Change Request Form

Change Request details

Change Request details			
Change Request Title	*Increase in scope of CCAG ToR and code drafting activities to include consequential change*		
Change Request Number			
Originating Advisory / Working Group	*CCAG*		
Risk/issue reference			
Change Raiser	*RECCo*	Date raised:	*26/10/22*

For further guidance on how to complete this document please see the supporting Change Request Form Guidance for Programme Participants. The guidance will support raising a change and responding to a change request via Impact Assessment. The Change Raiser should consider sharing the draft Change Request Form with impacted programme parties, prior to submission to PMO. The guidance, as well as other key documents are referenced below and can be found via the MHHS website.

Change Request to be read in conjunction with:
MHHS Change Request Form Guidance for Programme Participants
MHHS Change Control Approach
MHHS Governance Framework
Ofgem's MHHS Transition Timetable

Part A – Description of proposed change

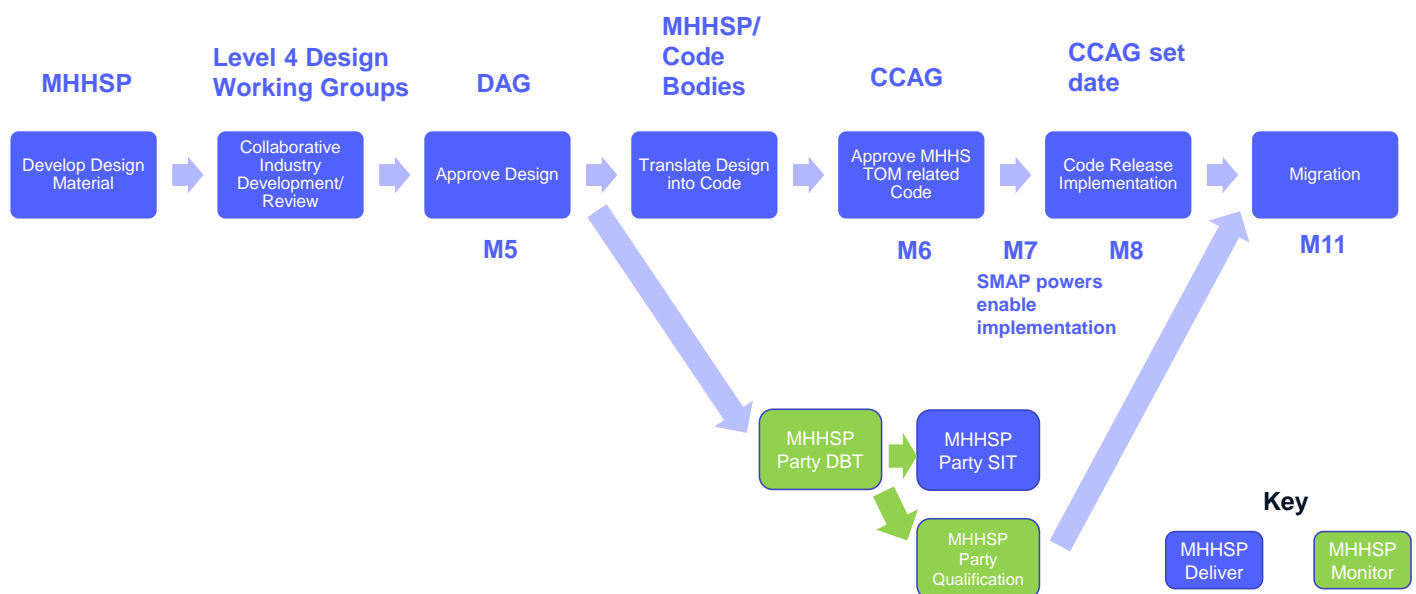**Guidance** *– This section should be completed by the Change Raiser when raising the Change Request.*

