



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

Extraordinary Programme Steering Group #48.3 24 September 2025

Version 1.0

MHHS-DEL4195

Document Classification: Public

Agenda

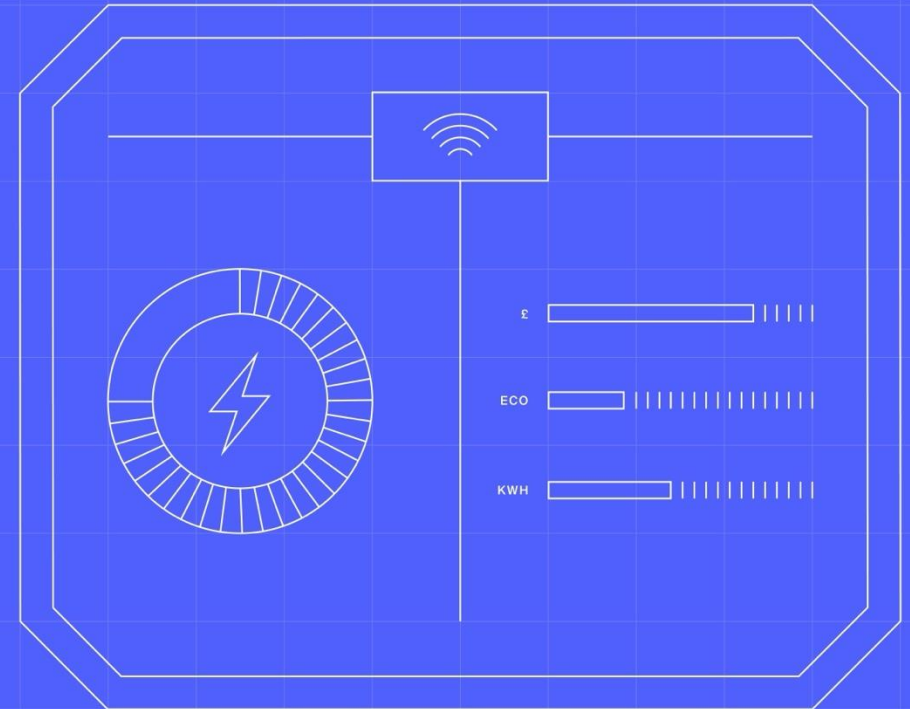
#	Item	Objective	Type	Lead(s)	Time	Page
1	Welcome		-	Chair	14.00-14.05 5 mins	1
2	M10 Decision Making Choreography	Reminder of M10 Decision-Making Choreography	Information	Programme (Lewis Hall)	14.05-14.10 5 mins	3
3	Review of M10 Acceptance Criteria	- Recap of the relevant M10 Acceptance Criteria progress - Outstanding work-off items	Information	Programme (Lewis Hall)	14.10-14.20 10 mins	5
4	Approval of M10/M13 Milestones	- T1-MI-1000: Central Systems ready for migrating MPANs (M10) - T1-MI-2000: Load Shaping Service switched on (M13) - T3-MI-0047: M10 Acceptance Criteria Ratification - T3-MI-0048: Review the M10 Acceptance Criteria and confirm M13 has completed	Decision	Programme (Chair)	14.20-14.30 10 mins	13
5	Decision to approve T1-CP-3000 (Control Point 3/4 – Readiness for Migration)	- Programme view on Control Point 3/4 - IPA view on Control Point 3/4 - Decision to approve T1-CP-3000	Decision	Programme & IPA (Keith Clark)	14.30-14.40 10 mins	15
6	Summary and Next Steps	Summarise actions and decisions, and look ahead to next meeting	Information	Chair & Secretariat	14.40-14.45 5 mins	19

