



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

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# MHHS Change Control Webinar #15

## CR067 – 28 September 2026

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Version 1.0

MHHS-DEL4649

Document Classification: Public

# Agenda

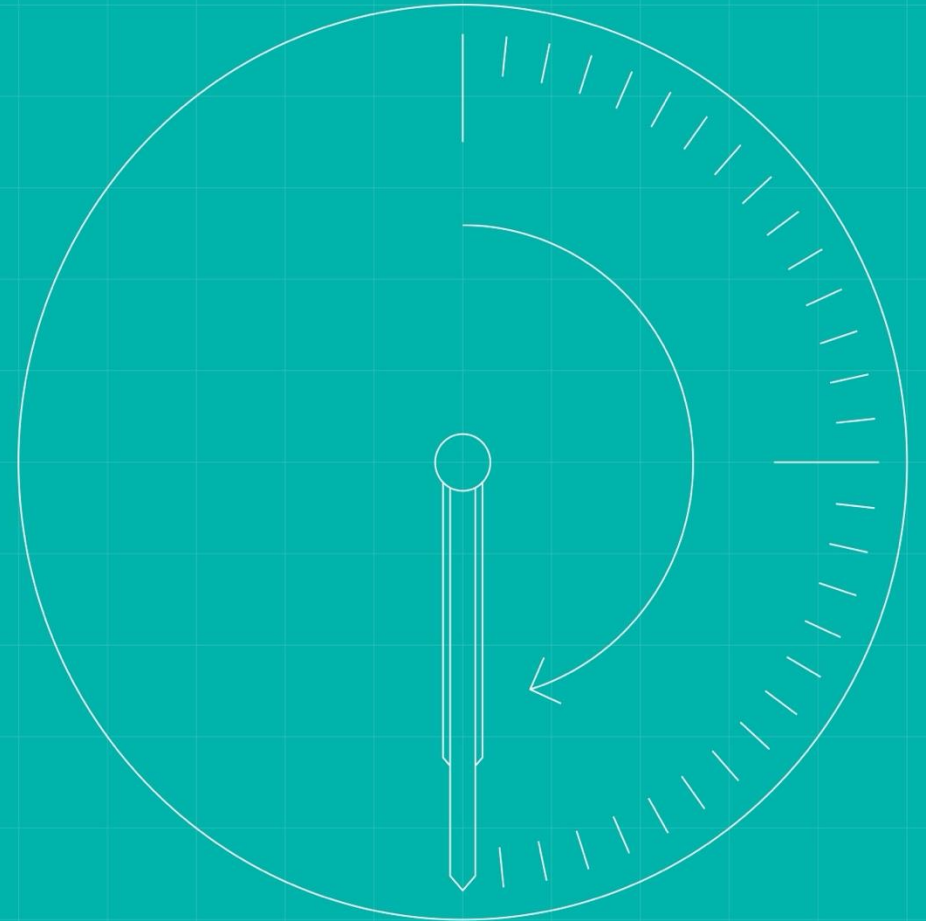
| # | Item                  | Objective                                      | Type        | Lead                        | Time                     | Page |
|---|-----------------------|------------------------------------------------|-------------|-----------------------------|--------------------------|------|
| 1 | Welcome               |                                                |             | MHHS PMO                    | 14:00 – 14:05<br>5 mins  | 1    |
| 2 | Presentation of CR067 | Splitting the M15 Milestone into M15a and M15b | Information | Joe Grisley<br>Stuart Scott | 14:05 – 14:35<br>30 mins | 3    |
| 3 | CR067 Q&A             | Questions from industry                        | Discussion  | All                         | 14:35 – 14:55<br>20 mins | 8    |
| 4 | AOB                   |                                                |             | All                         | 14:55 – 15:00<br>5 mins  | 10   |



*Please submit any questions you have via the Slido app, using the QR code above*

# Introduction to CR067

*Joe Grisley, Stuart Scott, MHHS Programme*  
*20 mins*



## CR067 Overview

## Splitting the M15 milestone into M15a and M15b

**Issue Statement:**

- 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:**

- Split the current M15 milestone into two separate Tier 1 milestones, removing ambiguity between Supplier compliance and industry-wide transition completion.
- Introduces M15a as the Programme and Supplier Compliance Deadline, marking completion of the 18-month migration period and triggering compliance measures where applicable.
- Introduces M15b as Full Transition Complete, representing the point at which all Suppliers have migrated and 100% of energy is settled under MHHS arrangements.
- Retains the existing M15 baseline date of 7 May 2027 while providing a clear governance framework for both the "happy path" and the identified exemption and Customer Acquisition Ban scenarios.

