



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

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# Extraordinary Programme Steering Group #48.1 12 September 2025

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MHHS-DEL4195

Document Classification: Public

# Agenda

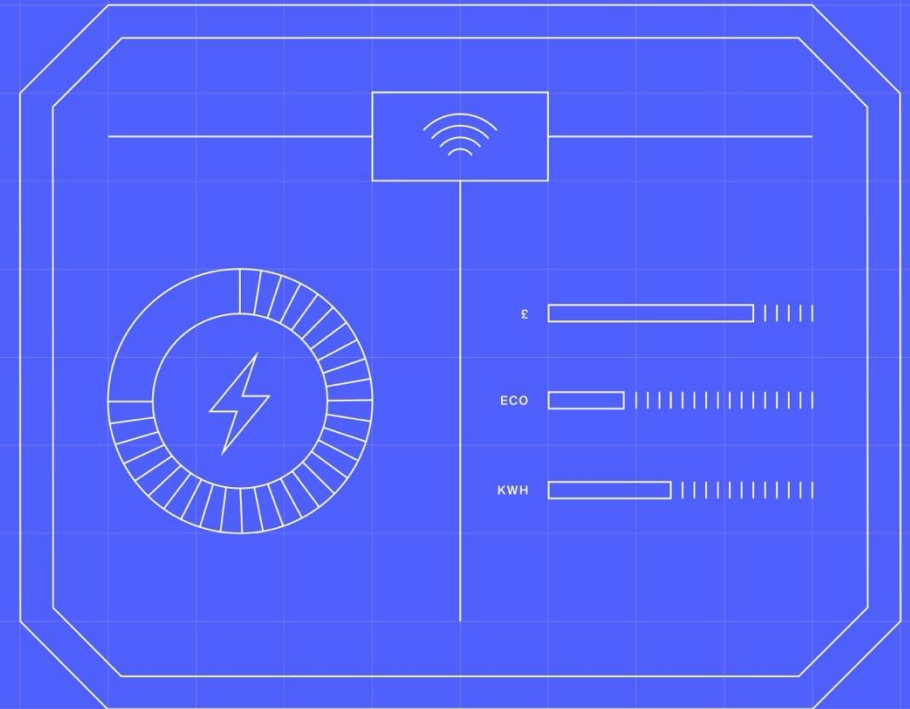
#	Item	Objective	Type	Lead(s)	Time	Page
1	Welcome		-	Chair	15:00-15:05 5 mins	1
2	M10 Decision Making Choreography	Reminder of M10 Decision-Making Choreography	Information	Programme (Lewis Hall)	15:05-15:10 5 mins	3
3	Programme view of current M10 status	Recap of the relevant M10 Acceptance Criteria progress and their associated risks Outstanding work items	Information	Programme (Lewis Hall)	15:10-15:25 15 mins	5
4	IPA view of current M10 status	IPA view of M10 progress and risks	Information	IPA	15:25-15:35 10 mins	14
5	M10 Contingency Planning	Context and update on Contingency planning exercise	Information	Programme (Jason Brogden)	15:35-15:45 10 mins	35
6	Open Discussion on M10 status	Open discussion on M10 status	Discussion	Programme (Chair)	15:45-15:55 10 mins	39
7	Summary and Next Steps	Summarise actions and decisions, and look ahead to next meeting	Information	Chair & Secretariat	15:55-16:00 5 mins	41

# M10 Decision-Making Choreography

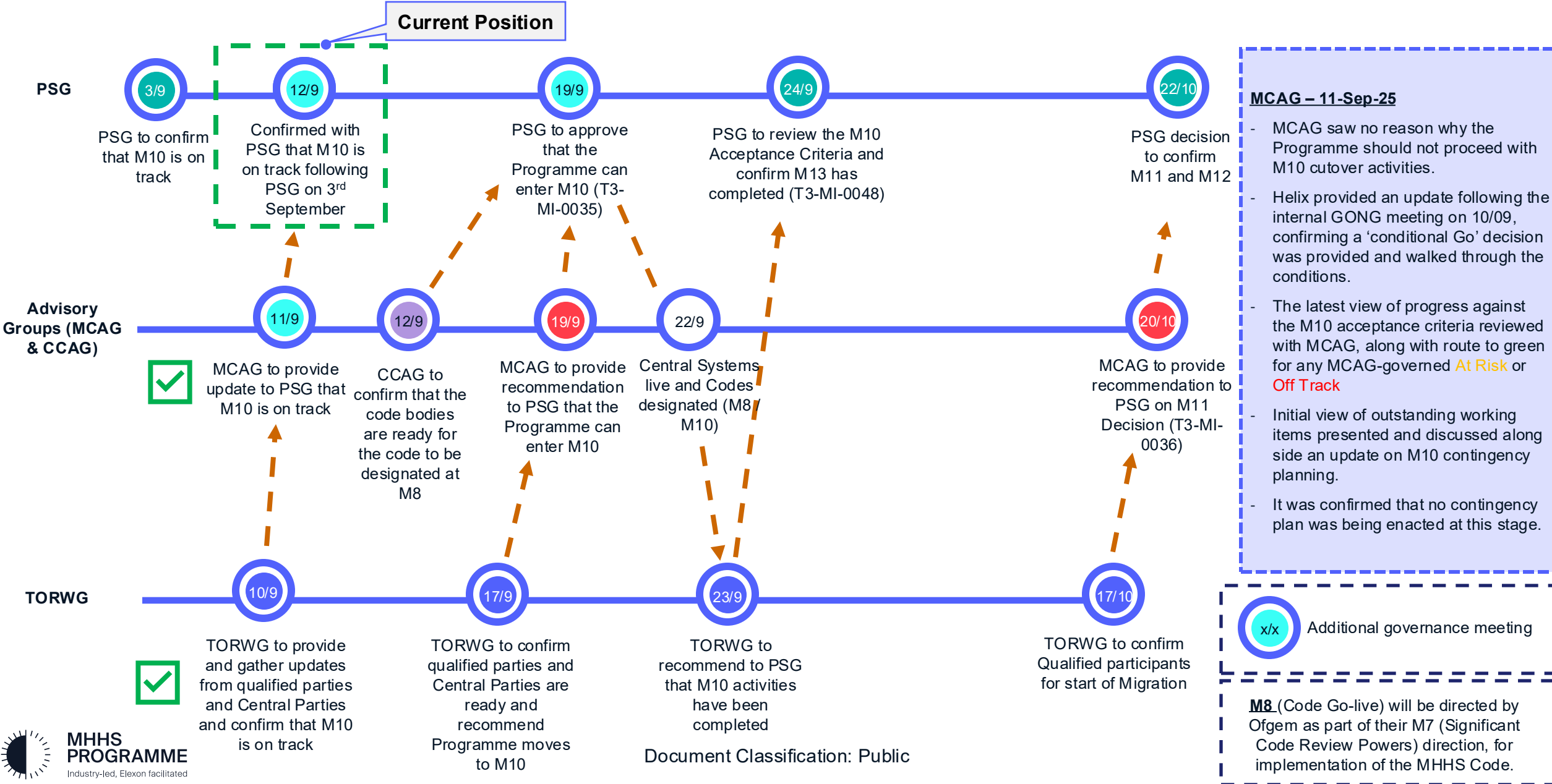
**Information:** Reminder of M10 Decision-making Choreography

*Programme (Lewis Hall)*

*5 mins*



# Overview of M10/M11 Decision Choreography

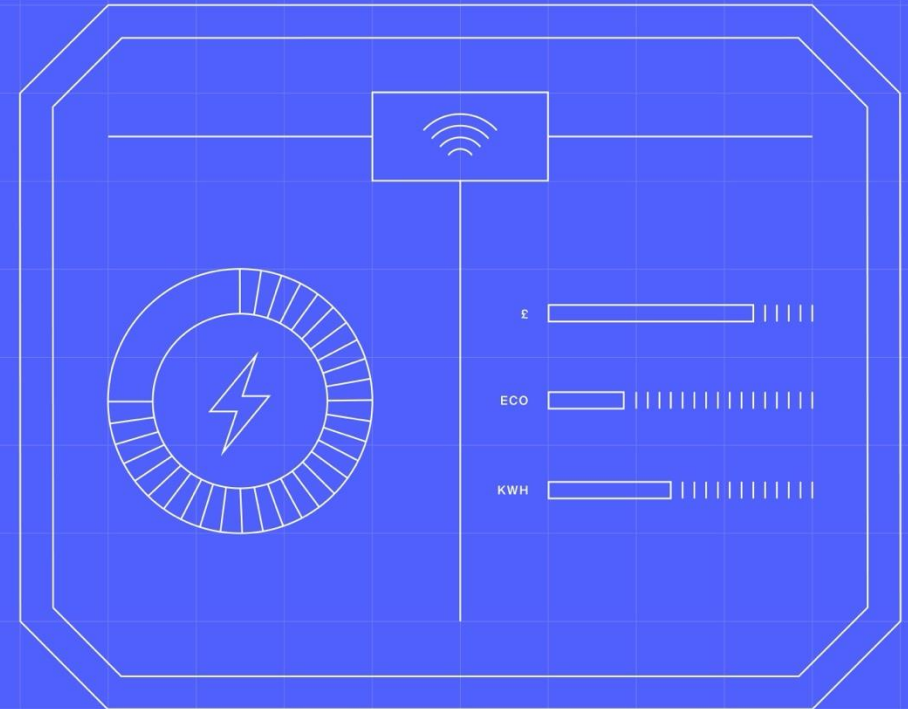


# Programme View of Current M10 Status

**INFORMATION:** Recap of the relevant M10 Acceptance Criteria progress and their associated risks

*Programme (Lewis Hall)*

*15 mins*



There are **no known blockers** to M10 that would prevent the Programme from continuing with planned M10 cutover activities.

Situation

- While there is some risk associated with the execution, the cutover plan is progressing on track.
- The ISD files have been published to the Elexon Portal and are being loaded by the LDSOs ahead of cutover weekend.
- All LDSOs have now been qualified to operate in MHHS arrangements.
- 1 supplier and their contracted agents have also been qualified by the Code Bodies.
- Readiness of central parties is being tracked closely.
- The current M10 work-off items can all be delivered post-M10 without impacting BAU settlement or central system stability.

