



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

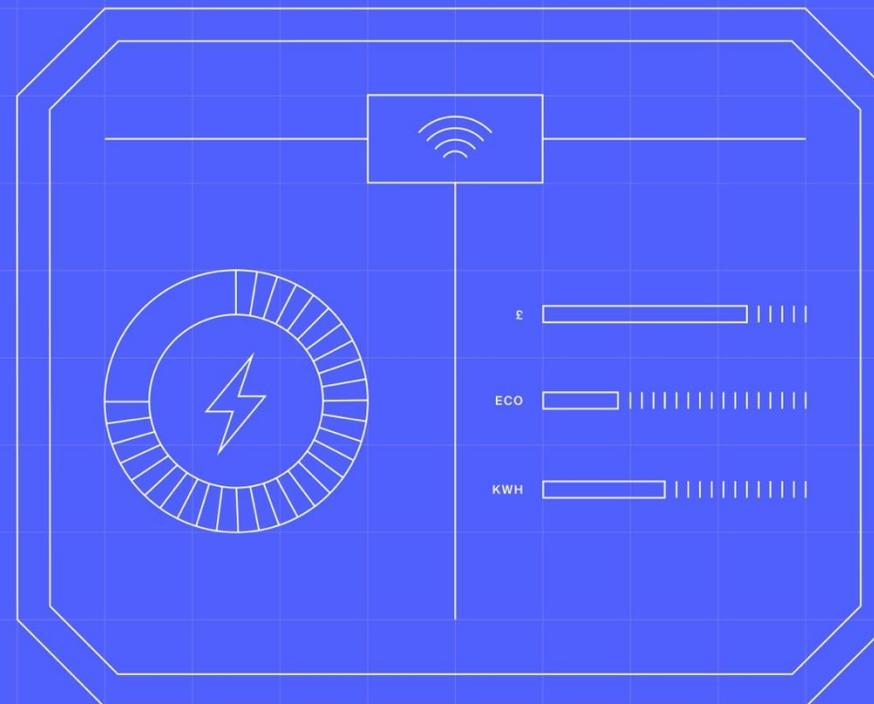
M10 Checkpoint: Programme Assessment

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1. Introduction

Context and overall approach



Purpose, background and objectives

Purpose

The purpose of the M10 Checkpoint is to assess whether the Programme is on track to meet the M10 milestone date of 22-Sep-25.

The Checkpoint will set out the level of risk currently carried by the Programme 3 months out from M10 and the critical actions and mitigations that need to be in place to reduce that risk to ensure M10 is achieved and that no impact to BAU settlement performance is felt.

The Programme is also tracking progress of activities and risks required to meet downstream milestones (M11 and beyond) and not just M10. They may be referenced in this specific report but are not the central focus, which remains readiness for M10.

Nevertheless, their impact does need to be considered in M10 decision making to ensure the Programme can progress through M10 and successfully meet later delivery obligations.

Background

As part of CR055, Ofgem and IPA requested a checkpoint be inserted into the plan 6 months and 3 months out from M10.

The checkpoints are intended to review progress against the plan, in the run down to Go-Live to ensure that the M10 date is on track to be met.

This checkpoint is designed to review the Programme status 3 months from the M10 milestone.

The M10 Checkpoint will also act as an important engagement tool for wider industry stakeholders across DESNZ and Ofgem, providing clarity on progress and confidence that the planned date will be met.

Objectives



To provide confidence that the Programme remains on track to achieve M10 by the baseline date of 22-Sep-25



To provide transparency of the risk level carried by the Programme and agree what needs to be done to mitigate impact to M10 and on BAU settlement performance



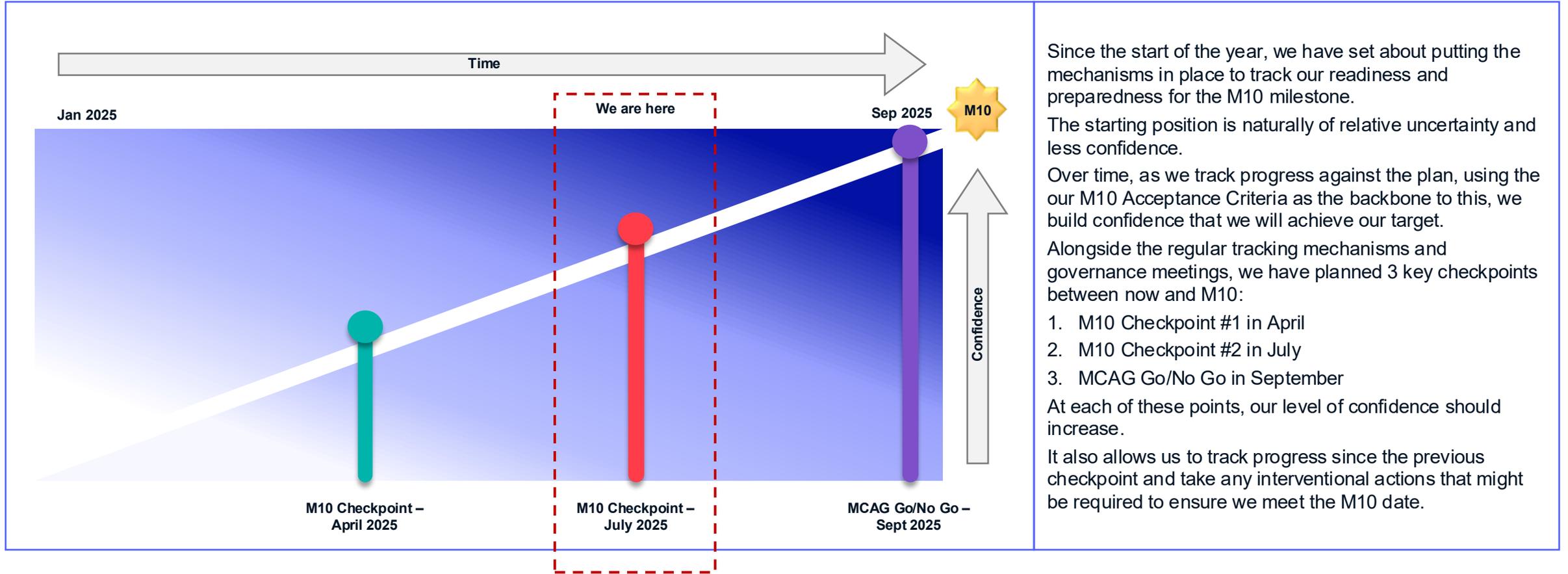
To present a final opportunity to course correct any deviation from the plan in time to avoid impact on the M10 date



To assess whether the actions agreed at the April Checkpoint have been effective in reducing the level of risk carried by the Programme