**Target Date of Change and Next Steps:**

- **Change Board validated CR067 on 23 September 2026** which now progresses through the agreed governance route
- **Industry webinar to be held on Monday 28 September**, and **10-working-day Impact Assessment to commence Monday 28 September – Friday 9<sup>th</sup> October**
- Change Board recommendation on 16 October, PSG consideration on 4 November and subsequent Ofgem approval.
- Following approval, update the MHHS Programme Plan and progress consequential changes to the M15 Acceptance Criteria and Migration Framework through the appropriate governance processes.



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## Change Request Form

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### Change Request details

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

*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                            |

**MHHS-DEL4648 CR067**



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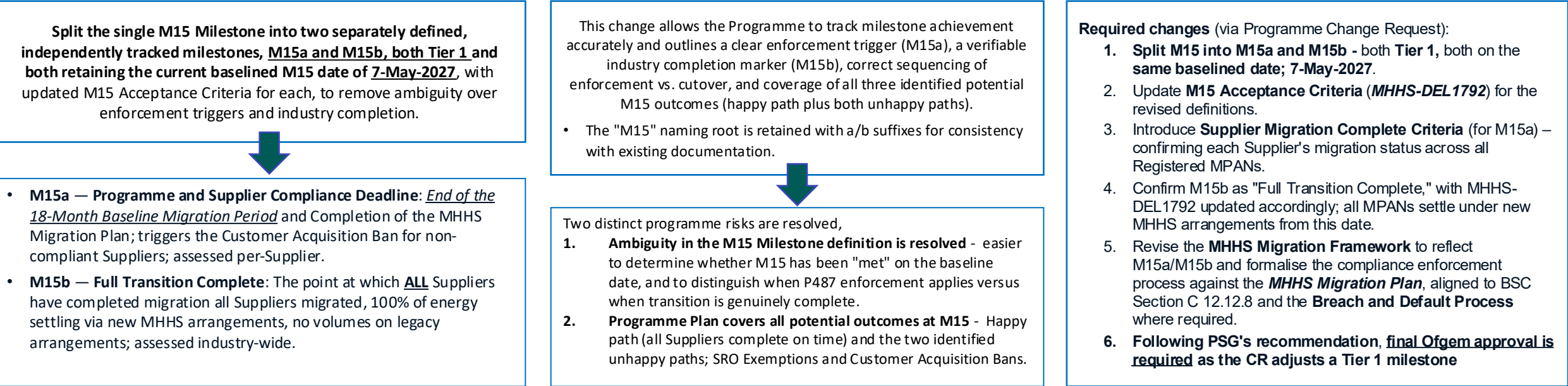
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# CR067 – Splitting the M15 Milestone into M15a and M15b

CR067 – Splitting the M15 Milestone into M15a and M15b – Overview

|              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Situation    | <ul style="list-style-type: none"><li>The M15 Milestone is defined as '<b>Full Transition Complete</b>' and its description represents completion of implementation activities and the conclusion of the 18-month migration period.</li><li>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</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Complication | <ul style="list-style-type: none"><li>The M15 Milestone conflates two distinct outcomes: <b>the end of the 18-month Baseline Migration Period</b>, which triggers a Customer Acquisition Ban for any non-compliant Supplier, and <b>Full Transition Complete</b>, when <b>ALL</b> Suppliers have successfully migrated and 100% of energy is settled under the new MHHS arrangements.</li><li>The current M15 definition and baselined date of M15 on 7-May-2027 assumes both outcomes occur on the same date</li><li>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.</li><li>As such, while '<b>Full Transition Complete</b>': <b>all Suppliers migrated by M15 remains the intended and planned for outcome</b>, it can no longer be assumed as certain</li><li>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.</li></ul> |
| Question     | <ul style="list-style-type: none"><li>How will the Programme manage the risk that the two distinct outcomes at M15 may occur on different dates ?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

This 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.