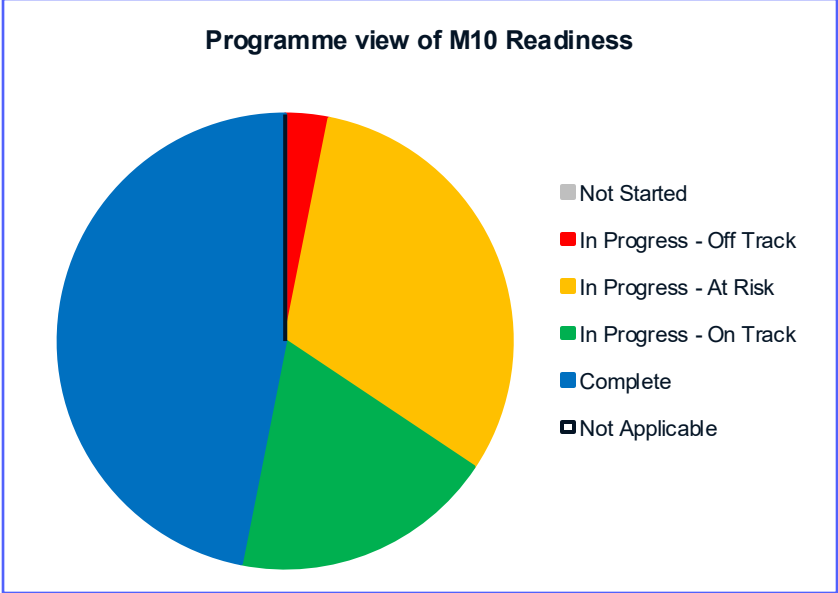
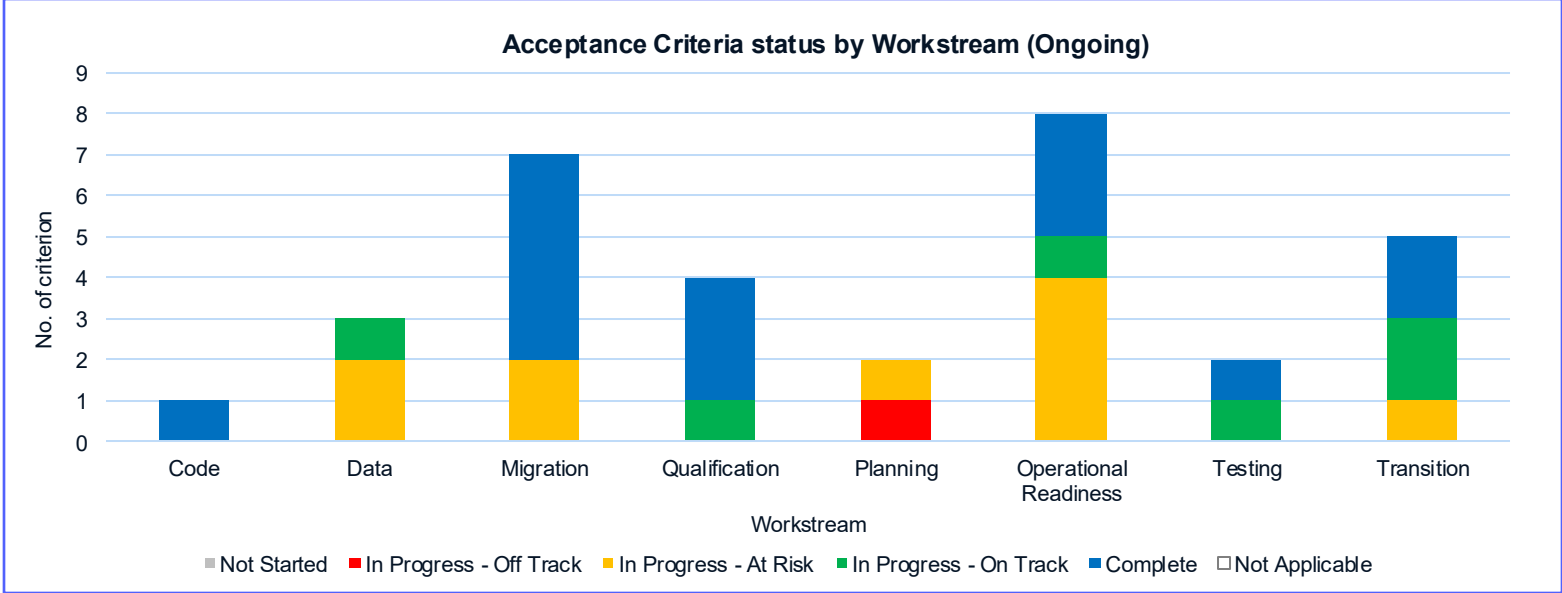
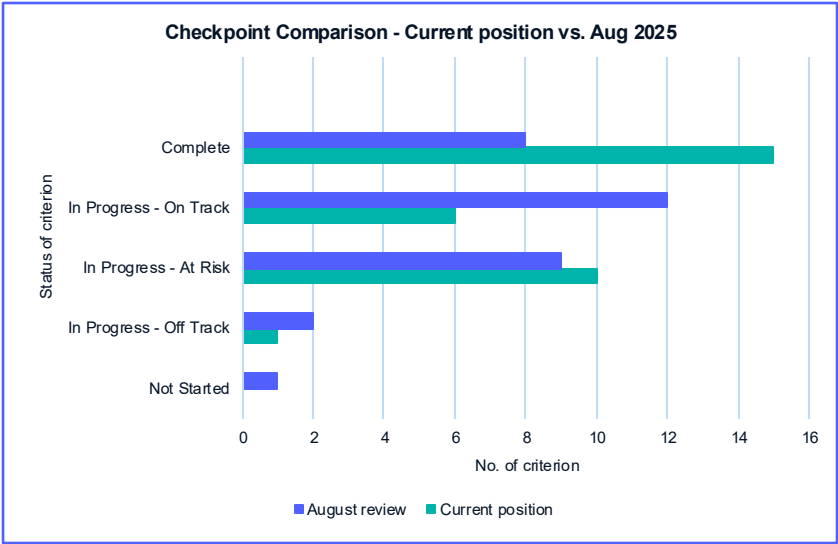
Complication

- The risk level carried by the Programme does remain high due to concerns regarding Elexon Helix readiness. Much of this is attributed to:
  - Previous issues with ISD file quality and loading process (*which have been tested further since SIT*).
  - General Elexon central system stability – a further deployment (25.14.3) is required on 19/09 to deliver a Severity 1 defect fix and D0082 flow, and another release (25.14.4) scheduled for 02/10 to delivery 2 additional missing D Flows (D0043 and D0079).
  - Risk that there could be further missing Helix functionality, or high impacting issues, identified through the cutover process.

# Overview against the M10 Acceptance Criteria

Overview

- Across the M10 acceptance criteria, the Programme assesses 1 as 'off track'.
- 10 criteria are deemed at risk while 15 have been completed. This week, 2 criteria have completed – 'All LDSOs Qualified' (@ BSC PAB 09/09) and 'MCC tested and ready to operate' (@ MCAG on 11/09).
- Criterion regarding ISD readiness remains 'at risk', ISD files published to Elexon Portal but issues with file retrieval need to be fixed. Workarounds being employed to allow LDSO file loading to commence.
- Programme still sees risk to M10 as high, reflected in the 'off track' criterion – 'M10 Risk Assessment undertaken'.
- Delivery of the legacy changes to support forward/reverse migration remains at risk due to concerns regarding readiness of 1 participant – this is being managed by Code Bodies as a compliance issue.
- Other 'at risk' items are proposed to be accepted and relate to: definition of Migration incentives, delivery of the cutover plan (due to ISD and Helix central system stability risks) and ensuring Service Management and ELS processes and operating model are sufficient to operate at volume throughout migration (to be demonstrated throughout ELS period).



## M10 Acceptance Criteria (1 of 3)

#	Workstream	Criterion	Evidence	Owners	Due Date	RAG	Path to Green / Associated Risks
1	Testing	End of SIT MVC testing	T1-TE-2000 (SIT Minimum Viable Cohort Complete (SIT Minimum Viable Cohort Test Exit Report Approved)) complete and approved.	All SIT Participants	22/08/2025	Complete	Approval @ SITAG on 15-Aug-25.
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	Initial M10 IPA report to be presented at PSG on 12-Sep-25. Further iteration at 19-Sep-25 (if required).
3	Qualification	Non-SIT LDSO Qualification Testing complete	T3-QU-0010 complete and approved by QAG.	LDSOs only	16/05/2025	Complete	Approved @ QAG on 22-May-25.
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 Participants, Code Bodies	12/09/2025	Complete	Approved @ BSC PAB on 27-Aug-25.
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	Complete	Approved @ BSC PAB on 09-Sep-25.
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	Data Cleanse Closure Report in draft and to be issued with PPs prior to M10, closing formal Data Cleanse Plan.
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	24/09/2025	In Progress – At Risk	Issue identified with DPI population over w/e 06-07/09. Patch to be deployed by St Clements and subsequent patch required post-M10 and prior to M11.  Not seen as a blocker for M10.
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	11/09/2025	In Progress – At Risk	ISD files loaded and published to Elexon Portal @ 09:30 on 11/09. There is an issue with the file retrieval process which need to be resolved to complete criterion. Workaround employed to enable LDSO ISD load.
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	Approved by Ofgem in Dec-24.
10	Migration	Migration Schedule approved	Migration Schedule approved at PSG.	Programme	19/08/2025	Complete	Approved @ MCAG on 22-Jul-25
11	Migration	Migration Framework approved	Migration Framework approved at MCAG.	Programme	30/04/2025	Complete	Approved @ MCAG on 29-Apr-25
12	Migration	Migration Control Centre (MCC) delegation of authority approved	MCC DoA agreed with MCAG.	Programme	30/04/2025	Complete	Approved @ MCAG on 29-Apr-25



## M10 Acceptance Criteria (2 of 3)

#	Workstream	Criterion	Evidence	Owners	Due date	RAG	Path to Green / Associated Risks
13	Migration	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	30/04/2025	In Progress - At Risk	Elexon in progress of actioning send back of Mod P487 from Ofgem. Not envisaged as a blocker for M10.  <i>The Programme accepts this risk and acknowledges existing enforcement incentive and work in progress on additional incentives.</i>
14	Migration	MCC tested and ready to operate	LDP assurance of MCC readiness for managing migration.	Programme	19/09/2025	Complete	Milestone approved @ MCAG on 11/09.
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 - At Risk	Programme retains concern over how the Service Management Model will operate at volume (ie. post M11).  <i>The Programme accepts this risk and acknowledges work done by Elexon to establish the Service Management Model. Performance will to be monitored throughout ELS.</i>
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 - At Risk	Programme has requested self-certification declarations from all M10 ready parties – due back 17/09.
17	Transition	Early Life Support Model defined	T3-MI-0033 complete and approved by MCAG.	Programme	31/03/2025	Complete	Approved @ MCAG on 29-Apr-25
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	Programme retains concern regarding set up of Helix operational processes needed to support Hypercare/ELS.  <i>The Programme accepts this risk and acknowledges work done by Elexon to establish the Service Management Model. Performance will to be monitored throughout ELS.</i>
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 - On Track	Programme has requested self-certification declarations from all M10 ready parties – due back 17/09.
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	Complete	Approved @ MCAG on 22-Jul-25
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	Complete	Approved @ MCAG on 22-Jul-25 as part of the consolidated cutover plan.
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	All LDSOs onboarded to DIP. Suppliers and Agents to follow at M11.
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	Service Activation plan on track.

