
Change Request Form

Change Request details

Change Request details			
Change Request Title	<i>Splitting the M15 Milestone into M15a and M15b</i>		
Change Request Number	<i>CR067</i>		
Originating Advisory / Working Group	<i>Migration Working Group</i>		
Risk/issue reference			
Change Raiser	<i>The MHHS SRO</i>	Date raised:	<i>18/09/2026</i>

For further guidance on how to complete this document please see the supporting Change Request Form Guidance for Programme Participants. The guidance will support raising a change and responding to a change request via Impact Assessment. The Change Raiser should consider sharing the draft Change Request Form with impacted programme parties, prior to submission to PMO. The guidance, as well as other key documents are referenced below and can be found via the MHHS website.

Change Request to be read in conjunction with:
MHHS Change Request Form Guidance for Programme Participants
MHHS Change Control Approach
MHHS Governance Framework
Ofgem's MHHS Transition Timetable

Part A – Description of proposed change

Guidance – *This section should be completed by the Change Raiser when raising the Change Request.*

Part A – Description of proposed change

Issue statement:

(the issue that needs to be resolved by the change)

Situation

- The M15 Milestone is defined as '**Full Transition Complete**' and its description represents completion of implementation activities and the conclusion of the 18-month migration period.
- P487 and CR065 have both been approved and implemented to incentivise Suppliers to meet the M15 Milestone, by the baselined M15 date of 7-May-2027.

Complication

- The M15 Milestone conflates two distinct outcomes: ***the end of the 18-month Baseline Migration Period*** (completion of the MHHS Migration Plan), which triggers a Customer Acquisition Ban for any non-compliant Supplier, and ***Full Transition Complete***, when **ALL** Suppliers have successfully migrated and 100% of energy is settled under the new MHHS arrangements.
- The current M15 definition and baselined date of M15 on 7-May-2027 assumes both outcomes occur on the same date
- P487 and CR065 make provisions for Suppliers, under set conditions, to migrate after the baselined M15 date via either an SRO exemption or whilst subject to a Customer Acquisition Ban.
- As such, while '**Full Transition Complete**': **all Suppliers migrated by M15 remains the intended and planned for outcome**, it can no longer be assumed as certain
- Only the happy path (all Suppliers complete migration at M15) is planned for in the Programme Plan; the two identified unhappy paths are not; SRO Exemptions and Customer Acquisition Bans.

To remove this ambiguity, a change is required so the Programme has a clear and robust basis for managing two distinct M15 outcomes: the Supplier-level compliance deadline and the industry-level transition completion point. This must include managing the risk that these two outcomes occur on different dates

Description of change:

(the change being proposed)

Proposed Resolution

This issue will be addressed by splitting the M15 milestone into two separate milestones, one for each outcome, thereby avoiding any ambiguity in determining whether M15 has been "met" against its baseline date of 7-May-27.

1. **M15a — Programme and Supplier Compliance Deadline**

End of the 18-Month Baseline Migration Period and Completion of the MHHS Migration Plan. Assessed on a per-Supplier basis; triggers the Customer Acquisition Ban for any non-compliant Supplier.

M15a marks the end of the 18-month Baseline Migration Period, by which point each Supplier must have completed its migration in line with the MHHS Migration Plan. Assessed individually per

Supplier, M15a is the clear trigger point for the Customer Acquisition Ban where a Supplier has failed to complete migration, subject to any relevant SRO exemption provisions.

Proposed new Milestone title:

- **M15a – End of the 18-Month Baseline Migration Period and Completion of the MHHS Migration Plan**

2. **M15b — Full Transition Complete**

The point at which **ALL** Suppliers have completed migration, 100% of energy is settling via the new MHHS arrangements, and no volumes remain on legacy arrangements. Assessed industry wide.

M15b marks the point at which **ALL** Suppliers have completed migration and 100% of energy is being settled through the new MHHS settlement arrangements, with none processed through legacy settlement arrangements. M15b is therefore assessed on an industry-wide basis.

Proposed new Milestone title:

- **M15b – Full Transition Complete**

Baseline Date

Both M15a and M15b Milestones will retain the existing baselined M15 date of **7 May 2027**. For the avoidance of doubt, this change does not move or extend the Supplier compliance deadline for M15.

The MHHS Programme Plan will be updated to reflect this change.

Consequential Document Changes

To support the revised M15 Milestone split and definitions, consequential changes will also be made to the following Programme document:

- ***M15 Acceptance Criteria document (MHHS-DEL1792)***
 - Each of the two separate milestones M15a and M15b will have their own set of M15 Acceptance Criteria defined within this document
 - In support of M15a, a new set of ***Supplier Migration Complete Criteria*** will be introduced to determine each Supplier's migration completion status, including whether migration activity has been completed successfully for all their Registered MPANs.
 - Milestone M15b aligns with the original M15 intent of "Full Transition Complete" with relevant updates made to the M15 Acceptance Criteria document accordingly. Following this date, all MPANs will be settling under the new MHHS arrangements.

