

Paper Reference	CACoP_47_1104_07
Action	For Discussion

Expanding the CCSG to include all CACoP Codes

1. PURPOSE

This paper provides an update on the discussions around extending the Cross-Code Steering Group (CCSG) membership to include all Code Administration Code of Practice (CACoP) Codes. The CACoP Forum is invited to agree the way forward for this work.

2. BACKGROUND

The CCSG was established in September 2021 as part of the Retail Code Consolidation (RCC) Significant Code Review (SCR). Its purpose is to support the development of Modifications and Change Proposals that impact multiple Energy Codes. Its key objectives are to:

- Assess each proposal referred to it, to determine whether there are cross-Code impacts
- Where cross-Code impacts are identified, determine which is the 'Lead Code'
- Determine which industry parties and service providers should be invited to provide an impact assessment and the approach to delivering this impact assessment
- Ensure the views of constituent Code Parties and service providers are represented as part of the proposal's decision-making process

At its inception, the CCSG only encompassed the following CACoP Codes:

- Balancing and Settlement Code (BSC)
- Distribution Connection and Use of System Agreement (DCUSA)
- Independent Gas Transporters Uniform Network Code (IGT UNC)
- Retail Energy Code (REC)
- Smart Energy Code (SEC)
- Uniform Network Code (UNC)

The RCC CSR implemented changes to each of the above Codes to require their participation in the CCSG. It also implemented the CCSG's terms of reference as a REC document, requiring a REC Change Proposal to amend.

The Connection and Use of System Code (CUSC), the Distribution Code (D-Code), the Grid Code and the System Operator Transmission Owner Code (STC) were not included in the CCSG membership. This means that the CCSG is unable to fully consider cross-Code impacts across all the CACoP Codes.

We took an action at the last meeting for the REC to discuss the proposal for expanding the CCSG membership with Ofgem and understand if there were any reasons why these remaining Codes were not originally included in the CCSG membership (action 46/02). We have not been able to complete this action yet.

3. OVERLAP WITH THE CACoP FORUM

Prior to the CCSG's creation, each Code Administrator at the CACoP Forum would provide a brief update on new proposals raised under its Code that could have a cross-Code impact. Since the CCSG was created, the updates from the Codes now on the CCSG have been replaced by a single update from the CCSG. However, these updates were only ever noted, with little discussion or follow-up actions taking place, and it is unclear if any tangible action or other benefit arose from these updates outside of the meeting.

We note the clear remit of the CCSG to oversee active cross-Code changes. Therefore, to improve efficiency, we are seeking to separate cross-Code changes out such that the CCSG takes sole responsibility for reviewing and discussing 'day-to-day' cross-Code change business. The CACoP Forum would then focus on wider topics and on sharing knowledge, ways of working and lessons learnt, to help achieve greater consistency between our processes and procedures for the benefit of our customers. To support this, the Forum agreed at the last meeting to remove updating on proposals that may impact multiple Codes from its objectives in its terms of reference. It also agreed for us to explore whether and, if so, how the remaining Codes could become CCSG members.

4. VIEWS FROM THE AFFECTED CODES

We have spoken further with the representatives from the CUSC, the D-Code, the Grid Code and the STC on this proposal (action 46/01).

Without the further information on why their Codes were not originally included in the CCSG membership, the National Grid ESO representative was unable to confirm if their Codes would be willing to become a part of this. They also raised a concern that the CCSG discussions could overlap with the oversight provided by their Panels and what is already outlined in the existing Code governance around cross-Code change. They asked if they could attend a CCSG meeting to better understand the discussions that take place there, which the CCSG Chair agreed to facilitate.

The D-Code representative has discussed this with their Panel and shared with it the CCSG terms of reference. A further update on these discussions will be provided at the meeting.

5. PROPOSED WAY FORWARD

We cannot provide a recommended way forward on this without the further information sought from action 46/02 and a clear view from the affected Code Administrators and their Panels. We intend to continue to engage with the Code Administrators and Ofgem to resolve the remaining questions and actions and provide a clearer way forward by the next meeting.

Following the Forum's agreement in February to remove updating on proposals that may impact multiple Codes from its objectives in its terms of reference, we have removed this standing item from the agenda. However, we welcome any thoughts and views on whether cross-Code changes should still be discussed at the CACoP Forum meetings in a way that would add more value to members and without duplicating the CCSG's work and responsibilities.

6. RECOMMENDATIONS

The CACoP Forum is invited to:

- **NOTE** the progress with the discussions on whether the CUSC, the D-Code, the Grid Code and the STC should become CCSG members; and
- **DISCUSS** whether cross-Code changes should still be discussed at the CACoP Forum meetings without duplicating the CCSG's work and responsibilities.

David Kemp

Forum Chair

31 March 2023