# Consequential Change - M15 Acceptance Criteria

## Background

- The current **M15 Acceptance Criteria** document (MHHS-DEL1792) is v2.0, dated 25 February 2025.
- CR067 requires consequential changes to this document.

## Headline Changes

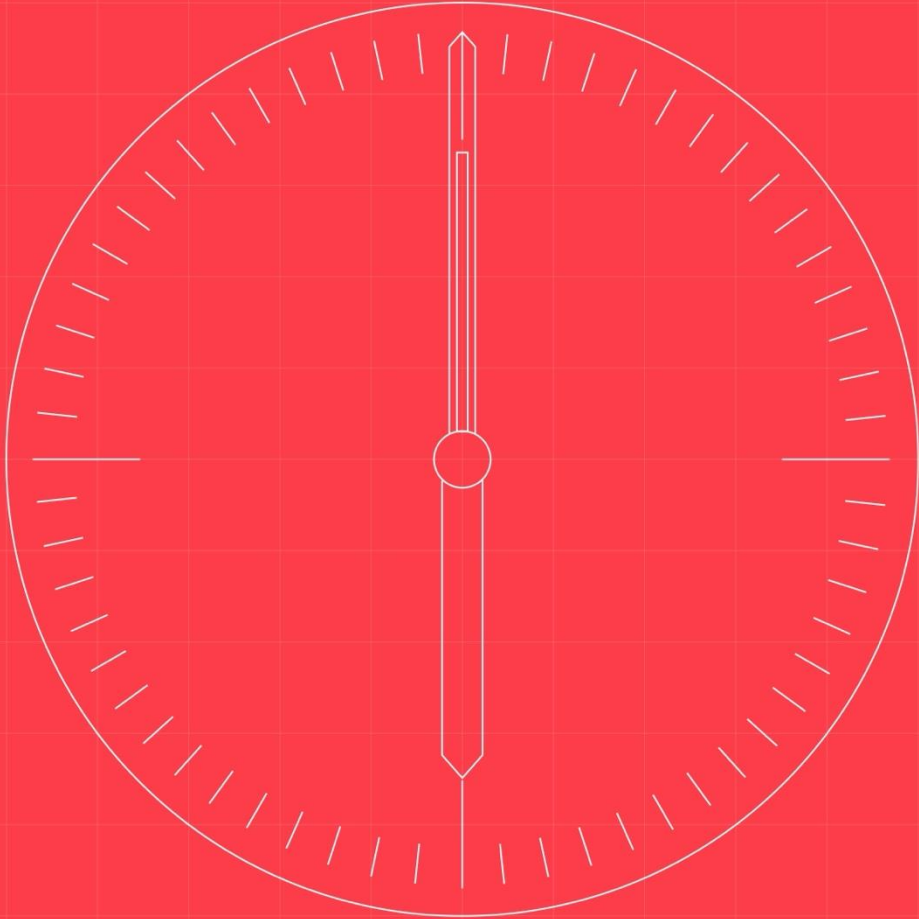
- **Separate criteria:** M15a and M15b will each have their own acceptance criteria within the document.
- **M15a:** Two new sets of criteria are proposed:
  - M15a Acceptance Criteria: the conditions the Programme must see satisfied before it considers Milestone M15a achieved.
  - Supplier Migration Complete Criteria: the conditions that determine each Supplier's migration status, including whether all of their Registered MPANs have migrated successfully.
- **M15b:** This milestone keeps the original M15 intent of "Full Transition Complete", and the document will be updated to reflect this. After M15b,
  - All MPANs exist in one of the 'acceptable' MPAN states
  - No MPANs exist in any of the 'unacceptable' MPAN states
  - No data is being sent through legacy settlement for any settlement dates on or after M15b

## Next Steps - Approval Approach

- A proposed set of updated criteria accompanies CR067 to show the likely scope and direction of the changes.
- It is indicative only and does not form part of the CR.
- The updated document will be developed with Industry through the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG), alongside the CR.
- Formal approval will follow only after CR067 is approved. MWG will first recommend approval, and MCAG will then approve the formal uplift to this document.