An initial, proposed set of M15 Acceptance Criteria is included with this Change Request (CR) for additional context and to indicate the direction of travel. However, these criteria are not intended to form part of this CR directly. They will require further discussion and review with Industry through the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG), and will be approved by MCAG once MWG has recommended approval. Discussion and development of these updates will take place alongside this CR, but formal approval will only follow once this CR itself has been approved.

The programme recognises that there will also be consequential change to the Migration Framework.

- ***MHHS Migration Framework***
 - Revised to reflect the updated definitions for M15a and M15b, together with the formal process for governing and enforcing Supplier compliance with the ***MHHS Migration Plan***, in accordance with BSC Section C 12.12.8 and invocation of the ***BSC Breach and Default Process*** (as required).

These changes will be addressed as part of a subsequent Change Request to be raised following the approval of CR067: Splitting the M15 Milestone into M15a and M15b. This subsequent Change Request will be progress following PSG decision on CR067.

Classification of Change

The proposed change is considered to be administrative in nature but necessary to remove ambiguity at M15, while keeping M15's original baseline date unchanged.

Desired implementation date and rationale:

(proposed implementation date of the change and why this date is required)

The Programme is committed to implementing these changes at the earliest opportunity, and as far in advance of the M15 baseline date as possible, to provide all industry participants with the clarity and certainty they require to plan effectively.

Resolving the current ambiguity is a priority. It is essential that the intended outcomes for M15 are unambiguous and consistently understood across all stakeholders.

Justification for change:

(please attach any evidence to support your justification including why it should be exempt from the change freeze)

The proposed change establishes a clear distinction between the Supplier compliance deadline and Full Transition Complete, enabling the Programme to track milestone achievement with precision. Specifically, it provides:

- A clear enforcement trigger (M15a);
- A verifiable industry completion marker (M15b);
- Correct sequencing of enforcement ahead of cutover; and
- Comprehensive coverage of all three identified M15 outcomes, the 'happy path', together with both 'unhappy path' scenarios (*SRO exemptions* and *Customer Acquisition Bans*), rather than accounting for the 'happy path' scenario alone.

Change Freeze criterion impacted

Yes / No

Fixing a design defect

No

Critical to M10/M15

YES

Consequences of no change:

(what would happen if the change was not implemented)

Without intervention prior to M15, the Programme continues to rely on the assumption that both M15 outcomes align with the 7 May 2027 baseline, leaving unaddressed the material risk that they may in fact fall on different dates. Current Programme planning accounts only for the "happy path", where all Suppliers complete migration by M15, and makes no provision for either of the two "unhappy paths": SRO Exemptions and Customer Acquisition Bans.

As a result, the single M15 Milestone definition remains ambiguous, continuing to conflate two distinct outcomes: the end of the 18-month Baseline Migration Period, and Full Transition Complete. Guidance alone cannot resolve the underlying risk created by this conflation; it would remain unclear what achieving, and complying with, M15 actually means.

In particular, it would remain unclear whether M15 is "met" through individual Supplier compliance or only through full industry-wide migration being complete, making it difficult to determine when the associated Customer Acquisition Ban and P487 enforcement provisions should apply, versus when industry-wide transition is genuinely complete.

The consequence of no change is therefore that a material ambiguity in the current M15 milestone would remain unresolved at the point when the Programme needs to make clear and potentially consequential decisions regarding Supplier compliance, enforcement and the status of industry-wide transition.

Alternative options:

(alternative options or mitigations that have been considered)

The Programme has considered the following alternative approaches to resolving the issue identified:

1. 'No change' - do-nothing approach.
 - This option would retain the existing M15 Milestone definition unchanged, permitting the M15 status to move to AMBER or RED should 'Full Transition' not be achieved by the baselined date of 7 May 2027. Under this approach, the Programme would issue guidance on how it intends to manage the M15 milestone, in order to resolve the current confusion and provide clarity for all parties in the event that the 'happy path' does not occur.
2. Retain the existing M15 Milestone as a Tier 1 milestone and introduce an additional related Tier 2 milestone
 - This option would separate the two distinct outcomes, thereby removing the ambiguity created by multiple events potentially occurring at the same time, by creating a new Tier 2 Milestone for "End of Migration Window," to sit alongside the existing M15 (Tier 1) milestone of "Full Transition Complete."
3. Retain the existing M15 Milestone definition and make changes through the Migration Framework only
 - This option would rely on the Migration Framework, rather than the Programme's milestone definition, to clarify when sanctions apply.

