
Change Request Form

Change Request details

Change Request details			
Change Request Title	<i>M5 and M3 milestone date changes</i>		
Change Request Number	<i>CR009</i>		
Originating Advisory / Working Group			
Risk/issue reference			
Change Raiser	<i>Keith Clark</i>	Date raised:	<i>07/07/2022</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 statements:

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

1. Milestone M5:

“M5 – Physical baseline delivered: In order for the other parties to commence the DBT phase a complete Physical Baseline, aligning both technical and regulatory designs, will be delivered.”

Delivery of the baseline MHHS Design is taking longer than originally planned, as some initial planning assumptions have proven to be inaccurate – as evidenced through Tranche 1 and Tranche 2 activities:

- There has been a significant increase in industry engagement during the early tranche activities. This has been invaluable and has enriched the Design – but the processing of the volume of comments, treatment of feedback around the Design process and the consequent implementation of additional controls has taken up significant effort from the Design team, resulting in reduced capacity for the production of ongoing and future tranche documents to the quality we want.
- Additional (unexpected) complexity has been encountered during the Design work so far. This has led to additional design activity that was not originally planned for.
- Aiming for consensus among the Participants has proven to be more complex and time consuming than expected. This has resulted in more sub-Working Groups than planned and has impacted artefact development.
- Participants challenged the Design baselining approach (conditional approval). A staggered approach may have helped flush out concerns early on and allowed subsequent artefacts to proceed on a foundation of relative stability, but there is a need to communicate more effectively the route to final baselining and how the incremental approvals work.

2. Milestone M3:

“M3 – DB Start: The DB (Design and Build) phase will commence in August 2021 with Elexon's Central System, followed by DCC in Feb 2022 and other parties in May 2022.”

The mobilisation of some Participants to reach readiness to start their own Design, Build and Test (DBT) activities (M3 milestone) has been slower than the Ofgem timetable originally set out. For Participants other than Elexon Central Systems (Helix) and DCC, this date was set as May 2022 and has been passed – and must be reset to a date in the future which is realistic and agreed by the Programme Steering Group (PSG).

The reasons for the slower pace of some Participants in reaching readiness for DBT have been variously stated by those Participants as including:

- Attention and focus on the lead-in towards and past the go-live of the Faster Switching Programme.
- Disruption in the energy market – including the need to support consumers and manage SoLRs.
- Contention between MHHS and other energy change programmes and Ofgem initiatives.
- Uncertainty in relation to the MHHS programme's plan to reach the Design baseline (M5).

3. Programme Plan:

The context to these issues is that there is an underlying issue that the MHHS programme does not yet have an end-to-end delivery plan that validates the original Ofgem timetable and provides an adequate reference point for the consistent management of delivery, risk, change and stakeholder expectations. Reaching that point will be important for setting the right context for making decisions about passing M5 and M3 milestones.

Description of change:

(what is the change you are proposing)

1. M5 change:

Revised plan to deliver the MHHS Design and baseline it at Milestone M5 – with a changed date for M5 of 31 October 2022, by which time the Design Advisory Group (DAG) will have been asked to approve that milestone.

This revised plan took into consideration all the issues mentioned above and includes contingency (including allowance for the summer holiday period) and was communicated to the Design Advisory Group (DAG) and the Programme Steering Group (PSG) on 8 June 2022. This intends that the Tranche 4 Artefacts, along with any updated Artefacts from earlier tranches, will all have been issued for review during July 2022 (target) or at least within August 2022.

At the time of writing, Tranche 4 artefacts are being delivered to schedule and are available for early review if participants choose to do so, in advance of the commencement of the review period in September.

The period for industry feedback will start in September 2022, with the baseline design being approved at DAG in October (Milestone M5). The PSG will be informed of the M5 decision on 02 November 2022.

