

# Market-wide Half Hourly Settlement (MHHS) Programme Governance Framework – (Strawman)



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## 2 Change Record

Date	Author	Version	Change Detail
15/07/2021	Andrew Margan	0.1	Draft version for review
21/07/2021	Andrew Margan	0.2	Amended following internal review
22/07/2021	Andrew Margan	0.3	Amended internal draft
29/07/2021	Andrew Margan	1.0	Final draft

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## 3 Market-Wide Half Hourly Settlement – Programme Governance

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### 3.1 Scope and Approach

This paper sets out a strawman MHHS Programme governance structure that can be easily understood and be further developed by MHHS Programme Participants. The paper should provide greater clarity of the roles and responsibilities of each governance group, how the groups will interact with each other and how decisions, communications and escalations will occur. The strawman should be taken to PSG (Level 2) and the relevant (Level 3) decision groups for their discussion, amendment and sign off.

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### 3.2 Objectives and Assumptions

The programme objectives and the governance structure should:

- a) Be delivery focused
- b) Secure trust and buy-in across all Programme Participants;
- c) Be industry-led;
- d) Be efficient and streamlined (including supporting rapid decision making and ensuring parties have access to the necessary capacity/capabilities to fulfil their roles);
- e) Enable objectives and benefits of the MHHS programme to be delivered; and
- f) Be clear, transparent and appropriate for different requirements of the programme, e.g. licence obligations, programme management, programme management budget, and change process.

Ofgem has confirmed that Elexon will be obligated under the BSC to act as the Senior Responsible Owner (SRO) and MHHS Implementation Manager (IM). Ofgem's role is Programme Sponsor. Ofgem is consulting on its proposed Sponsor role, and has set out and consulted on proposed thresholds for Ofgem intervention or decision. These include a material impact to the MHHS Target Operating Model, material impacts to Programme cost and benefits (£5m per a single decision or £20m for a cumulative decision), and/or a material impact to consumers or competition<sup>1</sup>. Ofgem and the programme will be supported by an Independent Programme Assurance (IPA) provider which will have a wide ranging assurance remit across programme delivery. Elexon's Board will ensure MHHS Programme separation (alongside the IPA) and also manage the BSCCo Business Plan (budget process), as per their obligation.

It is anticipated that the Programme governance structure will be directed by Ofgem in autumn 2021 through their SCR powers. Ofgem's proposed direction will place programme governance arrangements under the BSC. The BSC Programme documents, including the governance arrangements can be changed after Ofgem direction through the Programme change process, which have yet to be established will be developed with industry following the appointment of the MHHS Lead Delivery Partner in November 2021. This document is subject to the Ofgem directed governance framework changes.

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### 3.3 Summary of High-Level Governance

An industry led model will ensure the decision-making between the SRO, MHHS Implementation Manager (MHHS IM), and Programme Participants is appropriately balanced, to ensure that the SRO is empowered to make decisions on behalf of the industry, but is accountable to, and has engaged and consulted with the Programme Participants. The objective is that all parties will have access to the correct and relevant Programme information and they all have an opportunity to participate and influence the Programme decision-making, without unnecessarily delaying the programme. All programme decisions need to be communicated in a clear and timely manner by the MHHS IM.

The MHHS Programme governance structure should be designed so that decisions are made at the most appropriate level with Programme Participants through consensus and well defined thresholds and limits as opposed to escalating all decisions to the PSG. Decisions that cannot be resolved at the lower level, can be escalated to the decision making group above. The IPA will have a role in providing assurance that the Programme's or SRO's decision making is in line with the agreed process.

