



**MHHS  
PROGRAMME**  
Industry-led, Elexon facilitated

---

# Programme Steering Group

## CR001 and CR002 Impact Assessment Report & Recommendations

---

April 2022

## Objective of this session:

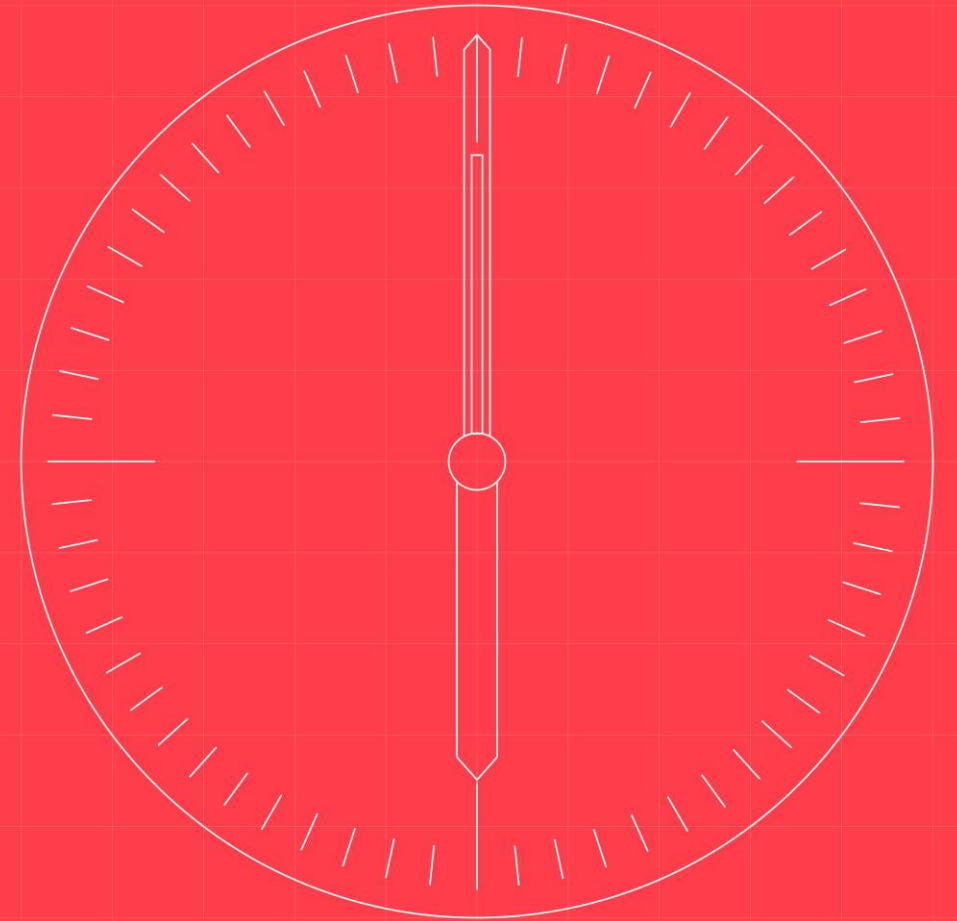
To decide whether to recommend CR001 and / or CR002 to Ofgem for approval – for subsequent Ofgem assessment and decision

## Headlines:

- Universally, parties felt that a delay to M5 (from Apr-22) was helpful or necessary
- Very few respondents provided cost information. Assessment will therefore need to be based on relative risks, and potential impact on the programme's end date (and benefits)
  - based on the limited cost information received, the run cost of delay in the end date is likely to be at least £2M per month (as a minimum, but noting that other parties have said they will also have costs should the end date be delayed)
  - one party stated that they were unable to provide accurate cost impact information for CR002 due to the lack of an underpinning project plan to assess impact against; this may more broadly explain the lack of some cost impact information for CR002 – the party provided an assumptions-based estimate of costs
- There are views from several parties (including 1 supplier view) that even with a delay in the M5 date via CR001, the current end date could be maintained – subject to particular focus on options to reduce the migration period and/or to vary the migration approach
  - a detailed justification for this view was provided by one party for CR001, although no party provided this for CR002
  - the relatively greater risk to the end date via CR002 was not disputed and several parties stated that they believe there would be delay under CR002
- Several suppliers observed that they are the parties representing consumer interests or considering customer experience in the design review, therefore there is a risk (for CR001) that some opportunities to maximise benefits may be lost
  - there were no examples of which benefits would be degraded by the approach proposed in CR001
  - all Small suppliers who responded, indicated they would not be engaging until the design is baselined
- Citizens Advice, as the consumer body, recommended approval of CR001 as the correct approach is to minimise additional costs and any delay to the realisation of benefits from any increased programme run-time. Citizens Advice suggested further detail that would be required to analyse the impact of CR002
- One view stated, is that provided there is no major deviation from the TOM, subsequent design change impacts should be minimal
- The majority of suppliers have supported both CR001 and CR002 – there was no compelling evidence provided by suppliers who did not support CR001, and only one example where additional resources had been considered (and rejected as an option)
- CR002 – no specific evidence, plan or rationale has been provided to drive confidence that 7 months' delay will lead to mass supplier engagement – and except in a few cases there has been no explicit commitment to engage per the CR002 proposal
  - in presenting their original proposal, market disruption was quoted by suppliers as the main factor blocking their engagement, but there was no commentary on why suppliers believe that such disruption will subside sufficiently by Sep-22 to enable relatively better engagement

# Summary

## CR001 and CR002



# Submitted Impact Assessments

Programme Parties	CR001 Recommendations				CR002 Recommendations				Replied 'Yes' to both CRs
	Yes	No	Abstained	Not Replied	Yes	No	Abstained	Not Replied	
Large Suppliers	4	0	1	0	3	1	1	0	3 (of 5)
Medium Suppliers	2	2	0	2	3	1	0	2	1 (of 4)
Small Suppliers	8	1	1	24	8	0	2	24	7 (of 10)
I&C	7	5	2	27	13	0	1	27	7 (of 14)
Agents	3	1	1	49	2	2	1	49	1 (of 5)
DNOs	3	0	1	2	1	3	0	2	1 (of 4)
iDNOs	1	4	1	7	3	1	2	7	0 (of 6)
S/W Providers	1	1	0	-	2	0	0	-	1 (of 2)
National Grid	1	-	-	-	-	-	1	-	0 (of 1)
Code Bodies	1	0	1	1	0	1	1	1	0 (of 2)
Consumer	1	-	-	-	-	-	1	-	0 (of 1)
Elexon (Helix)	1	-	-	-	-	1	-	-	0 (of 1)
DCC	1	-	-	-	-	1	-	-	0 (of 1)
SRO / IM & LDP	1	-	-	-	-	1	-	-	0 (of 1)

**Rationale for being marked down as 'abstained'**

- Several respondents did not fully complete the Impact Assessments, with a response to recommendation crucially omitted
- Several respondents declined to formally respond due to time constraints or lack of information available to form an opinion
- One respondent requested a variant of CR001 and CR002 without formally completing an Impact Assessment
- One responded communicating that they were neutral to either CR being approved without completing an Impact Assessment.

