



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

MHHS Change Control Webinar #14

CR065 – 01 June 2026

Version 1.0

MHHS-DEL4528

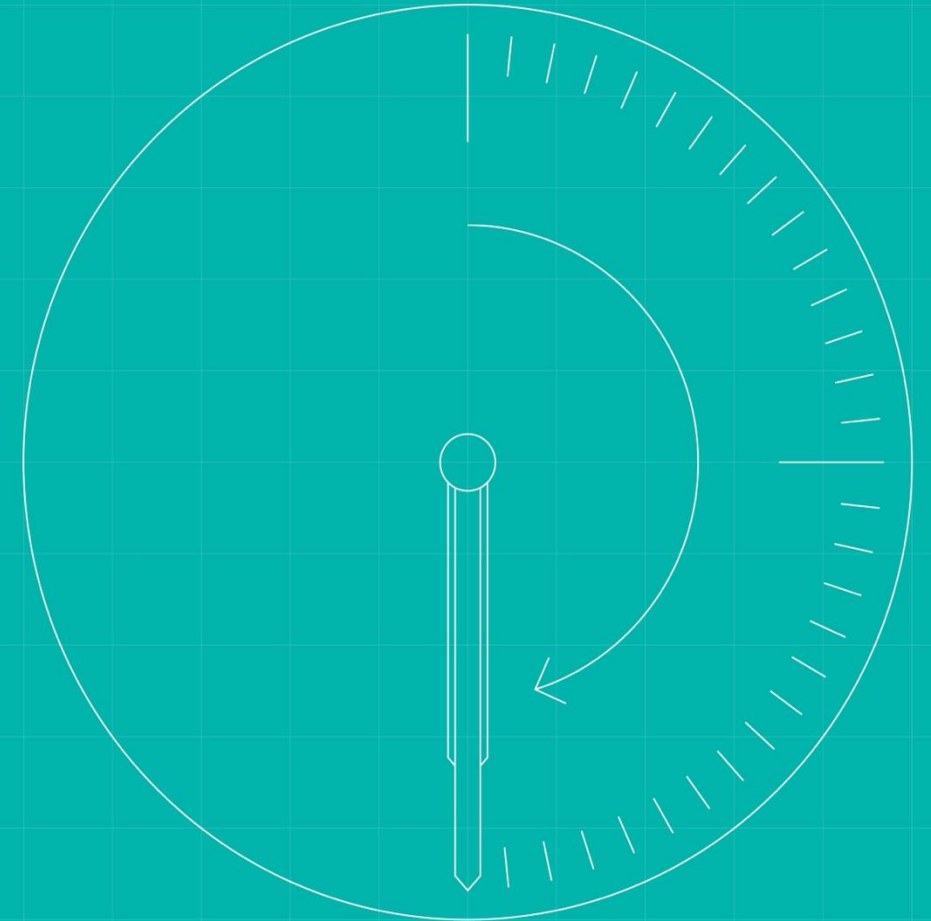
Document Classification: Public

Agenda

#	Item	Objective	Type	Lead	Time	Page
1	Welcome			MHHS PMO	15.30 – 15.35 5 mins	1
2	Presentation of CR065	Alignment of Migration Baseline Documents to Mod P487	Information	Joe Grisley Rachel Clarke	15.35 – 16.05 30 mins	3
3	CR065 Q&A	Questions from industry	Discussion	All	16.05 – 16.30 25 mins	18

Introduction to CR065

Joe Grisley, Rachel Clarke, MHHS Programme
20 mins



CR065 Overview

Objective: Change Board to make a decision on CR065

Alignment of Migration Baseline Documents to Mod P487

Issue Statement:

Following the approval of Modification P487, BSC Section C 'BSCCo and its Subsidiaries' 12.12.8 introduces migration incentives by restricting a supplier's ability to register new Metering Systems if they fail to complete migration on time by M15, other than in accordance with an exemption from the MHHS SRO.

Following this approval, the Migration Framework currently does not adequately reflect the addition of section 12.12.8 nor does the Migration framework include the MHHS SRO exemption process / Acquisition Ban Appeals Process.