M10 Decision-Making Choreography

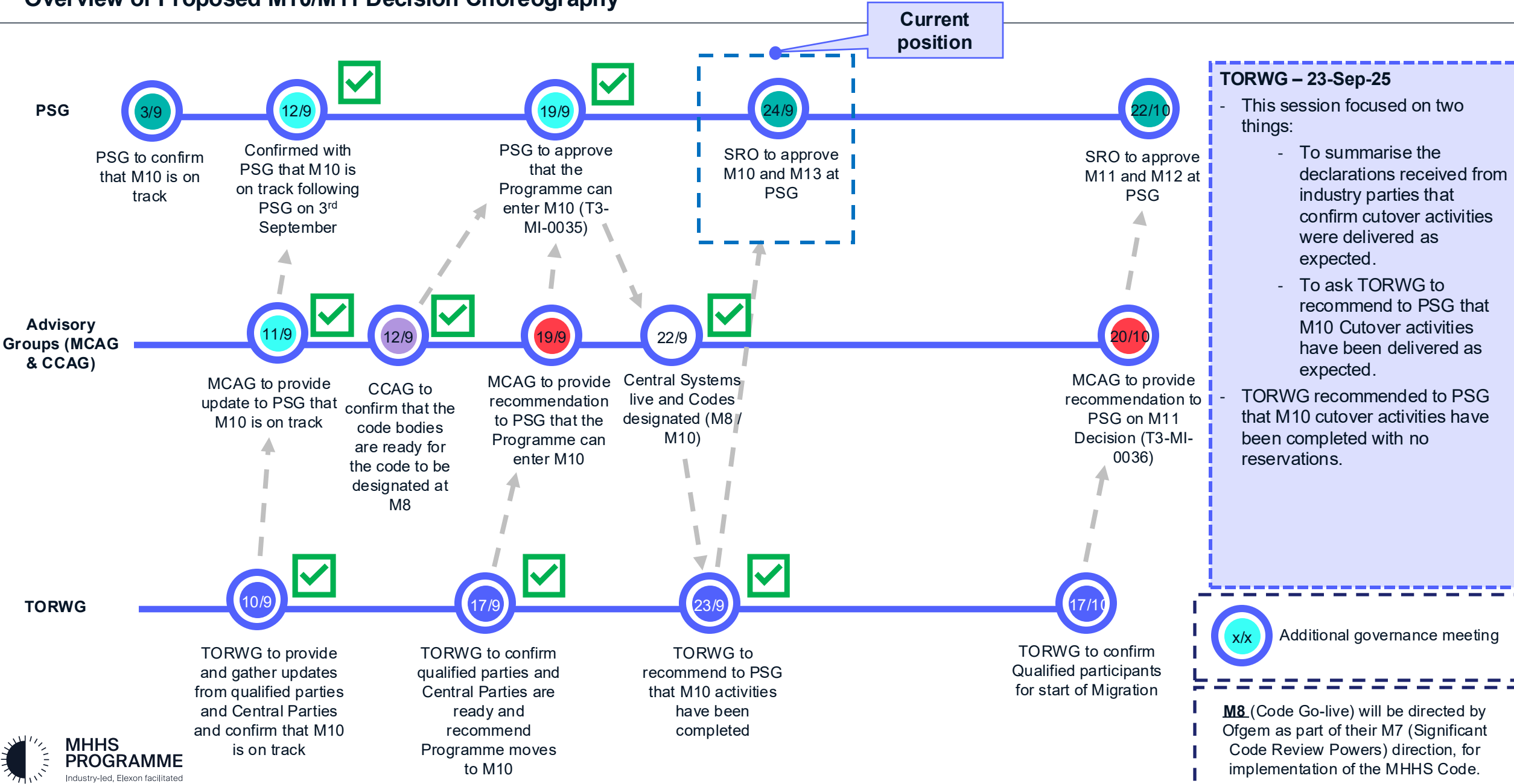
Information: Reminder of M10 Decision-making Choreography

Programme (Lewis Hall)