2. M3 change:

Whilst many Programme Participants may have already begun DBT activities (or will have started them soon), all Programme Participants - other than Elexon's Central System (Helix) and DCC - should demonstrate readiness for starting their DBT activities by or before 31 October 2022 (Milestone M3).

Below, we set out a minimum set of conditions that must be met by all Programme Participants in order for M3 to be reached and approved, forming part of the entry criteria for the DBT phase of the programme:

- A high-level project plan is in place, which provides sufficient detail (including resource plans) for the next stage of the Participant's delivery activities and outlines (possibly at a higher level) subsequent delivery stages to the end of the project.
This project plan should be aligned to the programme's revised and proposed programme plan (see item 3 below).
- An outline Business Case or other funding instrument is in place, approved by an appropriate investment committee – which provides for the necessary funding of the next stage(s) of the Participant's delivery plan according to the Participants own delivery methodology
- Relevant Points of Contact have been shared with the Programme. Per the request made by the programme's PPC function these would ideally be: Board-level MHHS Programme Sponsor; Programme Director/Delivery Lead; Design Lead; Test Lead; PMO Lead; Regulatory Lead – although each Participant is expected at M3 to share the appropriate contacts that they have in place, to support their delivery plan at that point
- A sufficient understanding of the Target Operating Model, MHHS Design and proposed programme plan to adequately inform the above
- If not already started, readiness to start activities required to reach detailed design at the earliest point after M3 (per the high-level project plan). These may include a High-Level Impact Assessment of the MHHS Design and the identification of required IT Service Providers (where relevant?)

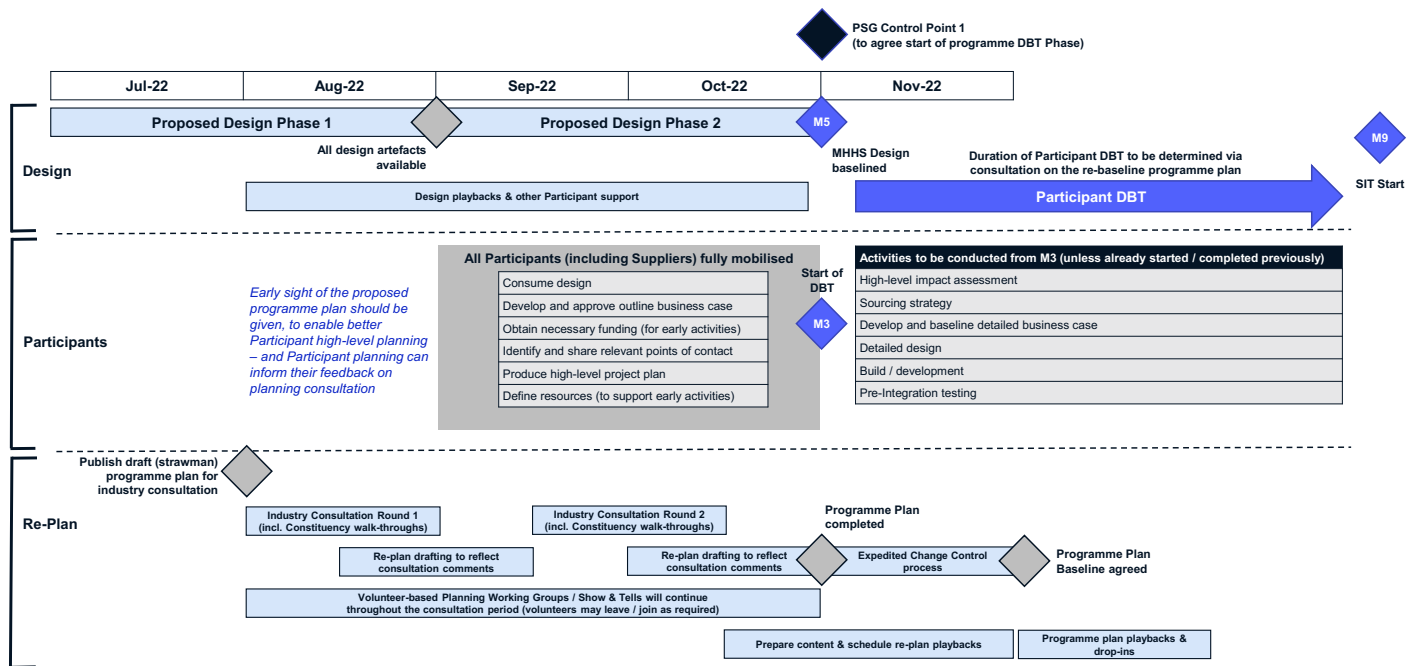
The PSG on 02 November 2022 will consider whether Milestone M3 has been reached by all Participants based on an initial report from Readiness Assessment 2 and Participant evidence provided via that assessment exercise.

