

# Code Administrator Meeting Summary

## CMP430/CMP431: Workgroup Meeting 9

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Date: 08/05/2024

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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 Workgroup members and talked through the agenda, reiterating the importance of Workgroup member participation in order to achieve the best solution for this modification. The Ofgem representative reinforced the Chair's comments and advised that all the input will be captured in the FMR and will aid Ofgem in their decision making.

### Action Review

**Action 10** – Proposed to close. The Proposer advised that conversations about October contracts will be part of the ToR review.

**Action 12** – To remain open.

**Action 14**- To remain open. The Proposer advised that the Revenue team will be attending the next Workgroup meeting to present the analysis.

**Action 15**- To remain open. Amended the action to include Elexon.

**Action 16**- Proposed to close.

### Legal Text Update

The Proposer advised the legal text had been refined after feedback received on the version shared in the previous Workgroup meeting.

The Proposer shared updated legal text for CMP430 CUSC Section 14 with the Workgroup, advising after conversations with the Authority and ESO's legal team, it was agreed changes for this modification should not link to the BSC proposed changes as they have not yet been approved.

They added that the key focus should be on introducing the new methodologies without using the term "measurement class," "domestic premises indicator" and "connection type indicator."

Main changes to the legal text were:

- New concept for "reverse migration" created.
- New clause added (14.17.41.4) for where a MPAN is registered for the first time by a Supplier.
- Suggestion to reference 14.17.13 (that defines chargeable energy capacity) in 14.17.41.1 and 14.17.41.2.
- The Proposer presented 3 options for clause 14.17.10.2.

A Workgroup member commented on the reverse migration concept, advising it expires after the M14 milestone and suggested making it clear that it is limited. The Proposer will investigate this point.

The Workgroup had a discussion on the timings of the BSC changes and could the CUSC changes wait for the approval of the BSC changes in order to avoid the issues with the legal text. It was pointed out by the Proposer that re CMP292, any changes to charging modifications need to be approved by the 30<sup>th</sup> of September in order to be implemented on the 1<sup>st</sup> of April 2025.

Two Workgroup members have offered to work offline with the Proposer on the legal text for CMP430 to try and achieve an optimal solution.

The Workgroup had a discussion on the amount of work required to develop the legal text and agreed to request a timeline extension. The Ofgem representative advised that as the timeline was approved by the Authority, they would need to approve any new changes and CUSC Panel members should be informed of the new changes made.

The Proposer and the Chair will review the timeline and send the revised version for the Authority to approve. CUSC Panel members will be informed via email of the suggested changes. .

### **Draft Workgroup Report Discussion**

The Proposer shared the Terms of Reference linked to the Workgroup Consultation responses with members, offering the Workgroup a view of how the Workgroup Consultation responses help meet the Terms of Reference. They added this will demonstrate that discussions happened in the Workgroup and that the responses were evaluated, and consideration was given to the relevant comments.

ToR c) – Regarding the lack of reliable estimated number of customers that will experience changes in charging arrangement, a Workgroup member commented that at the moment there is a data cleansing happening within the MHHS Programme ([see link](#)), but in terms of actual numbers those won't be available until October 2024. The Proposer advised that after looking into different ways to get data it is still proving to be very difficult, and the Workgroup Consultation responses did not provide any further information.

ToR d) - Regarding the comment about double charging or under charging being absorbed by suppliers, the Proposer suggested suppliers could look to migrate their portfolios and avoid the double charging. The Elexon representative advised that the programme and suppliers have a migration plan on the number of MPANs to migrate at any given time, clarifying that what MPANs are put in, and the timeframe is up to the Suppliers, suggesting that they can identify the ones at risk of double charging and do them at a time of the year where they will not be affected. Another Workgroup member confirmed that the MHHS programme has a plan for migration that Suppliers will have to follow.

The Proposer accepted their view was inaccurate but wanted to have a discussion with Workgroup members to explore the Double Charging issue. They Re-affirmed that the ESO could not find any alternative solutions including manual work arounds, to prevent or eliminate fully the double charging issue, and confirmed this statement would be added to the Final Modification Report (FMR).

ToR e) - The Proposer advised that they agreed with the comments made about the Unmetered Supplies and the fact that they have consumption specific profiles so double charging is not relevant. A Workgroup member disagreed with the comment and responded that UMS have consumption specific profiles but that it is not half-hourly. The Workgroup member stated that there is a mandate in [P434](#) for all to be half-hourly, but that doesn't mean that they all will, suggesting that the BSC will have to address those that won't.

ToR f) – The Proposer agreed with the comments that domestic and non-domestic unmetered customers should be treated differently, “they should all be charged on the Triad basis” but advised they would seek to clarify ESOs position should it be different. This will be shared with the Workgroup to follow up on at the next Workgroup meeting.

ToR g) - Regarding the comments about the timeliness and availability of data for suppliers to price in future and to the short-term IT developments before Task Force or REMA solutions, a Workgroup member commented that the data will be available through ECOS and suppliers just have to pick up from there and that will lead to any system adjustments necessary. Advising that it might be a short-lived IT development when considering the wider reforms but unfortunately there is not another way.

ToR h) Regarding the comment about the solution being enduring, the Workgroup agreed and advised that it should stay until other solutions come from the wider reforms (Task Force or REMA).

Next Steps

- The Workgroup agreed to cancel the Workgroup meeting scheduled for the 13<sup>th</sup> of May in order to allow for legal text developments. The next Workgroup meeting will be on the 20<sup>th</sup> of May.
- The Chair will circulate the relevant materials ahead of the next Workgroup meeting and cancel the meeting planned for the 13<sup>th</sup> of May.

**Actions**

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

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
10	WG4	Proposer/ HB	To meet with HB to consider the scenarios for contracts from October.		WG5	Closed
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
14	WG6	DH (ESO SME)	To conduct and analysis on the profiles for 5 to 8		WG7	Open
15	WG8	Proposer / Elexon	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	Closed
17	WG9	Proposer	To circulate the slide with the alternative solution to the Workgroup		WG10	Open
18	WG9	Proposer/ HB/LS	To organise a session to develop the legal text		WG10	Open
19	WG9	Proposer/Chair	To update the timeline and share with Ofgem for approval		WG10	Open
20	WG9	Proposer	Reverse migration concept expires after M14 milestone, proposer to make it clear this it is limited.		WG10	Open

**Attendees**

<b>Name</b>	<b>Initial</b>	<b>Company</b>	<b>Role</b>
Deborah Spencer	DS	Code Governance, ESO	Chair
Catia Gomes	CG	Code Governance, ESO	Tech Sec
Neil Dewar	ND	ESO	Proposer
Lee Stone	LS	Npower Commercial Gas Limited	Workgroup Member
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
James Stone	JS	Ofgem	Authority Representative