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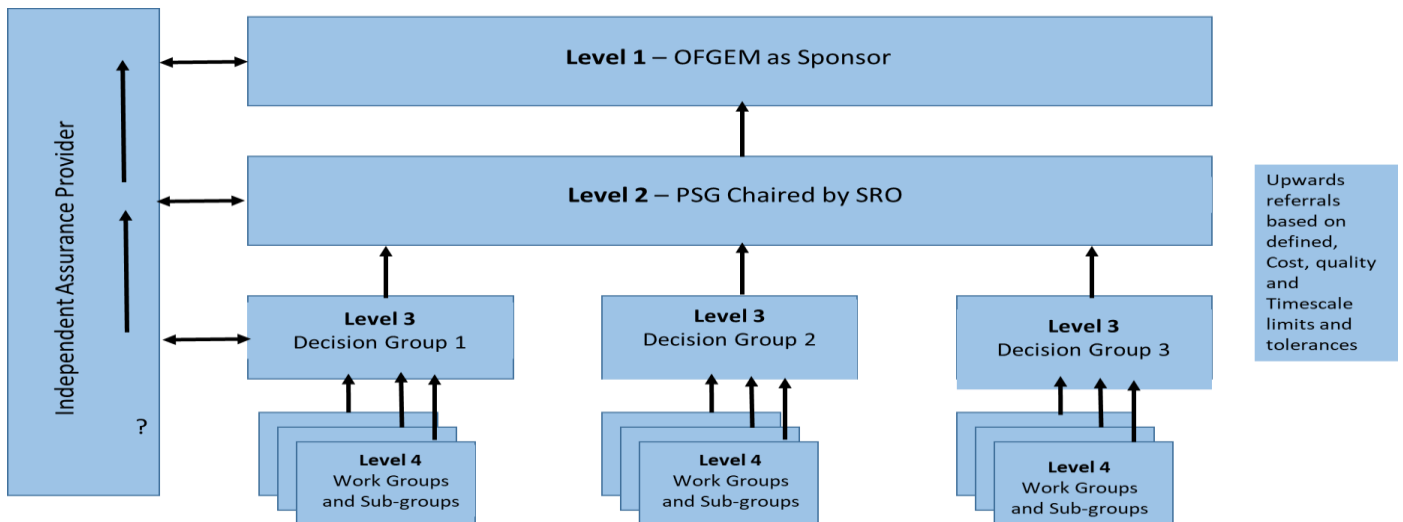
<sup>1</sup> [Reference to BSC MHHS Obligations to be placed here, post Ofgem directed changes]

### 3.4 Programme Governance

The objective of the governance framework structure is:

- a) The Programme is set up for success from the start.
- b) All programme parties are appropriately communicated with and have an opportunity to input into the programme and the decision-making process.
- c) The Programme is empowered to make programme decisions.
- d) Programme decisions will be made at the most appropriate level, through consensus.

### 3.5 Governance Structure



Note: Need to differentiate between Governing Bodies and operational roles, hence why PMO, PPC, SI etc not mentioned above

Note: Group names are intentionally left blank and are to be populate post industry consultation

### 3.6 Programme Decision Making

The proposed governance structure has four levels of decision making. Decision making can be delegated from the parent group to the child group below. Responsibilities and accountabilities sit with the SRO, unless a decision meets Ofgem's threshold criteria<sup>2</sup>. In the case of a decision meeting the threshold, Ofgem will direct the SRO to implement its decision. Below the Ofgem thresholds, the PSG will make Programme decisions through consensus. Where consensus cannot be reached the SRO will make the Programme decision based on the various views of the PSG and taking into account any advice from the IPA. The PSG should delegate decision making to a Level 3 group when appropriate to do so. The decision making framework with decision making criteria for the different level decision groups is to be taken to the first [October/November] PSG meetings for discussion and wider consultation. The Level 3 groups can delegate decision making, tasks and actions to a Level 4 group. Where consensus cannot be reached at a group, a decision can be escalated to the group above. Level 4 groups will be more detailed working groups and/or technical sub-groups.

### 3.7 Escalations

Lower level groups can escalate concerns to the group above. The MHHS Implementation Manager PMO function should support this activity or parties can escalate concerns to their Programme Representative, who is a member of the relevant group or to the SRO. If the decision area is above the Ofgem thresholds, the SRO or IPA can escalate these to Ofgem. If an individual party wishes to escalate an issue to Ofgem, because they feel it meets the thresholds, they should escalate this via the IPA. Ofgem will take advice from the IPA and other parties as appropriate in reaching their escalation decision. The IPA will communicate the Ofgem escalation decision to the SRO and PSG. The SRO will instruct the PMO to communicate the escalation decision to programme participants.

<sup>2</sup> [Reference to BSC MHHS Obligations to be placed here, post Ofgem directed changes]

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### 3.8 Membership Principles

Level 2 and Level 3 groups will have a representative structure that ensures that all categories of MHHS Participants have a constituency representative. Members of these groups, and attendees at the meetings of these groups are nominated constituency representatives only, unless invited by the Chair. Constituency representatives are expected to attend all meetings, although they can nominate alternates if they cannot attend for exceptional circumstances (e.g. leave, illness etc). Constituency representatives are expected to consult with their constituencies in a timely manner ahead of Level 2 and Level 3 group meetings to ensure that they are able to represent the full range of views within their constituency.