# Q&A

All

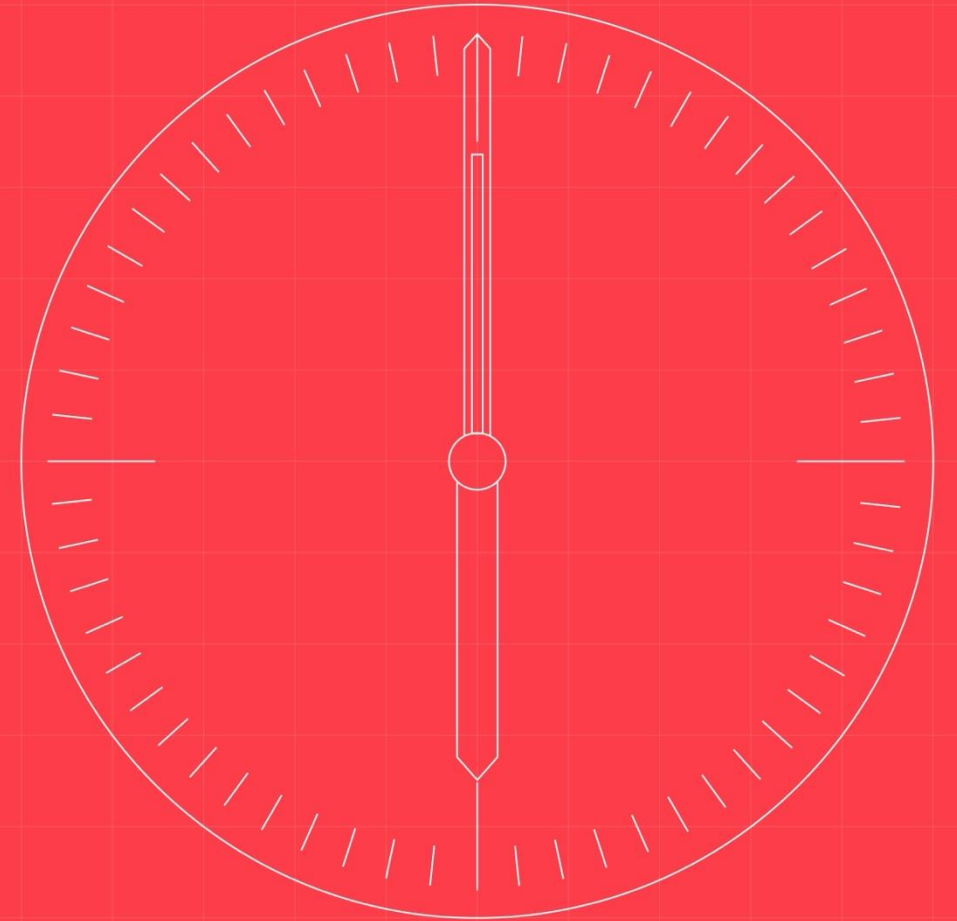




- *Please submit any questions you have via the Slido app, using the QR code above*
- *A polite reminder that questions should only be asked in **direct relation to the change request***
- *Should you have wider questions about the Programme or the Change Control process, please direct these to the PMO mailbox or your constituency representative*

# AOB

*All*



- *Is there any other business?*
- *Are there any questions?*

*If you require a particular question answered following this webinar, please submit via the Slido by close of play this afternoon (Monday 28<sup>th</sup> September) and the Programme will respond.*

*For all other queries please contact the PMO at [PMO@mhhsprogramme.co.uk](mailto:PMO@mhhsprogramme.co.uk)*

# Thank you