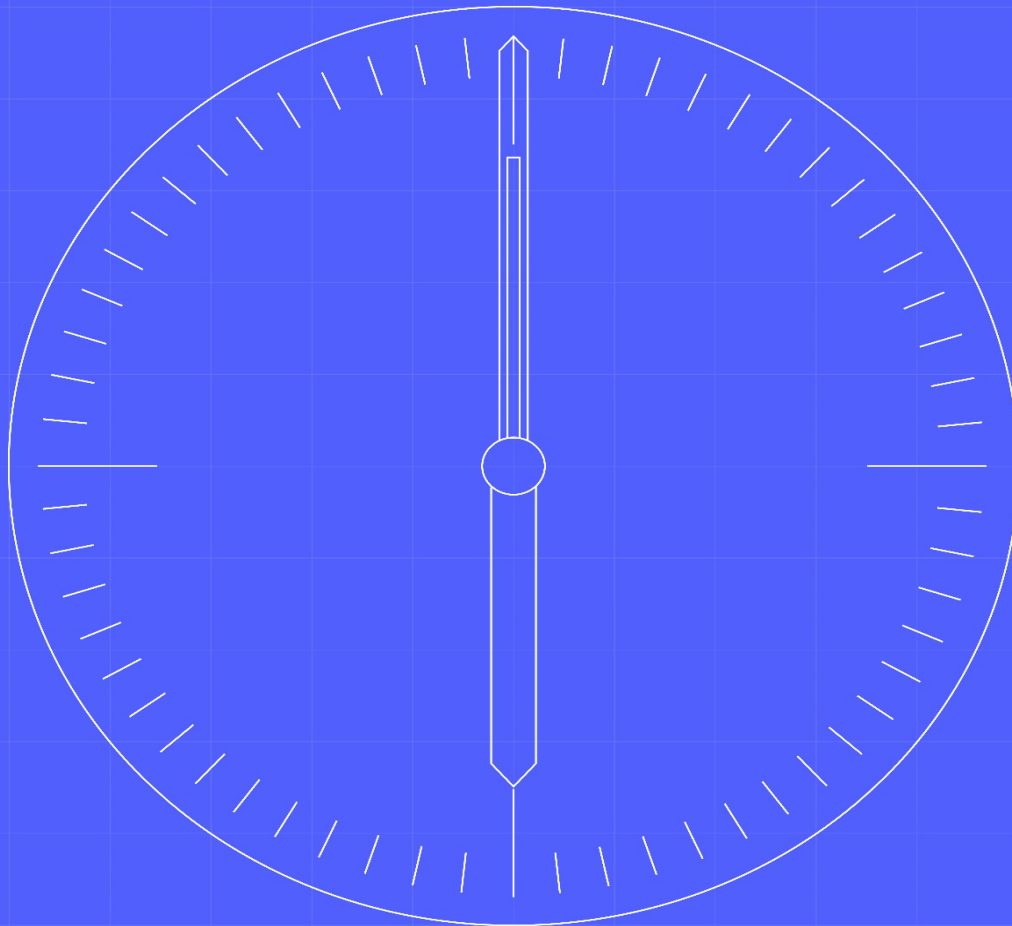




# MHHS Placing Reliance Policy



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## 1.1 Change Record

Date	Author	Version	Change Detail
01 March 2023	Dominic Mooney	0.1	Draft issued for LDP/SRO Review
08 March 2023	Dominic Mooney	0.2	Updated following LDP/SRO Review
08 March 2023	Dominic Mooney	0.3	Minor updates following v0.2 review by BSC and REC code delivery bodies
08 March 2023	Dominic Mooney	0.4	Version issued out for industry comment

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## 1.2 Reviewers

Reviewer	Role
Kate Goodman	LDP Test Architect
Nigel Hunt	LDP Test Manager
Jason Brogden	LDP Industry SME
Adrian Ackroyd	SRO Client Test Programme Manager
BSCCo	Various
RECCo	Various