Following careful consideration of these approaches, the Programme has concluded that splitting M15 into two separately defined and independently tracked Tier 1 milestones — **M15a** and **M15b** — represents the preferred option.

This approach provides a clear distinction between the Supplier compliance deadline and Full Transition Complete, while retaining the existing M15 naming convention and preserving the same 7 May 2027 baseline date for both Tier 1 milestones.

Risks associated with potential change:

The Programme has identified the following primary risks associated with implementing the proposed change:

- **Implementation timeline risk:** As the proposed change amends a Tier 1 milestone, Ofgem approval is required. The time taken to secure this approval could affect the implementation timetable for the revised milestone definitions and associated changes.
- **Consequential documentation alignment risk:** Approval of the change will necessitate consequential amendments to the *Migration Framework* documentation. There is a risk that by deferring changes to the *Migration Framework* until changes to the Tier 1 Milestone are approved, documents remain temporarily unaligned with the revised M15a and M15b definitions.
- **Stakeholder interpretation risk:** There is a risk that the introduction of M15a and M15b could be misinterpreted as changing, or extending, the existing Supplier migration obligation beyond 7 May

2027. This is not the intent. Clear communication will therefore be required to reinforce that 7 May 2027 remains the Supplier compliance deadline, and that the change is intended solely to provide clarity over the distinction between Supplier compliance and Full Transition Complete.

These risks will be managed through the timely progression of consequential documentation changes, clear governance and stakeholder communications, and alignment of the revised arrangements following PSG approval of CR067. Following approval of CR067, the programme will promptly look to raise a Change Request to align the Migration Framework.

Stakeholders consulted on the potential change:

(Please document the stakeholders, or stakeholder groups that have been consulted to date on this change. The Change Raiser should consult with relevant programme parties in the drafting of the request, prior to submission to PMO).

The MHHS SRO Team has consulted the Migration Working Group (MWG), the Independent Panel Advisor (IPA) and Ofgem throughout the drafting of this Change Request, and their feedback has informed the proposed approach set out above.

Target date by which a decision is required from PSG:

4th November 2026

(Ofgem approval to follow thereafter)

Part B – Initial Impact of proposed change

Guidance – *This section should be completed by the Change Raiser before being submitted to the MHHS PMO.*

Please document the benefits of the change and to delivery of the programme objectives

Programme Objective	Benefit to delivery of the programme objective
To deliver the Design Working Group's Target Operating Model (TOM) covering the 'Meter to Bank' process for all Supplier Volume Allocation Settlement meters	The proposed change does not alter the Target Operating Model or the underlying 'Meter to Bank' processes.
To deliver services to support the revised Settlement Timetable in line with the Design Working Group's recommendation	The proposed change does not alter the revised Settlement Timetable or the services required to support it.
To implement all related Code changes identified under Ofgem's Significant Code Review (SCR)	The change provides greater clarity over the governance and application of the arrangements introduced through P487 and CR065, helping ensure the Programme's milestone arrangements remain aligned with the relevant Code requirements and associated enforcement provisions.
To implement MHHS in accordance with the MHHS Implementation Timetable	The change provides a clear and unambiguous structure for managing the end of the Baseline Migration Period and Full Transition Complete. It enables the Programme to assess Supplier compliance against the 7 May 2027 baseline date while separately

	tracking achievement of industry-wide Full Transition Complete, including the potential SRO exemption and Customer Acquisition Ban scenarios.
To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem's Full Business Case	The change strengthens the Programme's ability to govern, monitor and demonstrate successful transition to MHHS. By clearly distinguishing Supplier compliance from Full Transition Complete, it provides a robust basis for managing the transition to the target MHHS operating arrangements and confirming when the industry-wide outcome has been achieved.
To prove and provide a model for future such industry-led change programmes	The change demonstrates the importance of clearly distinguishing programme compliance milestones from outcome-based completion milestones, particularly where programme outcomes may be affected by participant-level exceptions or enforcement arrangements.

Guidance – *Please document the known programme parties and programme deliverables that may be impacted by the proposed change*

Impacted areas	Impacted items
Impacted Parties	All MHHS Participants
Impacted Deliverables	- MHHS Programme Plan Consequential changes to; - M15 Acceptance Criteria document (MHHS-DEL1792), to be discussed and agreed via existing MHHS working groups and governance processes and approved post approval of this CR - MHHS Migration Framework, progressed via subsequent CR
Impacted Milestones	Milestone M15

Note – *Please refer to MHHS DEL174 Change Request Guidance for Programme Participants for information on how to score the initial assessment.*

Guidance – *Please include a reference and link to any additional documentation which the change relates to.*

Change Request to be read in conjunction with:	
Title	Reference
M15 Acceptance Criteria document <i>Note - This is an initial, proposed set of M15 Acceptance Criteria is included with this Change Request (CR) for additional context and to indicate the direction of travel. However, these criteria are not intended to form part of this CR directly. They will require further discussion and review with Industry through the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG), and will be approved by MCAG once MWG has recommended approval.</i>	MHHS-DEL1792

Part C.1 – Summary of Impact Assessment

Note – This section will be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.

