

# Code Administrator Meeting Summary

## CMP430 /CMP431: Workgroup Meeting 2

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Date: 11/03/2024

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### Contact Details

Chair: Deborah Spencer ([Deborah.spencer@nationalgrideso.com](mailto:Deborah.spencer@nationalgrideso.com))

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

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## 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 1.

On action 2, the Proposer explained that a meeting was held with Elexon about the data required for the MPANS. Elexon advised that they don't have that granularity of data available, but that there was some data provided on P432 around Non Half hourly CT metered sites, suggesting that some of that data could be used as a basis.

Elexon representative advised that in the P432 data, there was a maximum of 50,000 non Half Hourly MPANs. The Proposer suggested that this could be used to break down the different sites impacted and those sites that could be subjected to a different charging methodology and be at risk of double charging, as a result of this modification.

A Workgroup member stated that sites that could be affected by double charging are all those that are going to half-hourly from now, meaning P434 sites (Unmetered Metering Systems) that are already primed for Change of Measurement Class (CoMC) this year. The Workgroup member also advised that in DCP 414 60,000 sites were identified via an RFI directly to DNOs, and that data wasn't shared with the DCP 414 Workgroup. It was suggested that if the Proposer would like some granularity on that data, then it would probably be useful to contact DCUSA. The Proposer agreed to take an action on this.

The Proposer clarified that there is a need to clearly articulate what is subject to potential double charging or different charging arrangements as a result of this modification versus what would be subject to that with the current baseline.

The Workgroup agreed to close Action 2 as Elexon had answered the query and provided feedback.

### Cross Code Impacts Review

The Proposer shared a slide with the Workgroup that highlighted the cross-code impacts with:

- Code drafting under MHHS Programme
- BSC P432 "Half Hourly Settlement for CT Advanced Metering Systems"
- BSC P434 "Half Hourly Settlement for UMS Metering Systems"
- DCUSA DCP414 "Transitional Protection for NHH CT Customer affected by regulatory change".

The Workgroup agreed with the cross-code impacts highlighted and had no further comments.

### **Scope of Proposal**

The Proposer clarified the scope of CMP430 and CMP431 for the Workgroup.

The Proposer explained that there are three different elements to the defect under the two modifications:

- a. Demand data cannot be segmented in a way that maintains the same application of TNUoS charging for all sites once they have been migrated to the new MHHS arrangements.
- b. The risk of double charging MPANS increases during MHHS Migrations (April -25 to October-26) as sites move from legacy arrangements to the new MHHS arrangements.
- c. Some definitions or terminology within the CUSC may be inconsistent with any solution introduced under this Modification and MHHS baselined design.

The Proposer clarified that CMP430 (Charging modification) is seeking to address defects (a) and (b) but is co-dependent on the non-charging modification, CMP431, which will address defect (c). Similarly, CMP431 is co-dependent on CMP430.

The Proposer also advised that the ESO is not expecting there to be any changes to the CUSC through the suite of Authority-led Significant Code Review Modifications that are linked to MHHS Programme Milestones M6 (Code Changes Baselined) and M8 (Code Changes Delivered). Noting that changes to the settlement timetable following completion of MHHS Migration (end of 2026/early 2027) will likely require changes to the CUSC, and that the current plans are for this to be managed under a separate Modification at a later stage of the MHHS baselined plan.

A Workgroup member questioned the need to raise the separate modification before the settlement timetable changes. The Proposer agreed to have an offline conversation with the Workgroup member regarding this.

### **Solution Update**

The Proposer presented the proposed solution to the Workgroup, explaining that it is proposed to amend CUSC to maintain the current charging methodologies and segment customers by the new MHHS data items that make up the P0210 report as a result of approval of Change Request (CR) 32 in the MHHS Programme.

