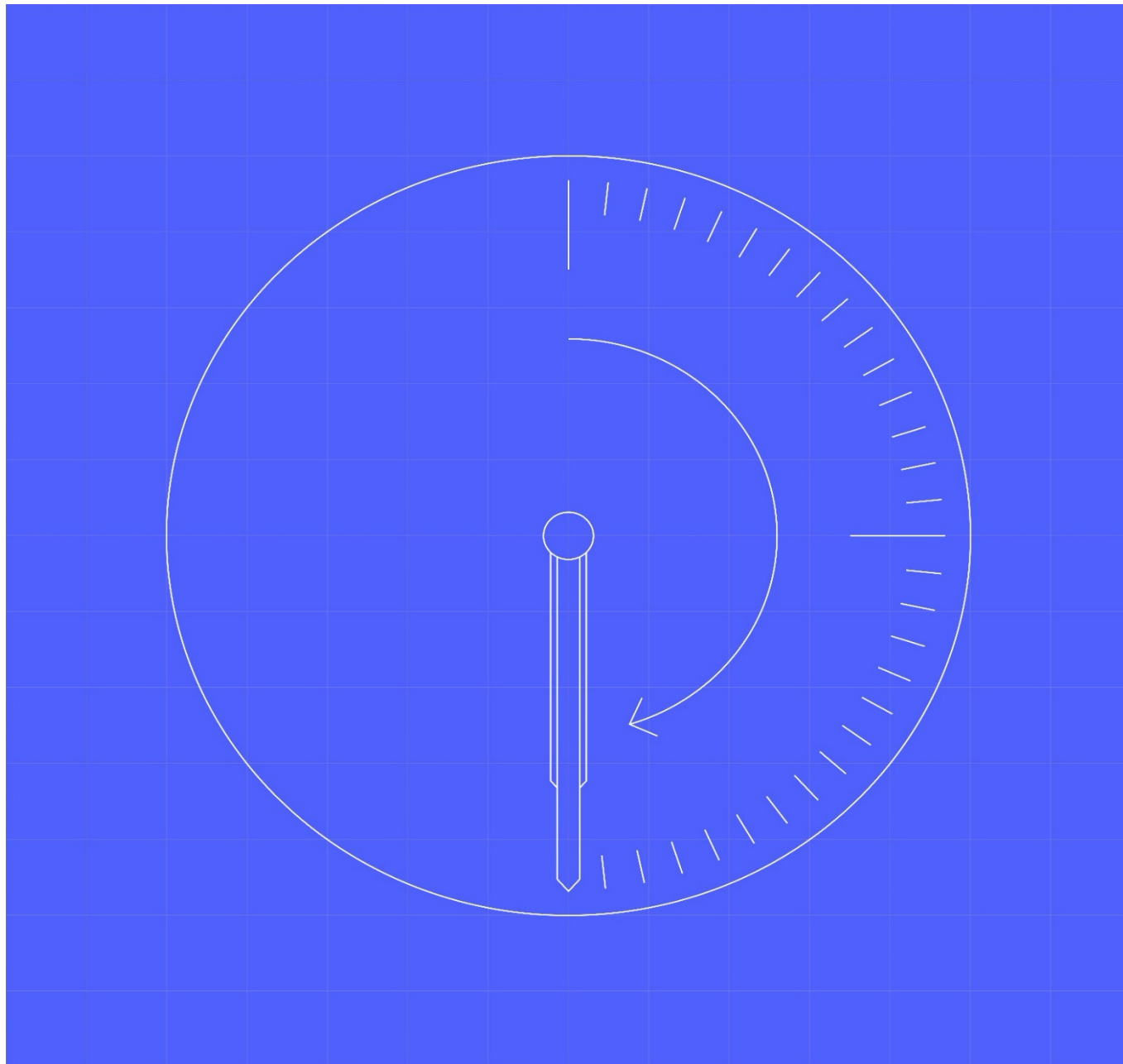


MHHS – M15 Acceptance Criteria



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1.1 Change Record

Date	Author	Version	Change Detail
22/11/2023	Migration Team	0.1	Draft for Industry Consultation
13/12/2023	Migration Team	0.2	Draft for TMAG Approval
20/12/2023	Migration Team	1.0	Approved
20/12/2024	Migration Team	1.1	Draft for Migration Framework Consultation 3
31/01/2025	Migration Team	1.2	Updated following Consultation 3 Industry Review
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28/09/2026	Migration Team	2.1	Draft for updates arising from CR0067 and associated updates to reflect general Programme progress.