3. Programme Plan:

There is no change proposed to the timeline for the programme to propose, and start a consultation on, a programme plan. This plan will validate (or propose to change) the existing Ofgem timetable, with all the underpinning detail (and / or clear assumptions) required to manage the programme's delivery.

This means that a proposed programme plan will be communicated to all Participants on 1 August 2022, followed by 2 cycles of consultation per the previously published Interim Plan. A plan will therefore have been consulted on and prepared for the final programme approval processes by 31 October 2022 (although noting that formal approval will not be in place by that date).

The above changes (if this Change Request is approved) mean that at the PSG on 2 November 2022, the programme should be in a position to conduct a Control Point 1 review and make a conscious decision on whether the programme should (or should not) proceed into its next phase – DBT.



Justification for change:

(please attach any evidence to support your justification)

CR007 was rescinded by unanimous decision at the Programme Steering Group on 6 July 2022.

1. M5 change:

The quality of the design is central to the success of the Programme. Whilst most if not all of the remaining Design Artefacts will be released in July, after careful assessment it was decided to include a 1-month contingency to manage identified risks. This period also allows for additional activities to enable Participants to meaningfully engage with the review process and to ensure that all parties involved can meet the milestone.

The contingency period of August is in place to manage the following main risks:

- Potential additional time required to achieve industry consensus around the design during the Sub-Working Group activities
- Potential resource constraints within the MHHS Design team
- Resource constraints for Participants to review material during the August holiday period

The design process is also being enhanced:

- Design Artefacts to be available as soon as they are ready
- Targeted signposting for Participants
- Improved usability of the MHHS Portal to improve Participant experience
- Enhanced change control and tracking
- Design playback sessions and Participant support

We are confident that these changes will enable the Programme to reach consensus across the industry and that the revised timeline provides the opportunity for meaningful review and engagement, ensuring quality in the MHHS Design.

It is important to note that the Transition Design will not be delivered by Milestone M5 because (1) it is better to de-link Transition Design to enable the consumption of the 'To Be' design before commencing the design of how to migrate from 'As Is', and (2) to allow time for completion of discussions relating to the migration approach. The expectation is to deliver the Transition Design by the end of the year and a plan will be produced for this in due

course. The Independent Programme Assurance (IPA) provider has reviewed and endorsed this revised Design approach and plan, and the approach and Plan on a Page has also been discussed with Ofgem and DAG.

2. M3 change:

The mobilisation of some Participants to reach readiness to start their own Design, Build and Test (DBT) activities (M3 milestone) has been slower than the Ofgem timetable originally set out. For Participants other than Elexon Central Systems (Helix) and DCC, this date was set as May 2022 and has been passed – and must be reset to a date in the future which is realistic and agreed by the Programme Steering Group (PSG). This date is being proposed as 31-Oct-22 because (1) it should not be before M5, and (2) there is no reason – or available evidence – to suggest Participants cannot reach M3 at the same time as M5 based on the requirements set out earlier in this document. On this second point, the programme is merely proposing that Participants have put in place relevant, funded personnel who understand and can contribute to decisions on the MHHS Design and the proposed programme plan, and that those personnel have agreed a high-level project plan within their organisation – even Participants who have been hindered by involvement in the Faster Switching Programme will have had at least 2 months to achieve this (a fact previously confirmed by Suppliers' own information).