Level 2 membership should be a mix of senior delivery and senior programme governance experts who are empowered by their constituency groups to make Programme decisions on behalf of their constituency.

Level 3 membership will depend on the group's terms of reference and the representatives should be senior experts in their field and be empowered to make Programme decisions by their constituents.

Level 4 membership will depend on the work group subject and meeting requirements, but these meetings should be open to all interested parties, unless specific terms of reference don't allow open membership. For example Security may be a closed group. Terms of reference for all initial Level 2 and Level 3 groups are set out for consultation in this document. Terms of Reference and the membership for all other groups will be consulted on, ahead of the groups being established.

A request for constituency representative nominations (and the nominations and potential elections process) will be communicated after the governance framework consultation closes.

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### 3.9 Generic Roles and Responsibilities

The Chair for all meetings will be provided by the SRO or someone delegated by the SRO from within the MHHS Implementation Manager function. Secretariat will be provided by the MHHS Implementation Manager Lead Delivery Partner PMO Function.

- a) The Secretariat will maintain and communicate up to date meeting documentation.
- b) The Secretariat will manage and report on meeting arrangements against Programme milestones.
- c) The Secretariat will maintain up to date RAID and action logs.
- d) The Secretariat will provide all meeting management services and deliver all regular and ad hoc meetings.

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### 3.10 Generic Meeting Practices and Frequency

Each group will meet approximately every month or more frequently as required. The meeting frequency will be reviewed by the Chair.

The role of the Chair is to facilitate discussion across the group, to enable challenge and to ensure decisions and recommendations are made, or issues escalated.

Members are responsible for driving forward their own contributions to the Programme and are expected to support decision making.

The Secretariat will be provided through the LDP PMO function and will provide agendas and meeting papers at least [5] working days in advance of each meeting and meeting output, including minutes, actions and decisions within [10] working days of each meeting. The refinements of the SLAs for meeting papers and consultation timescales will be developed with industry when the LDP is appointed.

Programme consultation timelines are likely to be set by each group at the time of issuing the consultation/information request.

### 3.11 Initial Programme Governance Group Summary Table

Group Name	Role	Level	Membership	Attendees
Programme Steering Group (PSG)	Primary programme decision making body	2	Constituency representatives	Senior level delivery & governance experts
Implementation Advisory Group (IAG)	Primary owner of programme implementation	3	Constituency representatives	Senior level programme experts
Design Advisory Group (DAG)	Primary owner for the end to end design output	3	Constituency representatives	Senior design experts
Cross Code Advisory Group (CCAG)	Primary owner for ensuring cross code change	3	Constituency representatives and Code Bodies	Senior regulatory experts and Code Body senior management
Business Process, Detailed Design, Detailed Architecture, Data, Cross-Code, Test, Integrate (plus others?)	Development Workgroups and subgroups	4	All programme parties	Dependent on subject
Security	Development Workgroup	4	Security representatives	System security experts

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## 4 Programme Steering Group (PSG) Terms of Reference (Level 2)

The PSG Terms of Reference (“ToR”) sets out the role, membership and mode of operation.

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### 4.1 PSG Role

The PSG role is an senior-level group, where key issues, challenges and Level 1 milestone Programme planning are presented and steering group members make strategic decision which efficiently drives the MHHS Programme forward, delivers the new TOM and ensures the Programme keeps to plan.

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### 4.2 PSG Objectives

To be the overarching Programme decision making authority for Market-wide Half Hourly Settlement, where they don't meet Ofgem thresholds.

Ensure the Programme is delivered according to the agreed TOM.

Ensure the Programme is kept to plan and proactive decisions are made to address any risk of delay.

Ensure different programme participant perspectives are appropriately represented during decision making.

Receive escalations from lower level workgroups and reach consensus, ensuring the Programme progresses to plan.

Enables Programme transparency for all impacted constituency groups and stakeholders.

Delegate decision making to appropriate lower level groups.