Description of Change:

- During the process of consideration of Modification P487 Ofgem and stakeholders requested clarity on the process for imposing and lifting the Acquisition Ban, and protections to ensure that the ban was not applied where failure to complete migration was wholly due to circumstances outside of the supplier's control.
- The MHHS Programme provided draft changes to the Migration Framework that set out the processes to be applied and introduce an SRO exemption process where failure is due to circumstances outside of the supplier's control. Ofgem's decision to approve P487 makes it clear that:

“the MHHS Programme will promptly raise a Programme Change Request to revise the MHHS Migration Framework substantially in line with the draft documentation provided to the BSC Panel in December 2025”.

- This change request will make all the necessary changes to the Migration Framework to implement P487 as set out by Ofgem.

Target Date of Change and Next Steps:

- The target date is 24 June 2026
- The next step will be to implement an Impact Assessment, with a deadline of 17.00 on 12 June 2026,

The screenshot shows a 'Change Request Form' from the MHHS Programme. The form title is 'Change Request Form' and the details are as follows:

Change Request details		
Change Request Title	Alignment of Migration Baseline Documents to Mod P487	
Change Request Number		
Originating Advisory / Working Group		
Risk/Issue reference	R499, R705	
Change Raiser	Warren Fulton	Date raised: 20/05/2026

Below the table, there is a note: "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."

Under the heading "Change Request to be read in conjunction with:", there is a list of documents:

- MHHS Change Request Form Guidance for Programme Participants
- MHHS Change Control Approach
- MHHS Governance Framework
- Ofgem's MHHS Transition Timetable

The form footer includes "© Elexon Limited 2026" and the MHHS Programme logo.

MHHS-DEL4523 CR065 Draft



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CR065 - Alignment of Migration Baseline Documents to Mod P487

Document Classification: Public

Agenda

- 1 Introduction
- 2 P487 Effect and Timing
- 3 Overview of proposed changes to the Migration Framework
- 4 Migration Fairness Principle
- 5 SRO Exemption process and appeals
- 6 Illustrative Scenarios
- 7 Applying and Lifting the Customer Acquisition ban and appeals
- 8 Consequential changes
- 9 Questions

Introduction

- P487 has been approved by Ofgem and introduces a Customer Acquisition Ban for suppliers who have not completed migration by M15, unless there is a relevant SRO exemption in place.
- During the P487 process there was a call for clarity over how the Customer Acquisition Ban would work and how suppliers would be protected against being subject to the ban if they had failed to complete migration due to circumstances outside of their control.
- The MHHS Programme developed:
 - a 'Migration Schedule Fairness' principle to ensure that any migration schedule takes account of the ability of a supplier to react to circumstances outside of their control;
 - an SRO exemption process to address circumstances outside a suppliers' control;
 - a set of illustrative scenarios as to how the exemption process might be applied; and
 - a process for applying and lifting the ban.
- All of these supplier protections and MHHS programme processes to ensure P487 works fairly and predictably for suppliers need to be included within the Migration Framework to have effect.
- The proposed changes to the Migration Framework were consulted on and substantially revised and augmented in response to that consultation. They were also further revised following a P487 working group.
- Ofgem's decision to approve P487 includes an expectation that "MHHS Programme will promptly raise a Programme Change Request to revise the MHHS Migration Framework substantially in line with the draft documentation provided to the BSC Panel in December 2025."
- CR065 introduces those supplier protections and MHHS programme processes to the Migration Framework as envisaged by Ofgem in its approval of P487.

P487 Effect and Timing

- P487 introduces a new paragraph to the BSC which states:
 - “Those Parties required by the MHHS Migration Plan to undertake MHHS Migration must comply with the MHHS Migration Plan set out in the Programme Plan. Failure to complete such MHHS Migration by the date set out in the MHHS Migration Plan, other than in accordance with an exemption from the MHHS SRO issued in accordance with the MHHS Migration Plan, shall result in the Party not being able to become a Registrant for Metering Systems for which it is not already a Registrant until such time as it has completed MHHS Migration.”
- This means that any electricity supplier that has not completed Migration by the baselined M15 date will be unable to take on new customers until it has completed migration. However, that customer acquisition ban will not apply if the supplier has an exemption from the SRO in respect of all the MPANS for which that supplier is responsible that have not completed migration by M15.
- P487 has been approved by Ofgem and will come into force when the relevant changes (those that are the subject of this Change Proposal) have been made to the Migration Framework or on the 26th of June, whichever is sooner, although P487 does not have any direct impact on parties until M15.
- This means that in the absence of changes to the Migration Framework to introduce the SRO exemption process the customer acquisition ban would apply without any recognition of suppliers’ ability to respond to circumstances outside their control. CR065 is essential to ensure P487 operates fairly and predictably.