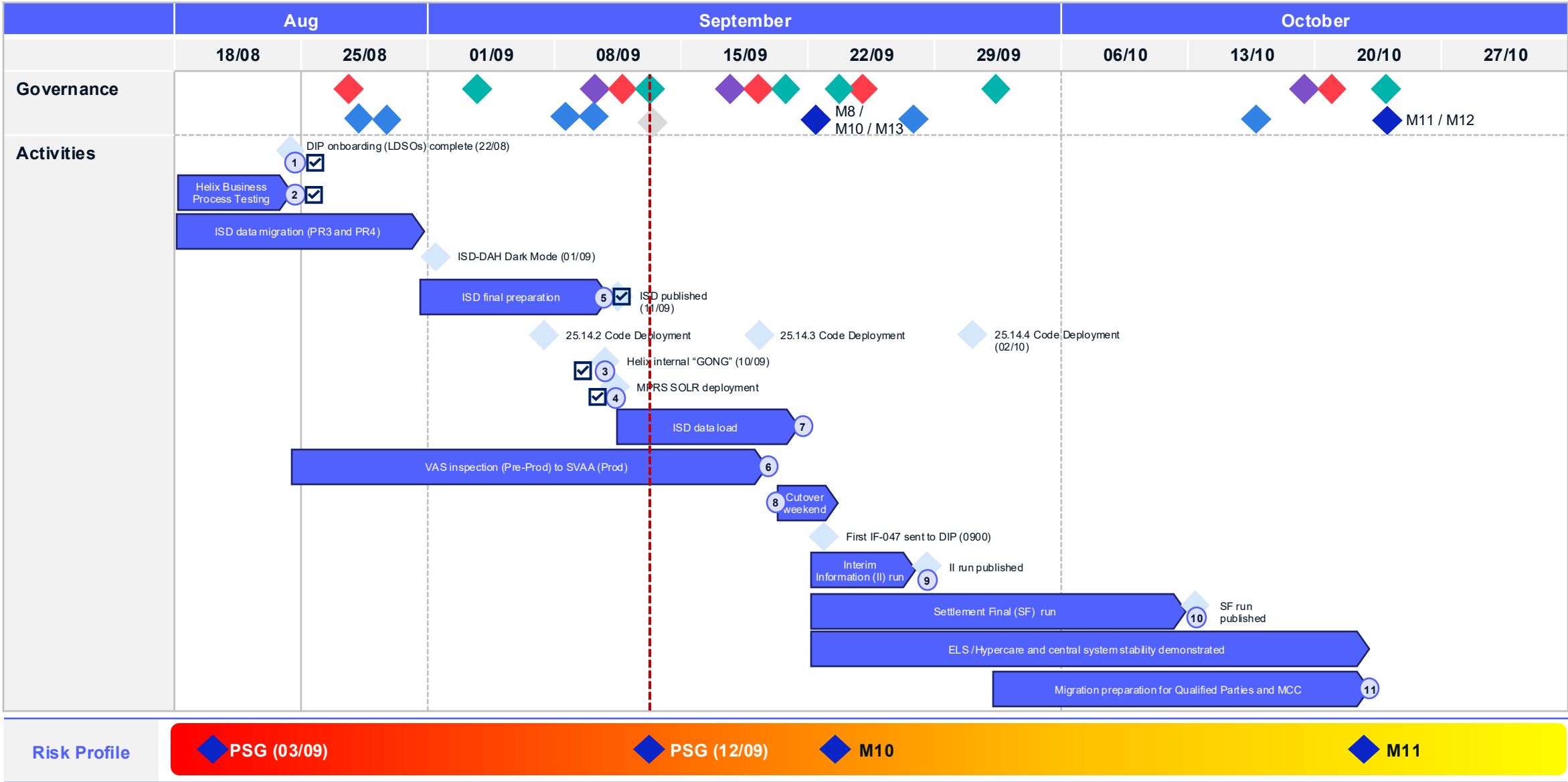
## M10 Acceptance Criteria (3 of 3)

#	Workstream	Criterion	Evidence	Owners	Due date	RAG	Path to Green / Associated Risks
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 - At Risk	ISD published on 11/09. Delivery of Helix Release 25.14.3 on 18/09. Helix cutover activities on cutover w/e complete.
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 - Off Track	Delivery of M10/M11 Glidepath activities, incl. LDSO DIP onboarding, Qualification of all LDSOs, publishing ISD, Helix deployment 25.14.3 and no further issues identified during cutover.
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 - At Risk	Programme retains concern regarding capacity of Elexon team to deliver post-M10 responsibilities when MPAN volumes ramp up during migration.  <i>The Programme accepts this risk and acknowledges work done by Elexon to establish the Service Management Model. Performance will to be monitored throughout ELS.</i>
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	Work off plan items to be set out at PSG on 12-Sept-25.
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	Process has been refined based on progress and successful outcomes from Pathway 2 and 3 qualification demonstrate robustness of process and engagement with PAB to date.
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	Complete	Approved @ PSG on 03-Sept-25.
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	1 party has highlighted their likely non-compliance with Code Bodies. This would impact c.700k MPANs at M10. Code Bodies are discussing route to compliance and any additional measures required. Escalated to BSC Panel for discussion 11-Sep-25.
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	Complete	Set out and agreed @ BSC PAB on 30-Jul-25.
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	Complete	Set out and agreed @ BSC PAB on 30-Jul-25.

## Risk glidepath to M10 and M11 – mitigating actions and contingency plans

No.	Action	Mitigation	Contingency	Associated Risk ID	Owner(s)	Due Date
1	LDSOs are onboarded to DIP	<ul style="list-style-type: none"> <li>LDSO onboarding brought forward to August and decoupled from Supplier and Agent onboarding</li> </ul>	<ul style="list-style-type: none"> <li>If an LDSO is late – cutover proceeds. LDSO has time to onboard before later Go-Live decisions.</li> </ul>	R1121, R839, R1137	DIP Manager	Complete
2	Helix Internal Testing is complete; Helix Service Activation GoNG	<ul style="list-style-type: none"> <li>No known mitigation</li> </ul>	<ul style="list-style-type: none"> <li>Use Helix contingency ISD load activity (PR4) and delay Helix Service Activation GoNG declaration to Programme to 29-Aug</li> </ul>	R1152, R1137, R839	Helix	Complete
3	Helix internal “GoNG” – Helix declaration to Programme	<ul style="list-style-type: none"> <li>No known mitigation</li> </ul>	<ul style="list-style-type: none"> <li><b>If Elexon No Go - Programme, Ofgem discussion required for M10</b></li> </ul>	R1137, R1152	Helix	Complete (w/ conditions)
4	MPRS SoLR patch is deployed by LDSOs	<ul style="list-style-type: none"> <li>No known mitigation</li> </ul>	<ul style="list-style-type: none"> <li>Patch is deployed after as soon as possible after M10 and before M11</li> </ul>	R1156	St Clements, LDSOs	Complete
5	ISD files are published	<ul style="list-style-type: none"> <li>Early ‘mock’ file to be shared with LDSOs by 01/09 to allow for early format and quality checks</li> </ul>	<ul style="list-style-type: none"> <li>SFTP mechanism in place to allow M10 parties to access ISD</li> <li><b>If ISD cannot be made available – Programme, Ofgem discussion required for M10</b></li> </ul>	R1156	Helix	Complete
6	VAS inspection against SVAA system	<ul style="list-style-type: none"> <li>Further Helix internal business process testing is being executed</li> </ul>	<ul style="list-style-type: none"> <li>All M10 ready parties go live but legacy settlement processes remain</li> </ul>	R1103, R1152	Helix	17-Sep-25
7	ISD Data Load complete	<ul style="list-style-type: none"> <li>7-day window from 11/09 – 19/09 to load ISD files</li> </ul>	<ul style="list-style-type: none"> <li>If LDSO is late – M10 proceeds. LDSO updates MPRS feature switch to later M10 date. Suppliers directed not to migrate MPANs belonging to LDSO.</li> <li>If Supplier or Agent – resolution plan to be M11 ready submitted to Programme</li> </ul>	R1144	All M10 Parties	19-Sep-25
8	M10 Cutover Weekend “GoNG”	<ul style="list-style-type: none"> <li>Weekly Cutover Progress Reporting</li> <li>GLIG reporting</li> <li>Additional governance meetings for early intervention</li> </ul>	<ul style="list-style-type: none"> <li>Any late Non-Helix parties submit resolution plans to go live</li> <li>If Helix (incl. 25.14.3 build complete), all other central systems go live but legacy settlement processes remain (subject to feasibility)</li> <li><b>– Programme, Ofgem discussion required for M10</b></li> </ul>	R1152, R1137, R839, R1151	Programme (PSG)	19-Sep-25
9	Interim Information (II) Run	<ul style="list-style-type: none"> <li>VAS/SVAA inspection exercise should validate new vs legacy outputs and identify any discrepancies</li> </ul>	<ul style="list-style-type: none"> <li>Not due until WD4 post M10, providing time to address any issues before industry impact</li> </ul>	R1136, R1082	Elexon	25-Sep-25
10	Settlement Final (SF) Run	<ul style="list-style-type: none"> <li>VAS/SVAA inspection exercise should validate new vs legacy outputs and identify any discrepancies</li> </ul>	<ul style="list-style-type: none"> <li>Not due until WD15 post M10, providing time to address any issues before industry impact</li> </ul>	R1136	Elexon	10-Oct-25
11	Qualified Parties M11-ready	<ul style="list-style-type: none"> <li>Readiness for M11 tracked via Programme and MCC</li> </ul>	<ul style="list-style-type: none"> <li>If a PP is not ready, there will be a Migration Schedule update</li> </ul>	R1110, R897	All M10 Parties	17-Oct-25