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## 1.3 References

Reference	Document/Link	Publisher	Published	Additional Information
REF-01	<a href="#">MHHS-DEL315 E2E Testing &amp; Integration Strategy</a>	SI Testing	April 2022	
REF-02	<a href="#">MHHS-DEL852 Pre-Integration Testing Guidance</a>	SI Testing	March 2023	

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## 1.4 Terminology

Term	Description
	For terminology, see Programme glossary on the MHHS portal: <a href="#">Programme Glossary (sharepoint.com)</a>

## 2 Executive Summary

The MHHS E2E Testing & Integration Strategy [REF-01] describes the two Industry-wide testing routes that Market participants can take to Qualify in the new MHHS arrangements; 1) Systems Integration Test (SIT), and 2. non-SIT Qualification Testing (UIT).

#	Route	Entry Requirement-	MHHS Qualification		
1	SIT Participants	PIT DBT1* completion (Assured by MHHSP)	SIT (Assured by MHHSP)	Security and Organisational Controls Evidence (Developed by Code Bodies)	DBT 2 PIT* if required for Code assurance (Code Bodies, if required)
2	Non-SIT Participants	PIT DBT 1 completion (Assured by Code Bodies)	Qualification Testing (accountability of Code Bodies but dependent on SIT testing development)	Security and Organisational Controls Evidence (Developed by Code Bodies)	DBT 2 PIT if required for Code assurance (Code Bodies, if required)

\*Please refer to the MHHS Pre-Integration Guidance [REF-02] for details of DBT1 PIT and DBT2 PIT.

The MHHS Programme acknowledges that there is precedent on previous similar Energy industry programmes where Market participants met their industry testing requirements by 'placing reliance' on testing that had already been executed and passed by other Market participants, on condition that it could be determined that the Market participant placing reliance uses the same 3rd-party software or service provider, in the same arrangements and configuration.

As a principle, the MHHS Programme intends to ensure that there is no unnecessary duplication of effort for Market participants in achieving the Programme testing objectives, and ultimately qualifying in the new MHHS arrangements. This document is supplementary to the MHHS E2E Testing & Integration Strategy [REF-01], setting out the MHHS 'Placing Reliance' policy with the intention to aid Programme participant planning by outlining the criteria and scenarios where this approach could be adopted by Market participants, and how this will be managed and assured. Please note the policy does not apply for Central Parties.

The Programme is maintaining a principle of 'equivalence' between the industry testing requirements for Market participants proceeding down the SIT or non-SIT routes; the MHHS 'Placing Reliance' policy seeks to maintain this equivalence principle whilst ensuring sufficient test coverage, confidence and risk mitigation to enable market qualification – to this end this policy has been developed in consultation with the Elexon and REC Code Delivery Bodies.

Please note that the MHHS Qualification Approach and Plan (QA&P) is currently under joint development by the Elexon and REC Code Delivery Bodies via the Qualification Working Group (QWG) and is due to be published in May 2023, however the MHHS 'Placing Reliance' policy is being defined earlier with the intent to provide clarity and confidence for Programme participant planning and therefore governance approval for the policy will be sought via the Programme Testing and Migration Advisory Group (TMAG) and BSC and REC Performance Assurance Boards.

## 3 Introduction

The following MHHS principles and definitions are key to the 'placing reliance' policy.

## Principles:

1. We expect any Programme participant engaging in MHHS industry-wide testing (i.e. SIT and UIT) to do so as a defined BSC and/or REC MHHS Role. Apart from the Central Systems, the Roles are as follows:
  - Supplier
  - Metering Service Smart (MSS)
  - Metering Service Advanced (MSA)
  - Smart Data Service (SDS)
  - Advanced Data Service (ADS)
  - UMS Data Service (UMSDS)
  - Registration Service
  - UMSO
  - Network Operations Service
2. Organisations in each participating Role are responsible for executing and evidencing their own completion of MHHS Programme industry-wide testing (this applies to both SIT and Qualification Testing). For instance in the case of a partnership with a 3rd-party software provider or IT service provider (not currently defined BSC or REC roles) or other 3rd-party testing provider, the responsibility remains with the Code defined organisation to declare, execute and evidence their completed test coverage. For example, in the case of a role like SDS it is the responsibility of the Code defined organisation to declare, execute and evidence their completed test coverage, however this has been achieved.
3. Where a Participant has successfully completed market role testing with one MPID, other MPIDs belonging to the same organisation will by default be deemed to have passed for the same role and requirements, providing it is demonstrated to the Programme, and Code Delivery Bodies, that the other MPIDs for that role are served by the same technology stack/operational processes and controls and there are no deviations from role/requirements previously tested for the other MPID. For any MPID/roles served by different technology stack/operational processes and controls, then separate testing will be required to successfully exit Qualification for that MPID/role.

