – Proposed to close. The Proposer confirmed that they had met with the Authority, who confirmed they don't have any further analysis as part of DCP414 other than what was already provided.

Action 9 – Proposed to close. The Proposer confirmed they had met with the Authority to discuss legal text. Updates will be given to the Workgroup in the legal text review later in the meeting.

Action 10 – To remain open.

Action 12 - To remain open.

Action 14 – To remain open.

Workgroup Consultation Responses Review

The Chair shared the summary of the Workgroup Consultation responses for both CMP430 and CMP431 with the Workgroup. Both Workgroup Consultations were issued on the 17th of April 2024 and closed on the 24th of April 2024. CMP430 Workgroup Consultation received 5 non-confidential responses and CMP431 Workgroup Consultation received 1 non-confidential response.

The Proposer stated that a few questions were raised as part of the Workgroup Consultation in order to help get data to help with the development of the modification and the ToR, but no further insights into the number of sites impacted had been provided in the responses. The Proposer asked the Workgroup members to provide any additional thoughts or comments they might have on the Workgroup Consultation, by the next Workgroup meeting.

The Workgroup had no comments.

Legal Text Update

The Proposer shared an update on the legal text with the Workgroup. The Proposer explained the new approach that will be taken for the legal text for CMP430 (CUSC Section 14).

The Proposer advised that following previous feedback that suggested that we could not introduce new terms and definitions to CUSC that had not been approved – i.e., that are contingent on draft BSC text yet to be approved (Measurement Class(MC), Connection Type Indicator (CTI), Domestic Premises Indicator (DPI)) in Section 11 and Section 14 was too complicated and confusing. The ESO had developed 3 new approaches for legal text based on feedback:

- **New Approach 1** – Describing changes to Charging, Non-Charging and BSC arrangements.
- **New Approach 2** – Describing charging Arrangements without newly defined terms.
- **New Approach 3** – Describing changes to Charging and Non-Charging Arrangements

The Proposer advised that the ESO met with Ofgem and ESO Legal team last week to go through approaches before bringing these to the Workgroup.

- **New Approach 1** was discounted as not viable and resulted in the same concerns seen previously and would likely lead to “send back”.
- **New Approach 2** could work but has not been subject to legal review yet , will not be shared with the Workgroup until then.
- **New Approach 3** has been subject to ESO Legal review and is the preferred approach but potentially needs refining (less is more).

The Proposer explained that the Principles for New Approach 3 are based on explaining to CUSC Parties what changes as a result of transitioning to the MHHS arrangements – Annex 4 from the Consultation. This proposes to introduce a new section to CUSC Section 14 and clarifies the change in charging arrangements for affected MPANs. The Proposer advised that whilst we cannot introduce a table, we are able to add a guidance note to CUSC.

Regarding CMP431 (CUSC Non-Charging) suggested legal text, the Proposer highlighted the following:

- Minimal definitions required under this approach.
- Domestic Premises could be defined using reference to the BSC or Supply Licence.
- If it is established no changes required to Section 3 or Section 11 of CUSC, CMP431 could be withdrawn.

The Proposer went on to share the Draft Legal Text for CMP430 (CUSC Section 14) with the Workgroup advising that the clause 14.17.41.2 is about stating that all charging arrangements will remain the same except for the specific scenarios described in the two bullet points within the clause.

A Workgroup member commented on the issues with the concept of reverse migration, suggesting that a concept of MHHS MPANS and Non MHHS MPANS could be incorporated, advising that in this way it won't matter whether they haven't been migrated at all or reversed migrated, they should just be treated the same. The Proposer will take this suggestion away and revert to the Workgroup.

Next Steps

- The Workgroup agreed to cancel the Workgroup meeting on the 3rd of May in order to allow time for the Proposer to develop the legal text further.
- Next Workgroup meeting is on the 8th May 2024.
- The Chair will circulate the relevant materials ahead of the next Workgroup meeting and cancel the meeting planned for the 3rd of May.

Actions

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

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
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	Closed
6	WG3	Proposer	To speak with Ofgem about possible data available through previous RFI		WG4	Closed
7	WG3	Proposer	To speak with the Revenue Team to work on information relating to impacted sites.		WG4	Closed
9	WG3	Proposer	To meet with Ofgem and MHHS Programme about the interacting timescales and the certainty needed around the Legal Text		WG4	Closed
10	WG4	Proposer/ HB	To meet with HB to consider the scenarios for contracts from October.		WG5	Open
12	WG5	Proposer/ Elexon Representatives	CUSC Section 14 changes 14.17.41. To consider if a further table is required to include export.		WG6	Open
13	WG6	Ofgem Representative	To discuss with Elexon about the information that was provided through DCD414 process in respect of CT/VT sites.		WG7	Closed
14	WG6	DH (ESO SME)	To conduct and analysis on the profiles for 5 to 8		WG7	Open
15	WG8	Proposer	Proposer to meet with MHHS Programme on latest version of proposed legal text		WG9	Open

16	WG8	Proposer	To circulate draft legal text by 3rd May for review ahead of the next Workgroup	WG9	Open
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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
Niall Coyle	NC	Npower Commercial Gas Limited	Workgroup Alternative
Andrew Green	AG	WWA	Workgroup Alternative
Hugh Boyle	HB	EDF Energy	Workgroup member
James Knight	JK	Centrica	Workgroup member
Andrew Colley	AC	SSE Generation	Workgroup member
Gareth Williams	GW	Scottish Power Transmission	Observer
Colin Berry	CB	Elexon	Observer
Chris Welby	CW	Elexon	Observer
David Tooby	DT	Ofgem	Authority Representative