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### 4.3 Membership

The PSG Membership is the SRO as Chair, a representatives from each programme participant constituency and Ofgem as an observer –

- a) SRO - Chair
  - b) SRO Programme Director
  - c) Lead Delivery Partner (LDP) Programme Manager
  - d) Independent Programme Assurance (IPA) Manager
  - e) Elexon Representative (as central systems provider)
  - f) DCC Representative (as smart meter central system provider)
  - g) Large Supplier Representative
  - h) Medium Supplier Representative (Subject to Ofgem MHHS BSC Governance Framework decision).
  - i) Small Supplier Representative
  - j) I&C Supplier Representative (Subject to Ofgem MHHS BSC Governance Framework decision).
  - k) Supplier Agent Representative
  - l) Supplier Agent Representative
  - m) DNO Representative
  - n) iDNO Representative
  - o) Consumer Representative
  - p) Ofgem (Observer)
  - q) The PMO will attend to act as meeting secretariat.
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### 4.4 PSG Scope, Deliverables, Roles and Responsibilities

The SRO (or in exceptional circumstance someone delegated by the SRO) will chair the meetings.

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The PMO will maintain and communicate up to date meeting documentation.

The PMO will manage and report on the delivery of P1 and P2 Programme milestones.

The PMO will maintain an up to date Programme plan, RAID log and actions log.

The PMO will provide all meeting management services and deliver all regular and ad hoc meetings.

PSG Members (or nominated alternatives) will attend every meeting.

PSG Members will be fully meeting prepared before the meeting starts.

PSG Members should be a mix of programme delivery and governance experts.

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#### **4.5 Decision Making**

Decisions above the threshold must be referred to Ofgem by the SRO or the IPA.

PSG will have authority to delegate decisions to lower level groups and sub-groups (Level 3 or Level 4) and should seek to do so where appropriate.

The PMO will ensure decisions are based on full transparency and appropriate consultation.

Where consensus is not reached, the lower level workgroups should escalate the decision to the group above. If a decision cannot be reached at the decision group level, the SRO will make the decision after considering the varying views expressed, including IPA recommendations, if under the threshold or Ofgem will make the decision if above the threshold.

All changes must follow the MHHS Programme change control process (Section 7).

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## 5 Implementation Advisory Group (IAG) Terms of Reference (Level 3)

The IAG Terms of Reference (“ToR”) sets out the role, membership and mode of operation.

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### 5.1 IAG Role

The IAG’s role is to oversee and manage, the MHHS Programme plan and resolves implementation issues and tasks delegated from the PSG to ensure the Programme plan delivers to Programme timelines.

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### 5.2 IAG Objectives

To be the primary decision making authority for the implementation decisions, unless above Ofgem thresholds.

To collectively monitor and manage the Programme plan.

Ensure different programme participant perspectives are appropriately represented during decision making.

Enable Programme plan transparency for all impacted constituency groups and stakeholders.

Delegate appropriate tasks and activities to other groups.

Receive escalations from other groups and reach consensus on decisions.

Provide detailed advice to the SRO, PSG and groups if required.

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### 5.3 Membership

The IAG Membership is the SRO as Chair, programme delivery representative from each programme participant constituency and Ofgem as an observer –

- a) SRO - Chair
- b) SRO Programme Director
- c) Lead Delivery Partner (LDP) Programme Manager
- d) Lead Delivery Partner SI Manager
- e) Lead Delivery Partner PPC Manager
- f) Independent Programme Assurance (IPA) Manager
- g) Elexon Representative (as central systems provider)
- h) DCC Representative (as smart meter central system provider)
- i) Large Supplier Representative
- j) Medium Supplier Representative
- k) Small Supplier Representative
- l) I&C Supplier Representative
- m) Supplier Agent Representative
- n) Supplier Agent Representative
- o) DNO Representative
- p) iDNO Representative
- q) Consumer Representative
- r) Ofgem (Observer, to attend as appropriate)
- s) The PMO will attend to act as meeting secretariat.

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## 5.4 Purpose and Duties of MHHS Implementation Advisory Group

IAG's purpose is to be the group that manages and oversees the Programme plan and manages changes or updates to the plan.

IAG is responsible for all implementation decisions and all requests that impact on implementation timescales.

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## 5.5 IAG Scope, Deliverables, Roles and Responsibilities

The SRO (or someone delegated by the SRO from within the MHHS Implementation Manager function) will chair the meetings

The PMO will maintain and communicate up to date meeting documentation.