Risk glidepath to M10 and M11 – reducing the risk profile



## Outstanding work items

#	Work item	Due date	Owner
1	Fix of Severity 1 impacting settlement runs and D0082 in Release 25.14.3	18-Sep-25	Elxon
2	ISD load complete ( <i>dependent on publishing on 11-Sep-25</i> )	19-Sep-25	LDSOs
3	Deployment of missing D Flows (D0043 and D0079) in Release 25.14.4	02-Oct-25	Elxon
4	Delivery of deferred P Flows (P0275, P0276 and P0277)	Mar-26*	Elxon
5	Missing D Flows in Code Drafting (D0164, D0394, D0395) incorporated into regulatory code	Pre-M11	Programme
6	Patch to address final DPI exceptions identified as part of the LDSO data migration activities	Pre-M11	St Clements
7	Decision provided on migration incentives (Mod P487)	TBC*	Ofgem
8	Data Cleanse Report finalised ( <i>once data cleanse plan is completed on cutover weekend</i> )	Pre-M11	Programme
9	Outstanding SAT testing for M16 transition	TBC*	Elxon
10	Outstanding Helix SIT-Ops PIT work-off plan items	TBC*	Elxon
11**	Elxon to publish Settlement Service Continuity Plan (SSCP) in line with conditions in Elxon GONG	22-Sep-25	Elxon
12**	Missing D354, D355 and D256 from DTC and DTS to be incorporated	Pre-M11	Programme

*\*Date to be confirmed*

*\*\*Added since MCAG (11-Sep-25)*

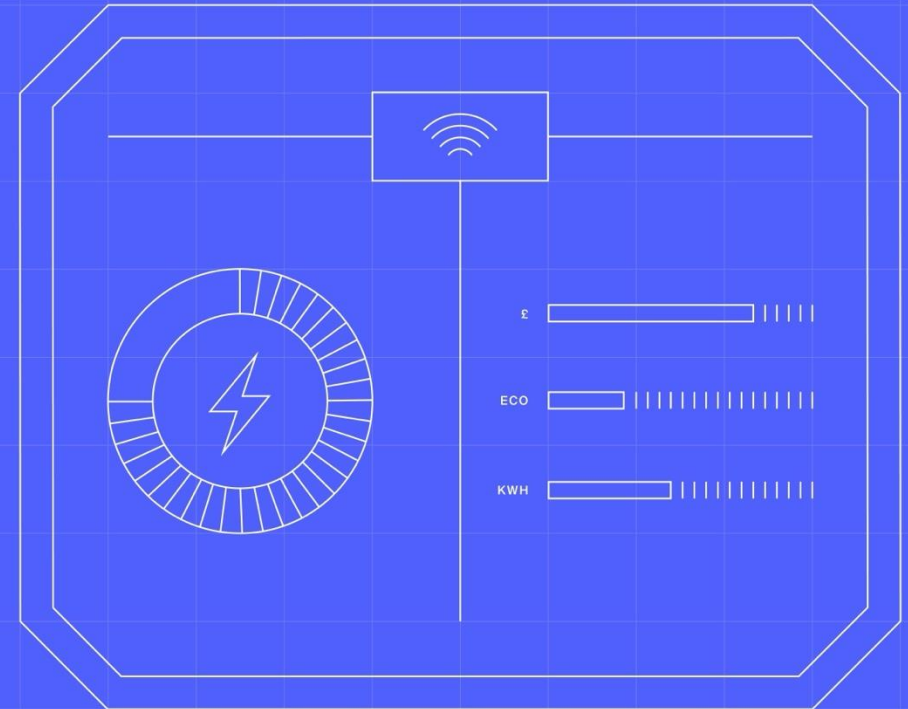
*This list is as of today (11-Sep-25) and may be subject to change before M10 (22-Sep-25)*

# IPA view of Current M10 Status

**INFORMATION:** IPA view of of M10 Progress and risks

*IPA*

*10 mins*





# MHHS IPA M10 Readiness Report

**DRAFT**  
**8 September 2025**

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# Executive Summary

## Background and purpose

The Programme is approaching the M10 milestone on 22 September 2025, which aims to confirm readiness of central systems to support the migration of MPANs to the new half-hourly settlement arrangements. M11 follows on 22 October 2025, at which point Participants can begin to migrate MPANs onto the new arrangements.

The Central Programme Team has assessed M10 milestone readiness against 32 'M10 Acceptance Criteria' that were approved at the Transition and Operational Readiness Working Group (TORWG) and the Migration and Cutover Advisory Group (MCAG). Since April 2025, per Ofgem's directions, progress towards M10 has been assessed at checkpoints in April, July and August 2025.

The M10 readiness and final M10/M11 decision choreography was presented at the Programme Steering Group (PSG) on 3 September 2025. On 12 September 2025, the outcome from the MCAG meeting on 11 September 2025, where the evidence for proceeding with cutover will be evaluated, will be presented to the PSG. The PSG will then decide whether to proceed with cutover on 12 September 2025. The final decision to enter the cutover weekend will be made at the PSG on 19 September 2025.

**This report provides IPA's assessment of end-to-end Programme readiness for M10 and will serve as an input for decision making at PSG on 12 September 2025.** The IPA will provide an additional summary update to this report, setting out our any key updates to readiness assessment, for the PSG on 19 September 2025.

## Our Assessment

Our assessment is based on our independent assurance activities against four assurance exam questions, as set out below. These assurance activities were performed between the 6 August 2025 and 4 September 2025.

1. Does the Central Programme Team's assessment of the M10 Acceptance Criteria provide a fair and accurate view of readiness based on the evidence provided?
2. Based on the evidence provided, are the M10 Acceptance Criteria either complete or sufficiently on track to support the Programme's progression towards M10 on 22 September 2025?
3. Are there documented and agreed work-off plans for any deferred or outstanding items that need to be performed between M10 and M11 and post M11?
4. Is the overall level of risk acceptable to proceed to M10 when balanced against mitigations and contingencies?

## IPA Assurance Activities

Our assessment has been based on the following activities conducted by the IPA:

- Review of the M10 Acceptance Criteria and evidence requirements established by the Central Programme Team
- Review of evidence used to support the Central Programme Team's assessment of end-to-end Programme readiness
- Attendance at MHHSP governance meetings and industry led engagement sessions taking place between 6 August 2025 and 4 September 2025
- Review of Working/Advisory Group documentation
- Led assurance meetings with Programme Participants through periodic and risk-based assurance
- Review of documentation provided as evidence by Programme Participants through periodic risk-based assurance.
- Attendance at industry led open days and workshops and other meetings with Programme Participants for issue resolution

# M10 Readiness - Key Messages

The following key messages are based on our independent assurance assessment of evidence available up to 4 September 2025.

## Key Messages

1

The Programme can continue to **proceed to the cutover weekend, contingent on progress with mitigation plans** for current key risks and issues, and no new significant issues arising

2

**20 of 32 M10 Acceptance Criteria are complete or on track, 10 at-risk, 1 off-track, 1 not started.** Not all at-risk/off-track criteria will be met, requiring risk assessment and work-off plans.

3

**Where work-off plans are required, they must be clearly documented and risk assessed** to ensure they are manageable and do not disrupt settlement operations between M10 and M11

4

We are **aligned with the Central Programme Team's view of readiness against the M10 Acceptance Criteria**, providing confidence that decisions can be made on an informed basis.

## Overall Commentary

Whilst positive progress is being made across most areas toward attaining the M10 Acceptance Criteria, the Programme continues to carry a higher level of risk than would be desired at this stage, driven by key issues and risks reported by the Central Programme Team. Daily monitoring remains essential to ensure completion of mitigation plans and achievement of key confidence points on the glide-path to M10. Any delays in their completion, or the emergence of further significant issues, are likely to impact achievement of M10 on 22 September 2025 given the limited time and capacity remaining.

Since the August 2025 PSG, the number of completed criteria has risen from eight to 12, and 'critical' criteria to SIT exit and cutover planning are now complete. The key risks in relation to at-risk or off-track criteria include:

- Finalisation of Industry Standard Data (ISD).
- Helix solution readiness, specifically the Severity 1 defect reported on 4 Sep 2025 and the outstanding/deferred D-flows
- One Participant is not currently on track to fully meet the criterion related to forward/reverse migration at M10.

Mitigation plans are in place for those criteria currently not on-track and considered feasible, but it is highly likely that not all at-risk and off-track criteria will be fully met by M10. For criteria not fully met at M10, outstanding or deferred items must be risk-assessed, both individually and collectively, to ensure their delivery post M10 will not impact settlement operations or result in an excessive number/severity of incidents that could compromise the achievement of M11. They must also not create undue risk to legacy settlement as it transitions onto the new settlement platform (VAS) shortly after M10.

We have independently reviewed evidence against all 32 M10 Acceptance Criteria based on their reported status for the 3 September 2025 PSG meeting. Based our review, we are aligned with the Central Programme Team's assessment on all 32 out of 32 criteria.

# IPA M10 Assessment – Key Assurance Exam Questions

Exam Question	RAG	IPA Assessment Summary	Ref.
1. Does the Central Programme Team's assessment of the M10 Acceptance Criteria provide a fair and accurate view of readiness based on the evidence provided?	G	<ul style="list-style-type: none"> <li>The Central Programme Team's assessment against the M10 Acceptance Criteria provides a fair reflection of current progress against each criterion and IPA is aligned (100%) with the Central Programme Team's assessment across the 32 criteria. For the 12 completed criteria, the pre-defined evidence requirements set by the Central Programme Team have been met.</li> <li>IPA is aligned with the rationale for the one criterion being assessed as off-track (#25 'M10 Risk Assessment') due to risks relating to Helix system stability and emerging issues surrounding missing d-flow requirements and ISD readiness concerns.</li> </ul>	<a href="#">Section 2</a>
2. Based on the evidence provided, are the M10 Acceptance Criteria either complete or sufficiently on track to support the programme's progression towards M10 on 22 September 2025?	A	<ul style="list-style-type: none"> <li>Of the 32 M10 Acceptance Criteria, 20 (62.5%) are either complete (12) or on track (eight). 11 (34.5%) are at risk (10) or off track (one), and one has not started. This is a higher proportion than expected at this stage before M10.</li> <li>The status of the M10 Acceptance Criteria, presented at the PSG on 3 September 2025, highlights that the Programme is carrying a higher-than-desired level of risk due to open risks and issues associated with at-risk and off-track criteria, for example, the resolution of ISD and Helix solution readiness. Mitigating actions and contingency plans are either in place or in development to address these criteria.</li> <li>One Participant is currently not on-track to fully meet the M10 Acceptance Criteria for supplier/agent roles to have forward/reverse migration functionality in place ahead of M10. Efforts are underway to explore contingency options and assess the impact on M11.</li> </ul>	<a href="#">Section 2</a>
3. Are there documented and agreed work-off plans for any deferred or outstanding items that need to be performed between M10 and M11 and post M11?	A	<ul style="list-style-type: none"> <li>Work-off plans for deferred items have been formally agreed at various points of the Programme. These are documented in a variety of formats, such as the DIP product backlog or addressed through future Helix system releases.</li> <li>The list or centralised register of outstanding and deferred items, including those owned by Helix, still needs to be formally documented and finalised to assess the overall level of risk, inform M10 decision-making, and support tracking of closure.</li> </ul>	<a href="#">Section 3</a>
4. Is the overall level of risk acceptable to proceed to M10 when balanced against mitigations and contingencies?	A	<ul style="list-style-type: none"> <li>The current risk profile must be balanced against the context of the M10 go-live. For example, the current go-live is not a 'big bang', with the migration of MPANs onto the new arrangements not starting until M11 on 22 October 2025.</li> <li>When balancing these factors, the current level of risk is acceptable for the Programme to proceed with the Cutover Plan. However, this is contingent on the successful progress with mitigation plans for current key issues and no new significant issues arising.</li> <li>Whilst some open risks will be addressed in time for M10, a level of risk is likely to carry into the period between M10 and M11, placing additional demand on defined support mechanisms.</li> </ul>	<a href="#">Section 3</a>



**Red:** Based on the evidence reviewed, the exam question has not been met. Significant unmitigated risks or issues remain, which are likely to impact the Programme's ability to proceed to M10.