1.2 References

Document	Publisher	Published	Additional Information
MHHS-DEL961 – Migration Design Document v1. 5	Migration Team	26/03/2025 30/09/2024	
MHHSP-BRS003-Registration Service Requirements v5.7	MHHS Design Team	04/06/2024	
MHHS-DEL2426 - [01] Migration Framework Foundations v 6.0	Migration Team	02/09/2026 25/02/2025	

1.3 Terminology

Term	Description
ADS	Advanced Data Services
BAU Process	This refers to a process within the MHHS arrangements as set out within the MHHS Core Design.
BSC	Balancing and Settlement Code
Central Services / Systems	MHHS Programme term referring to the parties and systems that comprise the supporting infrastructure for MHHS business processes and services, namely the Elexon Central Services, Electricity Enquiry Service, Data Service Provider, Central Switching Service, Data Transfer Network, and the Data Integration Platform.
CoA	Change of Agent
Core Migration Window	A six-month period of full allocation of Migration capacity before tapering down
CoS	Change of Supplier
CSS	Central Switching Service
Daily Planned Migration Threshold	This is an industry-wide limit on the maximum planned for number of migrations that can take place on a given day under normal circumstances (200,000).
Data Cleanse Plan	The approach and activities required to improve and populate data prior to Migration start.
DC	Data Collector
DCC	Data Communications Company
DIP	Data Integration Platform
DNO	Distribution Network Operator
DS	Data Service
DSP	Data Services Provider
DTN	Data Transfer Network

Term	Description
ECS	Elxon Central Services
EES	Electricity Enquiry Service
ESO	Electricity System Operator
Export MPAN	An MPAN that exports energy to the grid from a premises.
Forward Migration	The process through which MPANs will move from legacy arrangements to MHHS arrangements.
IDNO	Independent Distribution Network Operator
Import MPAN	An MPAN that imports energy from the grid to a premises
ISD	Industry Standing Data
LDSO	Licensed Distribution System Operator
LDSO Portfolio Thresholds	Limits set for each LDSO based on the size of their portfolio, ensuring balanced migration across different operators. See MHHS-DEL1648 - Migration Thresholds Document v1.0
Legacy Arrangements	The existing arrangements set out under the BSC and REC. For the purposes of the Migration Design, this is primarily the REC Metering Services Schedule and the Balancing and Settlement Procedures related to Data Collection.
MCAG	Migration and Cutover Advisory Group
MCC	Migration Control Centre
MFW	Migration Framework
MHHS	Market-Wide Half-Hourly Settlement
MHHS Arrangements	The new MHHS arrangements as set out in the MHHS Core Design Artefacts.
Migration Design	The technical articulation of how MPANs will move from legacy to new MHHS arrangements. See MHHS-DEL961 – Migration Design Document v1.4
Migration Period	The period denoted by the Programme as occurring between the M11 and M15 milestones.
Migration Planning and Management Tool (MPMT)	Application to be developed for use by the MCC to manage the end-to-end migration process
MOP	Meter Operator
MPAN	Meter Point Administration Number
MPID	Market Participant Identifier
MS	Metering Service
MSA	Metering Service (Advanced)
MSS	Metering Service (Smart and Non-Smart)
MWG	Migration Working Group
NFR	Non-Functional Requirement
Primary MPAN	The MPAN, within a Related MPAN arrangement, for which a Switch is initiated, or a forward migration (via an IF-031) is initiated.
PSG	Programme Steering Group
Qualified Supplier	A Supplier MPID recognised in ISD as both having passed the relevant BSC qualification requirements; and declared that their service is operational within the MHHS arrangements.
REC	Retail Energy Code
Registration Service	The Registration Service is the LDSO service that holds Meter point standing data information about each MPAN within its Distribution Region. Data includes the BRP <u>Supplier</u> , the processing and metering services appointed to the MPAN. It also includes information on the type of customer, the Measurement Class, Energisation Status and Line Loss Factor Class.
Reverse Migration	The process through which MPANs will move from MHHS arrangements to legacy arrangements.
SDS	Smart Data Services
Secondary MPAN	The MPAN, within a Related MPAN arrangement, for which a forward migration occurs when an IF-031 is received for a Primary MPAN.

Term	Description
SIT	Systems Integration Testing
Supplier Capacity Envelope (Envelope)	A daily profile covering the whole migration period detailing the maximum number of migrations for a given Supplier MPID in a LDSO that may be undertaken. This also includes the submission rules for a Supplier MPIDs de minimis category submissions.
Supplier Submission	A Supplier's forward view of planned migrations by MPID at LDSO Region level that falls within the Supplier Capacity Envelope provided for each LDSO Region and includes all eligible MPANs within their portfolio within each LDSO Region. The aggregate Supplier Submissions shall include all eligible MPANs within the Suppliers portfolio.
Switch	The process by which a new Supplier Registration supersedes an existing Supplier Registration, managed by the CSS.
TOM	Target Operating Model
UMS	Unmetered Supplies
UMSDS	Unmetered Supplies Data Services
UMSO	Unmetered Supplies Operator
Unused Capacity	The available capacity following the baselining of Suppliers' Submissions or following the fulfilment of an unused capacity request(s) during the Sprint Execution Phase.
Upper Migration Threshold	This is an industry-wide limit on the maximum number of migrations that can take place on a given day under exceptional circumstances (300,000). See MHHS-DEL1648 - Migration Thresholds Document v2.0

1.4 Programme Milestones

The below Programme milestones are referenced throughout this document.