3. Programme Plan:

There is no change to the existing timetable to issue and consult on, a programme plan that seeks to validate (or propose to change) the existing Ofgem timetable, with all the underpinning detail (and / or clear assumptions) required to manage the programme's delivery.

The existing timetable has been retained because some Participants have made it clear that, without an understanding of the proposed programme plan, they would find it difficult to complete and validate their own high-level project planning to reach Milestone M3.

Additionally, the programme team believes that Participants will be in a much better position to be consulted on that programme plan (and to provide feedback on it) whilst planning their own delivery activities – i.e. programme planning and Participant planning as are best conducted alongside each other, iteratively and interactively.

Consequences of no change:

(what is the consequence of no change)

1. M5 change:

If Milestone M5 were to be reached as currently planned, there would be negative impact on the quality of the MHHS Design and / or Participant buy-in to the Design.

2. M3 change:

Milestone M3 is already passed and not met by some Participants. Leaving M3 as May 2022 and not moving it, means that Participants have no clarity on what specifically is expected of them, and by when. This also means significant risk that the programme will not be ready to move into its next key phase – DBT.

3. Programme Plan:

The proposed new programme could still be published for consultation and delivered as planned – but it would be likely to contain more and wider assumptions, and any design-related components of the plan may be difficult to agree.

Alternative options:

(What alternative options or mitigations that have been considered)

1. M5 change:

A Design delivery plan was developed to achieve M5 by 30 Sept 2022. However, the risks regarding potential additional time required to achieve industry consensus and potential resource constraints within the MHHS Design team and resource constraints for Participants to review material during the August holiday period were deemed too significant and this alternative was not pursued.

2. M3 change:

CR007 was previously issued and rescinded unanimously by PSG in July, mainly due to the fact that M5 is now proposed to be moved.

The original IPA recommendation was that the M3 date should be 2 months after M5 for the purpose of ensuring Participants had time in August and September to consume the design when resource constraints due to Faster Switching were expected to reduce. It is considered that the proposed change now enables the consumption of the design from August to October prior to the M5 milestone. An alternative option of maintaining that 2-month period (or even increasing it to 3 months per some Participants' requests) was also considered. Requiring Participants to reach M3 on 31 December 2022 or 31 January 2023 was considered to have the following effects:

- would negatively impact Participants' ability to input to the programme plan consultation, which might mean deferring (until 2023) the timeline for reaching that planning baseline
- would negatively impact the overall programme timeline, Central Parties' timescales and costs – and likely delay the MHHS go-live

Overall, the benefits of such likely delays were considered to be unclear and without strong Participant evidence to substantiate them. Therefore, it was considered that there was no justification in delaying M3 beyond M5.

3. Programme Plan:

The plan to baseline this is unchanged, and per item 2 above a delay to that timetable was considered but the benefits of such a delay were not identifiable. In fact, the programme's view is that going into 2023 without a baseline for programme delivery (validating or changing the Ofgem timetable) would significantly increase delivery risk.

Risks associated with potential change:

(what risks related to implementation of the proposed change have been identified)

Since this Change Request proposes to move M5 and M3, it seeks to mitigate the delivery risks as outlined above.

The main identified new risk is that Participants are being asked to consume and understand the MHHS Design, and to consume and be consulted on the proposed programme plan, in parallel. This may mean resource constraints – which is why this Change Request will provide the clarity to allow Participants to plan for this approach. Additionally the programme is proposing a comprehensive set of playbacks and drop-in sessions to support Participants through this process.

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).