Overview of the Proposed Changes to the Migration Framework

The proposed changes fall into 3 categories:

- a) The Migration Schedule Fairness principle, which is introduced in the Migration Framework Principals and Guidelines and requires the MCC to ensure that any migration schedule takes account of the ability of a supplier to react to circumstances outside of their control, including planning for migration of MPANs on a date beyond M15 where it is not practical to achieve migration by M15 due to circumstances beyond a supplier's control.
- b) The SRO Exemption process operation and appeals, which is introduced in the Migration Foundations document, with the detailed process set out in an Annex to that document.
- c) The Customer Acquisition Ban process operation and challenges, which is established in [where is it now] with a detailed process for the imposition and lifting of the ban and the process for challenging the data on which the decision to impose the ban is calculated.

Migration Fairness Principal

ID	Statement	Rationale	Implications:
MCP08	The MCC will ensure that the Migration Schedule takes account of the ability of a supplier, taking all reasonable steps, to react to circumstances outside of their control.	Any supplier that has not completed MHHS Migration by the date set out in the MHHS Migration Plan will face a ban on new customer acquisition until such time as their migration is complete. It is important that the Migration Plan is reasonably achievable for every supplier if they take all reasonable steps and does not require suppliers to achieve results that are not possible due wholly to circumstances outside of their control.	When replanning the Migration Schedule, the MCC will take account of any circumstances outside of the control of suppliers, including any SOLR process. They will always attempt to produce a Migration Plan that sees all MPANs in an Acceptable State by M15. Where that is not possible following this principle some MPANs may be planned to be put in an Acceptable State after the baselined date for M15. Where this is the case and a Supplier is complying with the Migration Plan the SRO will exempt any MPANs scheduled to reach an Acceptable State after M15 from the customer acquisition ban until their scheduled date.

SRO Exemption

The SRO Exemption is introduced in a new paragraph in Section 3.3 (Migration Complexities) of the MHHS Migration Framework Foundations:

“7. Circumstances beyond Suppliers’ control: Suppliers are expected to take all reasonable steps to ensure that they have completed migration and that all MPANs for which they are responsible are in Acceptable States by M15. Suppliers are responsible for their own readiness and the performance of agents and 3rd party service providers with whom they have a contractual relationship. However, it is recognised that Suppliers’ ability to complete migration in a timely fashion may be impacted by circumstances genuinely beyond their control. Where this is the case the MCC will always attempt to replan the migration of the impacted MPANs to allow for completion of migration by the baselined M15 date. Where this is not possible wholly due to circumstances genuinely outside the control of the Supplier or due to a SoLR process, and **if the Supplier has completely complied with the MCC plan in place**, the SRO will issue an exemption so that the Supplier will not be subject to a Customer Acquisition ban. The SRO exemption will apply to specific MPANs scheduled for migration or other action after the baselined M15 date and will last from the baselined M15 date until the date in the MCC Migration Schedule for their migration or other action. The exemption will cease to apply if the MPANs are not in an Acceptable State after the date in the MCC Migration Schedule by which they are due to be in an Acceptable State.”

Process for seeking an SRO exemption

- The process for seeking an SRO exemption is set out in the new Appendix 2 to the Migration Framework Foundations.
- A Supplier must always notify the Migration Control Centre as soon as they are aware of a risk that they may not be able to complete migration according to their migration schedule, or by M15.
- An application for consideration may be made to the Migration Control Centre by a Supplier where a situation beyond their control, including natural disasters or other outages beyond their ability or their agents ability to resolve, has had the effect of making it impossible for them to comply with their Migration Plan.
- An application must be made as soon as the impact of any event is known.

SRO Exemption Process and Appeals 2

SRO Decision process

- The process for the SRO to make decisions on exemption requests is set out in the new Appendix 2 to the Migration Framework Foundations.
- The SRO will take into account:
 - Whether the event is wholly outside the control of the supplier and its agents;
 - The extent to which the supplier has taken all reasonable steps to mitigate the impact of the event on its ability to complete migration by M15, including prompt notification to the MCC;
 - The extent to which the supplier has cooperated with the MCC in defining a revised migration schedule; and
 - Whether the supplier is delivering in accordance with the new migration schedule.
- If it appears to the SRO that the Supplier has been impacted by an event wholly outside their control and that of their agents, that they have taken all reasonable steps to mitigate the impact of the event on their ability to complete migration by M15, that they have fully cooperated with the MCC in defining a revised schedule and that they are on track against that new schedule the SRO will issue an exemption from the M15 customer acquisition ban.
- Any exemption will:
 - Relate only to any MPANs scheduled for migration after M15; and
 - Cease to apply in respect of each MPAN on the day after the date on which it is scheduled for migration.