Building confidence in achieving M10

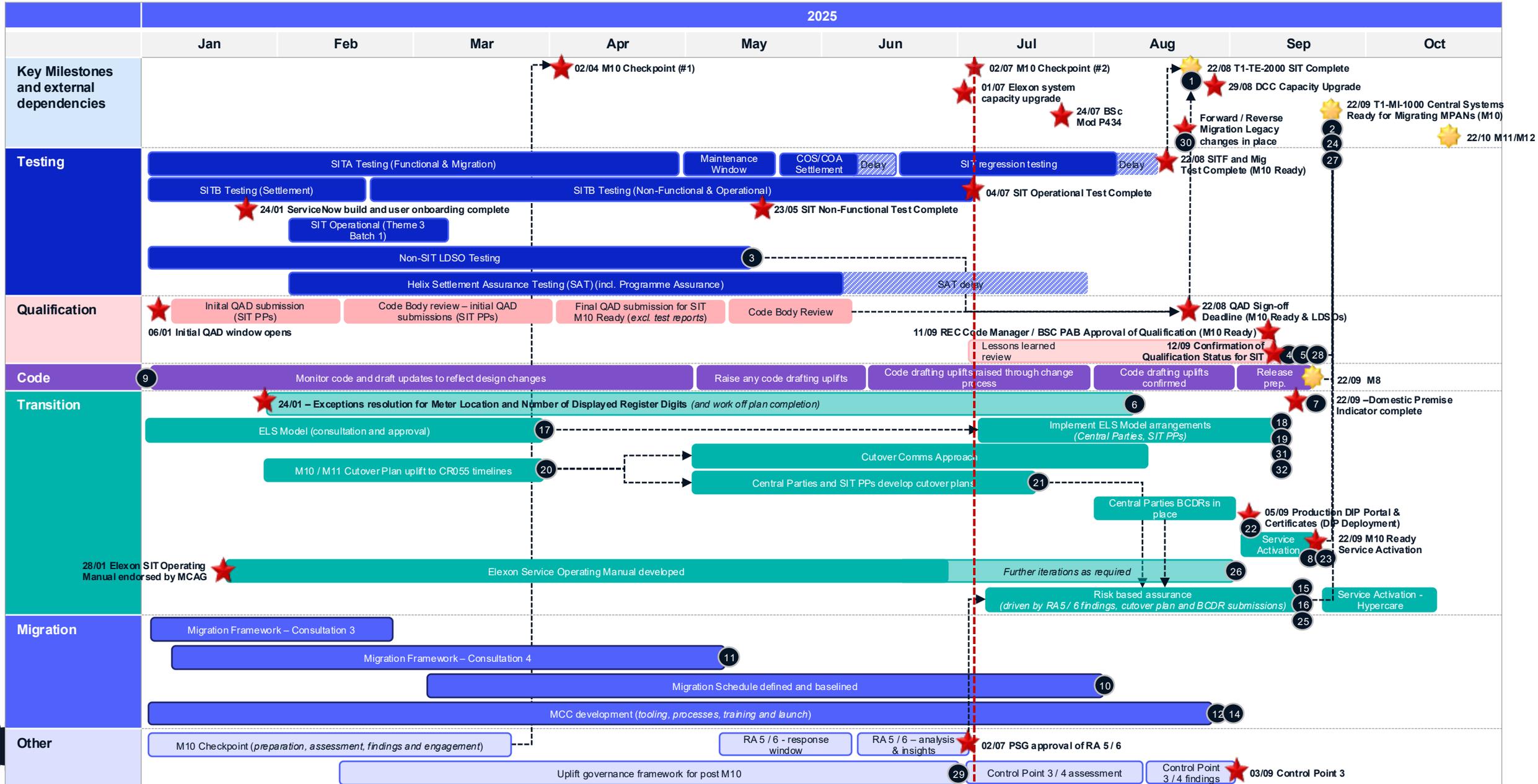
The M10 checkpoint(s) are a critical enabler to instilling confidence in the MHHS Programme's ability to meet the M10 date of 22 September 2025



M10 Readiness Plan

Key

- Acceptance criteria met
- Key planned activity
- ★ Milestone or external dependency
- ★ Tier 1 milestone
- Internal dependency



Evidence and reference materials

#	Inputs	Criterion assessed
1	MHHS Outline Plan	<i>Various</i>
2	SIT End of Sprint Reports (<i>Functional, Migration, Non-Functional, Operational</i>)	1
3	Daily Flash Reporting (<i>Functional, Migration, Non-Functional, Operational</i>)	1
4	Migration Framework	11, 12
5	Migration Schedule	10
6	Early Life Support Model	17, 18, 19, 29, 30
7	M10 / M11 Cutover Plan	7, 8, 20, 21, 22
8	Central Party Cutover Plans	7, 8, 20, 21, 22
9	SIT Operational Manual and Low Level Service Design documents	15, 16
10	ORT Artefacts (Test Approach and Plan, Scenarios and Scripts)	15,16
11	Insight from Programme forums/meetings/bi-laterals	<i>Various</i>
12	QAD progress and submissions (via Code Bodies)	4, 5, 28
13	Non-SIT LDSO testing (daily reporting)	3, 5
14	Data Cleanse Plan	6
15	Central Party and LDSO Readiness Plans	21, 23
16	MHHS RAID Log	27
17	RAID strategic themes reporting (PSG)	27
18	Readiness Assessment 5/6	16, 19
19	M10 Acceptance Criteria (Central Party and LDSO self-reporting)	<i>Various</i>
20	Programme Participant Readiness Tracker	<i>Various</i>
22	SAT Daily Reporting	1, 25
23	Knowledge Transfer Process and progress (plans, engagement, tools)	26
24	M10 Checkpoint Report – April 2025	<i>Various</i>

Approach

- The M10 Checkpoint assessment considers several different evidence points and insights.
- These cover test progress, central party and PP readiness, cutover preparation, document creation and approval, governance meetings and decisions and engagement with industry through various channels such as bi-laterals, governance meetings, PPIRs, Change Requests and formal consultations.
- We have used all this information to develop a programme view of progress against each of the 32 individual criteria that form the M10 Acceptance Criteria.
- These individual findings have been aggregated up to provide an overall view of Programme Readiness for M10, 3 months out from the milestone itself.