## Definitions:

1. **'Qualification Testing'** [1] - Testing of Role-based scenarios specified by the Code Delivery Bodies, within an integrated industry-wide test environment (UIT), to be completed by organisations that follow the non-SIT route to Qualification. Qualification Testing and SIT should execute similar coverage of the design baseline as the level of confidence required is similar.
2. **'Equivalence'** [2] - Where an organisation has successfully exited SIT, the SIT exit evidence is considered "equivalent" to that required for Qualification Testing. The SIT exit evidence will form part of that required for BSC / REC market Qualification. The Programme is currently assuming that these organisations will not be required to undertake any further industry-wide Qualification Testing, however this will be dependent on whether the SIT coverage is sufficient to align with the Code requirements and risk areas. Please note - there may however be additional PIT evidence that will be required to achieve Qualification (for DBT2 / 'Consequential Change' functionality). Full Qualification requirements will be defined by the BSC and REC Code Delivery Bodies.
3. **'Testing on behalf of'** [3] – where an MHHS participant organisation elects to delegate some or all of its Industry-wide testing to a 3rd-party software provider or IT service provider, or other 3rd-party testing provider with which they are contractually aligned, for execution "on their behalf". This might be an option some SIT participants chose to adopt during SIT testing in order to meet their SIT test coverage requirements. Where a participant organisation, which has acceded to the code, chooses to opt for this, they also accept the associated risks and remain accountable for meeting code requirements.
4. **'Placing Reliance'** [4] – An organisation choosing to Qualify via the non-SIT route may, where appropriate, "place reliance" on MHHS industry-wide testing already successfully undertaken by another organisation (i.e. met via [1], [2] or a combination of [2] and [3]). To do this, the organisation wishing to

“place reliance” must demonstrate to the satisfaction of the Programme that the system/service/configuration on which they are placing reliance is identical to that already tested. Where a participant organisation which has acceded to the code, chooses to opt for this, they also accept the associated risks and remain accountable for meeting code requirements.

This policy document is concerned with defining the approach, criteria, and operation of [3] and [4].

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## 4 Approach & Criteria

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### 4.1 Approach

The Programme expects that there are various existing commercial arrangements that Programme participants (PPs) have with 3rd-party software and IT service providers, or plan to procure to deliver MHHS; we assume these will likely fall into the following broad categories:

- PPs hosting their own software and using a 3rd-party adaptor service;
- PPs hosting their own systems and connecting into a 3rd-party IT provider who provides software and adaptor on a single code and instance;
- 3rd-party IT provider providing the solution for the PP software and adaptor and providing a service on behalf of the PP or a variation of this where PPs additionally use other software (either their own or a separate 3rd-party solution)

However, with there being such a large degree of potential variations of arrangements within the industry, the Programme will require initial assistance from Programme participants to indicate:

- a) What Roles (and MPIDs) you plan to Qualify in;
- b) Which route through industry-wide test to Qualification you are planning to take for each Role and MPID (SIT or non-SIT);
- c) If you are proposing to delegate any of your testing to a 3rd-party [3];
- d) If you plan to “place reliance” on any testing [4].

All participants will be subject to assurance, but in the case where you are electing to adopt either [3] or [4] we will also ask you (in conjunction with your software/service provider) to provide a clear statement of the architecture of the software that demonstrates all the features/configurations that you use and how you therefore propose to approach DBT1 PIT and industry-wide testing coverage.

This information will be used to determine the validity of your proposal on a case-by-case basis, and to identify if any additional testing may be required to satisfy Qualification requirements.