Process to appeal an SRO exemption decision

- The process for appealing an SRO exemption decision is set out in the new Appendix 2 to the Migration Framework Foundations.
- If a Supplier applies for an exemption which is not granted, or which is not granted in full they may appeal to the IPA on the following grounds:
 - The process was not properly followed in material ways that could have impacted the SRO decision;
 - The evidence presented to the SRO did not include all the evidence provided by the Supplier or was mis-represented; or
 - The evidence provided was not properly interpreted.

Illustrative Scenarios 1

- All applications would be treated on a case-by-case basis as circumstances will differ. A number of scenarios are set out in the slides below with the likely outcome as to whether an exception would be granted. These are illustrative only, and Ofgem have said that they expect them to be included in the baselined Migration Framework. These illustrative scenarios are included in Appendix 2 of the Migration Framework Foundations document.

Event	Consequence for Customer Acquisition Ban
a) Unplanned capacity constraints from LSDOs	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.
b) Failure by a 3 rd party service provider	<ul style="list-style-type: none"> No exemption
c) Unplanned capacity constraints from DIP	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.
d) Unplanned capacity constraints from DCC	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.
e) Delays or outages from Elexon Settlement	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.

Illustrative Scenarios 2

Event	Consequence for Customer Acquisition Ban
f) Late SOLR acquisition	<ul style="list-style-type: none"> Supplier to apply for MCC to replan. Likely exemption if migration cannot be reasonably achieved prior to M15.
g) Late commercial supplier acquisition	<ul style="list-style-type: none"> No exemption
h) Late qualification due to PAB delays	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.
i) Late qualification due to supplier readiness	<ul style="list-style-type: none"> No exemption
j) Market disruption e.g. Covid, conflict etc	<ul style="list-style-type: none"> No individual exemption. M15 may move if problem is major.
k) Delay as a result of Qualification testing and Service Activation	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.
l) Delays from a major programme incident	<ul style="list-style-type: none"> SRO to replan the Migration schedule. Any MPANs not scheduled for migration before M15 would likely be exempt from the customer acquisition ban until their scheduled migration date. M15 may move if problem is major.

Applying and Lifting the Customer Acquisition Ban and Challenges

The detailed process for applying and lifting the Customer Acquisition Ban, and the process to challenge the data on which a ban is based, is set out in Appendix 3 of Migration Framework Foundations. The key points from that process are:

- Migration status will be determined by the MHHS Programme from EES reports. The first EES report provided after M15 will be used to identify any suppliers that have not completed migration and will trigger the application of the customer acquisition ban.
- The MHHS Programme will provide a copy of the relevant EES report to each Supplier that has not completed migration within 2 WD of receiving that report from EES. The Supplier can challenge the information in that report within 2 WD of receiving it.
- The challenge will be considered by the IPA. The IPA will take evidence from the Supplier and the Programme and provide a ruling within 5 WD.
- When the Supplier has completed migration, they should provide evidence of completion of migration for all outstanding MSIDs to the MHHS Programme. The programme will then request the customer acquisition ban to be lifted.

Consequential Changes

The previous slides have set out the main changes to Migration Framework documents covered by the Change Proposal.

All the changes proposed are listed in the 'Appendix: checklist of changes to Migration framework documents'.

In addition to the key sections reflecting the customer acquisition ban, introducing the principle of Migration Schedule Fairness and the SRO exemption and setting out the detailed processes for both, there are minor changes to ensure that the Migration Schedule Fairness principle is taken into account wherever relevant and that the SRO exemption process is followed.