Part A – Description of proposed change
Issue statement: *(what is the issue that needs to be resolved by the change)* RECCo and other code bodies are required to develop code drafting to reflect the changes required to implement the Market-wide Half-Hourly Settlement (MHHS) Target Operating Model (TOM). The code drafting will reflect the new legal baseline that code parties and service providers operate to when MHHS is implemented. Part of this will be reflective of a set of core design artefacts, produced by the MHHS Programme, that reflect the core processes and interfaces required for MHHS. There will also be consequential impacts to the codes based on change that is not part of the programme design baseline, but will need to be updated as part of code drafting. These are classified as consequential changes by the MHHS Programme, with the design of these progressed separately by the relevant code bodies. Currently, the scope of code drafting that will be delivered as part of the MHHS Programme is limited to drafting that is required to translate the programme design baseline into industry codes, as set out below: There is an opportunity to improve the efficiency of the overall code drafting process for industry as a whole, by bringing together all code drafting required to deliver the MHHS arrangements, as defined in both the programme design baseline and the consequential change design requirements. It is important to note that the role of CCAG will be to approve that the drafting reflects the approved solution design that will be determined and approved by the parties responsible for consequential change. It is not the role of CCAG to take decisions on the design itself. The ToRs currently focus on central coordination, monitoring and management of code changes being progressed outside of Programme governance. Similarly, the scope section states that 'the CCAG is responsible for overseeing the development of the Code Modifications and redlined legal text production that delivers MHHS Code compliance'. There is no reference within the ToRs to baselining MHHS code drafting to be designated by Ofgem. As the programme has an agreed MHHS drafting plan which includes the development of code drafting by code bodies, consultation with industry and approval by the CCAG, it is proposed that a change to the CCAG ToRs is made to clarify the scope of the CCAG role and increase the scope of code changes that will be included within the MHHS drafting designated via the Smart Metering Act Powers. This will include all changes to codes to ensure the MHHS

arrangements work for settlements as well as other industry processes e.g. billing, data access, assurance and error resolution. To ensure the core and consequential change changes are clear to CCAG and participants, these will be clearly identified for visibility and transparency.

Description of change:
(what is the change you are proposing)

This change is seeking to:
- Increase the scope of the programme code drafting activities to include drafting of consequential change
- Amend the following sections of the CCAG Terms of Reference:

Add new bullet to CCAG Objectives:

To ensure MHHS code drafting reflects the changes required to impacted industry codes as a result of implementing MHHS, including the scope of the MHHS design artefacts and required consequential changes to that code.

Amend the following in Purpose and Duties of Cross-Code Advisory Group:

CCAG purpose is to oversee the central coordination, monitoring and management of MHHS related 'farmed-out' Code change requests and modifications to all impacts MHHS impacted Code Bodies and approval of baselined MHHS code drafting to be designated by Ofgem.

Add two new bullets to CCAG Scope, Deliverables, Roles and Responsibilities:

CCAG will review and approve code drafting required as a direct consequence of implementing the MHHS design, oversee industry consultation and provide a recommendation to Ofgem on the changes to be designated. Therefore, code drafting included within the scope of the M6 milestone will include drafting required to reflect MHHS baselined design artefacts and wider change to regulatory provisions required to ensure the new MHHS arrangements work for all impacted industry codes and market participants. The role of CCAG will be to approve that the drafting undertaken reflects the approved solution design that will be determined and approved by the responsible parties. It is not the role of CCAG to take decisions on the design itself.

In addition to the changes to the CCAG ToRs set out above, changes will be required to programme planning assumptions to recognise the inclusion of code changes that are not a directly lifted from approved design artefacts. This may include stakeholder engagement activities being managed through the CCIAG or under separate code led consultations to ensure a clear technical and regulatory design baseline is agreed for reflection in the MHHS code drafting, but it will not include ownership for the development and approval of consequential change solution design.

Justification for change:
(please attach any evidence to support your justification)

MHHS will require significant changes to settlement, retail, charging and industry participant systems in order to successfully implement and operate the new TOM. The MHHS Programme design artefacts address the core components required for settlement but do not cover the breadth and depth of changes required as a result of implementing the TOM in industry codes. The changes cannot be neatly separated and developed independently of each other. There is a risk that if the MHHS code drafting only reflects the limited scope provided by the design artefacts, this will require code bodies to develop, and code parties to assess, partial changes to industry systems and processes through one process, and partial changes through another.

This introduces risks that gaps will exist between the two sets of drafting, duplicates the effort of industry parties reviewing the code drafting and creates inefficiencies for code parties in maintaining two sets of code drafting in parallel.

This scenario would also increase the level of risk to the overall programme delivery where the end to end MHHS solution is dependent on code changes being progressed outside programme control.

Ensuring that all code changes required to deliver the new MHHS arrangements are captured in a single place under programme governance will remove the existing ambiguity and prevent gaps and inefficiencies being introduced across both code bodies and industry representatives.

Consequences of no change:

(what is the consequence of no change)

This CR is proposing to clarify that all code changes required to deliver the MHHS TOM are captured within a single set of code drafting for each code. Without this clarity, there is a risk that multiple change proposals / modifications will be raised to implement the new MHHS arrangements. These would be progressed independently and subject to differing code governance regimes. As detailed above, this will introduce additional risk for the MHHS Programme as it will be difficult for code parties and Ofgem to understand the full scope of changes and how these fit together and for code bodies to develop a robust regulatory framework.