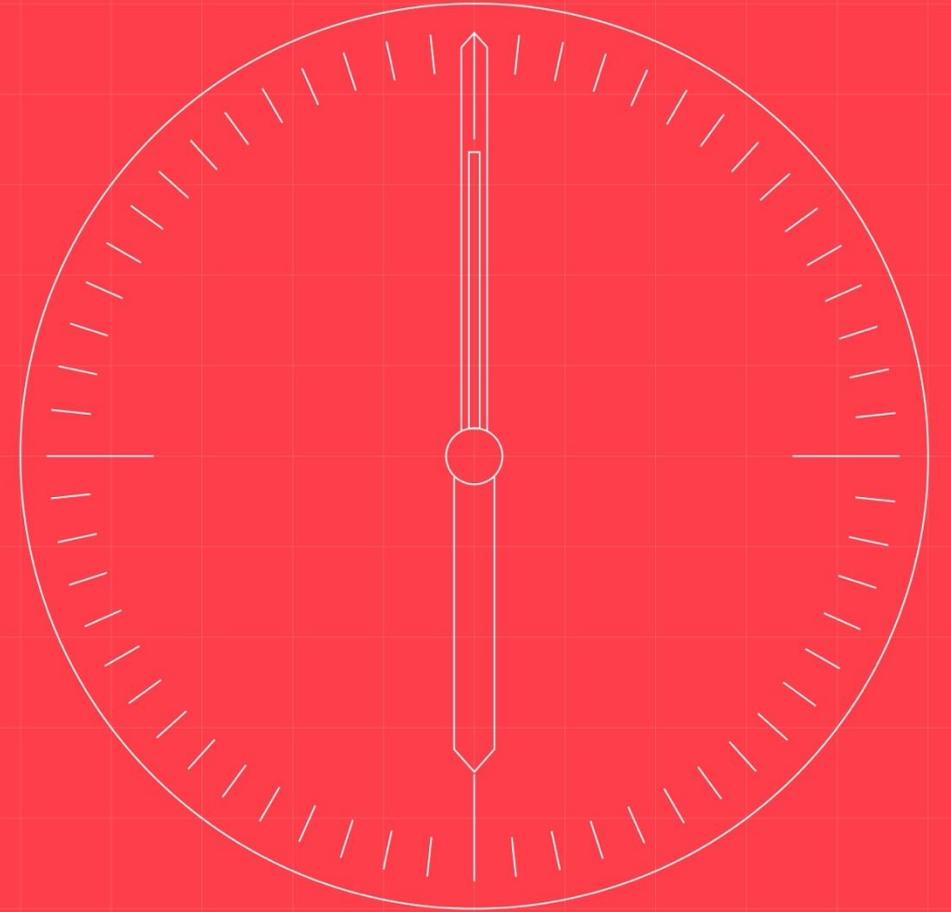
Points to note

- The inputs highlighted on this slide are not an exhaustive list but provide a sample of the types of information and insight the Programme has reviewed to arrive at its proposed position for the M10 Checkpoint.
- The Programme and IPA have used this information independently to form a view of Programme status and so we would expect to see some areas of minor misalignment between both assessments.
- The assessment against the Acceptance Criteria is not against what is required to fulfil each criterion (i.e. the required eventual position for M10 decision making) but instead assesses against where the Programme would expect to be at this point in time.

2. Programme Assessment

Are we on track to achieve the M10 date of 22-Sep-25?

- *Executive Summary*
- *Current position (July 2025)*
- *'Off Track' and 'At Risk' items*
- *April vs July positions*
- *Progress against plan vs impact to M10*
- *Programme Assessment – conclusion*
- *Assessing M10 viability en route to M10*



Programme Assessment - Executive Summary

- **The Programme considers M10 still achievable** 3 months from the milestone date; however, **it must recognise known issues that risk causing a delay to M10** if not properly mitigated.
- At this stage, **the Programme is carrying a greater level of risk than desirable** and this risk, if unmitigated, would impact the M10 date.
- Highlighted below are three key issues that need to be addressed to give full confidence to the Programme that M10 can be delivered on time.

Issue	Resolution	Desired outcome	Confidence*
SIT CoS Settlement testing is behind schedule, impacting other critical path activities.	An extension to this test phase of 2 weeks has been proposed to allow for defect fixes and remaining tests to be executed. This would subsequently delay SIT Regression by the same time but does still enable T1-TE-2000 (SIT Complete) to be approved on time on 22/08.	<ul style="list-style-type: none"> • SIT CoS Settlement exit criteria are met before 27/06, allowing SIT Regression to commence. • PAB Pathways 2 and 3 remain viable for M10-Ready participants. 	
Elexon Helix Settlement Assurance Testing (SAT) is currently delayed by 11 weeks.	A recovery plan has been put in place by the Helix team and daily reporting to track progress is being published. Weekend working has been enacted where appropriate to de-risk the plan and to ensure the declared dates are met.	<ul style="list-style-type: none"> • SAT completes by 01/08 enabling the new Helix Build to be deployed into SIT-A and to be regression tested. 	
SIT Regression is delayed by 2 weeks due to delays to SIT CoS Settlement testing.	There was a 2-week window between SIT Regression ending and the SIT Test Completion milestone (T1-TE-2000). This will be used to complete regression execution and exit reporting. We have also reduced the regression window by 1-sprint - increasing risk to SIT exit but maintaining the T1 milestone date.	<ul style="list-style-type: none"> • SIT Regression testing for M10-Ready parties still completes in advance of 22/08 and T1-TE-2000 is approved on time. 	