**Amber:** Based on the evidence reviewed, the exam question has been partially met. Risks and issues remain but mitigating actions are in place or being developed which, if successfully executed, enable the Programme to proceed to M10.



**Green:** Based on the evidence reviewed, the exam question has been met, with only minor risks or issues remaining, supporting the Programme's progression to M10.

Our overall recommendations, which either reinforce or supplement the actions already underway by the Central Programme Team and Programme Participants, are set out below.

## Proceed towards M10, with daily monitoring of mitigating plans for key risks and issues



- Daily tracking and reporting on the progress of mitigating plans for key risks and issues highlighted against the M10 Acceptance Criteria to enable prompt action to maintain progress or resolve issues, as required.
- Track and report on progress against the key 'confidence points' identified by the Central Programme Team in the 'Risk glidepath to M10 and M11' presented at PSG on 3 September 2025 and those identified in Section 3 of this report.
- Impact assess any further delays or issues on the ability of the Programme to achieve M10 and M11 on their planned dates.

## All parties to promptly escalate any emerging risks / issues through the appropriate channel



- All parties to promptly escalate any emerging risks or issues that may impact M10 readiness through the appropriate channels (e.g., Central Programme Team or Elexon Service Desk). This is crucial to support prompt impact assessment, identify mitigating plans and address the risk or issue on a timely basis.

## Consolidate and finalise M10 work-off plans and risk assess their impact



- Provide a consolidated view of all work-off items against the M10 Acceptance Criteria (or a register of where they can be reviewed).
- Finalise the risk assessment of the outstanding and deferred items (individually and in aggregate) to understand the potential impact on post M10 operations (including legacy settlement) and achieving M10.
- Implement a transparent and simple mechanism to track and report progress against agreed work-off items post M10 and to approve and communicate their completion.

## Utilise 12 and 19 September 2025 PSG as the formal decision points for proceeding to M10



- At the go/no-go decision points at the PSG on 12 and 19 September 2025, review the following information to inform decision-making over whether to proceed to M10, with views canvassed from all PSG members on whether there are any reasons not to proceed:
- Status against the M10 Acceptance Criteria (as it is likely not all criteria will be fully met by 19 September PSG, the Central Programme Team should also make clear the governance approach being taken in this scenario e.g., 'Conditional Go')
  - Progress against mitigation plans for key risks and issues highlighted at PSG on 3 September 2025
  - Progress against key 'confidence points' identified in the Risk glidepath to M10 and M11
  - Latest view of work-off plans for M10 against the M10 Acceptance Criteria.

# 2

## IPA assessment against M10 Acceptance Criteria

# Acceptance Criteria Assessment – Summary

**Overall Summary:** We have independently reviewed the evidence provided by the Central Programme Team against the 32 M10 Acceptance Criteria. Following our review, we are aligned with the Central Programme Team's assessment on 32 out of 32 criteria (100%), as published at the PSG on 3 September 2025. We are aligned with the key risk areas identified by the Central Programme team in their M10 Acceptance Criteria assessment.

## M10 Acceptance Criteria Summary

Since the PSG meeting on 6 August 2025, the number of completed M10 Acceptance Criteria has increased from eight to 12. However, 10 criteria are 'at-risk' (increased from nine) and one is 'off-track' (decreased from two). The overall number of 'at-risk' and 'off-track' items have therefore remained unchanged since August and we consider the overall level of risk being carried within the Programme to be higher than desired at this stage, given the proximity to M10.

The **key risk areas** driving these 11 criteria to be "At-Risk" or "Off-Track" are:

- Uncertainty regarding the stability and readiness of Elexon's Central Systems due to ongoing internal testing and further planned code deployments which may result in defects in the lead up to M10.
- Elexon's readiness to publish ISD files ahead of M10 due to LDSOs reporting defects against precursor ISD files.
- Elexon's ability and readiness to support early life reporting may not be sufficient.
- Participant readiness to meet the requirement to have forward/reverse migration functionality in place ahead of M10.

## IPA Alignment

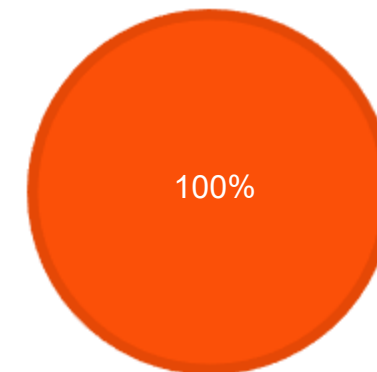
We have independently reviewed the evidence provided by the Central Programme Team against all 32 M10 Acceptance Criteria to assess whether IPA is in alignment with the Central Programme Team's assessment.

### We note the following key observations:

- Based on the evidence reviewed, the assessment against the Acceptance Criteria by the Central Programme Team provides a fair reflection of the current status of the programme against the Acceptance Criteria.
- 12 Acceptance Criteria have been completed with supporting evidence reviewed to validate completion (e.g., MCC Control centre authority approved, Central Programme Party Cutover Plans in place).
- Four Acceptance Criteria have a due date in the past but are yet to be marked as complete. IPA do not view this to be material and are aligned with risks associated and mitigations in place to support completion ahead of M10.
- 11 Acceptance Criteria have been noted to be either off-track or at-risk. It is unlikely that all criteria will be fully completed ahead of M10. Therefore, clearly documented and risk assessed work-off plans are required to ensure outstanding items do not compromise the delivery of M11 or erode confidence in settlement operations.

## IPA ALIGNMENT WITH THE CENTRAL PROGRAMME TEAM'S ASSESSMENT OF THE M10 ACCEPTANCE CRITERIA

■ Fully Aligned



# 3

## Key Risks and Confidence Points leading up to M10



# Risk Themes and Key Confidence Points

The IPA has been tracking five key risk themes ahead of M10 and M11, relating either to risks within the end-to-end programme or inherent to the overall delivery approach. Most of these risks have mitigating actions in progress, which have been reported by the Central Programme Team as part of their M10 readiness assessment. **There are key activities and milestones that must be delivered to enable M10 and M11, providing ‘confidence points’ that, if achieved, build confidence towards attainment of the milestones.** As M10 and M11 approaches, the trend should show increasing confidence as more of these points are met.




Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			4 Sep 25	Trend	
1. Helix Readiness for M10	M10 is delayed due to Elexon/Helix readiness issues or problems encountered during or prior to their cutover activities.	<ul style="list-style-type: none"> <li>✓ Finalised Helix Cutover Plan and Runbook <b>[Complete]</b></li> <li>• LDSO confirmation of successful mock ISD file load <b>[9 September 2025]</b></li> <li>• Helix and Industry confirmation of no further outstanding requirements <b>[9 September 2025]</b></li> <li>• Elexon final Go / No Go decision <b>[10 September 2025]</b></li> <li>• VAS/SVAA Inspection <b>[Ongoing to 16 September 2025]</b></li> <li>• Consistent execution of Helix Cutover to plan <b>[Ongoing to 22 September 2025]</b></li> </ul>	LOW	➡	Whilst Helix have made improved progress against their readiness criteria in recent weeks, confidence in readiness has decreased due to the identification of a new Severity 1 defect on 4 September 2025, which must be resolved prior to M10 with limited time remaining.
2. Post-M10 issues	Issues are experienced post-M10 in the execution of legacy and/or MHHS settlement due to problems arising from the Helix cutover or with the Helix solution.	<ul style="list-style-type: none"> <li>✓ Completion of Helix SAT and industry SIT including regression <b>[Complete]</b></li> <li>✓ Finalised Helix future system release notes <b>[Complete]</b></li> <li>• Successful Helix releases <b>[25.14.3 on 18 September 2025 and 25.14.4 on 2 October 2025]</b></li> <li>• VAS/SVAA Inspection <b>[Ongoing to 16 September 2025]</b></li> <li>• Successful first settlement runs post-M10 <b>[26 September 2025]</b></li> </ul>	MEDIUM	➡	Based on experience during SIT, there remains a risk of new defects being identified during cutover activities, releases, and VAS/SVAA inspections. Given the limited time available before M10, any such defects would likely need to be resolved on a fix-forward basis.