M9 – Start of System Integration Testing (SIT)

M10 – Go Live of new services

M11 – Start of 1 Year Migration for UMS / Advanced

M12 – Start of 1 Year Migration for Smart / Non-Smart

M14 – All Suppliers must be able to access MPANs under the new TOM

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

M15b – Full transition complete

M16 – Cutover to the new settlement timetable

2 Introduction, Overview and Scope

2.1 Introduction

The M15 milestone is planned to take place in May 2027 (CR055 update) and up until CR0067 is implemented, is currently defined as 'Full transition complete' i.e. all MPANs have been migrated to the MHHS arrangements, and none remain in the legacy arrangements. Whilst the target will be to migrate 100% of MPANs, practically it will not be necessary to enact the migration process for all MPANs in the legacy arrangements as there will be some MPANs in states that prevent them from being migrated and this has been accepted in the Migration Framework as "acceptable" MPAN states. Therefore, it is necessary to define a set of acceptance criteria, that if attained, will allow the Programme to consider M15 as achieved.

Following the implementation of CR0067, the M15 milestone will be split to provide a clearer and more robust framework for managing its two distinct outcomes (see section 2.2 below). This will give all industry participants greater clarity and the certainty they need to plan effectively. This document now covers the Acceptance Criteria for the two separate milestones for M15, M15a and M15b, for each individual outcome.

- **Note:** Throughout this document, references to "M15" or the "M15 milestone" should be understood as applying equally to both split milestones, M15a and M15b. Where a statement refers to only one of these milestones specifically, the specific milestone name, M15a or M15b, will be used instead.

The purpose of this document is to define this acceptance criteria for all M15 milestone related activities which include the MPAN states that will be 'acceptable' and 'unacceptable' at M15, and to also define the reporting mechanisms that will be used to assess progress towards the acceptance criteria across the Migration Period.

The rationale for defining 'acceptable states' throughout this document, rather than stating 'all MPANs to be migrated', is that for certain MPANs the migration process will not be necessary to enact. For example, MPANs that have not yet had an initial registration or MPANs that have been terminated. By using the term 'acceptable' states, the expectation that 100% of MPANs will be migrated is removed as this will not be practically possible. Instead, 100% of MPANs will need to exist in one of the 'acceptable' states at M15.

The vast majority of activity to move MPANs to an 'acceptable' state will be Suppliers enacting Change of Agent (CoA) and Change of Supply (CoS) migration processes to migrate MPANs to MHHS. However, there will be a smaller number of MPANs that it is not necessary to migrate that will require other activities performed to them to move them into an 'acceptable' state e.g. termination of the MPAN, de-activation of the Supplier registration etc.

We have defined M15b (CR067 update) as the first settlement date that no energy is being processed through legacy settlement arrangements from (noting that legacy settlement reconciliation will continue to take place for a finite period for settlement dates prior to M15). 100% of the energy being settled across the industry (for settlement dates on or after M15b) should be being processed through MHHS settlement processes. Therefore, all MPANs will need to be moved out of 'unacceptable' states and into 'acceptable' states on the day preceding M15b at the very latest in order to ensure M15b is achieved and all M15 milestone related activities can be considered to be achieved. on-time.

Even if 0.1% of MPANs remain in one of the 'unacceptable' states, and therefore are still being settled under legacy arrangements, legacy settlement operations will need to be maintained for longer than expected which will come at significant cost.

For additional clarity, however, please note that the achievement or non-achievement of M15 (including both M15a and M15b introduced under CR0067) has no functional impact on either legacy or MHHS settlement processes. Legacy settlement processes will continue to run as they always have done until there are no more MPANs being settled under these arrangements. Similarly, MHHS settlement will need to have been up and running successfully for 18 months by the M15 date, and the timing or the achievement of M15 will not change how these processes operate.

This document, and supporting documents as listed in References section, which included the Migrations Framework documents referenced in MHHS-DEL2426 - [01] Migration Framework Foundations v2.2, together with the migration timetable, form the MHHS Migration Plan that details the obligations, as defined in Section C12 of the Balancing and Settlement Code Section C, that defines the obligations on MHHS Market Participants relating to participation in the Migration of MHHS Metering Systems.

2.2 Updates to support CR0067 - Splitting the M15 Milestone into M15a and M15b

As per section 2.1 above, prior to CR0067, the M15 milestone was defined as "Full Transition Complete." This single milestone conflated two distinct outcomes and assumed both would occur on the same date.

CR0067 has been introduced to split the M15 Milestone into two separate milestones, one for each distinct outcome, removing ambiguity as to whether M15 has been "met" against its baseline date of 7 May 2027. This change creates a clear distinction between (a) the Programme/Supplier compliance deadline and (b) industry-wide Full Transition Complete, allowing the Programme to track achievement of each with precision and to apply a distinct set of Acceptance Criteria against each milestone.

The two new milestones created to replace the previous single overall M15 Milestone are;

- **M15a** — End of the 18-Month Baseline Migration Period and Completion of the MHHS Migration Plan
- **M15b** — Full Transition Complete

Both M15a and M15b have retained the previously baselined M15 date of 7 May 2027. For the avoidance of doubt, this change does not alter or extend the Supplier compliance deadline established under the original M15 definition. The core principles of the original M15 Acceptance Criteria remain intact, with updates made solely to reflect the clarification of outcomes and the associated decisions now planned in relation to the overall split of the M15 Milestone.

