

Code Administrator Meeting Summary

CMP430/CMP431: Workgroup Meeting 11

Date: 24/05/2024

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 meeting agenda.

Action Review

Action 15 – Proposed to be closed.

Action 20 – To be kept open.

Action 23 - Proposed to be closed after this meeting.

Legal Text Update

The Chair asked each Workgroup member for their thoughts and views on the draft legal text options (Option 1 and Option 2). Main highlights were:

- A Workgroup member asked if it covers all permutations? Explaining that the main reason for table in Annex 4 was to cover all scenarios. The Proposer advised that the possibility of having a guidance note is still being discussed.
- A Workgroup member suggested that if the guidance notes are not included as part of this modification, it might be an opportunity to add the table to the CUSC at a later date through a new modification.
- The Workgroup general view was that both draft legal text options work and agreed that the preferred option is Option 2.

The Authority representative advised that Ofgem will provide some feedback for the Workgroup on the draft legal text via email, but referenced a few points:

- When the term “User” is applied, who it refers to? A Workgroup member asked if only suppliers can register MPANS with the BSC ? or can “User’s” do it too?
- When we talk about MPANS moving between suppliers, does it mean that they will always keep the option they registered at (half-hourly/ non hourly)?

The Proposer went through the draft legal text Option 2 with the Workgroup, and reviewed the comments received.

Option 2

- On the comment from the ESO Revenue Team that stated, “ Is it right to limit this to just 14.17.13, or better to refer to the "rest of Section 14 other than this paragraph 14.17.41", or something similar?”, a Workgroup member advised as Section 14 is very large, it would be beneficial to understand exactly

what clauses are to be affected. The Proposer explained that this will be covered in the next stage of the legal text drafting.

- On the comment from the ESO Revenue Team that stated “ Is the "with a whole current or a current transformer" needed? If all domestic are going on the same methodology, doesn't matter what meter system them have. These words have been removed from the other version of legal text “., the Workgroup agreed that this no longer relevant as it was agreed on the previous Workgroup meeting.
- On the comment from the ESO Revenue team that stated in regard to 14.17.41.3 “ensure that this is clear there is no retrospective change to charging arrangements”, the Workgroup agree that this clause is correct as it is drafted.
- On the comment from the ESO Revenue team that stated in regard to 14.17.41.4 “risk that this is not clear. This could be removed with an update to 14.17.41.2 to clarify that arrangements are applicable to new sites registered into the MHHS TOM”, the Proposer agreed to amend the wording in 14.17.41.2 to account for this scenario and add clarity.
- On the comment from the MHHS Programme/Elexon that queried “ Is energy consumption reference required? “ , the Proposer advised that a conversation with the ESO Revenue team about this point and their advice was that it is required, and it will be added to the draft legal text, the Workgroup agreed.
- The Workgroup agreed to typographical changes suggested for 14.17.41.2 (i), (ii) and 14.17.41.3.

Option 1 (Only the comments that apply to Option 2 as well, as it is the Workgroup preferred Option to take forward)

- On the comment from MHHS Programme/ Elexon that stated “BSC Section C12 has a sunset clause for MHHS paragraphs. This needs to be considered with any interactions introduced under CUSC”, the Proposer explained that this is still being considered and that conversations with the legal team are required on this point and advised that this will apply to both draft legal text options. A Workgroup member advised that we should be careful about linking to a specific end date.

The Proposer advised that the next steps for the legal text will be :

- Discuss with Ofgem on preferred option.
- Discuss option 2 WG comments with Legal and Business and refine legal text.
- ESO/ Proposer to conduct a review of the rest of CUSC S14 against “anchored” new 14.17.41 text and set out potential areas where there are unintended consequences to existing CUSC text.
- Intention is to bring the analysis to next WG meeting.

Next Steps

- The Chair will circulate the relevant materials ahead of the next Workgroup meeting.

Actions

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

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
15	WG8	Proposer / Elexon	Proposer to meet with MHHS Programme on latest version of proposed legal text		WG9	Closed

20	WG9	Proposer	Reverse migration concept expires after M14 milestone, proposer to make it clear this it is limited.	WG10	Open
23	WG10	Workgroup	To provide feedback on legal text	12:00 on Thursday 23 rd of May	Closed

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
Lee Stone	LS	Npower Commercial Gas Limited	Workgroup Member
Hugh Boyle	HB	EDF Energy	Workgroup member
Gareth Evans	GE	WWA	Workgroup member
Karl Maryon	KM	Drax Energy Services Limited	Workgroup member
Andrew Colley	AC	SSE Generation	Workgroup member
Gareth Williams	GW	Scottish Power Transmission	Observer
Colin Berry	CB	Elexon	Observer
David Tooby	DT	Ofgem	Authority Representative