**Confidence Point:** ✓ Confidence point met

**Confidence Level:** HIGH / MEDIUM / LOW degree of confidence that risk is unlikely to impact M10 or M11

**Confidence Trend:**
➡ Increasing Confidence
➡ Maintaining Confidence
➡ Decreasing Confidence

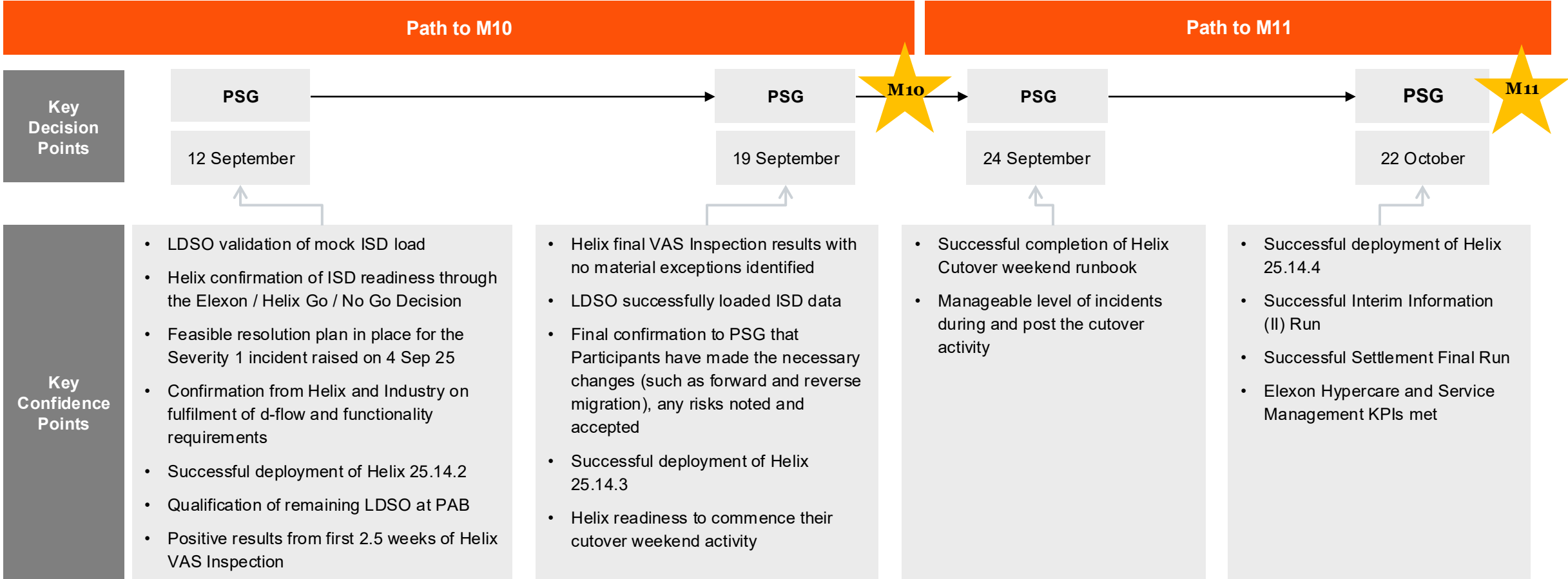
# Risk Themes and Key Confidence Points

Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			4 Sep 25	Trend	
<b>3. Participant Readiness</b>	A core capability provider (other than Helix), LDSO or Supplier experiences delays in cutover or other readiness activities (eg., DIP onboarding, ISD Data Load), resulting in either a delay to M10 or significant issues post go-live.	<ul style="list-style-type: none"> <li>GLIG MHHS Cutover reporting <b>[Weekly to 19 September 2025]</b></li> <li>LDSO confirmation of successful ISD file load <b>[19 September 2025]</b></li> <li>Completion of DIP onboarding <b>[5 September 2025]</b></li> <li>Confirmation to PSG of Participant Readiness (e.g. consequential change / forward and reverse migration) <b>[12 September 2025]</b></li> </ul>	MEDIUM		Whilst Participants are broadly on track against their individual pathways, one Participant is unlikely to fully meet the forward / reverse migration criterion by M10. The impact of this on M11 is currently being assessed.
<b>4. Qualification</b>	All Participants required to be ready for M10 are not qualified in time through the PAB process.	<ul style="list-style-type: none"> <li>✓ Qualification of Pathway 2 participants at PAB</li> <li>Qualification of remaining LDSOs at PAB <b>[11 September 2025]</b></li> </ul>	HIGH		BSC PAB and REC Code Manager has successfully qualified all participants in Pathway 2. Confidence remains high as Participants move through the Qualification process as per the schedule.
<b>5. Unexpected major incidents or events</b>	Unexpected major incidents or external events occur that disrupt cutover or early operations (e.g., SOLR event, Azure Outage).	<ul style="list-style-type: none"> <li>✓ Major incident management process established and tested as part of SIT Operations Testing <b>[Complete]</b></li> <li>✓ Finalised Disaster Recovery test <b>[Complete]</b></li> <li>Finalised Helix Business Continuity plan <b>[12 September 2025]</b></li> <li>Issue Resolution Group established and tested <b>[19 September 2025]</b></li> </ul>	MEDIUM		As the Programme progresses towards M10 and M11, the window for unexpected incidents to arise narrows, thereby increasing overall confidence.

# IPA Key Confidence Points to M10 and M11

The risk profile of the Programme would be expected to gradually reduce towards M10 and M11 as risks and issues are addressed. However, based on the nature of the risks, not all risks will be fully mitigated prior to the M10 decision points on 12 September 2025 and 19 September 2025.

It is therefore important to consider the activities and milestones between each decision point and what key information will be available to the PSG. If completed successfully, these points will help to build confidence, provide greater clarity for decision making and reduce the overall risk profile.



# Detailed Risks and Confidence Points

The following pages provide a break down of the detailed risks and confidence points in relation to the risk themes on Pages 11 and 12. IPA is tracking the completion of each of these points to ensure that Programme remains on a glide-path to M11 that reduces the overall risk levels.

Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>1. Helix Readiness for M10</b> - M10 is delayed due to Elaxon/Helix readiness issues or problems encountered during or prior to their cutover activities	<b>Code deployment and stability</b>	Three further code releases are planned with the final one on 18 September 2025, two days before cutover weekend. The scope of these releases remains subject to change and introduces risk around regression and code stability, which could impact M10 readiness.	<ul style="list-style-type: none"> <li>✓ Confirmation that all Helix internal business readiness testing is complete, reducing the likelihood of further functional defect fixes being required <b>[Complete]</b></li> <li>✓ Finalisation of release notes for each future release and confirmation of no SIT / Industry Impact <b>[Complete – changes, such as build for D0079, discussed and assigned to releases as they arise]</b></li> <li>• Confirmation of Industry validation of missing D-flows <b>[10 September 2025]</b></li> <li>• Successful deployment of all pre-M10 releases <b>[18 September 2025]</b></li> </ul>	MEDIUM		Previous code releases during SIT identified defects and therefore there is a risk of defects being found during upcoming releases. Confidence increases as releases are finalised and successfully deployed (Releases 25.14.3 & 4).
	<b>Resolution of missing D-Flows</b>	There is a risk that the three missing D-flows required for M10 cannot be designed, built and tested in time. These are currently being planned for deployment in the 18 September 2025 code release, two days before cutover weekend and in the post M10 release (25.14.4)	<ul style="list-style-type: none"> <li>• Confirmation from Helix on which releases will address the missing D-flow requirements <b>[10 September 2025 Elaxon Go-No/Go Decision]</b></li> <li>• Confirmation of Industry validation of missing D-flows <b>[10 September 2025]</b></li> <li>• Successful deployment of release 25.14.3 <b>[18 September 2025]</b></li> </ul>	MEDIUM		Whilst resolution plans are in place for all three D-flows, their delivery maybe impacted by Helix resources being diverted to the recent unrelated Severity 1 incident. This adds additional risk to their delivery.

**Confidence Point:** ✓ Confidence point met



**Confidence Level:** HIGH / MEDIUM / LOW degree of confidence that that risk is unlikely to impact M10 or M11

**Confidence Trend:**
 Increasing Confidence
 Maintaining Confidence
 Decreasing Confidence

# Detailed Risks and Confidence Points

Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>1. Helix Readiness - M10</b> is delayed due to Elexon/Helix readiness issues or problems encountered during or prior to their cutover activities	<b>Inherent cutover complexity</b>	The Helix cutover is inherently complex due to the number of systems, which could result in delays to cutover activities. To note: initial cutover activities have been executed in line with planned timelines.	<ul style="list-style-type: none"> <li>✓ Elexon go/no decision to commence cutover activities on 12 August 2025 and Service Activation on 22 August 2025 <b>[Complete - Conditional Go decisions on 12 and 22 August 2025]</b></li> <li>Elexon final go/no decision on 10 September 2025 <b>[10 September 2025]</b></li> <li>Cutover activities delivered on track against plan in lead to M10 <b>[Ongoing to 22 September 2025]</b></li> <li>Completion of Helix cutover weekend runbook <b>[Confirmation to PSG 24 September 2025]</b></li> </ul>	LOW	➔	During the Helix cutover, several systems will be connected for the first time, creating integration risk. This materialised on 4 September 2025, when a sequencing issue in file flows caused a Severity 1 defect. A resolution plan is in development, but it must be implemented before M10, and further integration risks remain.
	<b>ISD Readiness</b>	Helix ISD activities not completed in time for LDSOs to publish the ISD Catalogue on 11 September, resulting in delays to the Cutover Plan.	<ul style="list-style-type: none"> <li>Confirmation from LDSOs that the penultimate ISD files have been successfully loaded <b>[10 September 2025]</b></li> <li>ISD readiness for M10 is confirmed by Helix at their Go / No-Go/Decision point <b>[10 September 2025]</b></li> <li>LDSOs have confirmed the final version of ISD (v12) has been successfully uploaded <b>[On-going between 12-18 September 2025]</b></li> </ul>	MEDIUM	➔	On 1 September 2025, Helix issued the penultimate ISD file to LDSOs to test loading. Issues were identified and are being addressed, but this has reduced confidence ahead of the final ISD load after 11 September 2025.
	<b>VAS inspection</b>	VAS inspection could identify issues in the settlement calculation that impact M10 readiness (inherent risk)	<ul style="list-style-type: none"> <li>Completion of VAS/SVAA Inspection and Helix confirmation that there are no open issues <b>[On-going monitoring - VAS Inspection runs from 27 August to 17 September 2025]</b></li> </ul>	MEDIUM	➔	VAS/SVAA comparison was completed during SAT, but VAS inspection remains a key test of accuracy. As testing progresses, positive results will build confidence.



# Detailed Risks and Confidence Points

Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>2. Post M10 issues</b> - Issues are experienced post-M10 in the execution of legacy and/or MHHS settlement due to problems arising from the Helix cutover or with the Helix solution	<b>Code deployment and stability</b>	Multiple releases prior to cutover weekend (25.14.2 and 25.14.3) and after M10 (25.14.4) could result in system defects which materialise between M10 and M11 and could impact the Programme's ability to proceed with M11.	<ul style="list-style-type: none"> <li>✓ Confirmation that all Helix internal business readiness testing is complete, reducing the likelihood of further functional defect fixes being required <b>[Complete]</b></li> <li>✓ Finalisation of release notes for each future release and confirmation of SIT / Industry Impact <b>[Complete – changes, such as build for D0079, discussed and agreed per occurrence]</b></li> <li>• Successful deployment of future code releases up to M11 <b>[Confirmation of successful final pre-M11 release 25.14.4 on 2 October]</b></li> <li>• Successful Settlement Final Run <b>[Confirmation of successful run on 10 October]</b></li> </ul>	MEDIUM		Previous code releases during SIT identified defects and therefore there is a risk of defects being found during upcoming releases. Confidence increases as releases are finalised and successfully deployed (Releases 25.14.3 & 4).
	<b>Inherent Final Cutover Complexity</b>	The final VAS cutover on 20-21 September 2025 could result in issues regarding connectivity across the MHHS and Industry ecosystem due to the inherent complexity of integrations being operated in the production environment for the first time. This could lead to MHHS and/or industry processes not functioning as intended post M10.	<ul style="list-style-type: none"> <li>• Completion of Helix cutover weekend runbook <b>[Confirmation to PSG 24 September 2025]</b></li> <li>• Successful Interim Information (II) Run <b>[25 September 2025]</b></li> <li>• Successful Settlement Final Run <b>[10 October 2025]</b></li> </ul>	MEDIUM		During the VAS cutover, the system will be connected to others for the first time, creating integration risk. The Severity 1 integration issue reported on 4 September 2025 with other systems reduces confidence that VAS cutover will not experience similar issues.