## CR001 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR001)
<b>Large Suppliers</b>	<ul style="list-style-type: none"> <li>+ Timescales are less protracted and are less likely to lead to delays in benefits realisation</li> <li>+ Delivering sooner is preferable but with adequate time to review and impact-assess the design, built into the DBT timeline (or as a precursor to DBT)</li> <li>- Less supplier representation of consumer interests and consideration of customer experience in the design review, less potential to maximise benefits</li> <li>- Limited confidence of an accurate and robust design being produced by July (suggesting CR002 timescales), with potential need for future change</li> </ul>
<b>Medium Suppliers</b>	<ul style="list-style-type: none"> <li>+ Achieves the minimum possible delay and earlier benefits, can be supported by at least 1 respondent but recommend more focus on engagement leading up to M5</li> <li>- Design baselined with inadequate levels of engagement from suppliers; this may lead to further delays and increased costs down the line</li> <li>- Concerns about initial level of feedback on Tranche 1 so far and what that might mean</li> <li>- Same concerns as Large Suppliers – about potential for future design change and possible lack of maximised benefits</li> </ul>
<b>Small Suppliers</b>	<ul style="list-style-type: none"> <li>+ Allows more time to engage with the design, and more time to balance resource demands between Faster Switching and MHHS</li> <li>- Request for consideration of the effect of compressing other milestones to compensate allocating further time to M5 is a concern</li> </ul>
<b>I&amp;C</b>	<ul style="list-style-type: none"> <li>+ Allows more time – although there is still a risk that the design will not be completed by Jul-22</li> <li>- An extension from Apr-22 to Jul-22 not be sufficient to allow for supplier impact assessment / engagement due to the ongoing Faster Switching implementation</li> </ul>
<b>Agents</b>	<ul style="list-style-type: none"> <li>+ Implementing CR001 would allow the MHHS Programme to maintain the overall schedule</li> <li>- Energy suppliers will not be ready to make commercial and contractual decisions around their service provision for delivery of agency services to support MHHS; services are likely to be developed in a more 'vanilla' fashion due to a lack of real customer engagement, thereby reducing benefits to consumers in the short and longer-term</li> </ul>
<b>DNOs</b>	<ul style="list-style-type: none"> <li>+ Contracted Technical Service Providers ease the impact of the delay</li> <li>+ Delay would ease existing resource constraints and the short delay would allow teams to retain their resources – a slightly longer delay would be desirable (but not Nov-22)</li> </ul>
<b>iDNOs</b>	<ul style="list-style-type: none"> <li>- Concern about conflict with Faster Switching, which causes resource challenges</li> <li>- Without full supplier engagement in the design activity there could be post-M5 CRs, resulting in a disrupted process and potentially a less than optimal design/re-work</li> </ul>
<b>S/W Providers</b>	<ul style="list-style-type: none"> <li>- Concern about conflict with Faster Switching, which causes resource challenges</li> </ul>

## CR001 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR001)
<b>National Grid</b>	<ul style="list-style-type: none"> <li>+ No immediate impact of this CR on the timelines</li> <li>+ Increased time for engagement in design by programme parties would reduce risk of future changes to the design later in the programme</li> <li>– Without sufficient supplier input in the design phase, there is a risk to some MHHS benefits being delivered</li> </ul>
<b>Code Bodies</b>	<ul style="list-style-type: none"> <li>+ Programme parties will be reliant on the upcoming re-baseline activity planned after M5 has been achieved to develop a firm project plan for delivering MHHS, and [earlier] certainty of when this is achieved will help to support this activity</li> </ul>
<b>Consumer</b>	<ul style="list-style-type: none"> <li>+ Broadly support approach taken and think there are steps within the proposed timeframe that in collaboration with suppliers can reduce risk of future design change</li> </ul>
<b>Elxon (Helix)</b>	<ul style="list-style-type: none"> <li>+ There are options to absorb this delay within the existing programme timeline; Programme could consider reducing the industry testing or migration phases</li> <li>– There is a cost impact (of moving from Apr-22 to Jul-22)</li> </ul>
<b>DCC</b>	<ul style="list-style-type: none"> <li>+ Supportive of this delay, if certainty could be provided that design assumptions to support progression of MP162 could be confirmed as within the 'Tranche 1' artefacts</li> </ul>
<b>SRO / IM &amp; LDP</b>	<ul style="list-style-type: none"> <li>+ By reaching M5 at the earliest feasible point after Apr-22 (i.e. Jul-22), this minimises (and avoids prolonging) uncertainty about the impact of the baselined design on parties' own operating models and their existing strategies for IT provision – allowing maximum time for assessing that impact and maximum latitude for their Design and Build (DB) timelines in reaching (and de-risking) achievement of milestone M9</li> <li>+ Each month of delay will have a cost of unrealised benefits (which could be assessed by Ofgem in referring to their Ofgem Business Case model). The party has proposed a number of ways to explore containing the 3-month M5 delay in the re-planning activity, so that there will be no delays to the end date for CR001</li> </ul>

## CR002 Impacts – Views on the proposed approach (Page 1)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR002)
<b>Large Suppliers</b>	<ul style="list-style-type: none"> <li>+ Better supplier representation of consumer interests and consideration of customer experience in the design review, to ensure later benefits are maximised</li> <li>+ Greater confidence of an accurate and robust design being produced, with less future change</li> <li>- Timescales are too protracted and will ultimately lead to significant delays in programme mobilisation delaying benefits realisation and slowing down parties that are mobilised</li> </ul>
<b>Medium Suppliers</b>	<ul style="list-style-type: none"> <li>+ As for large suppliers – also feel that CR002 allows for reduced design risk, greater benefits and for development of [more] suitable product offerings</li> <li>- Concern that delay of the design baseline will delay consumer benefits</li> </ul>
<b>Small Suppliers</b>	<ul style="list-style-type: none"> <li>+ Moving the end of Design to November gives sufficient time for business SMEs to engage appropriately in the detail</li> <li>- Request for consideration of the effect of compressing other milestones to compensate allocating further time to M5 is a concern</li> <li>- No small suppliers indicated they would be engaging until the design is baselined</li> </ul>
<b>I&amp;C</b>	<ul style="list-style-type: none"> <li>+ Suppliers being in the early stages of mobilisation, a longer delay to M5 would have minimal impact; a delay later in the project through design change when their project is fully up and running would have a much bigger impact [on suppliers]</li> <li>+ Implementation of CR002 would help to mitigate the resource constraints of MHHS and FSP running in parallel</li> <li>- It is unclear as to whether this delay will improve the accuracy of design and reduce the risk of future change</li> <li>- The replanning exercise will need to determine the knock-on impact of this delay, but there is a risk that this delay cannot be fully absorbed in future phases so consumers would not realise benefits until a later date</li> </ul>
<b>Agents</b>	<ul style="list-style-type: none"> <li>+ CR002 maximises the opportunity for delivering benefits; many of these will be delivered through new supplier products and require the necessary engagement</li> <li>+ Short term costs of a delay are outweighed by the benefits that will still be delivered</li> <li>- Support for the timescale being extended, but the proposed date is too far to the right and causes issues in terms of planning and resource allocation</li> <li>- Delay to the overall timescale of the MHHS programme and resultant deferred delivery of the benefits were stated as being likely</li> </ul>
<b>DNOs</b>	<ul style="list-style-type: none"> <li>+ Contracted Technical Service Providers ease the impact of the delay</li> <li>- A large amount of re-work will be required and that this may cause further delays and require the commitment of resource (and funds) for longer periods</li> <li>- Extension to the duration is helpful but proposed date is too far to the right and causes issues in terms of planning and resource retention</li> <li>- Concern about such a delay compressing testing phases to try to maintain the end date [which would not be supported]</li> </ul>
<b>iDNOs</b>	<ul style="list-style-type: none"> <li>+ Reduces conflict with Faster Switching, which mitigates resource challenges</li> <li>+ Fuller supplier engagement in design activity means potentially less change to / disruption of the design later</li> </ul>
<b>S/W Providers</b>	<ul style="list-style-type: none"> <li>+ More time to get the design right, less pressure on resources, more opportunity to maximise benefits</li> </ul>

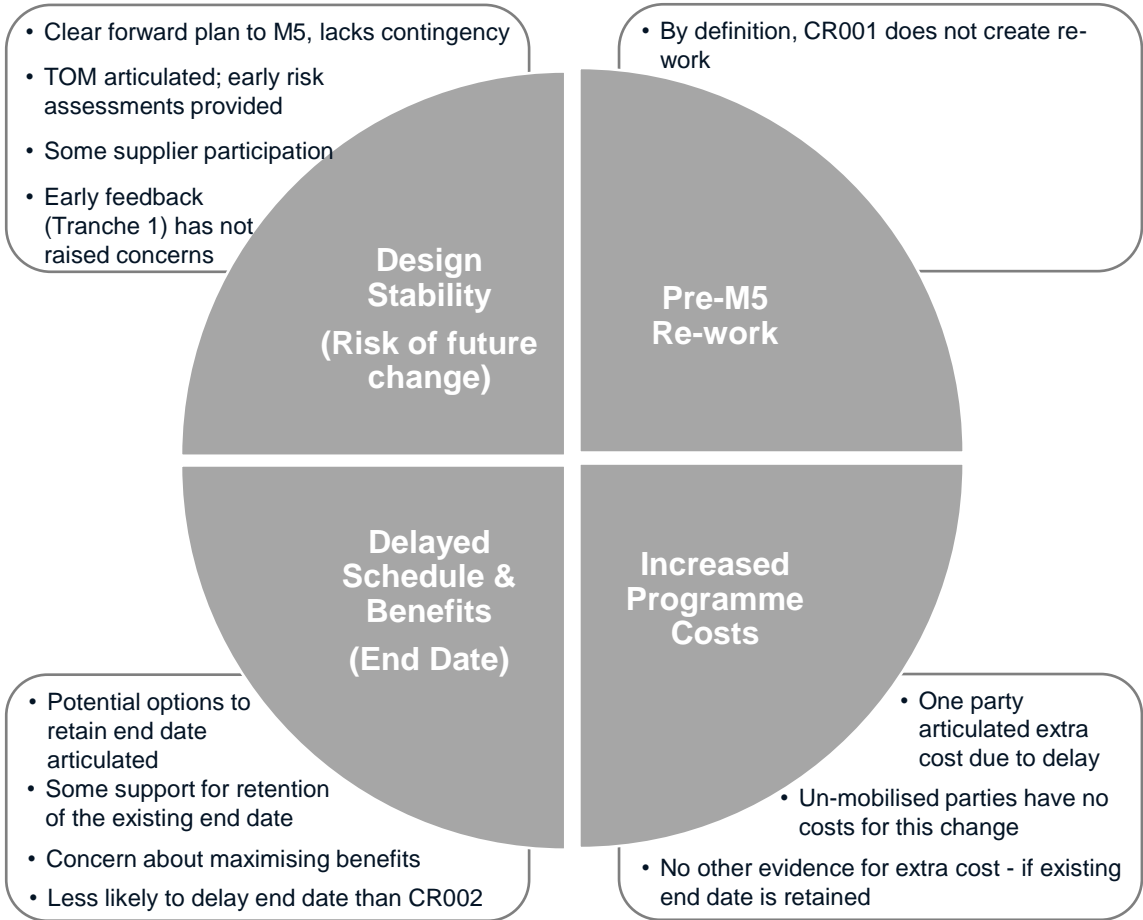
## CR002 Impacts – Views on the proposed approach (Page 2)