The PMO will manage and report on the delivery of P1 and P2 Programme milestones.

The PMO will maintain an up to date Programme plan, RAID log and actions log.

The PMO will provide all meeting management services and deliver all regular and ad hoc meetings.

IAG Members (or nominated alternatives) will attend every meeting.

IAG Members will be fully meeting prepared before the meeting starts.

IAG Members should be programme delivery experts.

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## 5.6 Decision Making

The IAG will make Level 3 decisions and Level 2 decisions when delegated from the PSG. (Level 1 decisions will be escalated to Ofgem by the SRO or IPA).

The IAG can delegate decisions to another Level 3 group or a lower level work group.

The IAG will ensure that any decisions are based on full transparency with programme participants and appropriate consultation.

Where parties raise significant concerns with an IAG decision, the concern will be resolved by IAG or escalated to the PSG via a constituency representative.

Consultation will be carried out on an ongoing basis. If required the IAG will request information to inform their decisions from other groups, including working groups and sub groups.

Where the IAG is presented with recommendations from a Working Group(s) they will have the ability to:

- i) Accept the recommendation – the proposal/recommendations are aligned to the TOM and overall objectives.
- ii) Reject the recommendation – the proposal/recommendations does not align to the TOM, programme principles or requires further work/clarity.
- iii) Refer the recommendation for additional work or analysis.
- iv) Accept the recommendation, subject to additional work being completed.
- v) Refer to the PSG when the recommendation meets the threshold for Ofgem intervention or DAG cannot reach consensus.

Decisions and outputs of the IAG will be published within [10] working days of the meeting.

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## 6 Design Advisory Group (DAG) Terms of Reference (Level 3)

The DAG Terms of Reference (“ToR”) sets out the role, membership and mode of operation.

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### 6.1 DAG Role

The DAG’s role is to oversee, review, consult and approve, the MHHS Programme development of the end-to-end business processes, system and data architecture that delivers the detailed system design that enables all programme participants to design, build and test their individual system and business changes.

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### 6.2 DAG Objectives

To be the primary decision making authority for the system and solution design, unless above Ofgem thresholds.

To oversee the Programme design outputs, review and validate the output contents against objectives and expectations, send the deliverables for consultation and approve the design artefacts.

Ensure different programme participant perspectives are appropriately represented during decision making.

Enable Design transparency for all impacted constituency groups and stakeholders.

Delegate appropriate tasks and activities to Level 4 working groups.

Receive escalations from lower level workgroups and reach consensus on decisions, so the Programme design work progresses to plan.

Provide detailed advice to the SRO, PSG and other groups if required.

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### 6.3 Membership

The DAG Membership is the SRO as Chair, technical expert representatives from each programme participant constituency and Ofgem as an observer –SRO - Chair

- t) SRO Design Manager
- u) Lead Delivery Partner (LDP) [Programme/Design] Manager
- v) Lead Delivery Partner (SI) System Integrator Manager
- w) Independent Programme Assurance (IPA) Manager
- x) Elexon Representative (as central systems provider)
- y) DCC Representative (as smart meter central system provider)
- z) Large Supplier Representative
- aa) Medium Supplier Representative
- bb) Small Supplier Representative
- cc) I&C Supplier Representative
- dd) Supplier Agent Representative
- ee) Supplier Agent Representative
- ff) DNO Representative
- gg) iDNO Representative
- hh) Consumer Representative
- ii) Ofgem (Observer, to attend as appropriate)

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## 6.4 Purpose and Duties of MHHS Design Advisory Group

DAG's purpose is to be the mechanism that oversees, reviews and approves end-to-end business processes, system and data architecture deliverables that produce the detailed system designs that enables all programme parties to design, build and test their individual system and business changes.

DAG is responsible for all design decisions and all requests that impact on design.

DAG is responsible for overseeing the development of the physical baseline which will provide the detail necessary for all parties to commence system design and build.

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## 6.5 DAG Scope, Deliverables, Roles and Responsibilities

DAG's scope is the development and management of all system and process design artefacts.

The SRO (or someone delegated by the SRO from within the MHHS Implementation Manager function) will chair the meetings.

The PMO will maintain and communicate up to date meeting documentation.

The PMO will maintain an up to date Programme plan, RAID log and actions log.

The PMO will provide all meeting management services and deliver all regular and ad hoc meetings.