Each of the two separate milestones M15a and M15b will have their own set of M15 Acceptance Criteria defined within this document.

2.2.1 Milestone M15a - End of the 18-Month Baseline Migration Period and Completion of the MHHS Migration Plan

The M15a milestone is a Programme-level deadline marking the end of the 18-month baseline migration period and completion of the MHHS Migration Plan.

Meeting M15a confirms the point at which the Programme-level and Supplier-level compliance deadlines apply. By this date, each Supplier must have completed its migration activities in line with the MHHS Migration Plan.

The MCC will determine supplier-level compliance at M15a by applying a standard set of **Supplier Migration Complete Criteria** on a per-MPID basis for each MHHS-qualified Supplier. Any Supplier that fails to meet these criteria for a given MPID will be deemed as non-compliant with its M15 migration-complete obligations for that supplier MPID.

Milestone M15a is therefore also the trigger point for sanctions, applied via a **Customer Acquisition Ban**, where a Supplier has not completed migration and met the **Supplier Migration Complete Criteria** by the M15a baseline date. This is subject to any applicable **SRO exemption**: that is, unless the Supplier has an approved SRO Exception Request permitting continued migration of a specified set of MPANs beyond the M15a baseline date.

2.2.2 Milestone M15b - Full Transition Complete

The M15b milestone is an industry-wide milestone marking the point at which **every** Supplier has completed its migration activities in line with the Migration Plan and met the **Supplier Migration Complete Criteria** for each of its MHHS-qualified Supplier MPIDs.

From this point onwards, 100% of energy is settled through MHHS settlement processes for settlement dates on or after M15b, confirming that no energy is still being processed under legacy settlement arrangements.

Achievement of the M15b milestone is assessed across the whole industry and serves as the verifiable marker confirming that industry-wide migration and Full Transition are genuinely complete.

2.3 Overview

- **MPAN State Terminology**
 - This section outlines the terminology that is used throughout this document to describe the various different states an MPAN can be in.
- **Acceptable and Unacceptable MPAN States at M15**
 - This section defines the 'acceptable' and 'unacceptable' MPAN states at M15. The primary aim of the MHHS Migration Period is to ensure that all MPANs are in one of the 'acceptable' MPAN states at M15 and no MPANs exist in any of the 'unacceptable' MPAN states.
- **M15^a Acceptance Criteria**
 - This details the exact acceptance criteria that will be used to determine whether M15^a has been achieved.
- **M15b Acceptance Criteria**
 - This details the exact acceptance criteria that will be used to determine whether M15b has been achieved.
- **Assumptions, Risks and Dependencies**
 - This section details the assumptions, risks and dependencies that have been considered when developing the M15 acceptance criteria.

3 Intended Audience

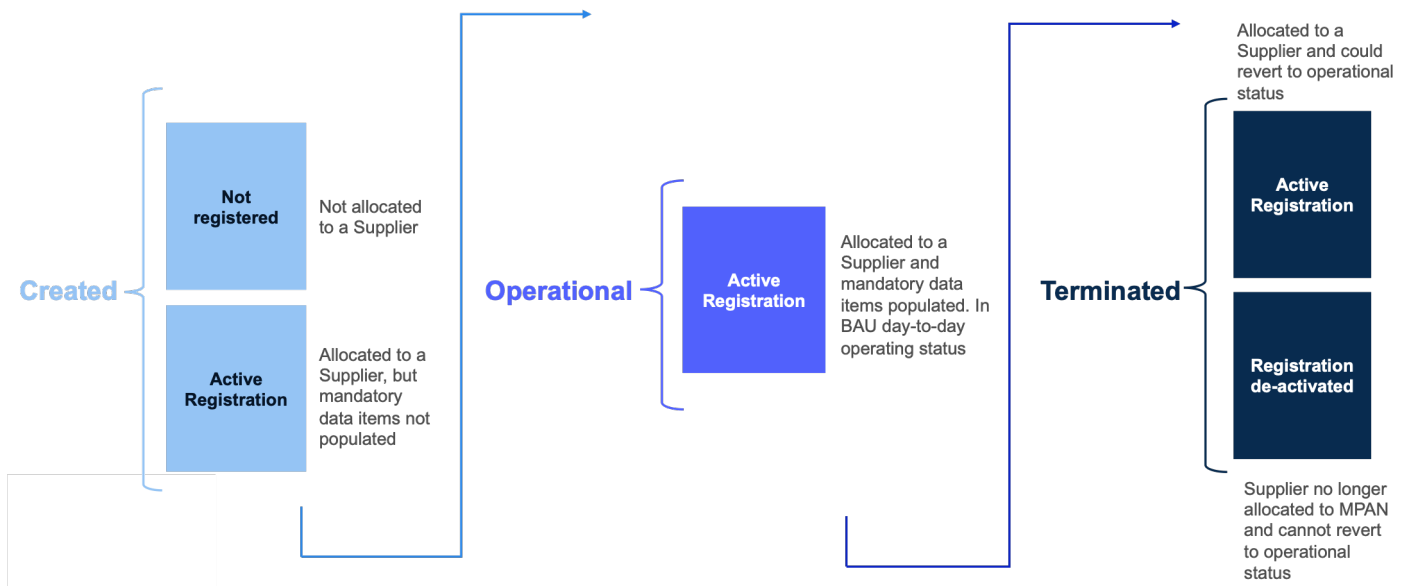
These parties are:

- The Registration Services (including Service Providers);
- Suppliers;
- Data Collectors / Aggregators;
- Meter Operators;
- The DIP Service Provider;
- Metering Services (i.e., MSS, MSA);

- Data Services (i.e., SDS, ADS, UMSDS);
- EES;
- LDSOs (i.e., DNOs and iDNOs);
- Meter Administrators;
- The DCC, operating Smart Metering and CSS;
- ESO;
- Elexon Central Services (ECS);
- Electralink (DTN);
- REC and BSC Performance Assurance Boards; and
- UMSOs.

4 MPAN State Terminology

The Registrable Measurement Point (RMP) status of an MPAN uses the terminology 'Created', 'Operational' and 'Terminated'. In the below diagram, these terms are mapped to each of the possible lower-level MPAN states. This terminology aligns to the terminology defined and used by the REC in Schedule 27 – RMP Lifecycle and is the terminology that will be used throughout this document.



- **Created & Not Registered:** This is an MPAN that has been created but has not been allocated to a Supplier.
- **Created & Active Registration:** This is an MPAN that has been created and has been allocated to a Supplier but does not have the mandatory data items populated.
- **Operational & Active Registration:** This is an MPAN that has been allocated to a Supplier, it has the mandatory data items populated and is currently operating in a BAU day-to-day operational status.
- **Terminated & Active Registration:** This is an MPAN that has been terminated but is still allocated to a Supplier and could be reverted to operational status.
- **Terminated & Registration de-activated:** This is an MPAN that has been terminated and no longer has a Supplier allocated to it. It cannot be reverted to operational status.

Where the term 'mandatory data items' has been used in the diagram and text above, this refers to the data items that are required, as a minimum, to update an MPAN's RMP status from 'Created' to 'Operational'. Under legacy arrangements, this required set of data items is defined in the BSCP501: Supplier Meter Registration Service, Section 3.6: New Connection for SVA Metering System. For ease, these data items are listed below:

- MPAN
- GSP Group ID
- LLF Class ID
- Metering Point Address
- Connection Type
- Metered Indicator
- Import / Export Indicator
- Associated Import / Export MPAN (where applicable)

- Energisation Status
- Confirmed DA, DC and MOP Appointment (Metered Only)
- Confirmed UMSO and MA Appointment (Unmetered Only)
- Measurement Class
- MTC
- Profile Class (NHH Only)
- SSC (NHH Only)

Please note, under MHHS arrangements, the mandatory data item set will be updated. The updated set of data items can be found within MHHSP-BRS003-Registration Service Requirements v5.4 as part of the New Connection section.

5 Acceptable and Unacceptable MPAN States at M15

The key aim throughout the Migration Period will be to ensure that by M15 all MPANs are in one of the 'acceptable' MPAN States set out below and no MPANs exist in any of the 'unacceptable' MPAN states.

These terms and their associated definitions are important, as they are referenced and used within both the M15a and M15b Acceptance Criteria, which are defined further in later sections of this document.

The Programme will develop a reporting process to track and assure the progress being made towards M15 throughout the Migration Period.

The ~~working assumption is the~~ Programme will use EES (Electricity Enquiry Service) data, provided by RECCo, to track the number of MPANs in each of the 'acceptable' and 'unacceptable' states. Once Migration is underway, this reporting will be shared with industry participants on a regular basis through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG).

~~The requirements for this reporting will be developed from Q1 2024 onwards through the development of the Migration Control Centre (MCC). These requirements will include:~~

- ~~• How EES data is ingested into the MCC;~~
- ~~• The timings for reporting;~~
- ~~• The approach to reporting through the Programme governance structure.~~

There will also be a requirement on Elexon to monitor the Interim Information (II) settlement run for the settlement date(s) following M15b to ensure no data has been submitted by any Data Aggregators. In the event, that data is still being submitted to Data Aggregators in the II settlement run, the Initial Settlement run (SF) will also be monitored to ensure no data is being submitted from this point. If no data is showing as being submitted in the II run, there will be no requirement to monitor the SF run.

The metrics that will be tracked through this reporting mechanism include the below. The current thinking is each metric will be broken down at least by Supplier and LDSO. However, ultimately these reporting requirements will need to be defined to this level of detail through the design of the MCC and shared with the Programme governance groups in the run up to Milestone M15; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG).

- The number of MPANs that have been migrated;
- The outstanding number of MPANs to be migrated; and
- The total number of MPANs remaining across all 'unacceptable' states.