Programme Parties	Range of respondents' views on benefits and concerns (related to the approach in CR002)
<b>National Grid</b>	<ul style="list-style-type: none"> <li>– There is insufficient information in the proposal to verify whether overall delivery costs would be reduced as a result of this CR</li> <li>– Concern that a long delay as outlined in CR002 could begin to impact consumers</li> <li>– It is not clear what level of MHHS Programme involvement will be required from non-supplier Programme Parties for the period Sept-Nov</li> </ul>
<b>Code Bodies</b>	<ul style="list-style-type: none"> <li>– Impacts DCC capacity to deliver later changes, alongside other programmes of work, such as Network Evolution, DSP re-procurement</li> <li>– Risk of undue delays / increased costs is not commensurate to that of suppliers' ability to engage in the design work under the timetable set out in CR001</li> </ul>
<b>Consumer</b>	<ul style="list-style-type: none"> <li>– Long review period seems unnecessary; CR002 needs to show adequate consideration of working towards the timeline or justifying the length of delay</li> </ul>
<b>Elxon (Helix)</b>	<ul style="list-style-type: none"> <li>– CR002 does not contain enough information for participants that are already fully mobilised to understand what design activities are expected to be carried out between end July-22 and end Nov-22 (whereas CR001 does) – assessing impact is not possible based on the level of information provided</li> </ul>
<b>DCC</b>	<ul style="list-style-type: none"> <li>– 7-month delay does not appear justified and creates a significant DCC system and resource cost. CR002 does not contain necessary evidence to explain why an additional 4-month delay is needed above the 3 months delay already proposed by CR001. Market conditions are unlikely to change in the near future, therefore providing a further reason to concentrate on implementing the benefits of MHHS as soon as possible</li> </ul>
<b>SRO / IM &amp; LDP</b>	<ul style="list-style-type: none"> <li>– Until the re-plan activity is completed, the party is unable to fully assess an impact to the end date. However, the party states that their view is that placing M5 as late as Nov-22 will adversely affect benefits by causing at least, a 4-month delay in the end date for the programme – M16 (Cut over to new settlement timetable), on the basis that under CR001 the party believes a 3-month delay is containable (as a maximum). There will also be at least a 4-month additional run cost for the party</li> </ul>