5 mins



Overview of Proposed M10/M11 Decision Choreography

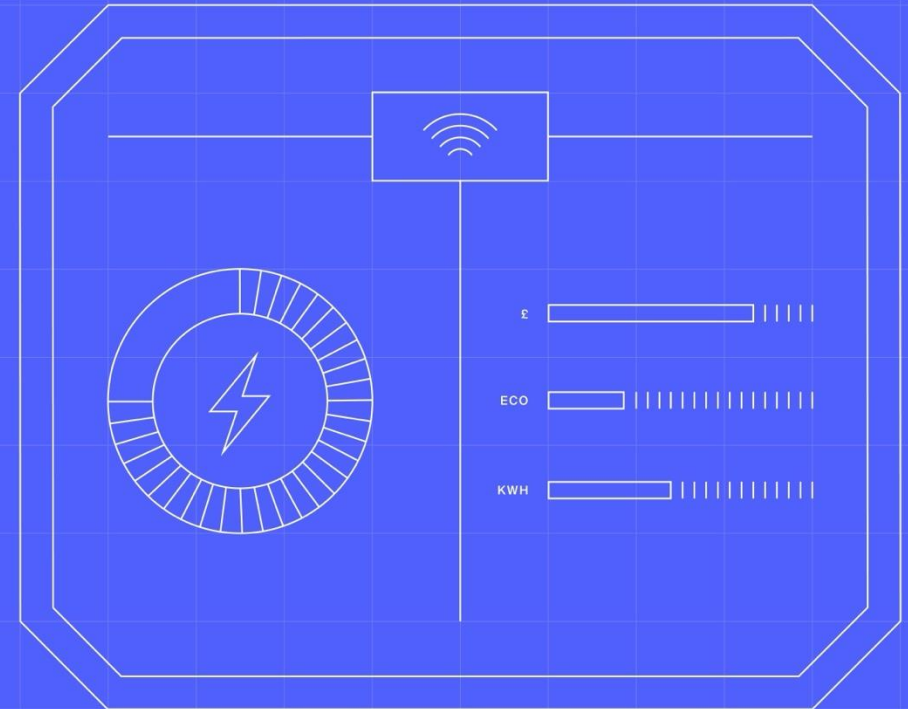


Review of M10 Acceptance Criteria

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

Programme (Lewis Hall)

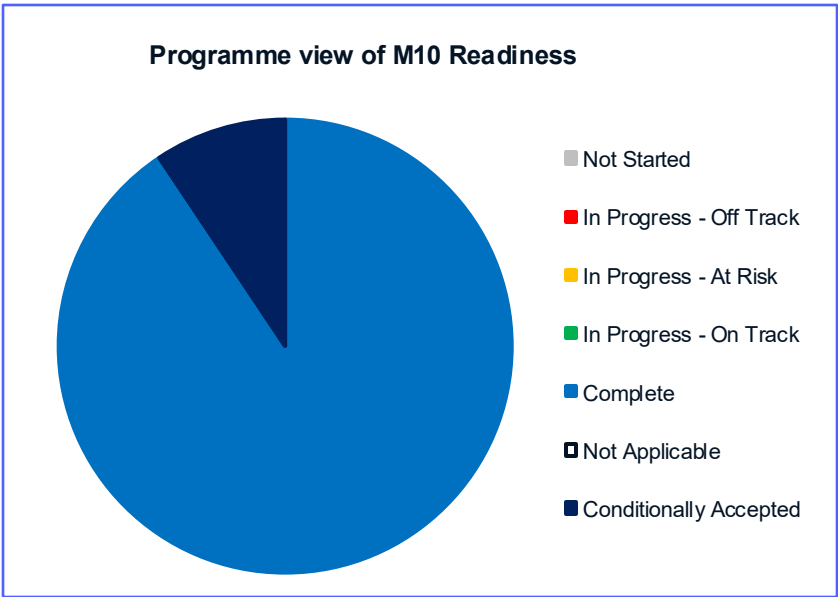
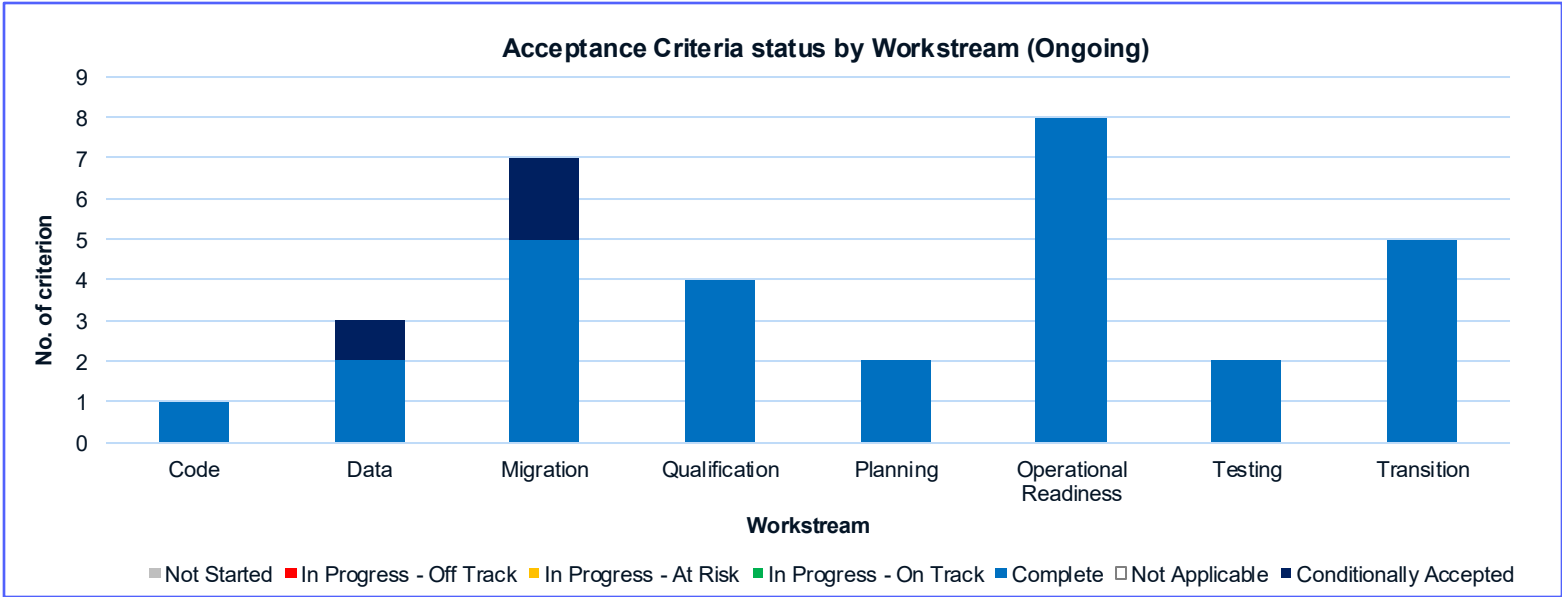
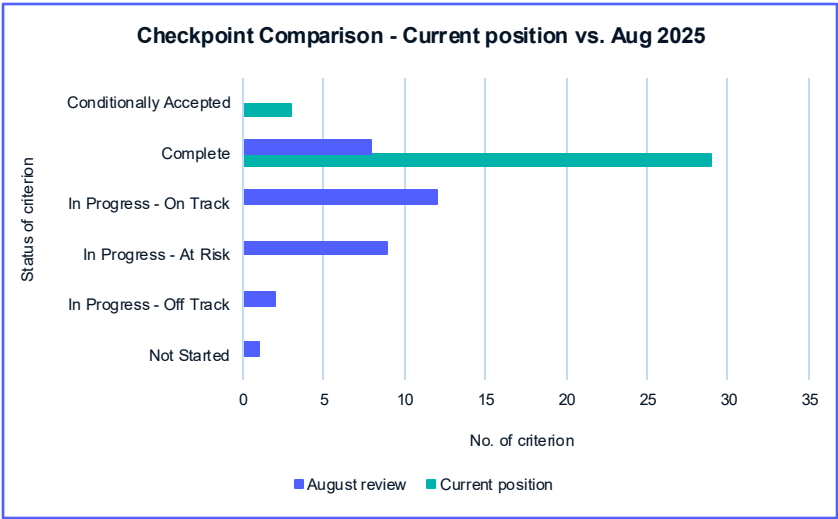
10 mins