5.1 Acceptable MPAN States at M15

The primary aim of the Migration Period will be to ensure that at M15, all MPANs are in one of the 'acceptable' MPAN states set out below. These are the only acceptable states that will be permissible at M15. Throughout the Migration Period, the MHHS Programme will regularly report on the number of MPANs that are in each of these states in order to track the progress of the MHHS Migration Period. ~~How exactly this will be measured and when this reporting will be carried out will be developed through the MWG in Q1-Q2 2024 and will be captured in the requirements for the MCC.~~ This reporting will be shared with industry participants on a regular basis, in the run up to M15, through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG).

5.1.1 A MPAN in an Operational state that has migrated to the MHHS arrangements

Definition: This is an MPAN that has been allocated to an MHHS qualified Supplier, it has the mandatory data items populated and is currently operating in a BAU MHHS day-to-day operational status.

How it will be reported on: EES data will be used to confirm whether an MPAN has been successfully migrated into the MHHS arrangements.

~~that both a Metering Service (MS) and a Data Service (DS) have been appointed for an MPAN. As defined and governed by both the BSC and REC Codes, an MPAN will be deemed to have been migrated where a Supplier Agent Appointment takes effect and either of the Metering Service and Data Service (or both parties) have been successfully appointed and confirmed via IF/PUB-036. As long as at least one of these appointments is successful, the MPAN will have been considered to be migrated into the MHHS arrangements. This will means that following the processing of the first IF/PUB-036 successfully appointing either the Metering Service or the Data Service for an MPAN, the Registration Service shall have generated an IF-036 for both the MS and the DS and has and sent a D0209 to de-appoint the legacy Data Aggregator (DA), thereby transferring the settlement arrangements for that MPAN from legacy to MHHS. All MS and DS appointments should be completed by the M15 date i.e. there are no future-dated appointments which remain yet to be processed and all Effective From Dates are either the M15 date or earlier.~~

When it will be reported on: The validation that all MPANs in an operational state have been migrated into the MHHS arrangements will occur shortly after the M15 date by the Programme checking against EES data to ensure that the EES data reflects the latest position for all migrations up to M15.

Ongoing operational reporting on this population will also occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCC.~~

The ~~confirmation validation~~ that all legacy Data Aggregators have been de-appointed will occur shortly after the M15 date (approximately 3 working days after M15 as a guide) via subsequent Elexon reporting that confirms no settlement data relating to settlement dates on or post-M15 has been submitted under legacy arrangements in the II settlement run.

5.1.2 A MPAN in a Terminated state that does not have a registration in an active state

Definition: This is an MPAN that has been terminated and no longer has a Supplier (MHHS or legacy) allocated to it. It cannot be reverted to operational status.

How it will be reported on: EES data will be used to confirm which MPANs have not been registered to a Supplier and have a 'Terminated' RMP status.

When it will be reported on: The validation that all active registrations have been de-activated for terminated MPANs will occur shortly after the M15 date (once the SLA for de-activation has passed).

Ongoing operational reporting on this population will also occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCC.~~

Note, there will be no requirement for the migration process to be executed for MPANs in this state.

5.1.3 A MPAN in a Created state that has a registration in an active state with a MHHS qualified Supplier

Definition: This is an MPAN that has been created and has been allocated to a MHHS qualified Supplier, but does not have the mandatory data items populated.

How it will be reported on: EES data will be used to confirm that an MPAN is registered to a MHHS qualified Supplier and has a 'Created' RMP status.

When it will be reported on: Ongoing operational reporting on this population will occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCC.~~

At the point of M15, a final report will also be produced to ensure that this criterion has been met.

Note, there will be no requirement for the migration process to be executed for MPANs in this state.

5.1.4 A MPAN in a Created state that no initial registration has been submitted for (Untraded)

Definition: This is an MPAN that has been created but has not been allocated to a (MHHS or legacy) Supplier.

How it will be reported on: EES data will be used to confirm that an MPAN is not registered to a legacy or MHHS qualified Supplier, has no agents appointed (legacy or MHHS) and has a 'Created' RMP status.

When it will be reported on: Ongoing operational reporting on this population will occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCC.~~

At the point of M15, a final report will also be produced to ensure that this criterion has been met.

Note, there will be no requirement for the migration process to be executed for MPANs in this state.

5.2 Unacceptable MPAN States at M15

The primary aim of the Migration Period will be to ensure that at M15, all MPANs are in one of the 'acceptable' MPAN states. This means that no MPANs should be in an 'unacceptable' state at M15.

Throughout the Migration Period, the MHHS Programme will regularly report on the number of MPANs that are in each of the 'unacceptable' states to track the progress of the MHHS Migration Period. ~~How exactly this will be measured and when this reporting will be carried out will be developed through the MWG in Q1-Q2 2024 and captured in the requirements for the MCC.~~

5.2.1 A MPAN in an Operational state that has a registration in an active state but has not been migrated to the new MHHS arrangements

Definition: This is an MPAN that has been allocated to a Supplier but is currently operating under the legacy arrangements.

How it will be reported on: EES data will be used to confirm the number of MPANs that have a 'Operational' RMP status and still have legacy Agents appointed.