# Detailed Risks and Confidence Points




Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>2. Post M10 issues</b> - Issues are experienced post-M10 in the execution of legacy and/or MHHS settlement due to problems arising from the Helix cutover or with the Helix solution	<b>Legacy Settlement re-platforming</b>	There could be issues with the legacy settlement following it being 're-platformed' from SVAA to VAS, which could result in reduced confidence and industry.	<ul style="list-style-type: none"> <li>Completion of VAS/SVAA Inspection and Helix confirmation that there are no open issues <b>[On-going monitoring - VAS Inspection runs from 27 August to 16 September]</b></li> <li>Successful Interim Information (II) Run <b>[25 September 2025]</b></li> <li>Successful Settlement Final Run <b>[10 October 2025]</b></li> </ul>	MEDIUM	➔	VAS/SVAA comparison was completed during SAT, but VAS inspection remains a key test of accuracy. As testing progresses, positive results will build confidence.
	<b>Missing requirements</b>	There could be further missed requirements (in addition to the three missing D-flows identified) which are only discovered post M10, impacting Industry processes.	<ul style="list-style-type: none"> <li>✓ Completion of Helix SAT to test settlement functionality <b>[Complete]</b></li> <li>Formal confirmation from Helix that no further D-flow or P-flow requirements are missing <b>[10 September 2025]</b></li> <li>Successful Interim Information (II) Run <b>[25 September 2025]</b></li> <li>Confirmation from M10 ready parties that a full settlement run has been performed as expected <b>[25 September 2025]</b></li> </ul>	MEDIUM	➔	Analysis is ongoing to confirm that no further D-flows or P-flows have been missed. However, Helix has deferred several flows for post-M11 build and deployment, which now require validation by industry prior to M10 confirm they are not required earlier than currently planned.

# Detailed Risks and Confidence Points




Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>2. Post M10 issues</b> - Issues are experienced post-M10 in the execution of legacy and/or MHHS settlement due to problems arising from the Helix cutover or with the Helix solution	<b>Risk acceptance</b>	Helix could accept an excessive level of risk prior to M10 in relation to outstanding items, workarounds or defects. This could impact solution quality and result in issues post-M10.	<ul style="list-style-type: none"> <li>A Formal 'Go' decision is provided by Elexon leadership to proceed with cutover activities received at Elexon go/no-go decision point <b>[10 September 2025]</b></li> </ul>	<b>MEDIUM</b>		Whilst Helix has made improved progress against its readiness criteria in recent weeks, several incidents have arisen and outstanding items remain, many of which are likely to require work-off plans post-M10. Any further incidents before M10 will likely need to be addressed on a fix-forward basis, given current resource and capacity constraints.
	<b>Post-M10 Governance</b>	Post-M10 governance may not be established and operating effectively by go-live. This could result in post M10 issues may not be resolved in a timely or effective manner.	<ul style="list-style-type: none"> <li>Post-M10 governance framework finalised <b>[10 September 2025]</b></li> <li>Post-M10 governance meetings scheduled <b>[19 September 2025]</b></li> </ul>	<b>MEDIUM</b>		The proposed post-M10 governance framework was presented at PSG on 3 September 2025 and now needs to be finalised and operationalised prior to M10.



# Detailed Risks and Confidence Points

Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>3. Participant Readiness</b> - A core capability provider (other than Helix), LDSO or Supplier experiences delays in cutover or other readiness activities (eg., DIP onboarding, ISD Data Load), resulting in either a delay to M10 or significant issues post go-live.	<b>Participant Cutover Delay</b>	There is a risk that a core capability provider (other than Helix), LDSO or a M10-ready Supplier experiences delays in their readiness or cutover activities.	<ul style="list-style-type: none"><li>Weekly MHHS Cutover reporting through GLIG continues to indicate participants are on-track with their cutover activities <b>[19 September 2025]</b></li><li>Final confirmation to PSG that Participants have completed, or are on-track with Cutover activities <b>[19 September PSG]</b></li></ul>	MEDIUM		LDSOs and Core Capability providers are making good progress with their cutover activities. However, concerns about the readiness of ISD and Domestic premises indicator files are driving amber statuses in participant M10/M11 cutover reporting. Mitigation strategies are in place and will need to be monitored going forward.
	<b>LDSO ISD File Load</b>	An issue occurs during LDSOs manual load of ISD file ahead of M10	<ul style="list-style-type: none"><li>Confirmation from LDSOs that the penultimate ISD files (v11) have been successfully loaded <b>[10 September 2025]</b></li><li>Successful load of ISD files (v12) between 11 and 19 September <b>[19 September 2025]</b></li></ul>	MEDIUM		On 1 September 2025, Helix issued the penultimate ISD file to LDSOs to test loading. Issues were identified and are being addressed, but this has reduced confidence ahead of the final ISD load after 11 September 2025.
	<b>Participant Readiness</b>	Participants may have not made the necessary operational or technical changes required for M10 (such as forward and reverse migration)	<ul style="list-style-type: none"><li>Final confirmation to PSG that Participants have completed pre-M10 activities and implemented necessary changes for post-M10 operations, with all risks acknowledged and accepted <b>[19 September PSG]</b></li></ul>	MEDIUM		One Participant is not on track to fully meet the criteria implement forward/reverse migration capabilities by M10, which has decreased confidence. The impact of this on M11 is currently being assessed.

# Detailed Risks and Confidence Points

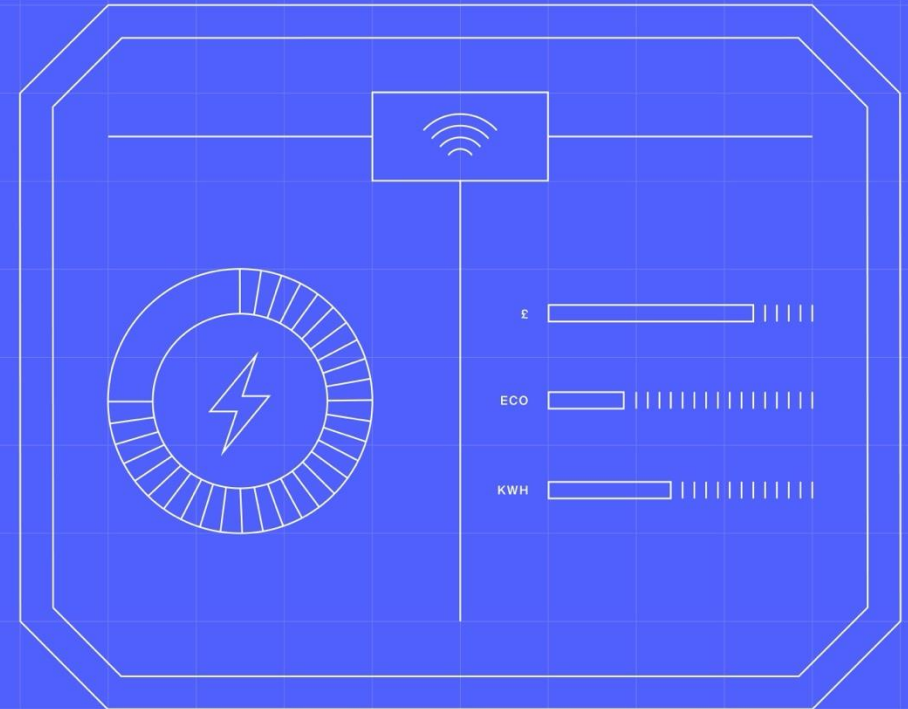
Priority Risk Area	Priority underlying risks		Confidence Points	Confidence Level		Rationale
				4 Sep 25	Trend	
<b>3. Participant Readiness</b>	<b>DIP Onboarding</b>	There is a risk that all required parties will not successfully onboard to the DIP in-time for Service Activation preparation.	<ul style="list-style-type: none"> <li>All LDSOs successfully onboarded to DIP <b>[5 September 2025]</b></li> <li>Weekly DIP Manager reporting through GLIG indicates Participants are on-track with their onboarding and Service activation activities <b>[12 September 2025]</b></li> </ul>	MEDIUM		All LDSOs must be onboarded to the DIP before M10. One LDSO is experiencing issues, but a mitigation plan is in place and on track for completion.
<b>4. Qualification -</b> All Participants required to be ready for M10 are not qualified in time through the PAB process.	<b>Participant Qualification</b>	There is a risk that all M10 ready Participants do not qualify as the number of PAB meetings was reduced from three to two due to previous delays in completion SAT.	<ul style="list-style-type: none"> <li>✓ Successful Qualification of all Pathway 2 Participants through BSC PAB <b>[Complete]</b></li> <li>• Successful Qualification of remaining LDSOs at PAB <b>[10 September 2025]</b></li> </ul>	HIGH		M10-ready suppliers and their contracted agents needed to be qualified ahead of M10. Confidence remains high following the successful Qualification of all Pathway 2 participants via BSC PAB and REC Code Manager.
<b>5. Unexpected major incidents or events -</b> Unexpected major incidents or external events occur that disrupt cutover or early operations (e.g., SOLR event, Azure Outage).	<b>Unknown risks</b>	Unexpected major incidents or external events occur that disrupt cutover or early operations (e.g., SOLR event, Azure Outage).	<ul style="list-style-type: none"> <li>✓ Major incident management process established and tested as part of SIT Operations Testing <b>[Complete]</b></li> <li>✓ Finalised Disaster Recovery test as part of SIT Operations Testing <b>[Complete]</b></li> <li>• Finalised Helix Business Continuity plan <b>[12 September 2025]</b></li> <li>• Issue Resolution Group established and tested <b>[19 September 2025]</b></li> </ul>	MEDIUM		As the Programme progresses towards M10 and M11, the window for unexpected incidents to arise narrows, thereby increasing overall confidence.