Alternative options:

(What alternative options or mitigations that have been considered)

N/A

Risks associated with potential change:

(what risks related to implementation of the proposed change have been identified)

This change is seeking to mitigate the following risks:

- Critical programme dependencies – the risk that changes to industry codes required to give effect to the new MHHS arrangements will be progressed independently and subject to the relevant code's governance framework leading to critical dependencies being tracked which are outside the MHHS Programme's control.

- Robust assessment of impacts – the risk that changes are developed in a piecemeal manner making it difficult to ensure the full scope of code changes fit together without gaps or inconsistencies.

- Inefficient delivery for industry as a whole – the risk that multiple changes will be progressed to deliver the MHHS arrangements in a piecemeal manner leading to inefficiencies for code bodies and industry parties.

Stakeholders consulted on the potential change:

(Please document the stakeholders, or stakeholder groups that have been consulted to date on this change. The Change Raiser should consult with relevant programme parties in the drafting of the request, prior to submission to PMO).

This CR has been discussed with the MHHS Programme and other code bodies (BSC, SEC and DCUSA)

Target date by which a decision is required:	ASAP

Part B – Initial Impact of proposed change

*Guidance – **This section should be completed by the Change Raiser before being submitted to the MHHS PMO.***

Please document the benefits of the change and to delivery of the programme objectives

What benefits does the change bring
(list the benefits of the change and how this improves the business case) • Clarity – there is currently a lack of clarity regarding the scope of code drafting to be included in the MHHS drafting workstream. The metering and data services workstreams are clear, with content derived from the design artefacts. However, it is not currently clear what information should be included in the registration, interfaces, qualification and governance workstreams where content will be based on regulatory design questions not considered within design artefacts within the scope of the M5 milestone. • Industry wide resource / cost efficiency – clarifying the scope of the CCAG and including all code changes required to enable the end to end MHHS arrangements to work for settlements and also other industry processes e.g. customer billing, data access, assurance and error resolution within the MHHS drafting captured through the M6 milestone, will ensure the most efficient process can be developed. This will minimise code body resource requirements as code bodies will not be required to progress multiple changes and reduce the burden on industry parties having to go through multiple review and impact assessment cycles to assess two halves of the same solution. Code drafting would be centralised for all MHHS code changes in one place for one drop, which is more efficient. • Transparency – industry has previously raised concerns regarding the transparency of changes required to deliver MHHS where separate change proposals / modification are progressed outside of the main MHHS drafting activity. This makes industry review complicated and may lead to gaps where parties assume required changes are being captured elsewhere.

Programme Objective	Benefit to delivery of the programme objective
To deliver the Design Working Group's Target Operating Model (TOM) covering the 'Meter to Bank' process for all Supplier Volume Allocation Settlement meters	This CR will provide industry-wide efficiency on how the MHHS Programme and code bodies will deliver the end-to-end impacts of implementing the MHHS TOM and consequential change via a single centralised process.
To deliver services to support the revised Settlement Timetable in line with the Design Working Group's recommendation	
To implement all related Code changes identified under Ofgem's Significant Code Review (SCR)	The CR supports this objective by ensuring all code changes required to deliver the new MHHS arrangements are progressed in a robust, efficient manner with clearly defined governance responsibilities.
To implement MHHS in accordance with the MHHS Implementation Timetable	The CR supports this objective as it avoids multiple CPs / modifications being progressed outside programme control which will lead to inefficiencies and increase the number of programme dependencies to track.
To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem's Full Business Case	
To prove and provide a model for future such industry-led change programmes	The MHHS Programme seeks to be a blueprint for best practice in future industry-led change programmes so identifying the most efficient and robust method for

	implementing all programme deliverables is vital to achieving this objective. This CR allows for gaps to be closed, risks to be mitigated and efficiencies to be realised without impacting the implementation timetable. These opportunities should be taken in any programme seeking to act as a model for future best practice.

Guidance *– Please document the known programme parties and programme deliverables that may be impacted by the proposed change*

Impacted areas	Impacted items
Impacted Parties	All
Impacted Deliverables	CCAG ToRs, MHHS code drafting,
Impacted Milestones	*M6*

Note *– Please refer to MHHS DEL174 Change Request Guidance for Programme Participants for information on how to score the initial assessment.*

Initial assessment			
Necessity of change	Important Change	Expected lead time	5 – 10 WDs
Rationale of change	Regulatory	Expected implementation window	Short
Expected change impact	Medium		

Guidance *– Please include a reference and link to any additional documentation which the change relates to.*

Change Request to be read in conjunction with:	
Title	**Reference**

Part C.1 – Summary of Impact Assessment

CR012 Impact Assessment Report & Recommendations was presented to PSG in December 2022. The report can be found via the MHHS Website.