Appendix: Checklist of Changes to Migration Framework Documents

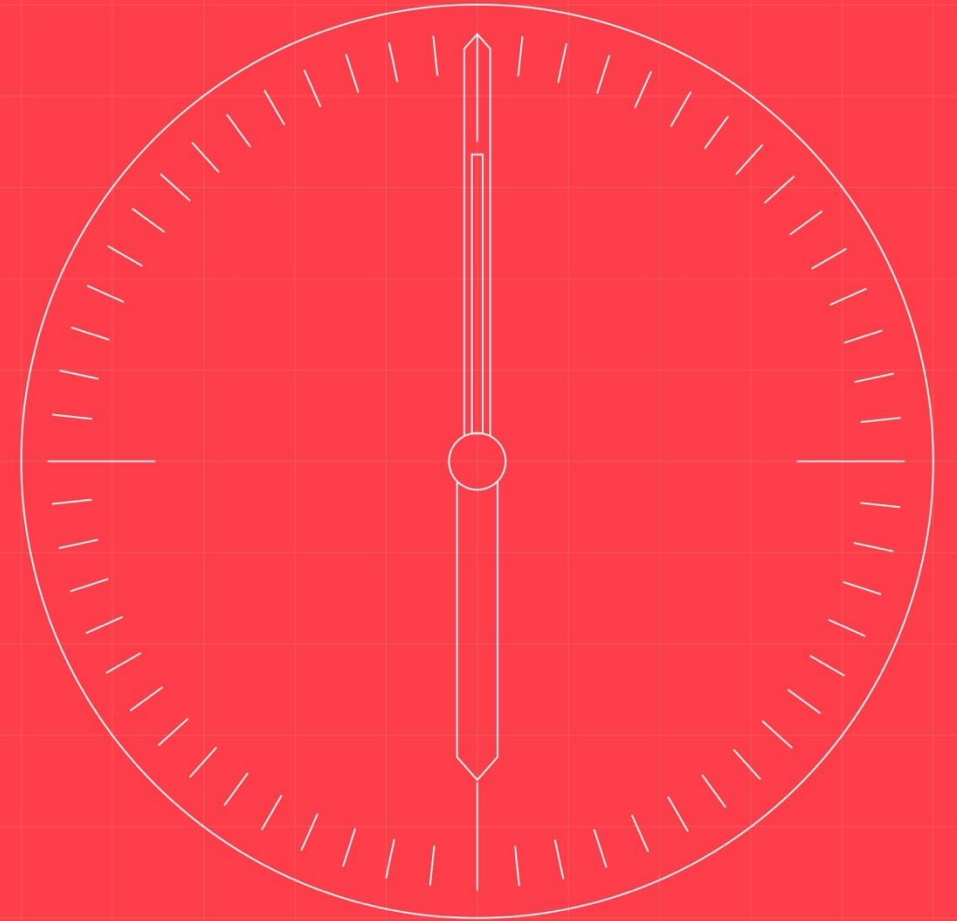
- **Migration Framework Foundations:**
 - **Para 2.1 - New text inserted at end of para: “Failure to comply fully with the Migration Framework may result in a customer acquisition ban from the baselined date for M15 until a Supplier’s portfolio has fully met the M15 Acceptance Criteria except where the SRO has issued an exemption.”**
 - **Para 3.4 - New sub-paragraph 7 inserted introducing the SRO exemption process for circumstances beyond suppliers’ control**
 - **Para 4.2 - New text inserted at end of para “Where the MCC is applying the principle of Migration Schedule Fairness in a way that could lead to Suppliers being impacted by a Customer Acquisition Ban or to MPANs being scheduled to not be in an Approved State at M15, SRO approval will be required.”**
 - **Section 6 - New para 6.7 inserted introducing the process for applying for an SRO exemption, which is set out in the new Appendix 2.**
 - **Section 8 - New responsibilities added for the MCC – “Assess applications for exemptions under the Migration Fairness principle and make recommendations to the SRO” and the SRO – “Decide on applications for exemptions under the Migration Fairness principle”**
 - **New Appendix 2 setting out the SRO Exemption Process, including illustrative scenarios**
 - **New Appendix 3 setting out the detailed process for the Customer Acquisition Ban, including the introduction of the Customer Acquisition Ban, including a process to challenge the data used, and for lifting of the ban when the relevant MPANs have been migrated**

- **Migration Framework – Principles and Guidelines**
 - **Para 5.1 – New principle MCP-08 ‘Migration Schedule Fairness’ introduced to require MCC to ensure that any migration schedule takes account of the ability of a supplier to react to circumstances outside of their control.**

- **Migration Requirements and Processes**
 - **Para 9.3.1 – New text ‘or Migration Schedule Fairness’ added to consideration of ‘Manage Migration Incident/Issue’**

Q&A

All





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

Contact

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Thank you