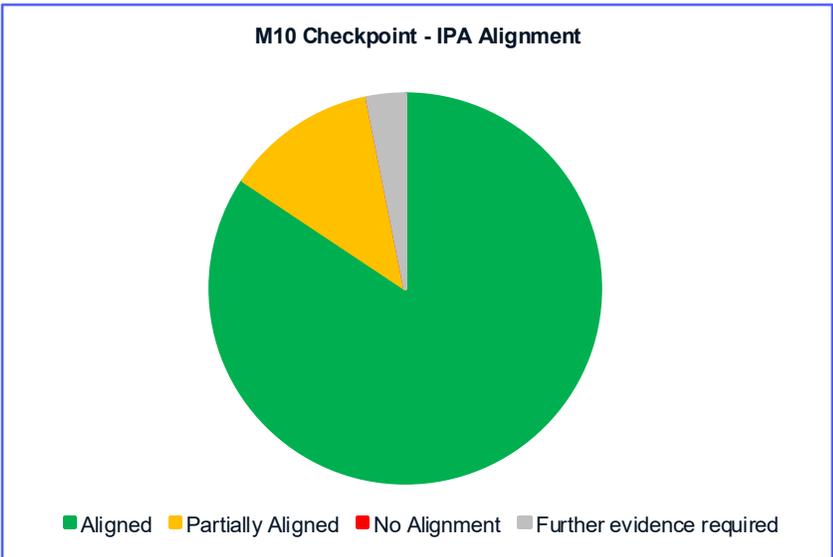
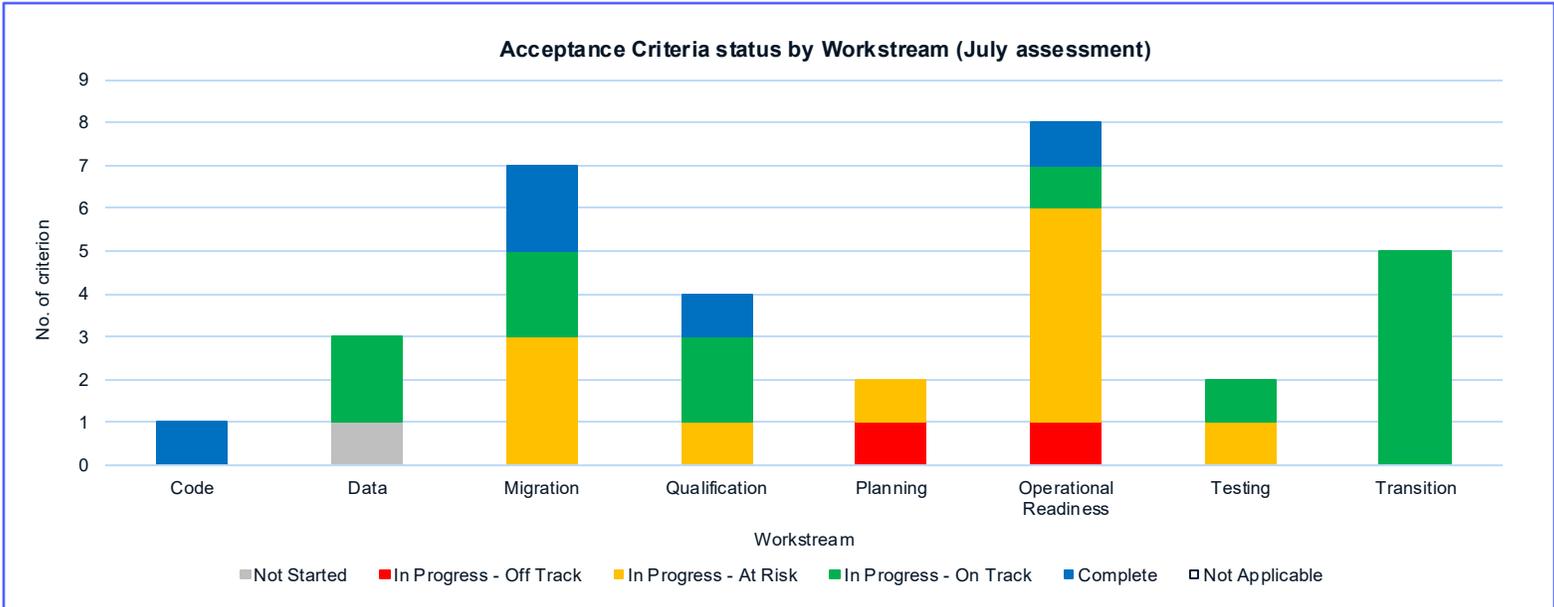
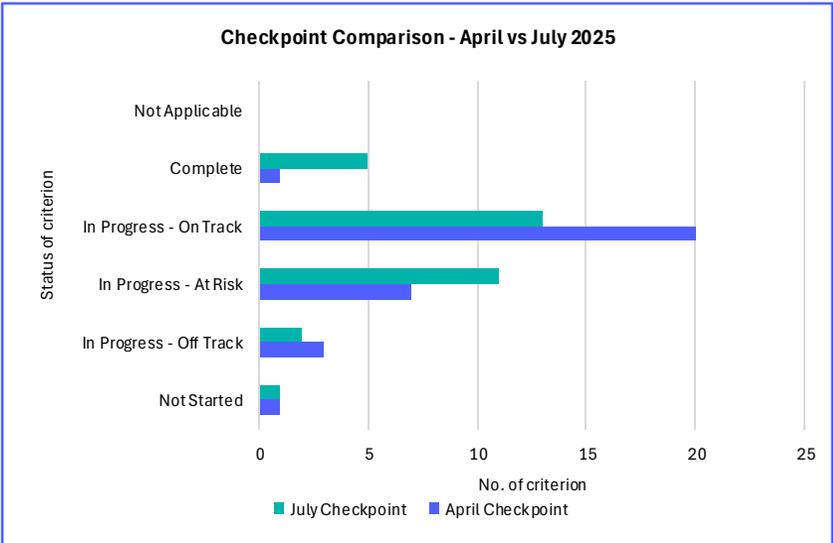
The Programme recommends a further checkpoint in August to review progress against these key items. By this stage, **if the mitigation plans have been effective then each of these issues will have been sufficiently resolved**, giving greater confidence that M10 is achievable and reducing the level of risk carried forward by the Programme.

It is important to note that **further delay incurred to any of these these items between now and August PSG (06/08) could require an extraordinary PSG** to be convened to discuss M10 viability sooner.

Overview against the M10 Acceptance Criteria

Overview

- Across the 32 individual acceptance criteria, the Programme assesses 13 of these as on track while 11 are at risk with the expected position 3 months out from M10. 5 of these criteria has already been successfully met.
- Overall, the Programme and IPA are aligned in their assessment of the M10 acceptance criteria, with full alignment across 27 criteria (85%).
- There is some minor misalignment across 5 criteria, on 4 we are partially aligned and 1 require further evidence.
- There is no criterion with 'no alignment' whatsoever.
- Recovery plans since the 6-month checkpoint have been somewhat effective in reducing risk to operational readiness. The Programme still carries significant operational risk that could impact successful achievement of downstream milestones if not appropriately mitigated.
- Delays to SAT, SIT CoS/CoA Settlement and the subsequent threat they post to timely completion of SIT Regression mean the Programme is carrying increased risk, reflected in the 'red' M10 Risk Assessment criterion.



'Off Track' criteria and mitigations (1 of 2)

								M10 Checkpoint - July 2025				
No.	Milestone	Workstream	Criterion	Evidence	Owners	What good looks like at M10	Due date	Expected position at 25 June (PSG Paper Day)	Programme assessment	Programme view (Progress against Plan)	Programme view (Impact on M10 decision)	Rationale for impact score
25	M10	Planning	M10 Risk Assessment undertaken	A review of disparate work-off items and plans is completed to assess the aggregated level of risk associated with M10 decision making. Findings presented back to the Programme.	LDP	A review of the M10 Readiness Criteria by the Programme team finds that any open risk associated with delivery does not impact the ability for the M10 cutover to proceed.	03/09/2025	<p>A review of the M10 Acceptance Criteria is undertaken, status updated, and any risks outlined.</p> <p>Level of risk carried by the Programme is manageable and does not jeopardise: (i) ability to achieve M10, or (ii) BAU settlement performance.</p>	<p>Proposed status is 'Off Track'.</p> <p>Helix SAT is currently delayed by 11 weeks. Further delays to SAT beyond 01/08 would have implications on SIT Regression testing, which is on the critical path.</p> <p>SAT is critical to ensuring BAU settlement performance is not impacted by M10.</p> <p>Additionally further delay to SAT would impact downstream Helix cutover activities, creating more risk of M10 delay.</p> <p>Resource contention between SAT and SIT Settlement (CoS) could lead to slower-than-expected defect fixes in SIT further delaying the test phase and subsequent regression window to point where there is no contingency remaining.</p>	In Progress - Off Track	Critical	<p>This is a critical activity that would impact M10 decision making.</p> <p>As part of determining if M10 is viable the Programme must assess the level of risk being carried and if it is too much, where there is sufficient concern for settlement performance or central systems, then this will need to be called out and understood.</p> <p>If the risk is high, then proceeding with M10 could be blocked.</p>

Mitigations

- The Programme has set out mitigating actions and desired outcomes for the issues that mean this criterion is flagged as 'off track' on Slide 9.
- Delivering on those mitigation plans for SIT CoS Settlement Testing, SAT and SIT Regression/Closure would ensure the level of risk the Programme is carrying is reduced to a manageable level.

This should be assessed at the next PSG as part of a further interim checkpoint.