Note – *This section will be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

All Impact Assessment responses will be considered public and non-confidential unless otherwise marked. If there are any specific elements of the response (e.g. costs) that are confidential, please mark the specific sections as confidential rather than the response as a whole. The MHHS Programme will publish all Impact Assessment responses and redact any confidential information as noted.

Guidance – **Programme Participants are required to:**

A. **Respond with 'Agree', 'Disagree' or 'Abstain', deleting as appropriate. If the respondent agrees, they can provide additional evidence to further support the assessment. If the respondent disagrees or abstains, they should provide a detailed rationale as to why.**

B. **Add any additional effects that have not already been identified. In doing so, they should provide as much detail as possible to allow a robust assessment to be made.**

C. **Proceed to Part C.2 for Impact Assessment Recommendation response once completed.**

Part C.1 – Summary of Impact Assessment (complete as appropriate)
Effect on benefits
This CR will have the following benefits: • Clarity – there is currently a lack of clarity regarding the scope of code drafting to be included in the MHHS drafting workstream. The metering and data services workstreams are clear, with content derived from the design artefacts. However, it is not currently clear what information should be included in the registration, interfaces, qualification and governance workstreams where content will be based on regulatory design questions not considered within design artefacts within the scope of the M5 milestone.   • Resource / cost efficiency – clarifying the scope of the CCAG and including all code changes required to enable the end to end MHHS arrangements to work for settlements and also other industry processes e.g. billing, data access, assurance and error resolution within the MHHS drafting captured through the M6 milestone, will ensure the most efficient process can be developed. This will minimise code body resource requirements as code bodies will not be required to progress multiple changes and reduce the burden on industry parties having to go through multiple review and impact assessment cycles to assess two halves of the same solution.   • Transparency – industry has previously raised concerns regarding the transparency of changes required to deliver MHHS where separate change proposals / modification are progressed outside of the main MHHS drafting activity. This makes industry review complicated and may lead to gaps where parties assume required changes are being captured elsewhere.
<Delete as appropriate>: **Agree   Disagree   Abstain**
Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.   *Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on when a benefit will be realised; who will realise the benefit; the extent to which the benefit will be realised.*   *Where possible, contextual information should be included e.g. the benefit will be delayed by X weeks; the change means Y population will also realise the benefit.*

Effect on consumers

This CR will ensure that changes to the REC and other codes relating to consumer facing processes directly impacted by the new MHHS arrangements are considered as part of the overall MHHS code drafting workstream. This will ensure a transparent, centralised and co-ordinated approach is in place to assess and ensure the agreed design changes are correctly implemented/translated into code, taking into account consumer outcomes e.g. impacts on billing, theft, data access and performance assurance.

<Delete as appropriate>: **Agree   Disagree   Abstain**

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. whether there will be an impact on service delivery to consumers; will there be a cost impact to consumers; will there be a choice impact to consumers?

Where possible, contextual information should be included e.g. what is the scale of the effect? Will the effect be permanent?

Effect on schedule

The CCAG has agreed the code drafting plan for delivering MHHS code change in early 2024. RECCo's assumption was that all changes to the REC required to deliver the MHHS arrangements would be delivered as part of this plan e.g. changes to the supplier exception processes would be captured within the registration workstream and changes to the performance assurance requirements would be captured within the governance and qualification workstream.

Therefore, this CR will not amend RECCo's drafting assumptions or impact the overall RECCo schedule. If the CR is not approved a revised timeline will need to be developed by RECCo outside the MHHSP to include the progression of REC change proposals outside the scope of programme governance. Other code bodies would need to impact assess this change and confirm if there is an impact on their schedule.

<Delete as appropriate>: **Agree   Disagree   Abstain**

Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts.

Impact Assessment respondents should consider and provide detail of any additional effect e.g. will the schedule/milestones be directly impacted; will the schedule/milestones be indirectly impacted.

Where possible, contextual information should be included e.g. the change will delay the project by X days; the change will require additional resource to complete (though detail resource in resource section); the delay can/cannot be recovered by condensing Y activity.

Effect on costs

The CCAG has agreed the plan for delivering MHHS text for early 2024. RECCo's assumption was that all changes to the REC required to deliver the MHHS arrangements would be delivered as part of this plan e.g. changes to the supplier exception processes would be captured within the registration workstream and changes to the performance assurance requirements would be captured within the governance and qualification workstream.