All Impact Assessment responses will be considered public and non-confidential unless otherwise marked. If there are any specific elements of the response (e.g. costs) that are confidential, please mark the specific sections as confidential rather than the response as a whole. The MHHS Programme will publish all Impact Assessment responses and redact any confidential information as noted.

Guidance – Programme Participants are required to:

- A. Respond with ‘Agree’, ‘Disagree’ or ‘Abstain’, deleting as appropriate. If the respondent agrees, they can provide additional evidence to further support the assessment. If the respondent disagrees or abstains, they should provide a detailed rationale as to why.
- B. Add any additional effects that have not already been identified. In doing so, they should provide as much detail as possible to allow a robust assessment to be made.
- C. Indicate whether the change would have a minor, medium or significant impact on their activities, referring to slide 16 of *MHHS-DEL171 Change Control Approach* to assess each criterion, using N/A to indicate no impact.
- D. Proceed to Part C.2 for Impact Assessment Recommendation response once completed.

Part C.1 – Summary of Impact Assessment (complete as appropriate)		
<u>Effect on benefits</u> This change introduces clarity and ensures that M15 is administered clearly, thereby supporting the programme to deliver M15 and the benefits associated with the programme.		
<i><Delete as appropriate>: Agree / Disagree / Abstain</i>		
1. Minor impact	2. Medium impact	3. Significant impact
<u>Effect on consumers</u> This change has no effect on consumers.		
<i><Delete as appropriate>: Agree / Disagree / Abstain</i>		
1. Minor impact	2. Medium impact	3. Significant impact
<u>Effect on schedule</u> Currently, there is an existing risk that Full Transition Complete may not occur on the 7 th May if a Supplier is unable to migrate their full portfolio by M15. By splitting the M15 milestone into M15a and M15b, this		

ensures that there is a clear and unambiguous milestone to act as the deadline date for MHHS Migration Plan and 18-month Migration Window. Thereby strengthening the validity of the Programme Plan by enabling the MHHS Migration Plan and 18-month Migration Window to complete on the 7th May whether Full Transition Complete has been achieved or not. This thereby strengthens the MHHS schedule and accounts for any unhappy path scenarios.

<Delete as appropriate>: Agree / Disagree / Abstain

1. Minor impact	2. Medium impact	3. Significant impact

Effect on costs

There are no direct costs to other MHHS participants.

<Delete as appropriate>: Agree / Disagree / Abstain

1. Minor impact	2. Medium impact	3. Significant impact

Effect on resources

There are no anticipated direct impacts on resources beyond reviewing the CR.

<Delete as appropriate>: Agree / Disagree / Abstain

1. Minor impact	2. Medium impact	3. Significant impact

Effect on contract

There are no anticipated direct impacts on contracts.

<Delete as appropriate>: Agree / Disagree / Abstain

1. Minor impact	2. Medium impact	3. Significant impact

Part C.2 – Impact Assessment Recommendation (mandatory)								
<u>Recommendation</u> <i>Change Raiser to provide initial recommendation.</i> The MHHS SRO recommend that the Change is approved <Delete as appropriate>: Agree / Disagree / Abstain								
<table border="1"> <thead> <tr> <th>1. Minor impact</th> <th>2. Medium impact</th> <th>3. Significant impact</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>			1. Minor impact	2. Medium impact	3. Significant impact			
1. Minor impact	2. Medium impact	3. Significant impact						
<u>D</u> <Delete as appropriate>: Agree								

Part D – Change approval and decision

Guidance: *The approvals section will be completed by the MHHS PMO once the Impact Assessment has been reviewed.*

Part D - Approvals
Decision authority level <Based on the impact assessment, state who is required to make a decision concerning this change>

Guidance - *This section will be completed by the MHHS PMO and Change Owner following the review of the impact assessment and decision reached by the SRO.*

Part D – Change decision			
Decision:		Date	
Approvers:			
Change Owner:			
Action:			
Changed Items	Pre-change version	Revised version	

Part E – Implementation completion

Guidance - *This section will be completed by the MHHS PMO at the end of the post-implementation process.*

Part E – Implementation completion			
Comment		Date	

Guidance – *The Closure Checklist in MHHS DEL175 Change Log must also be completed by MHHS PMO at this stage.*

Checklist Completed	Completed by
Yes/No	

Guidance – *This section will be completed by the MHHS PMO at the end of the post-implementation process and should be used to add any appropriate references of the change once it has been completed.*

References		
Ref	Document number	Description