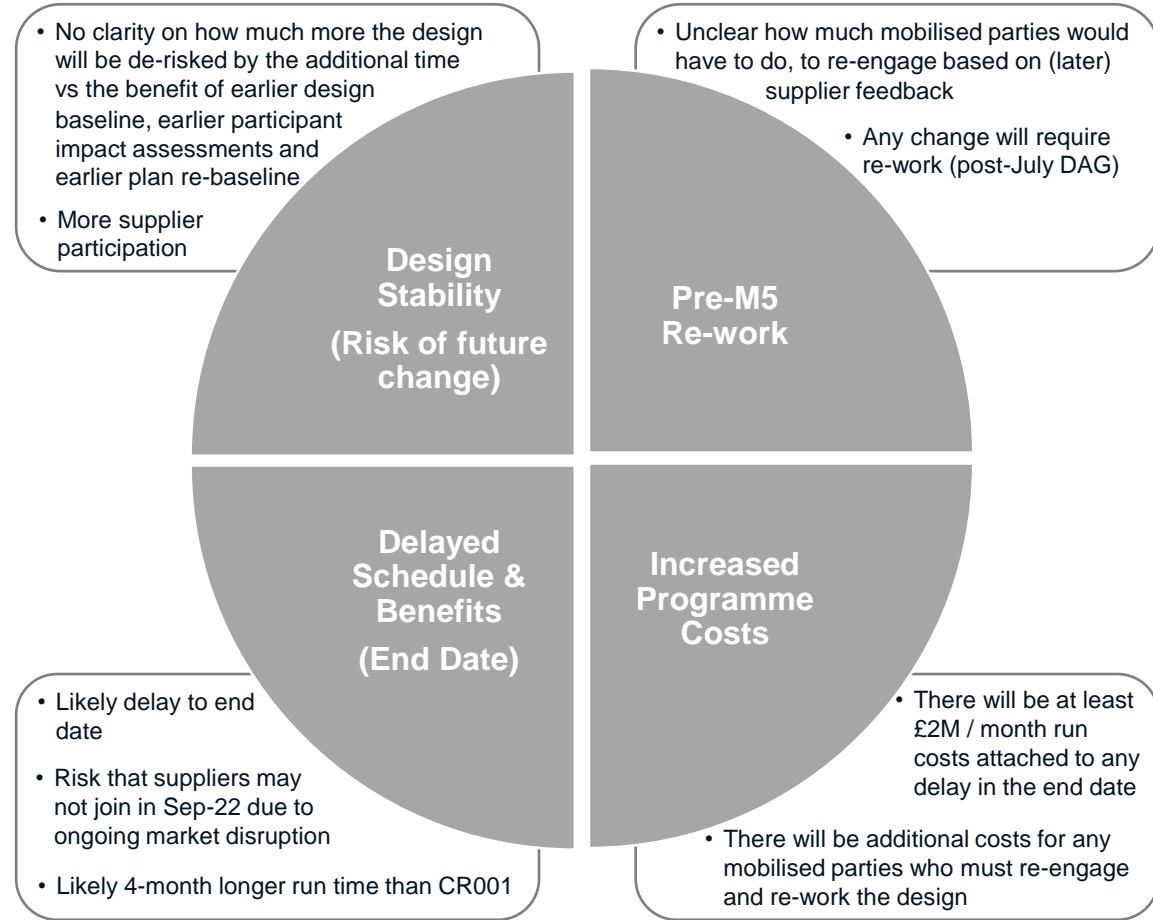


# CR001 and CR002 – Summary of relative impacts

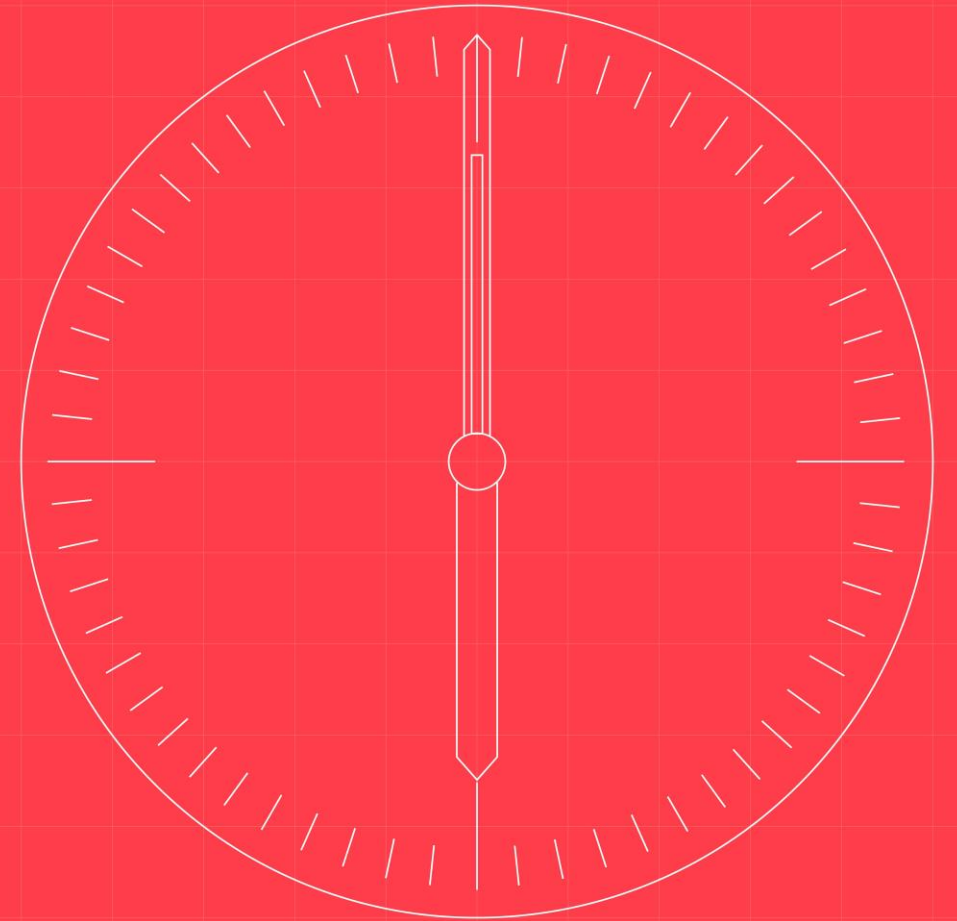
## CR001



## CR002



# Recommendations



# MHHS IPA

## M5 Design Baseline Milestone Replan Assurance

DRAFT

April 2022

**Confidential**



This document has been prepared by PwC for Ofgem only, and solely for the purpose and on the terms agreed with Ofgem in PwC's Order Form (Con/Spec 2021-086), as part of PwC's call-offs under the Economic, Financial and Other Consultancy framework. PwC accept no liability (including for negligence) to anyone else in connection with our work or this document.

© 2022 PricewaterhouseCoopers LLP. All rights reserved. 'PwC' refers to the UK member firm, and may sometimes refer to the PwC network. Each member firm is a separate legal entity. Please see [www.pwc.com/structure](http://www.pwc.com/structure) for further details.



# Executive Summary

Based on the current status of design activity the M5 milestone will not complete in line with the plan baseline date of April 2022 and a change to the planned milestone date is required. CR001 and CR002 have been raised as two proposals for the M5 milestone with both presenting risks and opportunities to deliver a stable design in line with the overall plan and benefits. The IPA has performed a qualitative assessment of the risks to the overall plan and benefits with each Change Request and provided associated recommendations.

Our overall recommendation is for the design activity to target a 29 July 2022 completion however, additional Programme Participant engagement should be planned through August and September 2022 to enable improved understanding and consumption of the design. This should be underpinned by a detailed plan consolidating activities up to a formalised milestone for the full plan baseline.

## CR001 - M5 Milestone on 29 July 2022

CR001 provides an option to deliver the design in a more expedient manner than CR002, therefore reducing the potential impact on the overall timeline and costs. It is supported by a clear delivery plan although this contains limited contingency, parallel activity between tranches and a 1 week delay observed in the current Tranche 1 review of design artefacts.

CR001 does provide for increased participation from industry compared to the current plan; however, it is unclear to what extent all Programme Participants will be able to use this time to more fully engage in the design activity. Key to the successful delivery of CR001 is how the proposed plan enables Suppliers to consume and build confidence in the design either prior to M5 or as their DBT activity commences post M5. This forms the basis of our recommendations over CR001 (see next page).

### Our view of risk to overall plan/benefits based on the key exam question

CR as proposed



CR with IPA recommendations implemented



## CR002 - M5 Milestone in November 2022

Whilst CR002 inherently provides a longer period for Programme Participants to engage, review and consume the design, it does not currently provide a clear plan as to how this additional time will be effectively used to promote increased engagement and reduce the risk of later rework. It is possible that this time could be put to good use but it would need to be considered in the context of how it enables more effective delivery of industry DBT and the impact on the overall plan.

Until this level of planning is performed there is an increased risk it will lead to a delay to the overall timeline and therefore benefits case. This forms the basis of our recommendations over CR002 (see next page).

### Our view of risk to overall plan/benefits based on the key exam question

CR as proposed



CR with IPA recommendations implemented



## Identifying the key exam question for the M5 replan decision...



What is the most expedient and credible timeline to deliver the M5 Design Baseline that balances the risk of future rework?

## What we heard...



*Whilst no fundamental concerns have been raised with the design to date, ensuring Programme Participants understand and are able to consume the design is important to build confidence and enable successful industry DBT following M5*

# Executive Summary - Recommendations

Two 'overall recommendations' have been identified to support delivery of the M5 milestone and subsequent full plan baseline. These should be implemented regardless of the approval of either CR:

- **Overall Recommendation 1** - The MHHS programme should develop and communicate the detailed plan to get to the full plan baseline following M5, This should consolidate all activities currently being planned to that point (eg., design, design playback/participant engagement, readiness for DBT and activities to deliver the full plan baseline) and should be used as the 'reporting baseline' for PSG.
- **Overall Recommendation 2** - The full plan baseline should consider how end-to-end delivery outside of the Programmes defined TOM will be coordinated and delivered to provide clarity and identify any potential gaps in delivery.

We have provided **recommended actions for both CR001 and CR002**, which should be implemented based whether the individual CR is approved. These are in the table to he right.

## Recommendations if the CR is to be taken forwards

### CR001

**CR001 Recommendation 1** - MHHS Programme should develop, communicate and track against a set of confidence indicators over design (linked to the M5 acceptance criteria). This should incorporate the planned IPA design assurance activity to be performed under IPA 'WP4 Design Documentation'.

**CR001 Recommendation 2** - As part of 'Overall Recommendation 1', the plan should include:

- The definition of the plan milestones/phases and what is expected to be delivered at each with respect to the design to ensure alignment across parties.
- Formal design playback activity within the plan during August (where feasible) and September to enable understanding and consumption of the design by Programme Participants.
- A milestone following M5 and the subsequent design playback activity in September at which point Programme Participants would be expected to be fully mobilised for DBT.
- Continual monitoring and identification of areas of risk in the design that require further validation by Programme Participants either prior to M5 or immediately after, during design playback.
- Tracking of progress against the Tranches to DAG and monthly checkpoints reported to PSG between now and M5 to review progress of design activity against plan and confidence indicators/acceptance criteria.

**CR001 Recommendation 3** - Suppliers to fully impact assess the resources required to support the design activity and put in place a plan to enable engagement prior to July 2022, wherever possible, or how they will engage in design playback whilst fully mobilising for DBT.

### CR002

**CR002 Recommendation 1** - As part of 'Overall Recommendation 1', define and document the detailed plan to the full plan baseline to support the proposed timeline. This plan should include:

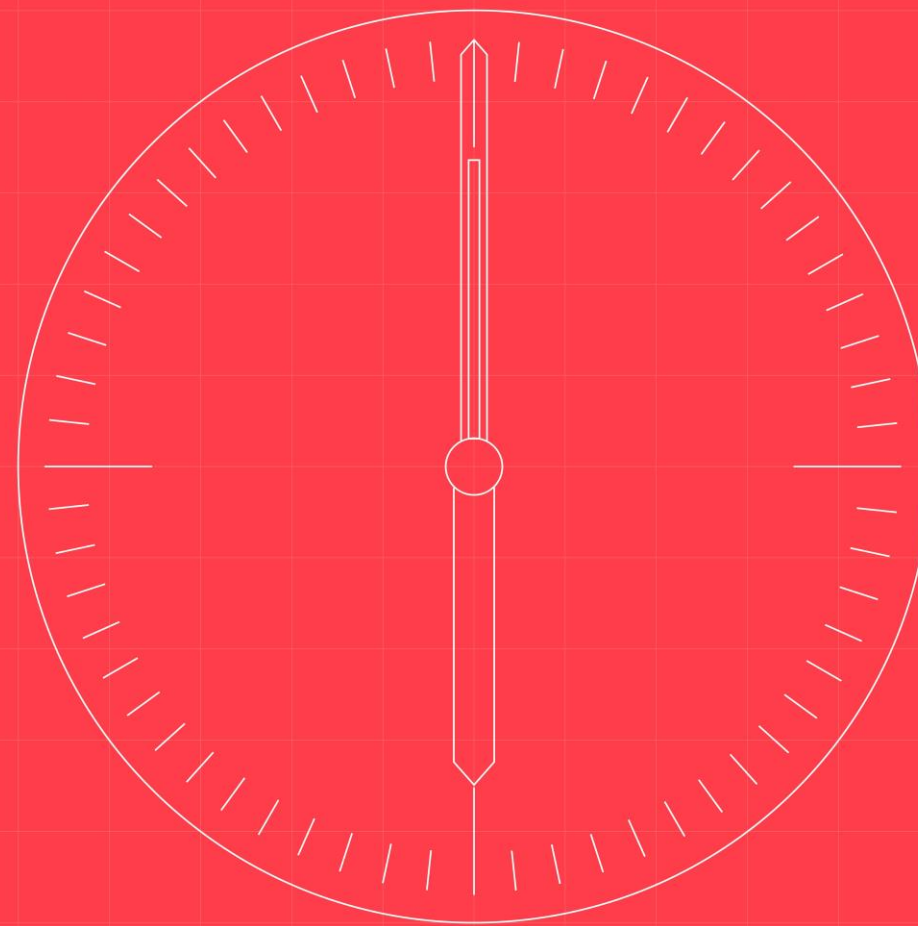
- How the additional time could be used to de-risk the design or potentially reduce the length of the DBT phase, or subsequent phases, to minimise impact on the overall timeline/costs.
- The options to reduce the proposed 3 month period for consultation, for example, how this leverages previous design engagement from supplier to ensure consultation is targeted.

# SRO Recommendation

[To be discussed and made as a result of this meeting]

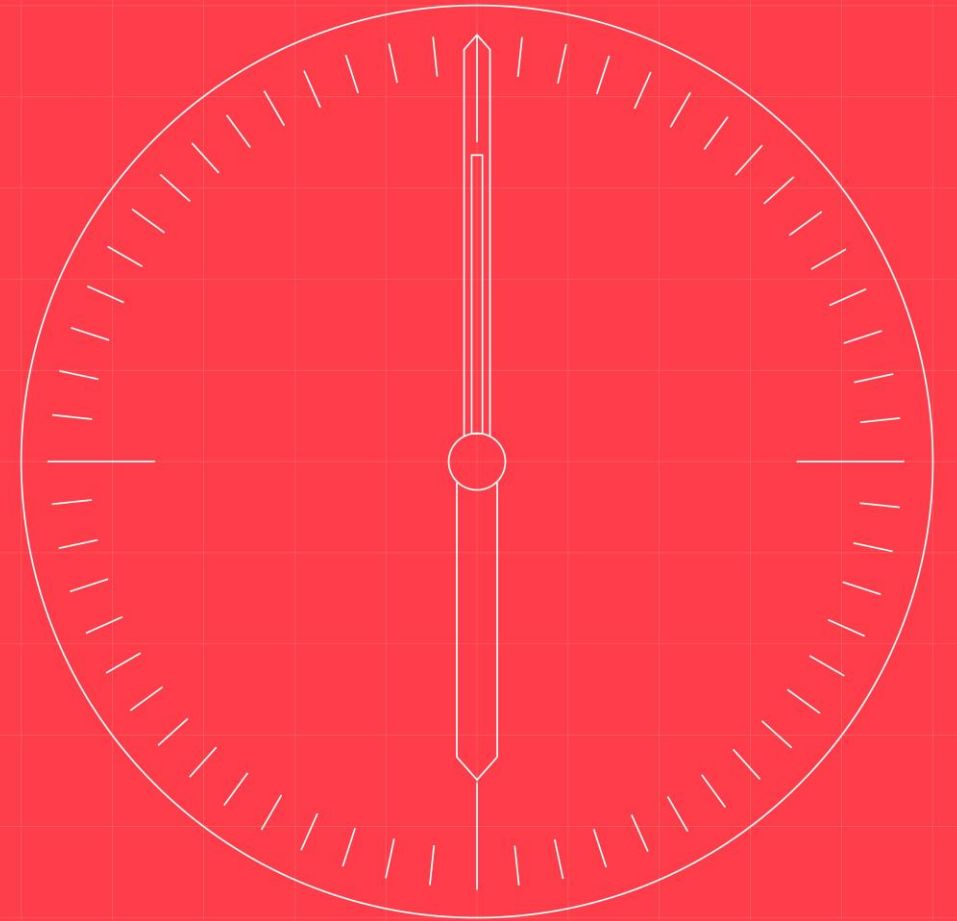
# Appendix

## More details on Impact Assessments



# CR001 Details

Design Baseline Replan to July 2022





## Overview of CR001 Impact Assessments received from Programme Participants (Page 1)

Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Large Suppliers</b>  (5)	Yes	4	<ul style="list-style-type: none"> <li>3 responses approved CR001 as necessary to deliver the programme, but recommended CR002 is approved rather than CR001 due to the view that: <ul style="list-style-type: none"> <li>there is too much residual design risk without supplier input resulting in later change [though unquantified in the responses]</li> <li>suppliers are the parties representing consumer interests or considering customer experience in the design review, therefore there is a risk that that will be lost. 1 noted that a lack of supplier innovation team engagement could result in customer opportunities being lost</li> </ul> </li> <li>1 response approved CR001 and recommended CR001 over CR002 (rejecting CR002 on the basis that the timescales associated with this CR are too protracted and will ultimately lead to significant delays in programme mobilisation delaying benefits realisation and slowing down parties that are mobilised to the degree they are required to be)</li> <li>Most responses note the risks of no contingency in July design delivery plan and design quality risk (with 1 referencing the number of current Tranche 1 review comments)</li> <li>Some respondents noted the importance of the re-plan for the end date and 1 respondent noted the potential to review qualification and migration timescales to retain the end date, but subject to the re-plan</li> </ul>
	No	0	----
	Abstained	1	<ul style="list-style-type: none"> <li>Proposed variant of CR1 &amp; CR2: July M5 on condition suppliers can engage adequately, with a review period of 4–6 months before DBT commences, &amp; a further plan review mid-way through DBT</li> </ul>
	Not Replied	0	----
<b>Medium Suppliers</b>  (6)	Yes	2	<ul style="list-style-type: none"> <li>One respondent answered all the impact questions, although without commentary</li> <li>One respondent agreed with the recommendation provided there is adequate engagement from programme participants before July 2022.</li> </ul>
	No	2	<ul style="list-style-type: none"> <li>1 response did not answer any of the impact questions. It did state concerns on the number of outstanding comments raised on the tranche designs – and also felt that consequential designs should be accountable in the M5 milestone. No specific supporting evidence was provided in CR001 – although there was some rationale in CR002 that applied to why CR001 was challenging – for example. not being willing to recruit additional resources due to lead-times and costs</li> <li>1 response disagreed with CR001 on the basis on conflict with Faster Switching, without providing any supporting evidence</li> </ul>
	Abstained	0	----
	Not Replied	2	----

## Overview of CR001 Impact Assessments received from Programme Participants (Page 2)

Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
Small Suppliers (34)	Yes	8	<ul style="list-style-type: none"> <li>All 8 respondents recommended both CR001 and CR002</li> <li>1 respondent noted that they agree with the content and detail stated in CR001 but would prefer to proceed with CR002</li> <li>1 respondent recommended CR001 but raised the concern of compressing future milestone timelines to incorporate the delay</li> </ul>
	No	1	<ul style="list-style-type: none"> <li>This respondent felt that while CR001 provides more time to engage with and review the design it does not provide sufficient time to stabilise the design and the risk of future change is not mitigated against – no supporting evidence was provided</li> </ul>
	Abstained	1	<ul style="list-style-type: none"> <li>This respondent declined to provide a recommendation to approve / reject the change but did agree or respond with “no impact” across all categories in the impact assessment</li> </ul>
	Not Replied	24	----
I&C (41)	Yes	7	<ul style="list-style-type: none"> <li>There were views that there is still a risk that the design will not be completed by July, but will be in a ‘more stable’ state – and that “further CRs will still be raised post-July”</li> <li>1 party estimated that the extension of M5 to July will incur direct internal project costs related to Change resources, however the indirect cost associated to the business resource effort required is significant but cannot be quantified</li> <li>1 party declined to support any aspects of CR001 in preference to CR002 but still recommended CR001</li> <li>1 party quantified the headcount required from now to Jul-22 but without comment on whether it would / could be provided</li> <li>“The re-planning exercise needs to determine if M5 delay results in a linear 3-month delay to post-M5 milestones and benefit realisation start”</li> <li>“Agree this change gives more confidence in the programme re-plan, reducing risk of delayed implementation and therefore delayed benefits”</li> </ul>
	No	5	<ul style="list-style-type: none"> <li>1 party made the point that consumers will be negatively impacted - as “potential process gaps will not be identified due to lack of supplier engagement” and review of operational documentation. Also, “an extension from to Jul-22 will only result in more costly delays later in the schedule when issues will be identified by suppliers far later in the development process” (no evidence provided for that view)</li> <li>There is a view that that this approach “risks having a programme re-plan that is built on a potentially unreliable design that creates further uncertainty for the programme moving forward”</li> </ul>
	Abstained	2	<ul style="list-style-type: none"> <li>Respondent did not return CR001 but communicated their preference was for CR002.</li> </ul>
	Not Replied	27	----