Ofgem
PSG
DAG
IPA
Industry Participants (via PPC bilaterals, Working Groups, Webinars)

Target date by which a decision is required:

10 August 2022 (next PSG)

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

What benefits does the change bring
<i>(list the benefits of the change and how this improves the business case)</i>
<ol style="list-style-type: none"> 1. Improves the quality of the MMHS Design and reduces the risk of later change 2. Improves Participants' engagement with (and buy-in to) the MHHS Design 3. Allows more time for less-mobilised / less-engaged Participants to accumulate necessary information for their own planning and readiness for their own DBT activities 4. Minimises likely impact on overall programme timeline, which allows for earliest consumer benefits

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	Improves the quality of the MMHS Design and reduces the risk of later change Improves Participants' engagement with (and buy-in to) the MHHS Design
To deliver services to support the revised Settlement Timetable in line with the Design Working Group's recommendation	
To implement all related Code changes identified under Ofgem's Significant Code Review (SCR)	Minimises likely impact on overall programme timeline, which allows for earliest consumer benefits
To implement MHHS in accordance with the MHHS Implementation Timetable	
To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem's Full Business Case	
To prove and provide a model for future such industry-led change programmes	Allows more time for less-mobilised / less-engaged Participants to accumulate necessary information for their own planning and readiness for their own DBT activities

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 Participants
Impacted Deliverables	MHHS Design and associated Participant engagement and communications Readiness Assessment 2 Control Point 1 review
Impacted Milestones	M5 and M3

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

Initial assessment			
Necessity of change	1 - Critical Change	Expected lead time	1 - <5 working days
Rationale of change	Programme	Expected implementation window	1 - Imminent
Expected change impact	Very Low		

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. Proceed to Part C.2 for Impact Assessment Recommendation response once completed.

Part C.1 – Summary of Impact Assessment (complete as appropriate)
<p><u>Effect on benefits</u></p> <p><i>Change Raiser to provide initial impact assessment.</i></p> <p>Benefits likely to be delivered to a higher standard as Programme Participants and the Programme are better prepared for Design and Build. Setting clear criteria for Participant readiness for DBT gives the Programme an increased chance of timely delivery, reducing the risk of later delivery of consumer benefits.</p>
<p><Delete as appropriate>: Agree Disagree Abstain</p>
<p><i>Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.</i></p> <p><i>Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on when a benefit will be realised; who will realise the benefit; the extent to which the benefit will be realised.</i></p> <p><i>Where possible, contextual information should be included e.g. the benefit will be delayed by X weeks; the change means Y population will also realise the benefit.</i></p>
<p><u>Effect on consumers</u></p> <p><i>Change Raiser to provide initial impact assessment.</i></p>

Benefits likely to be delivered to a higher standard as Programme Participants and the Programme are better prepared for Design and Build. Setting clear criteria for Participant readiness for DBT gives the Programme an increased chance of timely delivery, reducing the risk of later delivery of consumer benefits.

<Delete as appropriate>: **Agree Disagree Abstain**

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on service delivery to consumers; will there be a cost impact to consumers; will there be a choice impact to consumers?

Where possible, contextual information should be included e.g. what is the scale of the effect? Will the effect be permanent?

Effect on schedule

Change Raiser to provide initial impact assessment.

This Change Request proposes a move to milestones M5 and M3.

In relation to the proposed M5 change, the effect on the overall schedule is not yet clear but will be validated through the upcoming programme planning activity. However, by reaching the baseline design in the way proposed, it is expected that the risk of future (post-M5) material design changes will be lower than might have been experienced via the previous design delivery plan – which may serve to somewhat offset any direct (negative) schedule impacts.

In relation to the proposed M3 change, for Participants who are already mobilised / mobilising and engaged / engaging these changes should not materially affect their delivery approach and schedule – except directly in relation to the M5 change. For other Participants, the proposed M3 change should more realistically reflect what is reasonable to expect at that point in time, in order to be ready to start their DBT and may therefore enable those Participants' DBT readiness activities.

<Delete as appropriate>: **Agree Disagree Abstain**

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the schedule/milestones be directly impacted; will the schedule/milestones be indirectly impacted.