DAG Members (or nominated alternatives) will attend every meeting.

DAG Members will be fully meeting prepared before the meeting starts.

DAG Members should be a mix of business, system, data, design, security and solution technical experts.

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## 6.6 Decision Making

The DAG will make Level 3 decisions and Level 2 decisions when delegated from the PSG. (Level 1 decisions will be escalated to Ofgem by the SRO or IPA).

The DAG can delegate decisions to another Level 3 group or a lower level work group.

The DAG will ensure that any decisions are based on full transparency with programme participants and appropriate consultation.

Where parties raise significant concerns with a DAG decision, the concern will be resolved by DAG or escalated to the PSG via a constituency representative.

Consultation will be carried out on an ongoing basis, with the DAG taking decisions based on information developed by Design Working Groups.

Where the DAG is presented with recommendations from Design Working Groups they will have the ability to:

- i) Accept the recommendation – the proposal/recommendations are aligned to the TOM and overall objectives.
- ii) Reject the recommendation – the proposal/recommendations does not align to the TOM, programme principles or requires further work/clarity.
- iii) Refer the recommendation for additional work or analysis.
- iv) Accept the recommendation, subject to additional work being completed.
- v) Refer to the PSG when the recommendation meets the threshold for Ofgem intervention or DAG cannot reach consensus.

Decisions and outputs of the DAG will be published within 10 working days of the meeting.

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## 6.7 Design Working Groups (Level 4)

The DAG will convene a number of End to End (E2E) Design Working Groups which will have responsibilities to develop specific aspects of the E2E design.

Design Working Groups will report to DAG who will agree and define the scope of each group on its creation. Work from the Design Working Groups will be subject to review by DAG.

The DAG will stand up E2E working groups as needed and will have the responsibility of approving a clear Terms of Reference and Deliverables for each group it establishes.

Groups will be convened at the appropriate point and may not be required to remain active throughout the Programme delivery.

The below groups are likely to be required as Design Working Groups. (This list is not exhaustive).

- a) Business Process Working Group (BWG)
- b) Detailed Design Working Group (DDWG)
- c) Detailed Architecture Working Group (DAWG)
- d) Data Working Group (DWG)
- e) Security Working Group (SWG)
- f) Cross Code Working Group (CCWG)

The purpose, specific deliverables and membership of each group will be determined by the DAG when each Design Working Group is created.

All Design Working Groups will report their output to the DAG for approval. This will occur on an ongoing basis and may require engagement with wider industry.

Where a Design Working Group is unable to reach a consensus on a decision delegated to them by DAG the matter will be escalated to the DAG.

All Design Working Groups will be attended and chaired by the SRO or someone delegated by the SRO such as the MHHS Lead Delivery Partner. Meeting attendance should be open to all, unless otherwise determined.

Design Working Group members will be expected to actively contribute to the development and review of collateral required to achieve the deliverables, this is likely to include completing tasks and actions outside of the Design Working Group.

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## 7 Cross Code Advisory Group (CCAG) Terms of Reference (Level 3)

The CCAG Terms of Reference (“ToR”) sets out the role, membership and mode of operation.

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### 7.1 CCAG Role

The CCAG role is to oversee the development, management and implementation of MHHS Programme related Code changes to all MHHS impacted Codes to ensure Code reflects how the new MHHS TOM process and systems operate.

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### 7.2 CCAG Objectives

To be the primary authority for coordinating, monitoring and managing MHHS impacted Code changes, unless a decision is above Ofgem thresholds.

To oversee the Programme Code change management and progression against objectives, that ensures compliance with MHHS system and operational changes.

Ensure different programme participant, especially Code body perspectives are appropriately represented.

Enable transparency of Code changes for all impacted parties and stakeholders and ongoing monitoring of relevant Code Body Code change management and Code change implementation.

Delegate appropriate tasks and activities to Level 4 Cross Code Working Group.

Receive escalations from lower level workgroups and reach consensus on decisions, so the Programme Code changes progresses to plan.

Escalate to the PSG issues and decision making when consensus cannot be reached at the CCDG.

Provide detailed advice to the SRO, PSG and other groups if required.