## Overview of CR001 Impact Assessments received from Programme Participants (Page 3)

Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Agents (54)</b>	Yes	3	<ul style="list-style-type: none"> <li>• There is a view that a 3-month delay to M5 could be absorbed with current timelines but this would need to be carefully understood as part of the upcoming re-plan – compressing migration would carry significant risk</li> <li>• 1 party raised concern as to whether a 3-month delay was long enough for suppliers to engage fully but recognised the need for a change to the existing timeline</li> </ul>
	No	1	<ul style="list-style-type: none"> <li>• A longer delay, as articulated in CR002 “would provide more time for supplier engagement and a more robust design baseline”</li> </ul>
	Abstained	1	<ul style="list-style-type: none"> <li>• This party abstained from providing a recommendation due to minimal impact [on the party]</li> </ul>
	Not replied	49	-----
<b>DNOs (6)</b>	Yes	3	<ul style="list-style-type: none"> <li>• One respondent noted that a contract is already in place between a technical service provider and 6 DNOs to deliver MHHS changes - significant delay could increase costs</li> <li>• Any significant delay to M5 could mean DNOs would need to balance delivery of changes required for MHHS with upcoming CCDG changes (CP1558, REC R0010 and REC R0032) scheduled for delivery in Feb-23</li> <li>• Several respondents noted that a delay to M5 would assist with ongoing resource constraints as a result of FSP but it would not resolve them as both programmes would be running in parallel. One respondent noted that the Jul-22 end date would allow them to retain their SME resources.</li> </ul>
	No	0	-----
	Abstained	1	<ul style="list-style-type: none"> <li>• This party did not provide a recommendation but noted that their service provider has begun pre-work on the registration system as an enabler for MHHS and any significant delay to timelines may mean re-work and costs incurred</li> </ul>
	Not Replied	2	-----

## Overview of CR001 Impact Assessments received from Programme Participants (Page 4)

Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>iDNOs (13)</b>	Yes	1	<ul style="list-style-type: none"> <li>The party supported CR001 but cautioned that the benefits from overly delaying M5 for a robust design could well be adversely impacted if the future programme timeline is too short, and if sufficient supplier engagement [on the design] is not available</li> </ul>
	No	4	<ul style="list-style-type: none"> <li>Several parties raised that the CR001 milestone date is shortly after Faster Switching go-live when parties will be focussing on the latter stages of transition and resolving any issues identified at go-live</li> </ul>
	Abstained	1	<ul style="list-style-type: none"> <li>Party did not provide a recommendation but had stated the extension of the design delivery would benefit their own ability to engage with the programme meaningfully</li> </ul>
	Not Replied	7	-----
<b>National Grid</b>	Yes	1	<ul style="list-style-type: none"> <li>Input and expertise from programme parties is critical to ensuring a robust design and minimising change later in the programme</li> <li>There is a concern that a longer delay than 3-months would start to impact delivery of consumer benefits</li> <li>No impact envisaged to run costs or NG ESOs ability to deliver to overall programme timelines</li> </ul>
<b>Code Bodies (3)</b>	Yes	1	<ul style="list-style-type: none"> <li>The party noted the re-baseline of the programme activity will need to account for dependencies between the achievement of M5 and later code drafting milestones; also noted programme parties will be reliant on the fact that that the upcoming re-baseline activity planned after M5 must develop a firm plan for delivering MHHS, and certainty of when this is achieved will help to support this activity</li> </ul>
	No	0	-----
	Abstained	1	<ul style="list-style-type: none"> <li>The party noted that provided there is no major deviation from the TOM, any subsequent design change impacts should be minimal – and also highlighted that a wider programme re-plan may negatively impact DCC capacity to deliver later changes, alongside other programmes of work, such as Network Evolution and DSP re-procurement</li> </ul>
	Not Replied	1	-----
<b>Consumer</b>	Yes	1	<ul style="list-style-type: none"> <li>Looking to minimise the additional costs and the delay to the realisation of benefits from high risk of increased programme run-time</li> </ul>
<b>Software Providers</b>	Yes	1	<ul style="list-style-type: none"> <li>This respondent agreed that the 3 month delay would provide more time for suppliers to engage in design with less impact on the programme</li> </ul>
	No	1	<ul style="list-style-type: none"> <li>This respondent noted that the 3 month delay would not be sufficient to fully engage suppliers in design</li> </ul>

## Overview of CR001 Impact Assessments received from Programme Participants (Page 5)

Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Elexon (Helix)</b>	Yes	1	<ul style="list-style-type: none"> <li>• If this change request is approved, then Helix will need to re-baseline its plans and budget. In addition, Helix will need to update contracts with their suppliers to reflect these changes</li> <li>• There is significant cost impact</li> <li>• As a result of the delay there will be more focus on reviewing the MHHS requirements &amp; designs for a further 3 months compared to the original plan which will impact BAs, Solution Architects, Market Architects. This will reduce the availability of these roles for supporting build &amp; test</li> <li>• There is the potential for re-work where Helix has started build 'at risk', driving the need for an additional 3-month Programme Increment (PI) delaying the end of the Delivery phase (iterative build &amp; test) – risk for M9</li> <li>• Work on changes to the Codes and subsidiary documents will be delayed – revised dates should be agreed through the MHHS plan re-baselining activity post completion of MHHS design (M5)</li> </ul>
<b>DCC</b>	Yes	1	<ul style="list-style-type: none"> <li>• From the DCC's perspective, the additional time does not specifically benefit their element of the overall design; this delay will have minimal impact on DCC resource for MHHS</li> <li>• The programme has indicated that a delay of at least one month is needed due to slippage of the workgroups, this is accepted. The additional two months should support greater input from MHHS participants</li> <li>• Any delays to the wider programme could impact design reviews of the MP162 solution given the late stage of development that this modification is at. Baselining the design may prove more difficult if depending upon the length of delays that are incurred</li> <li>• There may be a dilution of the overall benefits by delaying implementation of MP162 and the wider MHHS programme, for example investing in SMETS1 infrastructure has a shorter useful life if the benefits of MHHS are delayed</li> <li>• Moving the MHHS implementation closer to the DSP programme timelines will create uncertainty, complexity and potentially create additional costs to manage this scenario</li> <li>• Presently the November 2023 SEC release is assigned to delivery of MP162 alone, which is appropriate given the importance and size of this modification. If November 2023 cannot be met due to changing MHHS programme timelines, this may create downstream/upstream issues with implementation of other important SEC modifications.</li> <li>• DCC would be supportive of this 3-month delay, if certainty could be provided by the programme that the design assumptions needed to support progression of MP162 could be confirmed as within the 'Tranche 1' artefacts (the data feed from Elexon Registration to the Faster Switching (CSS) System), thereby allowing MP162 to progress on its existing timetable. This must include the design decision that registration data is provided to the DCC via the CSS system, rather than any other route.</li> </ul>