'Off Track' criteria and mitigations (2 of 2)

								M10 Checkpoint - July 2025				
No.	Mile stone	Workstream	Criterion	Evidence	Owners	What good looks like at M10	Due date	Expected position at 25 June (PSG Paper Day)	Programme assessment	Programme view (Progress against Plan)	Programme view (Impact on M10 decision)	Rational for impact score
26	M10	Operational Readiness	Roles and responsibilities post-M10 agreed and accepted	Acceptance of enduring processes, roles and responsibilities for central parties, programme and code bodies.	Code Bodies, LDSOs, Central Parties	<p>The post M10 change governance process has been clearly defined, mobilised and industry have been engaged.</p> <p>Design Knowledge Transfer has been undertaken from Programme to Code Bodies.</p> <p>Elexon's enduring Service Management Model is operational as set out in the Service Operating Manual and Low Level Design Documents and has been sufficiently tested.</p> <p>Elexon's Target Operating Model in place and operational.</p>	05/09/2025	<p>Roles and responsibilities post-M10 are set out and agreed in the Service Operating Manual and Low Level Design Models.</p> <p>Knowledge Transfer process is set out in a detailed plan.</p> <p>Knowledge Transfer is underway between MHHS design team and new Helix triage team.</p>	<p>Proposed status is 'off track'. While KT is underway with the design team there is insufficient evidence points to demonstrate the knowledge transfer has been applied.</p> <p>There remain concerns regarding capacity and capability within the Elexon triage teams - the SME team proposed is currently smaller than that of the Programme.</p> <p>Drawing comparisons from FSP, a programme of comparable size, which overresourced to support Service Management requirements this is a risk.</p> <p>Volumetric estimations and forecasting analysis has yet to complete, which is key to any resource assumptions and the Programme cannot have confidence in this until it is complete.</p> <p>There are also concerns regarding DIP Manager resourcing, with all requests appearing to funnel through a single resource.</p> <p>Given proximity to Go-Live the Programme would expect all central party resource models to be defined and stable.</p> <p>This is another reason for calling this criterion off track.</p>	In Progress - Off Track	Moderate	<p>Similar to the Service Delivery Operating Model and ELS Model implementation, the Programme believe the impact on M10 is moderate.</p> <p>In making the M10 decision it would be imperative to understand what gaps in roles and responsibilities exist and what the plan (incl. timelines) is to address them. This would also need to include any interim measures that would ensure settlement performance or central system performance is not impacted following M10.</p> <p>If a clear plan is not set out then this could become a critical blocker to M10 decision making but the Programme believe that given current progress made in this area it would be possible to go ahead with central systems go live at M10 with minor gaps in roles and responsibilities.</p>

Mitigations

- The Programme wishes to see sufficient evidence that the Knowledge Transfer has been effective by witnesses a sustained period where Elexon lead and manage the triage process.
- The Programme wishes to understand the assumptions and detail behind the volumetric estimations that underpin the resourcing proposal.
- The Programme is seeking clarity and assurances from the DIP Manager that they understand what is expected of them in their role and are resourced to support this.

This should be assessed at the next PSG as part of a further interim checkpoint.

'At Risk' criterion – Themes

- The Programme Assessment identifies 11 criteria as 'At Risk'. This means that there is some risk that the completion date could be missed, or that the activity is behind against the plan but does have a plan in place to address the delay before any impact on overall delivery.
- Of these 11, the Programme deems 3 of these critical for M10. M10 could go ahead if the other 8 criteria are incomplete, provided the appropriate mitigations and work-off plans are in place. This is because the impact is sufficiently manageable, or they are progressed sufficiently to pose reduced risk to BAU settlement operations.
- We have summarised these 'At Risk' criteria into the below 6 themes.

End of SIT Testing (for M10 Ready) <i>(Critical for M10)</i>	Business and Operational Readiness	Performance Assurance and Monitoring	Risk of work off items	Migration supporting legacy changes <i>(Critical for M10)</i>	Migration incentives
<ul style="list-style-type: none"> • The end of SIT is at risk due to delays related to SAT and CoS Settlement testing. • Both activities are critical dependencies for SIT regression to commence. • Recovery plans have been defined for both test phases but if further delay is incurred it will impact the M10 delivery date. 	<ul style="list-style-type: none"> • The Service Management Model has improved since April checkpoint and is no longer deemed 'Off Track'. • However, Elexon Operational Readiness Testing (ORT) needs to conclude and gaps within Low-Level Design Documents and Service Operating Manuals need to be closed before M10. • Knowledge Transfer with Design needs to complete and roles filled to ensure sufficient coverage and capability at M10. • Concerns remain over DIP Manager capacity and ability to complete DIP onboarding. 	<ul style="list-style-type: none"> • Greater clarity is required on the Performance Assurance reporting arrangements to be put in place during the migration phase. • Processes regarding escalations and rapid resolution require final agreement. • This is being progressed between PAB, Code Bodies, Programme, DIP Manager and the Migration team. 	<ul style="list-style-type: none"> • There is a risk that volume of work-off items open at M10 could increase the aggregated risk level beyond a manageable threshold. • More work is needed to define, implement and test the central service management and ELS arrangements – until complete this risks creating several high-risk work off plan items. • DIP Reporting arrangements are not yet in place and also risk becoming a work off item. • This could impact decision making at M10. 	<ul style="list-style-type: none"> • There is a lack of clarity on delivery of the M10 forward / reverse migration changes • These changes need to be enabled to allow Migration to commence and it isn't clear if PPs are on or off track. • Regular status reporting is required from RECCo and BSCCo teams to track progress and identify areas of risk early. • There is a further risk that at M10 PPs will be operating in these arrangements for the first time, which could increase pressure on ELS. 	<ul style="list-style-type: none"> • Final clarity is needed to ensure the Programme and industry can act accordingly with any incentives or modifications to be put in place. • Decision on P487 is required by Elexon Panel and Ofgem. • The Programme does not consider this a risk to M10 decision making but it is something that needs to be tracked through to completion.

Proposed mitigating actions

Document Classification: Public

The Programme has set out a series of mitigating actions for those criteria marked as 'In Progress – At Risk'.

Criterion #	Acceptance Criteria	Acceptance Criteria status	Action	Due Date	Owner
1, 5	End of SIT Testing	In Progress - At Risk	New CoS / CoA timeline delivered to enable regression testing to commence on 30/06	27-Jun-25	SIT PPs, Programme
			SAT completed in line with recovery plan and Helix build successfully deployed into SIT-A for regression	01-Aug-25	Helix
			Regression complete and SIT exit confirmed in line with plan	22-Aug-25	SIT PPs, Programme
15, 16, 18, 29	Business and Operational Readiness	In Progress – At Risk	Complete ORT in line with Programme Plan	11-Jul-25	Helix
			Close gaps in LLSDs and SOM and publish final version before M10	25-Jul-25	Helix
			Post Go-Live TOM published, including resourcing assumptions showing increased support requirements from ELS through Qualification waves	31-Aug-25	Helix
			Complete and approve updates to Governance Framework, reflecting post-M10 arrangements (incl. IRG)	31-Aug-25	Programme
31, 32	Performance assurance and monitoring	In Progress – At Risk	Agree reporting process and cadence between Performance Assurance and Migration teams during migration window	12-Sep-25	Perf. Assurance, Programme
			Finalise escalation process for migration window between Performance Assurance and Migration teams.	12-Sep-25	Perf. Assurance, Programme
			Confirm any PAB assurance arrangements to be in place from M10 to ensure legacy system changes are working	31-Jul-25	Perf. Assurance
27	M10 Work-off plan agreed (if required)	In Progress – At Risk	<i>Define clear work off plan that can be accepted by PSG and other relevant stakeholders ahead of M10 (see previous slide for more detail)</i>	02-Sep-25	Perf. Assurance, PSG, Code Bodies
30	All Suppliers and Agents have made the necessary changes to support losing an MPAN via the Forward Migration Process and gaining an MPAN via the Reverse Migration Process.	In Progress – At Risk	Implement reporting processes at agreed cadence with the Programme on the progress of legacy system changes required by all PPs to be implemented before M10	02-Jul-25	BSCCo, RECCo
13	Migration incentives implemented	In Progress – At Risk	Decision on P487 provided and any Ofgem M15 incentives confirmed	31-Jul-25	Ofgem, Programme