The proposal is to align the CUSC to the relevant Balancing and Settlement Code (BSC) Sections and definitions to state that:

- Pre MHHS migration, a site will be charged under the existing arrangements; and
- Post MHHS migration, a site will be charged based on logic derived from the Connection Type Indicator and Domestic Premise Indicator

The Proposer explained that there are two options for the Legal text and explained to the Workgroup the benefits and risks associated with each option:

- Option 1 – Include text in CUSC to specify segmentation between charging methodologies, replicating some of what is outlined in the MHHS BSC legal text drafting.
- Option 2 – Only include updates to definitions to reference to MHHS BSC legal text drafting directly.

A Workgroup member mentioned the need to include the “domestic premise indicator”. The Proposer will consider this suggestion.

The Workgroup view was that Option 1 was the most suitable and the Proposer agreed to progress this as the preferred option for the legal text.

### **Consideration of Alternative Solutions**

The Proposer shared with the Workgroup the alternative solutions that were considered for these modifications and asked for the Workgroup views on whether they should still be considered and if any Workgroup member would like to raise any of them as a WACM.

Workgroup view was as follows:

- On the “Do nothing” solution a Workgroup member advised that it doesn’t sit well with the Standard Variable Tariff (SVT) Price Cap and another Workgroup member stated that it could create double charging for mass market (domestic and non-domestic) and introduces a lot of uncertainty.

- A Workgroup member advised that the solution “Move all sites to the 4-7pm peak methodology from the start of Migration” shouldn’t be too complicated to implement from a system perspective and questioned if there are any insight into the winter 2023 triad season out turn. The Proposer will take an action on this.
- A Workgroup member shared concerns with the “Move all sites to the 4-7pm peak methodology from the start of Migration” solution regarding UMS sites moving to triad charging arrangements this year and then having to move back to 4-7pm from April 2025. The Workgroup member advised that in the absence of any proportionality or an idea of the impacts, if this solution were to be implemented, he would consider raising an urgent BSC modification to extend the P434 mandate from M11 to M14.
- A Workgroup member commented on the solution to “Reintroduce Measurement Class as a data item to MHHS TOM” that this would increase the disconnect between the DCUSA and the CUSC and this connection is needed for residual charging purposes.
- On the solution “Elexon introduce consumption monitoring process to recreate segmentation by existing Measurement Class descriptions, the Elexon representative advised that this solution would add significant additional changes that would put the MHHS milestones at risk.
- On the “Obligate DNOs to provide data rather than Elexon” solution option, a Workgroup member commented that he doesn’t think that the DNOs get all the meter level data and advised that this solution would add extra complexities in that data being required and shared.
- On the “Remove NHH references from CUSC from April 2025” solution option, a Workgroup member commented that the feedback from Ofgem in recent industry forums is that network charges should not send operational signals.

The Workgroup agreed to capture the alternative solution as options considered, but at this moment no Workgroup member is considering raising any of those as a WACM. A Workgroup member mentioned the delayed REMA consultation is being released soon and if that takes any locational part of TNUoS out of TNUoS and into locational wholesale price, he would be more in favour of raising a WACM that removes the locational charges in the short term and just have all TNUoS recovered under the residual.

**Next Steps**

- Send invites for the Workgroup meetings – Workgroup members to accept or advise who the Alternate will be.
- Circulate Summary and actions log to Workgroup members.
- Circulate Workgroup 3 Papers.

**Actions**

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

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
1	WG1	Proposer	To consider industry cross-code impacts		WG2	Closed
2	WG1	Elexon	To provide data on impacted MPANs on the Authority points: -How many would be affected by baseline at the moment. -How many would change between charging methodologies. -How many would change under this proposal		WG2	Closed
3	WG2	Proposer	To speak with DCUSA about DCP 414 data (RFI directly to DNOs)		WG3	Open

3	WG2	Proposer	To consider including a definition for “domestic premise indicator” in the legal text	WG3	Open
4	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

**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
Neil Geddes	NG	Scottish Power Transmission	Observer
Colin Berry	CB	Elexon	Observer
Jason Brogden	JB	Elexon	Observer
Sinan Kufeoglu	DT	Ofgem	Authority Representative