In the case of non-SIT Participants electing to adopt [4], we will expect you, with the support of your software/service provider to identify which testing you plan to “place reliance” on and to demonstrate that this has been agreed with the organisation(s) undertaking that testing. You will need to submit an analysis of the coverage of Qualification test requirements against the testing you plan to “place reliance” on; evidence of the identical systems and service configuration that you are placing reliance on; and the identification of any tests that might be required for systems and services that are not identical.

The agreed approach to [3] or [4] will then be periodically reviewed and validated during PIT, and during SIT and Qualification Test assurance, with the testing evidence forming part of that required for BSC / REC market Qualification (subject to the arrangements continuing to be that which will be used in production).

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### 4.2 Assurance Criteria

Assurance of your declared approach will include such things as:

- The degree of commonality of the software and its configuration;
- The services the 3rd-party provider supports for each Programme participant,
- That the agreement of the 3<sup>rd</sup> party has been sought and obtained by the participant;

- That the participant expects to continue to use the 3rd-party provider for ongoing MHHS live operations (should this change during or after testing, then the participant will need to notify the Code Delivery Bodies and will be required to test and Qualify under the new arrangement).

Depending on the extent to which an organisation is intending to use [3] or [4] the MHHS Programme, working with the Code Delivery Bodies, may require additional testing to satisfy Qualification, this may take the form of basic connectivity testing via your software / service provider to the DIP and execution of Operational Service Management tests and validation of modelled exceptions handling scenarios.

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## 5 Process & Operation

### 5.1 SIT Participants Process

#### Stage 1 – Initial proposal

1. Programme participants that intend to Qualify via the SIT route and are volunteers for SIT will be requested to provide their proposal for how they will meet their DBT1 and SIT coverage requirements, specifying:
  - a. What Roles (and MPIDs) you plan to Qualify via SIT;
  - b. If you are proposing to delegate any of your testing to a 3<sup>rd</sup> party [3];
  - c. If you are adopting [3], to provide a clear statement of the architecture of the software that demonstrates all the features/configurations that you use and how you therefore propose to delegate this and to what extent and how this approach will apply within your DBT1 PIT and SIT testing coverage, along with evidence that this has been agreed with any partners to whom you are delegating.
2. The Programme will review the SIT candidate proposal and may schedule an assurance review meeting to validate any queries. We will also begin to assess, subject to Code Delivery Body agreement, if any additional testing will be required in order to meet Qualification requirements.
3. The outcome of this assurance review, alongside a PIT delivery plan which meets the SIT timelines will determine assurance validation of the 'SIT participants agreed' milestone (T2-TE-0150).

#### Stage 2 – Following assurance approval of your initial proposal to adopt [3], and when the SI-specified SIT Scenarios and Test Cases have been confirmed:

1. As part of the SIT readiness requirement, SIT-participating organisation will be required to provide a declaration of which of the SI specified scenarios/test cases will be delegated to a 3rd party to execute during SIT. At this stage we will also require confirmation of your planned PIT coverage for all the requirements for your role in the market.
2. The programme will assure the declaration and, in consultation with the Code Delivery Bodies, will confirm that this meets the requirement to Qualify (subject to the provision of evidence). If any additional testing is required to Qualify, this will be formally confirmed to the participant.
3. The declaration will also be used by the programme to inform the DBT1 PIT assurance.

#### Stage 3 – SIT test execution:

1. The SIT-participant organisation will no longer be required to complete the SIT scenario/test case delegated to their 3rd party and their successful exit from SIT will become dependent on their delegated 3rd party completing and evidencing the "Testing on behalf of" the SIT participant organisation. Responsibility for overall SIT completion will remain with the SIT-participant organisation.
2. The programme will assure SIT execution evidence to verify completion.

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## 5.2 Non-SIT Participant Process

At the time of writing, it is assumed that the Code Delivery Bodies will require non-SIT organisations to declare where they intend to “place-reliance” [4] via the completion of their individual Qualification Assessment Document submission. The process for validating and assuring will be defined by the Code Delivery Bodies within the MHHS Qualification Approach and Plan (QA&P).