M10 Acceptance Criteria – April vs July Checkpoints (1 of 3)

Status										
April Assessment	Complete	1	In Progress - On Track	20	In Progress – At Risk	7	In Progress – Off Track	3	Not Started	1
July Assessment	Complete	5	In Progress - On Track	13	In Progress – At Risk	11	In Progress – Off Track	2	Not Started	1

#	Workstream	Criterion	Evidence	Owners	Due Date	April RAG	July RAG	Trend
1	Testing	End of SIT testing	T1-TE-2000 (SIT Complete (SIT Test Exit Report Approved) complete and approved.	All SIT Participants	22/08/2025	In Progress - On Track	In Progress – At Risk	↓
2	Testing	IPA M10 Assurance Report developed and agreed	IPA have undertaken assurance all necessary assurance activities ahead of M10 decision making. Findings have been developed and shared with the Programme.	IPA	19/09/2025	In Progress - On Track	In Progress - On Track	→
3	Qualification	Non-SIT LDSO Qualification Testing complete	T3-QU-0010 complete and approved by QAG.	LDSOs only	16/05/2025	In Progress – At Risk	Complete	↑
4	Qualification	A minimum of 1 supplier & required contracted agents are qualified and ready to operate under new MHHS arrangements	Confirmation from Code Bodies that at least 1 supplier, and the necessary contracted agents needed to support each market role, have been qualified to enter the market under new MHHS arrangements.	SIT Participant, Code Bodies	12/09/2025	In Progress - On Track	In Progress - On Track	→
5	Qualification	All LDSOs qualified	T2-QU-0500 approved at QAG (all LDSOs approved for qualification by BSC PAB and REC Manager).	LDSOs, Code Bodies	10/09/2025	In Progress – At Risk	In Progress – At Risk	→
6	Data	All pre-migration data cleanse activities complete	"Go/No-Go" decision obtained from MCAG, confirming that all data preparation activities needed to commence M10 cutover have been completed	Programme Participants	13/08/2025	In Progress - On Track	In Progress - On Track	→
7	Data	All data migration activities set out in the cutover plan complete	All data has been loaded into central systems as part of the cutover to M10.	Programme Participants	22/09/2025	Not Started – as per plan	Not Started – as per plan	→
8	Data	ISD fully populated by Elexon	Confirmation from Elexon that all ISD data has been fully populated as part of cutover to M10.	Elexon	22/09/2025	In Progress - On Track	In Progress - On Track	→
9	Code	Significant Code Review Powers (SCR) enacted by Ofgem (M7) and updates to regulatory code ready to be implemented at M8	T2-RE-0600 approved by Ofgem and SCR powers enacted (M7) and code changes approved ahead of M8.	Ofgem	11/12/2024	Complete	Complete	→
10	Migration	Migration Schedule approved	Migration Schedule approved at PSG.	Programme	19/08/2025	In Progress - On Track	In Progress - On Track	→

M10 Acceptance Criteria – April vs July Checkpoints (2 of 3)

Status										
April Assessment	Complete	1	In Progress - On Track	20	In Progress – At Risk	7	In Progress – Off Track	3	Not Started	1
July Assessment	Complete	5	In Progress - On Track	13	In Progress – At Risk	11	In Progress – Off Track	2	Not Started	1

#	Workstream	Criterion	Evidence	Owners	Due Date	April RAG	July RAG	Trend
11	Migration	Migration Framework approved	Migration Framework approved at MCAG.	Programme	30/04/2025	In Progress - On Track	Complete	↑
12	Migration	Migration Control Centre (MCC) delegation of authority approved	MCC DoA agreed with MCAG.	Programme	30/04/2025	In Progress - On Track	Complete	↑
13	Migration	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	30/04/2025	In Progress - At Risk	In Progress – At Risk	→
14	Migration	MCC tested and ready to operate	LDP assurance of MCC readiness for managing migration.	Programme	19/09/2025	In Progress - On Track	In Progress - On Track	→
15	Transition	Service Delivery Operating Model in place	Risk-based assurance of Programme Participants M10 operational readiness complete and outputs shared with Programme.	LDP	19/09/2025	In Progress - Off Track	In Progress - At Risk	↑
16	Transition	Service Delivery Operating Model in place (Self-Certification)	LDSOs and Central Parties have self-certified that their service management operating models are in place and ready.	LDSOs, Central Parties	03/07/2025	In Progress - Off Track	In Progress - At Risk	↑
17	Transition	Early Life Support Model defined	T3-MI-0033 complete and approved by MCAG.	Programme	31/03/2025	In Progress - At Risk	Complete	↑
18	Transition	Early Life Support Model arrangements in place and operational	Risk-based assurance of Programme Participants ELS arrangements by LDP and outputs shared with Programme.	All SIT Participants	12/09/2025	In Progress - At Risk	In Progress – At Risk	→
19	Transition	Early Life Support Model arrangements in place and operational (Self-Certification)	LDSOs and Central Parties have self-certified that early life support models across people and process are in place and ready.	LDSOs, Central Parties	12/09/2025	In Progress - At Risk	In Progress - On Track	↑
20	Transition	M10/M11 Cutover Plan in place	SRO assurance that approved cutover plan is in place and ready to operate.	Programme	28/05/2024	In Progress - At Risk	In Progress - On Track	↑
21	Transition	Central Programme Party Cutover Plans in place	Risk-based assurance of Programme Participants' M10 readiness complete by LDP and outputs shared with Programme.	Central Programme Parties	15/07/2025	In Progress - On Track	In Progress - On Track	→
22	Transition	Production environment in place for LDSOs and Central Parties	Confirmation from all LDSOs and Central Parties that their Production environment arrangements are in place (activity will differ participant to participant).	All SIT Participants	22/09/2025	In Progress - On Track	In Progress - On Track	→
23	Transition	Service activation complete to DIP Production environment for Central Parties and LDSOs	All connectivity proving and DIP onboarding activities have completed in preparation for cutover to commence. DIP operational and participants onboarded.	All SIT Participants	05/09/2025	In Progress - On Track	In Progress - On Track	→

M10 Acceptance Criteria – April vs July Checkpoints (3 of 3)

Status										
April Assessment	Complete	1	In Progress - On Track	20	In Progress – At Risk	7	In Progress – Off Track	3	Not Started	1
July Assessment	Complete	5	In Progress - On Track	13	In Progress – At Risk	11	In Progress – Off Track	2	Not Started	1