Therefore, this CR will not amend RECCo's drafting assumptions or impact the overall RECCo costs. If the CR is not approved a revised budget will need to be developed by RECCo outside the MHHSP to include the progression of REC change proposals outside the scope of programme governance. Other code bodies would need to impact assess this change and confirm if there is an impact on their costs.

<Delete as appropriate>: **Agree   Disagree   Abstain**

Effect on resources

The CCAG has agreed the plan for delivering MHHS text in early 2024. RECCo's assumption was that all changes to the REC required to deliver the MHHS arrangements would be delivered as part of this plan e.g. changes to the supplier exception processes would be captured within the registration workstream and changes to the performance assurance requirements would be captured within the governance and qualification workstream.

Therefore, this CR will not amend RECCo's drafting assumptions or impact the overall RECCo resource requirements. If the CR is not approved a revised resource plan will need to be developed by RECCo outside the MHHSP to include the progression of REC change proposals outside the scope of programme governance. Other code bodies would need to impact assess this change and confirm if there is an impact on their resource.

<Delete as appropriate>: **Agree   Disagree   Abstain**

Effect on contract

N/A

<Delete as appropriate>: **Agree   Disagree   Abstain**

Risks

This change is seeking to mitigate the following risks:

- Critical programme dependencies – the risk that changes to industry codes required to give effect to the new MHHS arrangements will be progressed independently and subject to the relevant code's governance framework leading to critical dependencies being tracked which are outside the MHHS Programme's control.

- Robust assessment of impacts – the risk that changes are developed in a piecemeal manner making it difficult to ensure the full scope of code changes fit together without gaps or inconsistencies.

- Inefficient delivery – the risk that multiple changes will be progressed to deliver the MHHS arrangements in a piecemeal manner leading to inefficiencies for code bodies and industry parties.

<Delete as appropriate>: **Agree   Disagree   Abstain**
Impact Assessment respondents to add supporting commentary to support their selection. Where possible, Impact Assessment respondents to identify and describe any further impacts. *Impact Assessment respondents should consider and provide detail of any additional effect e.g. will existing risks be affected; will new risks be created?* *Where possible, contextual information should be included e.g. the change will affect the likelihood of a risk occurring, the change will affect the impact the risk would have, the change will require additional controls and mitigation.*

Part C.2 – Impact Assessment Recommendation

Note – *This section must be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

Guidance – The primary reporting metric of the Impact Assessment is the recommendation response. The consolidated response will be presented to the relevant governance group(s) and decision maker(s) with the totals for 'Agree', 'Disagree' or 'Abstain'. As such, please ensure this section is completed before the form is returned to MHHS PMO. Provide detailed rationale and evidence in the commentary field.

Part C.2 – Impact Assessment Recommendation (mandatory)
Recommendation *We recommend that the changes to the CCAG ToRs be amended as soon as possible to enable final planning for code drafting to be completed ahead of drafting commencement in January 2023.* **It is recommended by the Change Raiser the change is approved.**
<Delete as appropriate>: **Agree   Disagree   Abstain**
 Impact Assessment respondents to add supporting commentary to support their selection.

Impact assessment done by: <Name>

Guidance*: If you are a third party responding on behalf of another Programme Participant, please state this in your response.*

Impact assessment completed on behalf of: <Name>

Part D – Change approval and decision

Guidance: The approvals section will be completed by the MHHS PMO once the Impact Assessment has been reviewed.

Part D - Approvals
Decision authority level
Programme Steering Group

Guidance - This section will be completed by the MHHS PMO and Change Owner following the review of the impact assessment and decision reached by the SRO.

Part D – Change decision			
Decision:	Change approved	Date	07/12/22
Approvers:	MHHS Programme Steering Group		
Change Owner:	Jason Brogden		
Action:	A1. Changes to be reflected in MHHS Programme Governance Framework		
Changed Items	**Pre-change version**	**Revised version**	
A1	Governance Framework 2.x	Governance Framework 3.0	

Part E – Implementation completion

Guidance *- This section will be completed by the MHHS PMO at the end of the post-implementation process.*

Part E – Implementation completion			
Comment	MHHS Governance Framework updated	Date	12/12/22

Guidance *– The Closure Checklist in MHHS DEL175 Change Log must also be completed by MHHS PMO at this stage.*

Checklist Completed	Completed by
Yes	Alex Whiteman

Guidance *– This section will be completed by the MHHS PMO at the end of the post-implementation process and should be* **used to add any appropriate references of the change once it has been completed.**

References		
Ref	Document number	Description
MHHS DEL030 MHHS Governance Framework	V3.0	This paper sets out the MHHS Programme Governance structure