When it will be reported on: Ongoing operational reporting on this population will occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCG.~~

At the point of M15, a final report will also be produced to ensure that this criterion has been met.

5.2.2 A MPAN in a Terminated state that has a registration in an active state but has not been migrated to the new MHHS arrangements*

Definition: This is an MPAN that has been terminated but does not have a MHHS indicator of 'T' within the EES data and is still allocated to a Supplier and could be reverted to legacy operational status.

*MPANs outside of the SLA for Suppliers de-registering will be treated as non-conformant at the end of the Migration Period.

How it will be reported on: EES data will be used to identify MPANs that have a 'Terminated' RMP status, an MHHS indicator of 'F' or 'R' but have an active registration.

When it will be reported on: The validation that all active registrations have been de-activated for terminated MPANs will occur shortly after the M15 date (once the SLA for de-activation has passed).

Ongoing operational reporting on this population will occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCG.~~

At the point of M15, a final report will also be produced to ensure that this criterion has been met.

5.2.3 A MPAN in a Created state that has a registration in an active state with a Supplier that is not MHHS qualified

Definition: This is an MPAN that has a registration in an 'Active' state with a legacy Supplier (not MHHS qualified) and a 'Created' RMP status.

How it will be reported on: EES data will be used to identify MPANs that have a 'Created' RMP status and have a registration in an active state with a Supplier that is not MHHS qualified.

When it will be reported on: Ongoing operational reporting on this population will occur throughout the Migration Period. The cadence for this reporting will be developed and shared through the Programme governance groups; the Migration Working Group (MWG) and the Migration and Cutover Advisory Group (MCAG). ~~through the development of the requirements for the MCG.~~

At the point of M15, a final report will also be produced to ensure that this criterion has been met.

6 M15a Acceptance Criteria

This section sets out the complete set of M15a Acceptance Criteria. All of these criteria must be satisfied for the Programme to consider Milestone M15a achieved.

Achieving the M15a Acceptance Criteria confirms that:

1. there are no material issues preventing the Programme from declaring to industry that the time-based end of the 18-month Baseline Migration Period has occurred;
2. all Suppliers have been afforded sufficient time and opportunity to complete migration within the originally baselined migration period; and
3. the Programme is ready to assess each Supplier's compliance with its obligation to complete migration by M15, and to apply sanctions to any Supplier found non-compliant.

Criteria:

1. No significant problems have blocked migration

No major issues with the Central System, Code Bodies, or the Programme itself have prevented Suppliers from completing migration within their 18-month Baseline Migration Period in line with the Migration Plan.

2. All Suppliers had a fair chance to migrate

The MCC has run the migration process in line with the Migration Framework, giving every Supplier an equal opportunity to complete migrating within the 18-month window, based on each Suppliers chosen Migration Start Date.

3. The MCC can successfully identify which Supplier has and hasn't completed Migration

The MCC has reporting capability in place that allows it to accurately determine each **Supplier's Migration Complete Status** at milestone M15a, based on EES data provided by RECCo.

4. If required, Suppliers can request an SRO Exemption

The SRO Exemption process, as defined in the Migration Framework documents, has been established and is available for Suppliers to use, as required, ahead of the M15a decision point.

The process applies only where circumstances beyond the Supplier's control, such as natural disasters or other outages that neither the Supplier nor its agents can resolve, have made it impossible to comply with the Migration Plan. Where such circumstances apply, the specific MPANs affected must be stated.

5. If required, the sanction for non-compliance can be enforced

The Customer Acquisition Ban, the sanction defined in the Migration Framework for Suppliers who miss their migration complete deadline, is operationally ready to be applied at M15a, if required.

6. Governance is ready to support decisions at this milestone

The decision-making structure and processes ("choreography") needed to reach and approve the M15a Milestone are in place and functioning.

Note: The Programme confirms that there is no minimum threshold for the proportion of Suppliers that must have completed migration as a precondition for meeting the M15a Acceptance Criteria.

Where milestone M15a is deemed to have been achieved and met, it is fair and reasonable for the Programme (via the MCC) to subsequently apply the **Supplier Migration Complete Criteria** to identify any non-compliant Suppliers against whom Customer Acquisition Bans will be triggered.

If M15a is judged not to have been achieved, the Programme will not apply the **Supplier Migration Complete Criteria** at that time. Instead, milestone M15a will be rescheduled to a suitable future date when the M15a Acceptance Criteria can be reassessed.

7 Supplier Migration Complete Criteria

This section sets out the criteria the MCC will use to assess each Supplier's compliance with the obligation to complete migration by M15, and the sanctions that apply where a Supplier is found non-compliant.

Suppliers are expected to ensure migration is complete by M15a, with all registered MPANs in an 'acceptable' State and none remaining in an 'unacceptable' state, subject to any approved SRO Exemption requests.

To support Milestone M15a, the Programme (via the MCC) will introduce a new set of **Supplier Migration Complete Criteria**. These follow the same principles and process as the original M15 Acceptance Criteria, previously published, but are applied on a per-Supplier basis, assessed for each registered MPAN against each of the Supplier's MHHS Qualified Supplier MPIDs.