Overview against the M10 Acceptance Criteria

Overview

- Following completion of the M10 cutover on the weekend 20-21 September, all M10 Acceptance Criteria have been met. 29 have been completed with a further 3 conditionally accepted as part of the M10 Work Off Plan.
- In PSG on 19/09, the Programme highlighted 4 acceptance criteria to be delivered over the cutover weekend (*All pre-migration data cleanse activities complete, Production environment in place for LDSOs and Central Parties, Cutover Plan executed, M10 Work-Off plan agreed (if required)*) – each of these have now been met.
- 3 acceptance criteria were proposed as to be delivered via the work off plan (*All data migration activities set out in the cutover plan complete, Migration incentives implemented, 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*).
- These have been ‘conditionally accepted’ and added to the work off plan to be tracked through to completion.
- None of these work off items have a material impact on post-M10 settlement operations or central service stability.



M10 Acceptance Criteria (1 of 3)

#	Workstream	Criterion	Evidence	Owners	Due Date	RAG (19/09/2025)	RAG (24/09/2025)
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	Complete
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	Complete	Complete
3	Qualification	Non-SIT LDSO Qualification Testing complete	T3-QU-0010 complete and approved by QAG.	LDSOs only	16/05/2025	Complete	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 Participants, Code Bodies	12/09/2025	Complete	Complete
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	Complete
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	22/09/2025	In Progress - On Track	Complete
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	Conditionally Accepted
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	Complete	Complete
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	Complete	Complete
11	Migration	Migration Framework approved	Migration Framework approved at MCAG.	Programme	30/04/2025	Complete	Complete
12	Migration	Migration Control Centre (MCC) delegation of authority approved	MCC DoA agreed with MCAG.	Programme	30/04/2025	Complete	Complete
13	Migration	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	30/04/2025	In Progress - At Risk	Conditionally Accepted