# M10 Contingency Planning

**INFORMATION:** Context and update on Contingency planning exercise

*Programme (Jason Brogden)*

*10 mins*



## Introduction

- The Programme has been contingency planning to see what action might need to be taken by the Programme and all of industry if certain conditions are not met through M10 decision-making.
- **To be clear, the Programme is still progressing on the basis of delivering to the Cutover Plan and to meet M10**, but this exercise is to prepare for any exceptional circumstances, given the level of risk currently being carried by the Programme.
- The Programme has engaged with all Central Parties, LDSOs and M10-Ready Suppliers (including GLIG) to inform contingency plans through workshops and bilaterals to inform the current position.
- As such, the Programme has set out a number of assumptions associated with these options and it is very important for all Programme Participants to check and validate these assumptions. **All contingency options require actions from some industry parties to vary from existing cutover plans.**
- The Programme issued a **PPIR for response by CoP 11/9** for Programme Party responses.
- These slides give an early view of responses – please note this initial analysis has been done within half an hour of the deadline, therefore may be revised before the meeting

## Responses as at 5pm 11/9 – Contingency Plan 1

### LDSOs:

- 6 Responses - No issues highlighted with executing Contingency Plan 1
- 1 LDSO responded 'Yes' to question 2, it is perhaps more appropriate to say that, should the need to implement Contingency Plan 1 arise, we would feel it would be necessary to proceed with a cautious approach and additional monitoring was needed.
- 1 LDSO responded 'Yes' with key dependencies and risks: DIP is Operational; SVAA Settlement calendar still used; D0043 and D0079 in production 2/10 & test files with SCS by 22/09 proven; Suppliers' confirmation DUOS payment not impacted
- LDSO software/service providers – 2 Responses - No issues highlighted with executing Contingency Plan 1

### Central Parties:

- RECCo, Electralink, DCC, Elexon Helix & Elexon DIP Manager - No issues highlighted with executing Contingency Plan 1

### Suppliers:

- 14 Responses - No issues highlighted with executing Contingency Plan 1
- 10 Responses highlighted issues with executing Contingency Plan 1 and these were all customers of one software/service provider who had revised their position to no issues after submissions were received.
- **2 Suppliers said Yes and highlighted potential impact of GSP Group Correction Factors with one highlighting a need to patch software, which was a factor raised by Helix 5/9 but awaiting further feedback from Helix.**
- Supplier software/service providers – 1 Responses - No issues highlighted with executing Contingency Plan 1

### Supplier Agents:

- 4 Responses - No issues highlighted with executing Contingency Plan 1
- 2 Responses highlighted issues with executing Contingency Plan 1 and these were all customers of one software/service provider who had revised their position to no issues after submissions were received.

## Responses as at 5pm 11/9 – Notice for Go-Live changes and ISD Issues

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Notice for Go-Live date changes:

- LDSOs – Generally responded that 18/9 am the deadline for MPRS, but up to 2 weeks requested for preparation and execution of changes to Go-Live driven by people and other systems
- Suppliers – a range of responses with a number of Suppliers highlighting CoP 15/9 to give time to work with 3<sup>rd</sup> Parties; some later dates; and some Suppliers in later Waves highlighting that this would have no impact.
- There was general feedback that changing Go-Live at this point with diversion from original planning could have a material impact and any delay would have to be considered in light of industry November releases.

What is the latest that ISD v12 could be made available:

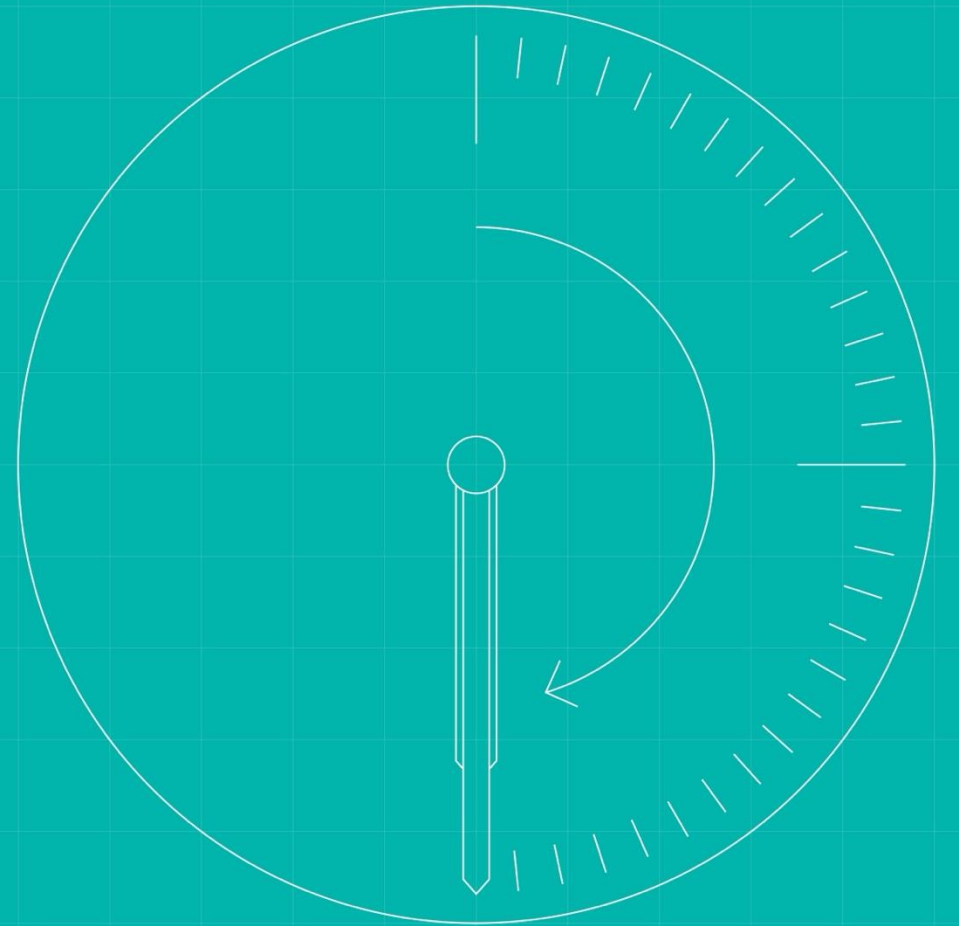
- 1 LDSO and 1 Supplier stated 12/9
- 1 LDSO stated 15/9
- The remaining respondents with dates before M10 stated 17/9 – 19/9
- Some respondents stated that this would be loaded much later in line with their Go-Live dates

# Open Discussion on M10 Status

**DISCUSSION:** Open discussion on M10 status

*Chair*

*10 mins*



### Question to PSG:

*Do PSG members have any objection to the Programme continuing with the M10 cutover activities (please provide evidence and rationale)?*

### Next steps:

- M10 Cutover activities will continue unless any material objections have been raised
- A summary of PSG discussions held in today's meeting will be published on the MHHS website as part of the Headline Report
- TORWG will meet, on 17/09, to confirm qualified parties and Central Parties are ready and recommend Programme moves to M10 in line with M10 Decision Choreography

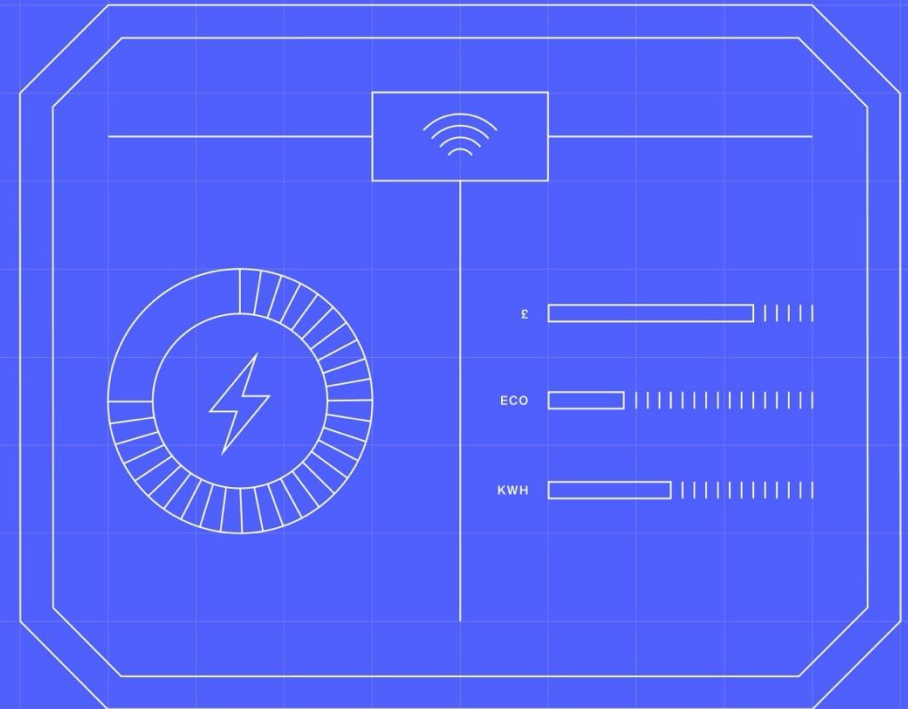


# Summary and Next Steps

**INFORMATION:** Summarise actions and decisions.  
Look ahead to next meeting

*Chair and Secretariat*

*5 mins*



## Summary and Next Steps

- 1. Confirm actions and decisions from meeting
- 2. Next PSG meeting:
  - 1. **19 September (ePSG)**
  - 2. **24 September (ePSG)**
  - 3. **01 October 2025 10:00 – 12:30 (virtual)**

Meeting dates	19 September (Extraordinary)	24 September (Extraordinary)	01 October 2025
Relevant milestones or activities	<ul style="list-style-type: none"><li>• T3-MI-0035</li></ul>	<ul style="list-style-type: none"><li>• T3-MI-0048</li></ul>	
Agenda items	<ul style="list-style-type: none"><li>• Decision to approve Programme can enter M10</li></ul>	<ul style="list-style-type: none"><li>• Decision for PSG to review the M10 Acceptance Criteria and confirm M13 has completed</li></ul>	<ul style="list-style-type: none"><li>• Ofgem Messaging</li><li>• Programme Change Requests</li><li>• M10 Update</li><li>• M11 Readiness</li><li>• Qualification Progress</li><li>• ELS/Hypercare Readiness Update</li><li>• Migration Update</li></ul>
Standing items	<ul style="list-style-type: none"><li>• Summary and Next Steps</li></ul>	<ul style="list-style-type: none"><li>• Summary and Next Steps</li></ul>	<ul style="list-style-type: none"><li>• Minutes and Actions</li><li>• Programme Reporting</li><li>• Delivery Dashboards</li><li>• Summary and Next Steps</li></ul>

# Thank you