Under these criteria, a Supplier is compliant only where all its registered MPANs are in an 'acceptable' state and none remain in an 'unacceptable' state (as defined above in section 5).

- The Programme will use EES data to track the number of MPANs in each of the 'acceptable' and 'unacceptable' states

Criteria:

These criteria apply on a per-Supplier MPID basis, for each of their MHHS qualified Supplier MPIDs.

1. All MPANs exist in one of the 'acceptable' MPAN states

This means that all MPANs have been moved to one of the 'acceptable' MPAN states.

2. No MPANs exist in any of the 'unacceptable' MPAN states

This means that no MPANs are in any of the 'unacceptable' MPAN states.

At M15a, where any Supplier MPID has an approved SRO Exemption request, the MPANs covered by that exemption are excluded from this **Supplier Migration Complete Criteria**.

- If this check identifies any other registered MPANs that are **not** covered by the approved SRO Exemption, and those MPANs are not in an 'acceptable' state (as defined in section 5), the Supplier will be deemed non-compliant with the obligation to complete migration by M15.

8 M15**b** Acceptance Criteria

This section sets out the complete set of M15**b** Acceptance Criteria. Each of these criteria will need to have been deemed as met by the MHHS Programme in order for the M15 milestone to be considered achieved.

Relationship to M15a

The M15b milestone date is determined, in part, by the outcome of the **Supplier Migration Complete Criteria** applied at M15a on a per-Supplier MPID basis. M15b can be achieved either on the same date as M15a, or at a later date if any Supplier has not met its migration obligations at M15a.

Scenario 1: All suppliers compliant

If all MHHS qualified suppliers have met the **Supplier Migration Complete Criteria** at M15a, with no SRO Exemptions approved, then M15b is also likely to be met.

In this case, the M15b Acceptance Criteria should be tested at the M15a baseline date to determine whether the milestone has been met.

Scenario 2: SRO Exemption approved

Where an SRO Exemption has been approved allowing one or more suppliers to migrate a specified set of MPANs after the M15a baseline date, testing the M15b Acceptance Criteria at that same date would not be appropriate, since the outcome is already known, the criteria will not have been met.

In this scenario, the M15b milestone date should be deferred and re-planned to align with the latest migration date agreed under the SRO exemption process. The M15b Acceptance Criteria should then be tested again at this revised date.

M15b Acceptance Criteria:

These criteria apply on an industry-wide basis, not on a per-supplier basis.

1. All MPANs exist in one of the ‘acceptable’ MPAN states

This means that all MPANs have been moved to one of the ‘acceptable’ MPAN states.

2. No MPANs exist in any of the ‘unacceptable’ MPAN states

This means that no MPANs are in any of the ‘unacceptable’ MPAN states.

3. No data is being sent through legacy settlement for any settlement dates on or after M15b****

This means that no data is being processed through legacy settlement processes for any settlement dates on or after M15**b**. Whilst noting that post-M15**b**, legacy settlement reconciliation will continue to take place for a finite period for settlement dates prior to M15**b**.

The Programme will use EES data to track the number of MPANs in each of the ‘acceptable’ and ‘unacceptable’ states

9 Assumptions, Risks and Dependencies

9.1 Assumptions

- No reverse migrations will take place from M14 onwards.
- The MHHS Programme will have access to the relevant data to track progress towards achieving the acceptance criteria across the Migration Period.
- The Programme will share a reporting template with Programme participants that will allow data to be ingested into the MCC.
- Elxon will hold the relevant data on legacy submissions and will be responsible for developing and sharing with the MHHS Programme reports confirming that no settlement data for settlement dates on or after M15b has been submitted under legacy arrangements in the II or SF settlement runs.
- Any risks associated with a Supplier of Last Resort (SoLR) process that occurs within close proximity to M15a are assumed to be managed via the SRO Exemption process.

9.2 Risks

- There is a risk that a number of MPANs will remain unmigrated towards the end of the 18-month Baseline Migration Period, which could jeopardise M15b being achieved on the same date as M15a.
- ~~There is a risk that there will be a number of MPANs that have still not been migrated towards the end of the Migration Period that places M15 at risk.~~
- ~~There is a risk that the M15 date aligns to an I&C contract round.~~
- ~~There is a risk that if current industry rules are not re-visited prior to M15, the state of Export MPANs on Supplier of Last Resort (SoLR) MPIDs will not be able to be changed by the new Supplier unless the customer agrees a new contract for these Export meters. If this remains to be the case at M15, these MPANs would be categorised as in an 'unacceptable' state and would prevent the attainment of M15. New industry rules need to be defined to prevent this.~~

9.3 Dependencies

- There is a dependency on Suppliers fulfilling their Migration Plans throughout the Migration Period.
- There is a dependency on Suppliers completing all required remediation activities against troublesome MPANs in order to support the achievement of milestone M15b.
- There is a dependency on the activities set out within the MHHS Data Cleanse Plan being completed ahead of the start of Migration. Note – This activity has now been completed.
- ~~There is a dependency on the M15 Acceptance Criteria reporting requirements being developed through the development of the MCC in 2024.~~