#	Workstream	Criterion	Evidence	Owners	Due Date	April RAG	July RAG	Trend
24	Transition	Cutover Plan executed	TORWG have confirmed that all cutover plan activities scheduled for cutover weekend have been completed.	LDP	23/09/2025	In Progress - On Track	In Progress - On Track	➡
25	Planning	M10 Risk Assessment undertaken	A review of disparate work off items and plans is completed to assess the aggregated level of risk associated with M10 decision making. Findings presented back to the Programme.	LDP	03/09/2025	In Progress - On Track	In Progress – Off Track	⬇
26	Planning	Roles and responsibilities post-M10 agreed and accepted	Acceptance of enduring processes, roles and responsibilities for central parties, programme and code bodies.	Code Bodies, LDSOs, Central Parties	05/09/2025	In Progress - Off Track	In Progress – Off Track	➡
27	Planning	M10 Work-off plan agreed (if required)	Any outstanding M10 delivery activities, that are not detrimental to M10 decision making, have clear and agreed action plans and form a single M10 work-off plan.	LDP	19/09/2025	In Progress - At Risk	In Progress - At Risk	➡
28	Qualification	Qualification Operating Model in place and operational for all post-M10 activities	The qualification processes have been demonstrated as part of the M10 qualification to be suitable and scalable to support qualification at scale needed beyond M10. BSC PAB has acknowledged and accepted their role and responsibilities in supporting the Qualification timelines and activities set out by the Code Bodies in the Qualification Approach and Plan. Risk based assurance is undertaken by the Programme and confirms Programme Qualification processes are understood and accepted by BSC PAB.	LDP Code Bodies BSC PAB	19/09/2025	In Progress - On Track	In Progress - On Track	➡
29	Operational Readiness	Programme Governance updated to reflect required changes to support Programme delivery post-M10.	A review of the Governance Framework and structure has been completed by the Programme and proposed changes necessary to support delivery of the Programme after M10 has been set out and agreed at PSG.	Programme	01/07/2025	In Progress - On Track	In Progress – At Risk	⬇
30	Migration	All Suppliers and Agents have made the necessary changes to support losing an MPAN via the Forward Migration Process and gaining an MPAN via the Reverse Migration Process.	Active confirmation from all Programme Participants that these changes have been implemented	Programme Participants Code Bodies	19/09/2025	In Progress - At Risk	In Progress - At Risk	➡
31	Migration	Performance Assurance measures are understood and in place to maintain BAU performance during the Migration period.	Settlement performance thresholds have been set out and agreed by all stakeholders, reporting mechanisms have been defined and there is a clear escalation process in place between PAB and Migration team.	Programme Code Bodies BSC PAB	12/09/2025	In Progress - At Risk	In Progress - At Risk	➡
32	Operational Readiness	Programme monitoring, assurance and escalation process for beyond M10 is in place and operational	The Programme, Elexon and PAB have actively communicated clear monitoring and reporting processes, assurance activities and escalation routes needed to support the central systems operating, while migration and qualification phases progress.	Programme Elexon BSC PAB	12/09/2025	In Progress - At Risk	In Progress - At Risk	➡

Progress against plan vs impact on M10

Given the proximity to M10 of this assessment, it is important to acknowledge that some of the M10 Acceptance Criteria may not be completely fulfilled before the milestone. While each criterion is important to M10 and needs to be met, not all of them are of the same criticality to the M10 cutover and immediate operation of the central systems after M10.

This means that with the right mitigations in place M10 could still proceed with open items and the risk to the new central systems and current settlement performance be contained.

To understand this position, and where the Programme is against these criteria, we have applied an additional RAG status to each of the criteria to show the impact on M10. The next two slides show this impact RAG status alongside the progress against plan (with a reminder of RAG definitions below).

This helps to circle critical blockers, as those criterion that are at risk or off track as well as being critical to M10 are the main threats to M10 being achieved.

Progress against Plan			Impact on M10		
RAG	Status	Description	RAG	Status	Description
	Complete	Criterion fully met		Complete	Criterion fully met
	In Progress – On Track	Criterion on track to be met by M10		Low	Criterion not being met by M10 would have minimal risk to post-M10 operations
	In Progress – At Risk	Criterion behind schedule but plan in place to deliver for M10		Moderate	Criterion not being met by M10 would have an impact on post-M10 operations, or threaten achievement of M11, but correct mitigating actions could manage this risk
	In Progress – Off Track	Criterion off track with no plan, or no confidence in plan		Critical	Criterion not being met by M10 would mean a delay to the milestone
	Not Started	Criterion not yet started			

M10 Acceptance Criteria – Progress against plan vs impact on M10 (1 of 2)

No.	Criterion	Progress against Plan	Impact on M10
1	End of SIT testing	In Progress – At Risk	Critical
2	IPA M10 Assurance Report developed and agreed	In Progress – On Track	Low
3	Non-SIT LDSO Qualification Testing complete	Complete	Complete
4	A minimum of 1 supplier & required contracted agents are qualified and ready to operate under new MHHS arrangements	In Progress – On Track	Moderate
5	All LDSOs qualified	In Progress – At Risk	Critical
6	All pre-migration data cleanse activities complete	In Progress – On Track	Critical
7	All data migration activities set out in the cutover plan complete	Not Started	Critical
8	ISD fully populated by Elexon	In Progress – On Track	Critical
9	Significant Code Review Powers (SCR) enacted by Ofgem (M7) and updates to regulatory code ready to be implemented at M8	Complete	Complete
10	Migration Schedule approved	In Progress – On Track	Moderate
11	Migration Framework approved	Complete	Complete
12	Migration Control Centre (MCC) delegation of authority approved	Complete	Complete
13	Migration incentives implemented	In Progress – At Risk	Low
14	MCC tested and ready to operate	In Progress – On Track	Moderate
15	Service Delivery Operating Model in place	In Progress – At Risk	Moderate
16	Service Delivery Operating Model in place (Self-Certification)	In Progress – At Risk	Moderate
17	Early Life Support Model defined	Complete	Complete

Key

Plan >>	Complete	In Progress – On Track	In Progress – At Risk	In Progress – Off Track	Not Started
Impact >>	Complete	Low	Moderate	Critical	

M10 Acceptance Criteria – Progress against plan vs impact on M10 (2 of 2)

No.	Criterion	Progress against Plan	Impact on M10
18	Early Life Support Model arrangements in place and operational	In Progress - At Risk	Moderate
19	Early Life Support Model arrangements in place and operational (Self-Certification)	In Progress - On Track	Moderate
20	M10/M11 Cutover Plan in place	In Progress - On Track	Moderate
21	Central Programme Party Cutover Plans in place	In Progress - On Track	Moderate
22	Production environment in place for LDSOs and Central Parties	In Progress - On Track	Critical
23	Service activation complete to DIP Production environment for Central Parties and LDSOs	In Progress - On Track	Critical
24	Cutover Plan executed	In Progress - On Track	Critical
25	M10 Risk Assessment undertaken	In Progress - Off Track	Critical
26	Roles and responsibilities post-M10 agreed and accepted	In Progress - Off Track	Moderate
27	M10 Work off plan agreed (if required)	In Progress - At Risk	Moderate
28	Qualification Operating Model in place and operational for all post-M10 activities	In Progress - On Track	Moderate
29	Programme Governance updated to reflect required changes to support Programme delivery post-M10.	In Progress - At Risk	Moderate
30	All Suppliers and Agents have made the necessary changes to support losing an MPAN via the Forward Migration Process and gaining an MPAN via the Reverse Migration Process.	In Progress - At Risk	Critical
31	Performance Assurance measures are understood and in place to maintain BAU performance during the Migration period.	In Progress - At Risk	Moderate
32	Programme monitoring, assurance and escalation process for beyond M10 is in place and operational	In Progress - At Risk	Moderate