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### 7.3 Membership

The CCAG Membership is constituted from senior management representatives from each Programme impacted Code Body, programme participant constituency representatives, Ofgem as an observer and the MHHS Programme –

- a) SRO - Chair
- b) SRO Governance Manager
- c) Lead Delivery Partner (LDP) [Programme/Design] Manager
- d) Independent Programme Assurance (IPA) Manager
- e) [Elexon Representative (as central systems provider)]
- f) Elexon Representative (as BSC/BSCCo Manager)
- g) [DCC Representative (as smart meter central system provider)]
- h) SEC Representative
- i) REC Representative
- j) CSUC Representative
- k) DCUSA Representative
- l) [Supplier Representative (Single Representative)]
- m) [Supplier Agent Representative (Single Representative)]
- n) [DNO/iDNO Representative]
- o) Consumer Representative
- p) Ofgem (Observer, to attend as appropriate)

- q) The PMO will attend to act as meeting secretariat.

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## 7.4 Purpose and Duties of Cross-Code Advisory Group

CCAG purpose is to oversee the central coordination, monitoring and management of 'farmed-out' Code change requests and modifications to all impacts MHHS impacted Code Bodies.

CCAG duty is to ensure MHHS impacted Codes are updated and comply with the new MHHS arrangements.

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## 7.5 CCAG Scope, Deliverables, Roles and Responsibilities

CCAG is responsible for overseeing the development of the Code Modifications and redlined legal text production that delivers MHHS Code compliance.

The SRO (or someone delegated by the SRO from within the MHHS Implementation Manager function) will chair the meetings.

The PMO will maintain and communicate up to date meeting documentation.

The PMO will maintain an up to date Programme plan, RAID log and actions log.

The PMO will centrally monitor and provide related Code change programme management.

The PMO will provide all meeting management services and deliver all regular and ad hoc meetings.

CCAG Members (or nominated alternatives) will attend every meeting.

CCAG Members will be fully meeting prepared before the meeting starts.

CCAG Members should be a mix of Code Body and regulatory experts.

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## 7.6 Decision Making

The CCAG will make Level 3 decisions and Level 2 decisions when delegated from the PSG. (Level 1 decisions will be escalated to Ofgem by the SRO or IPA via the PSG).

The CCAG can delegate decisions to another Level 3 group or a lower level work group.

The CCAG will ensure that any decisions are based on full transparency with programme participants and appropriate consultation.

Where parties raise significant concerns with a CCAG decision, the concern should be escalated to the PSG via their constituency representative or the SRO.

Consultation will be carried out on an ongoing basis, with the CCAG taking decisions based on information developed by the Cross Code Working Group.

Where the CCAG is presented with recommendations from lower level Cross Code Working Group(s) they will have the ability to:

- i) Accept the recommendation – the proposal/recommendations are aligned to the TOM and overall objectives.
- ii) Reject the recommendation – the proposal/recommendations does not align to the TOM, programme principles or requires further work/clarity.
- iii) Refer the recommendation for additional work or analysis.
- iv) Accept the recommendation, subject to additional work being completed.
- v) Refer to the PSG when the recommendation meets the threshold for Ofgem intervention or CCAG cannot reach consensus.

Decisions and outputs of the CCAG will be published within 10 working days of the meeting.

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## 7.7 Cross Code Working Group(s)



The DAG will convene a number of End to End (E2E) Working Groups, including Cross Code Working Group.

The Cross Code Working Group will report to DAG who will agree and define the scope of each group on its creation. Work and output from the Cross Code Working Group will be subject to review and action by the CCAG. The CCAG will manage, consult, approve and recommend the Code related decisions from the Cross Code Working Group.