## Overview of CR001 Impact Assessments received from Programme Participants (Page 6)

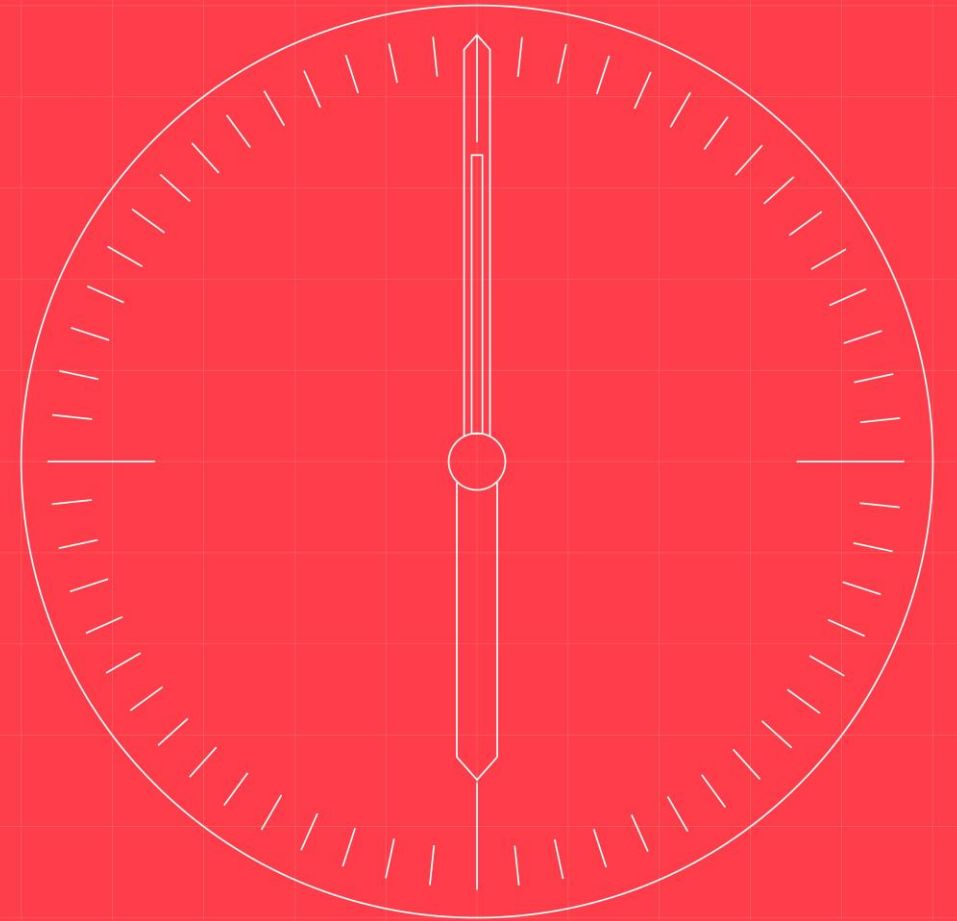
Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
SRO / IM & LDP	Yes	1	<ul style="list-style-type: none"> <li>• The party states that the current M5 date of Apr-22 will not be met and therefore this change (the movement of M5 to Jul-22) is required to ensure that a well-considered and high-quality design will be reached.</li> <li>• By reaching M5 at the earliest feasible point after Apr-22 (i.e. Jul-22), this minimises (and avoids prolonging) uncertainty about the impact of the baselined design on parties' own operating models and their existing strategies for IT provision – allowing maximum time for assessing that impact and maximum latitude for their Design and Build (DB) timelines in reaching (and de-risking) achievement of milestone M9</li> <li>• This in turn, will enable the earliest programme plan re-baseline, early and increased confidence in the programme's timeline and reduced risk of uncertain and/or delayed implementation timelines and therefore uncertain and/or delayed benefit realisation timescales</li> <li>• Each month of delay will have a cost of unrealised benefits (which could be assessed by Ofgem in referring to their Ofgem Business Case model). The party has proposed a number of ways to explore containing the 3-month M5 delay in the re-planning activity, so that there will be no delays to the end date for CR001</li> <li>• Whilst high levels of supplier participation in the design activity are preferred, the party has outlined evidence to support the view that the risk of the baseline design being subject to later change, is mitigated due (a) existing supplier and other participation, (b) early (Tranche 1) feedback not representing a high level of material challenge to those artefacts and (c) the evidence of the Design team's own risk assessments for each constituency – walked through with, and generally accepted by each constituency and providing confidence that the team understands the design risk areas</li> <li>• The party believes that the key drivers for change for suppliers are those already mandated in the TOM. Whilst recognising there are some elements of optionality that remain for suppliers within the detailed design, the party's view is that the differentials between these options are not significant when set against the consequences of a delay. The elements that remain are largely the detail around interface resolution and the supplier elements of the registration processes</li> <li>• Until the re-plan activity is completed, the party is unable to fully assess an impact to the end date. However, the party states that with a maximum of a 3-month delay, the end date could be maintained – probably by looking at options to reduce the 12-month migration window to 9 months – which would mean no overall impact on the party's costs and resources</li> <li>• The party recommended this CR be approved as it provides the balance between providing parties additional time to engage and participate in the design, whilst protecting programme timelines and in effect, protecting consumer benefits</li> </ul>

# Overview of CR001 Impact Assessments received from Programme Participants (Page 7)

Programme Parties	CR001 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
IPA	Yes	1	<ul style="list-style-type: none"> <li>• The schedule for the continuous assurance element of IPA activity will be unaffected by CR001, unless the end date of the programme is delayed, in which case it will need to run for a longer duration. The stage-based elements of the IPA plan and schedule are dependent on the MHHS Programme plan and schedule. Re-phasing should be possible, providing the sequence of activity remains the same</li> <li>• However, if the Programme were to continue beyond the current end date, there would be an additional monthly run cost depending on the shape of the Programme for the additional period. The cost would be to cover the continuous assurance delivered through IPA Work Package 1</li> </ul>

# CR002 Details

Design Baseline Replan to November 2022





## Overview of CR002 Impact Assessments received from Programme Participants (Page 1)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Large Suppliers</b>  (5)	Yes	3	
	No	1	
	Abstained	1	<ul style="list-style-type: none"> <li>Proposed variant of CR001 &amp; CR002: July M5 on condition suppliers can engage adequately, with a review period of 4 – 6 months before DBT commences, &amp; a further plan review mid-way through DBT</li> </ul>
	Not Replied	0	-----
<b>Medium Suppliers</b>  (6)	Yes	3	<ul style="list-style-type: none"> <li>1 response suggested that more time is needed because the design requires significant input from suppliers [before being baselined] as it is suppliers who leverage the capability to develop the relationships and provide product offerings (benefits) for consumers. A supporting schedule was provided, showing DB starting in April 2023 and suggesting that migration could be effected in 6 months, not 12 months</li> <li>Resource conflicts with Faster Switching were referenced, without specific information about how those conflicts could be managed</li> </ul>
	No	1	-----
	Abstained	0	-----
	Not Replied	2	-----

## Overview of CR002 Impact Assessments received from Programme Participants (Page 2)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Small Suppliers (34)</b>	Yes	8	<ul style="list-style-type: none"> <li>• 8 respondents recommended that CR002 be approved for implementation</li> <li>• Resource conflicts with Faster Switching were often referenced, without specific information about how those conflicts could be managed</li> <li>• General view that CR002 provides sufficient time for SMEs to engage in the design, de-risking the need for later design change</li> </ul>
	No	0	----
	Abstained	2	• 2 respondents did not complete the impact assessment form
	Not Replied	24	----
<b>I&amp;C (41)</b>	Yes	13	<ul style="list-style-type: none"> <li>• Being in the early stages of mobilisation a [longer] delay to M5 would have minimal impact, whereas a delay later in the project through design change when their project is fully up and running would have a much bigger impact [on them]</li> <li>• Changes are not expected to increase costs as parties are not mobilised yet, and delaying M5 for longer is seen as preventing additional cost being incurred later down the line - as it will avoid insufficient scrutiny of the final design (without any supporting evidence for that)</li> <li>• Resource conflicts with Faster Switching were often referenced, without specific information about how those conflicts could be managed</li> <li>• “There is a risk that this delay cannot be fully absorbed in future phases so there would be a delay to the start of benefit realisation”</li> <li>• “It is accepted that there is a need to push back the M5 milestone, but it is unclear as to whether a delay to November will improve the accuracy of design and reduce the risk of future change”</li> </ul>
	No	0	----
	Abstained	1	
	Not Replied	27	----