Where possible, contextual information should be included e.g. the change will delay the project by X days; the change will require additional resource to complete (though detail resource in resource section); the delay can/cannot be recovered by condensing Y activity.

Effect on costs

Change Raiser to provide initial impact assessment.

Whilst the deferral of M5 does extend the related activity duration and may affect costs for already-mobilised teams, it will be difficult for most Participants to fully articulate cost impact until the change is seen in the wider context of the overall programme plan through to go-live and beyond. For un-mobilised teams, there should be no incremental costs.

In relation to M3, we do not expect this change to directly impact costs for Programme Participants as they should already be preparing for DBT with associated costs factored in.

Impact assessors should identify any of their own costs.

<Delete as appropriate>: **Agree Disagree Abstain**

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the change cause a loss of income; will the change cause additional cost; will the change cause a reprofiling of cost?

Where possible, contextual information should be included e.g. whether it is capital or operating expenditure that will be affected; what period costs will be affected in; what the rough order of magnitude of the cost impact will be and if organisation will be able to absorb it?

Effect on resources

Change Raiser to provide initial impact assessment.

Whilst the deferral of M5 does extend the related activity duration and may affect resources for already-mobilised teams, it will be difficult for most Participants to fully articulate resource impact until the change is seen in the wider context of the overall programme plan through to go-live and beyond. For un-mobilised teams, there should be no resource impacts beyond those which should already have been anticipated.

In relation to M3, we do not expect this change to directly impact costs for Programme Participants as they should already be preparing for DBT with associated costs factored in.

However, we do note that Participants will be asked to engage with both the design and programme plan consultation at the same time, and this change request is needed in order to allow time for that engagement to be planned and resourced.

Impact assessors should identify any of their own resource impacts.

<Delete as appropriate>: Agree Disagree Abstain

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. will there be an impact on tools or equipment; will there be an impact on staff capacity; will there be an impact on staff skills or capability?

Where possible, contextual information should be included e.g. the change will require X additional staff for Y period of time; the change requires Z training or support.

Effect on contracts

Change Raiser to provide initial impact assessment.

We do not expect this to impact contracts for Programme Participants as they should already be preparing for DBT with associated contract requirements factored in.

Impact assessors should identify any of their own contract impacts.

<Delete as appropriate>: Agree Disagree Abstain

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on contracts with sub-contractors; whether there will be an impact on contracts with vendors; whether there will be an impact on contracts with regulators/ESO.

Where possible, contextual information should be included e.g. the changes will require new contracts to be created; the changes will variations to existing contracts; the changes will affect ability to meet contract requirements.

Risks

Change Raiser to provide initial risk assessment.

Please see section in Part A above titled 'Risks associated with the potential change'

<Delete as appropriate>: Agree Disagree Abstain

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. will existing risks be affected; will new risks be created?

Where possible, contextual information should be included e.g. the change will affect the likelihood of a risk occurring, the change will affect the impact the risk would have, the change will require additional controls and mitigation.

Part C.2 – Impact Assessment Recommendation

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

Guidance – The primary reporting metric of the Impact Assessment is the recommendation response. The consolidated response will be presented to the relevant governance group(s) and decision maker(s) with the totals for ‘Agree’, ‘Disagree’ or ‘Abstain’. As such, please ensure this section is completed before the form is returned to MHHS PMO. Provide detailed rationale and evidence in the commentary field.

Part C.2 – Impact Assessment Recommendation (mandatory)
Recommendation <i>Change Raiser to provide initial recommendation.</i> It is recommended by the Change Raiser the change is approved.
<Delete as appropriate>: Agree Disagree Abstain
<i>Impact Assessment respondents to add supporting commentary to support their selection.</i>

Impact assessment done by: <Name>

Guidance: *If you are a third party responding on behalf of another Programme Participant, please state this in your response.*

Impact assessment completed on behalf of: <Name>

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