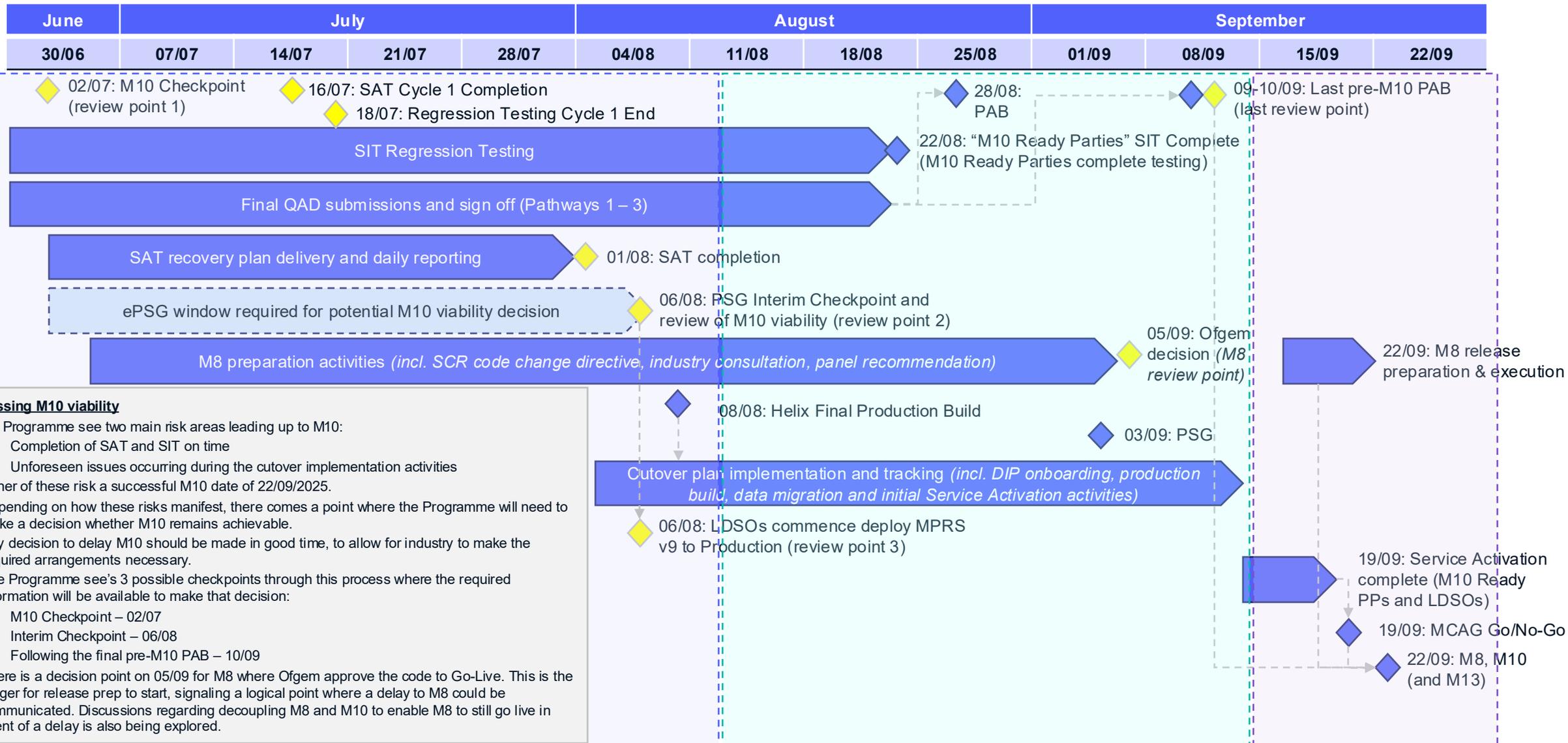
Key

Plan >>	Complete	In Progress - On Track	In Progress - At Risk	In Progress - Off Track	Not Started
Impact >>	Complete	Low	Moderate	Critical	

- **Overall Status: Achievable but at significant risk**
 - Based on the assessment of progress against the M10 Acceptance Criteria, the Programme believes that the M10 date of 22-Sep-25 remains achievable but is at significant risk due to delays incurred to SAT and CoS / CoA Settlement Testing, which have put strain on critical downstream activities required to complete for M10.
 - SAT is being tracked daily against its recovery plan. This should continue until it's planned conclusion on 01-Aug-25 and reporting to GLIG (weekly) and PSG (monthly) should remain in place.
 - A plan to complete CoS / CoA Settlement testing has been set out and, while this delays SIT regression testing by 2 weeks, it still enables the SIT completion milestone (TE-T1-2000) to be completed on 22-Aug-25, protecting the critical path.
 - If either of these items is going to delay M10, it will happen over the course of this month (July) and so the Programme proposes an interim checkpoint take place at PSG on 06-Aug-25 to assess the Programme's position and risk level.
 - Delays occurred between now and the end of July could require an extraordinary PSG to be convened earlier than August to review M10 viability. We have outlined this key 'risk window' on the next slide.
 - It is also important to note that there are several other individual risk areas that the Programme are assessing and while these are deemed manageable at this stage, the aggregation of this risk must be considered in any M10 decision making.
-

Key points en route to M10 to assess milestone viability

Key Milestone M10 viability potential decision point Planned activity Potentially required activity



Assessing M10 viability

- The Programme see two main risk areas leading up to M10:
 - Completion of SAT and SIT on time
 - Unforeseen issues occurring during the cutover implementation activities
- Either of these risk a successful M10 date of 22/09/2025.
- Depending on how these risks manifest, there comes a point where the Programme will need to make a decision whether M10 remains achievable.
- Any decision to delay M10 should be made in good time, to allow for industry to make the required arrangements necessary.
- The Programme see's 3 possible checkpoints through this process where the required information will be available to make that decision:
 - M10 Checkpoint – 02/07
 - Interim Checkpoint – 06/08
 - Following the final pre-M10 PAB – 10/09
- There is a decision point on 05/09 for M8 where Ofgem approve the code to Go-Live. This is the trigger for release prep to start, signaling a logical point where a delay to M8 could be communicated. Discussions regarding decoupling M8 and M10 to enable M8 to still go live in event of a delay is also being explored.

Risk window 1: SAT and SIT completion

Risk window 2: Unforeseen issues in cutover preparation and implementation

Fix forward window

Thank you