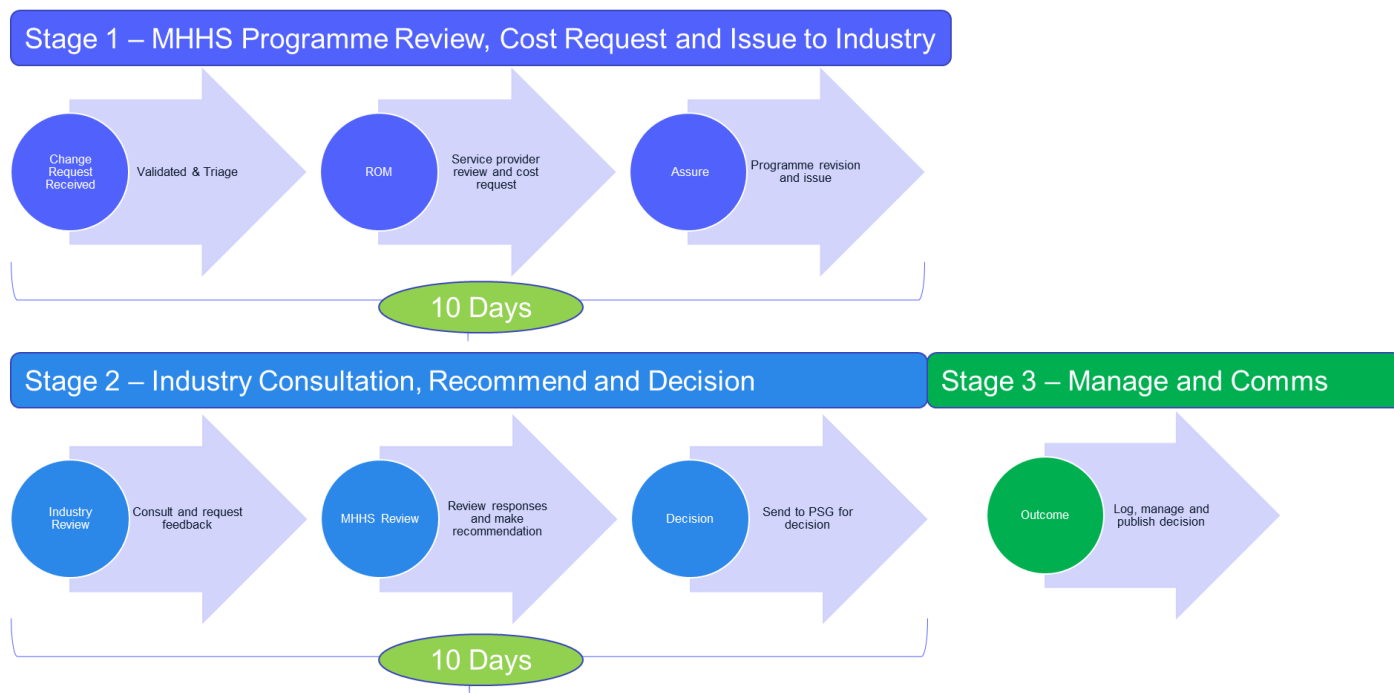
The Cross Code Working Group will be convened at the appropriate point and may not be required to remain active throughout the Programme delivery.

## 8 Change Control High-Level Principles

All programme changes must follow a robust change control process. The change control process must be available to all programme participants. Change requests, should be actioned quickly, so programme activities are progressed to plan, but have the required detail for all parties to assess the change and provide feedback. Consultation feedback should be within the agreed timescales. Decision making should follow a robust process and be informed. All change request outcomes must be communicated and managed effectively.

The detailed change process will be developed with industry after the LDP is appointed in [November 2021].

### 8.1 Change Control Process Diagram



### 8.2 Proposed High-Level Change Control Process

All programme participants must have access to the change control process and be able to raise a change requests. The change request process should start when the programme receives a valid change request. The MHHS Implementation Manager should validate the change request. If there are any issues with the change request received, the MHHS Implementation Manager should engage with the change request author to resolve the issue.

A valid change request should be triaged by the MHHS Implementation Manager and the relevant impact assessments and cost estimate should be requested and created. The MHHS Implementation Manager should amend the change request to ensure the appropriate information is contained within it, for industry assessment.

The MHHS Implementation Manager should issue the change request for industry consultation through agreed communication channels. The consultation responses should be reviewed by the appropriate MHHS Implementation Manager functions for their input and recommendation. The updated change request should be issued to PSG (or other decision group if appropriate) for their decision and recommendation.

If the change request impact is above the Ofgem thresholds, the SRO should escalate the change request to Ofgem for their action and decision. If the change request is below the Ofgem thresholds, then PSG should be able to make a recommendation. PSG's decision should be communicated and the change request should be actioned appropriately. If the change request is below the Ofgem thresholds and PSG cannot make a decision or recommendation, the SRO can cast the deciding vote or request additional analysis to support decision making.

All change requests should be managed and logged by the MHHS Implementation Manager. All change requests decisions should be communicated within [10] working days of a decision.

Detailed change control process instructions, forms and SLAs need to be developed after the LDP is appointed.