## Overview of CR002 Impact Assessments received from Programme Participants (Page 3)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Agents (54)</b>	Yes	2	<ul style="list-style-type: none"> <li>One respondent believes CR002 maximises the opportunity for delivering on long term benefits, as many of these will be delivered through new supplier products and require the necessary engagement</li> <li>Short term costs of a delay are outweighed by the long term benefits that will still be delivered</li> <li>The programme re-plan and design phase could be delivered in parallel rather than sequentially</li> </ul>
	No	2	<ul style="list-style-type: none"> <li>A 7+ month delay to the programme could not be absorbed into the existing timeframes, which would lead to deferred benefits and inefficient resourcing models for participants to manage</li> <li>Late design change is not necessarily a concern as the programme has been driving targeted engagement with suppliers to date</li> <li>CR001 provides sufficient time for suppliers to actively engage in design</li> </ul>
	Abstained	1	<ul style="list-style-type: none"> <li>Abstained from providing a recommendation due to minimal impact on the individual participant</li> </ul>
	Not Replied	49	----
<b>DNOs (6)</b>	Yes	1	<ul style="list-style-type: none"> <li>One respondent approved both CR001 and CR002 for implementation as they recognise the need to extend timelines to allow for supplier engagement. It was also noted that the delay set out in CR002 could have adverse impact on delivering consumer benefits if the programme is delayed as a result.</li> </ul>
	No	3	<ul style="list-style-type: none"> <li>Several respondents believe the cost of rework, new design issues being found and subsequent change requests could increase if design is delayed for too long</li> <li>Generally parties highlight criticality of supplier engagement in design but timelines in CR002 are too long and do not significantly reduce the risk of incurred future costs</li> <li>If implemented the view is that CR002 would stall the pre-work already underway by DNO Service Providers</li> </ul>
	Abstained	0	----
	Not Replied	2	----

## Overview of CR002 Impact Assessments received from Programme Participants (Page 4)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>iDNOs (13)</b>	Yes	3	<ul style="list-style-type: none"> <li>Several respondents predicted that Faster Switching go-live is likely to have completed by November 22, releasing parties to focus on the MHHS design</li> <li>One respondent raised delaying the milestone to November will reduce the risk for MPRS without which the development of the MHHS stage 0 release (for February 2023 go-live) will be required at the same time as development of the MPRS MHHS solution</li> </ul>
	No	1	<ul style="list-style-type: none"> <li>Respondent noted all mobilised parties are equally facing multi-Programme delivery and competing regulatory challenges</li> </ul>
	Abstained	2	<ul style="list-style-type: none"> <li>One respondent questioned what the knock-on impacts will be on the wider programme should Milestone 5 be delayed. This may for example result in 'pinch points' at later stages of the programme should the end date of the programme also not be moved out</li> </ul>
	Not Replied	7	----
<b>NG ESO</b>	Abstained	1	<ul style="list-style-type: none"> <li>Inputs and expertise from Programme Parties (PPs) is critical to delivering a robust design and reducing risk of a change to design later in the programme.</li> <li>There is insufficient information available in the proposal to verify whether the overall delivery costs would be reduced as a result of this CR</li> <li>Respondent is unclear on the level of involvement required of non-supplier PPs during this extended design window.</li> <li>Unable to make a recommendation without more information on how the design period would work during this extended period.</li> </ul>
<b>Code Bodies (3)</b>	Yes	0	----
	No	1	<ul style="list-style-type: none"> <li>Respondent did not support the risk of undue delays and increased costs to the programme is commensurate to that of Suppliers ability to engage in the design work under the timetable set out in CR002. Therefore, recommend that CR001 is approved and this proposal is not.</li> </ul>
	Abstained	1	<ul style="list-style-type: none"> <li>Respondent noted provided there is no major deviation from the TOM, any subsequent design change impacts should be minimal</li> <li>Respondent highlighted a wider programme replan may negatively impact DCC capacity to deliver later changes, alongside other programmes of work, such as Network Evolution and DSP re-procurement.</li> </ul>
	Not Replied	1	----
<b>Consumer</b>	Abstained	1	<ul style="list-style-type: none"> <li>Do not approve or disagree to approve. We have sought to set out the necessary detail we think is needed to provide confidence and clarity about what the costs and benefits to consumers would be and why the proposed approach is necessary</li> </ul>
<b>Software Providers</b>	Yes	2	<ul style="list-style-type: none"> <li>One respondent noted that this delay could help ease resource constraints by spreading design review activities and would help avoid parallel development activities for MPRS Stage 0 changes scheduled for Feb-23</li> <li>It was noted that 12-month DBT phase should remain in the programme plan</li> </ul>
	No	0	----

## Overview of CR002 Impact Assessments received from Programme Participants (Page 5)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
<b>Elexon (Helix)</b>	No	1	<ul style="list-style-type: none"> <li>• This change request results in additional costs for the Helix programme which will be passed on to suppliers as per existing arrangements. This could result in increased prices for consumers if these costs are passed on from suppliers to consumers</li> <li>• There are options to absorb some of the timeline impact</li> <li>• As a result of the delay there will be more focus on reviewing the MHHS requirements &amp; designs for a further 7 months compared to the original plan which will impact BAs, Solution Architects, Market Architects. This will reduce the availability of these roles for supporting build &amp; test</li> <li>• There is the potential for re-work where Helix has started build 'at risk', driving the need for an additional Programme Increments (PIs) delaying the end of the Delivery phase (iterative build &amp; test) – risk for M9</li> <li>• Additionally, there is the potential for re-work where Helix has started build before the baselined MHHS requirements &amp; design are available and the baselined versions are different to Helix's working assumptions</li> <li>• Work on changes to the Codes and subsidiary documents will be delayed – revised dates should be agreed through the MHHS plan re-baselining activity post completion of MHHS design (M5)</li> <li>• This change request does not contain enough information for participants that are already fully mobilised to understand what design activities are expected to be carried out between end July 2022 and end November 2022</li> </ul>
<b>DCC</b>	Yes or No	1	<ul style="list-style-type: none"> <li>• It is not clear why an additional four months is needed above CR001</li> </ul>

## Overview of CR002 Impact Assessments received from Programme Participants (Page 6)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
SRO / IM & LDP	No	1	<ul style="list-style-type: none"> <li>• The party states that the current M5 date of Apr-22 will not be met and therefore this change (the movement of M5 to Jul-22) is required to ensure that a well-considered and high-quality design will be reached</li> <li>• With a much later determination of the design at M5, the party's view is that there will be prolonged uncertainty about the impact of the baselined design on parties' own operating models and on their existing strategies for IT provision – compressing the available time for assessing that impact and reducing the time available for their subsequent Design and Build (DB) activities in reaching milestone M9. Given that most parties have stated the impact of the design is likely to be high and that the M5 to M9 timeline is already tight, it is our assumption that M9 and subsequent milestones will be delayed as a result</li> <li>• The proposal for this change (CR002) gives no guidance on how the re-baselining of the programme plan will be handled. This change will serve, in the party's view, to delay the point where we have re-baselined the plan and reached confidence in the programme's timeline - and prolongs risk of uncertain and/or delayed implementation timelines and therefore uncertain and/or delayed benefit realisation timescales</li> <li>• “There is a significant risk that the 7-month delay is more likely to have an impact on the programme end date (than CR002), resulting in a delay to realising customer benefits (in addition to the increase in programme costs as a result) and with little or no material improvement to the design”</li> <li>• There is the additional risk that parties who have been engaged in the design to date will have to be involved in re-engagement and re-work (more cost) as a result of this proposal for suppliers to review the design later</li> <li>• “The programme needs to define a ‘design that works’ – not ‘a design that works optimally for every party’, and therefore the incremental value of a longer review period is potentially low”</li> <li>• Until the re-plan activity is completed, the party is unable to fully assess an impact to the end date. However, the party states that their view is that placing M5 as late as Nov-22 will adversely affect benefits by causing at least, a 4-month delay in the end date for the programme – M16 (Cut over to new settlement timetable), on the basis that under CR001 the party believes a 3-month delay is containable (as a maximum). There will also be at least a 4-month additional run cost for the party</li> <li>• The party recommended this CR not be approved as it introduces significant extra costs, creates delays in realising consumer benefits – and the reduction in risk to the baselined design is not sufficient to justify this</li> </ul>

## Overview of CR002 Impact Assessments received from Programme Participants (Page 7)

Programme Parties	CR002 Recommendation	Number	Themes, quotes (and evidence) related to the recommendations
IPA	Yes	1	<ul style="list-style-type: none"> <li>• The schedule for the continuous assurance element of IPA activity will be unaffected by CR002, unless the end date of the programme is delayed, in which case it will need to run for a longer duration. The stage-based elements of the IPA plan and schedule are dependent on the MHHS Programme plan and schedule. Re-phasing should be possible, providing the sequence of activity remains the same</li> <li>• Assuming M16 does not change as a result of the CR (i.e. MHHSP programme is completed within the original time frame, but elements within it move), we do not anticipate any additional costs.</li> <li>• However, if the Programme were to continue beyond the current end date, there would be an additional monthly run cost depending on the shape of the Programme for the additional period. The cost would be to cover the continuous assurance delivered through IPA Work Package 1.</li> </ul>