M10 Acceptance Criteria (2 of 3)

#	Workstream	Criterion	Evidence	Owners	Due date	RAG (19/09/2025)	RAG (24/09/2025)
14	Migration	MCC tested and ready to operate	LDP assurance of MCC readiness for managing migration.	Programme	19/09/2025	Complete	Complete
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	Complete	Complete
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	Complete	Complete
17	Transition	Early Life Support Model defined	T3-MI-0033 complete and approved by MCAG.	Programme	31/03/2025	Complete	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	Complete	Complete
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	Complete	Complete
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	Complete
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	Complete
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	Complete
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	Complete	Complete
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	Complete

M10 Acceptance Criteria (3 of 3)

#	Workstream	Criterion	Evidence	Owners	Due date	RAG (19/09/2025)	RAG (24/09/2025)
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	Complete	Complete
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	Complete	Complete
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 – On Track	Complete
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	Complete	Complete
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	Complete
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	Conditionally Accepted
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	Complete
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	Complete

Open Criteria (1 of 2) – met with delivery of M10 Cutover weekend

Overview

- The 4 M10 Acceptance Criteria open at PSG on 19/09 have all now been completed.
- The M10 Work Off Plan was agreed in PSG on 19/09 and criteria 6, 22, 24 were all met through the cutover weekend.

#	Workstream	Criterion	Evidence	Owners	Due date	RAG (12/09/2025)	RAG (19/09/2025)	RAG (24/09/2025)	Path to Green / Associated Risks
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	22/09/2025	In Progress - On Track	In Progress - On Track	Complete	All declarations received from LDSOs and central parties confirming completion of data cleanse activities. Closure Report to be presented to MCAG hereafter.
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	Complete	All LDSO declarations received. Programme working with outstanding LDSO to resolve issue.
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	In Progress – On Track	Complete	ISD load complete and Helix Release 25.14.3 deployed. Criterion to be met upon successful execution of cutover weekend.
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 – On Track	Complete	M10 Work Off Plan presented to PSG on 19/09 and accepted as part of decision to proceed with cutover weekend.

Open Criteria (2 of 2) – Delivered through agreed work off plan

Overview

- 3 M10 Acceptance Criteria remain open with work-off plans in place.
- These work-offs do not pose material risk to delivery of M10 and have now been 'conditionally accepted' upon approval of the M10 Work Off Plan.
- Work Off Plans with allocated owners are in place to ensure each criteria is met in timely manner.

#	Workstream	Criterion	Evidence	Owners	Due Date	RAG (12/09/2025)	RAG (19/09/2025)	Path to Green / Associated Risks
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	Conditionally Accepted	Fix to correct impacted MPANs (<50 in total) will be implemented by LDSOs ahead of M11. Programme to work with LDSOs to coordinate changes as per work off plan.
13	Migration	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	30/04/2025	In Progress - At Risk	Conditionally Accepted	Final proposal for Mod P487 to be submitted to Ofgem in Dec-25. <i>The Programme accepts this risk and acknowledges existing enforcement incentive and work in progress on additional incentives.</i>
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	Conditionally Accepted	1 supplier and 2 MOAs non-compliant at M10. Remedial plans demonstrating return to compliance by M11 requested by Code Bodies.

M10 Work-Off Plan

#	Work item	Due date	Owner
1	Deployment of missing D Flows (D0043 and D0079) in Release 25.14.4	02-Oct-25	Elxon
2	Delivery of deferred P Flows (P0275, P0276 and P0277)	Mar-26*	Elxon
3	Missing D Flows in Code Drafting (D0164, D0394, D0395) incorporated into regulatory code	Pre-M11	Programme
4	Patch (or manual fix) to address final DPI exceptions identified as part of the LDSO data migration activities completed	Pre-M11	St Clements LDSOs
5	Decision provided on migration incentives (Mod P487)	Q1 2026*	Ofgem
6	Outstanding SAT testing for M16 transition	July 2026*	Elxon
7	Outstanding Helix SIT-Ops PIT work-off plan items	17-Oct-25	Elxon
8	Missing D Flows in Code Drafting (D354, D355 and D356 from DTC and DTS) to be incorporated	Pre-M11	Programme
9	Publish Settlement Assurance Testing (SAT) Closure Report	26-Sep-25	Elxon
10	Return to compliance for 2 Programme Participants who have declared M10 system changes required to support forward/reverse migration will not be in place by M10	22-Oct-25	Code Bodies Programme Parties

****Specific date to be confirmed***

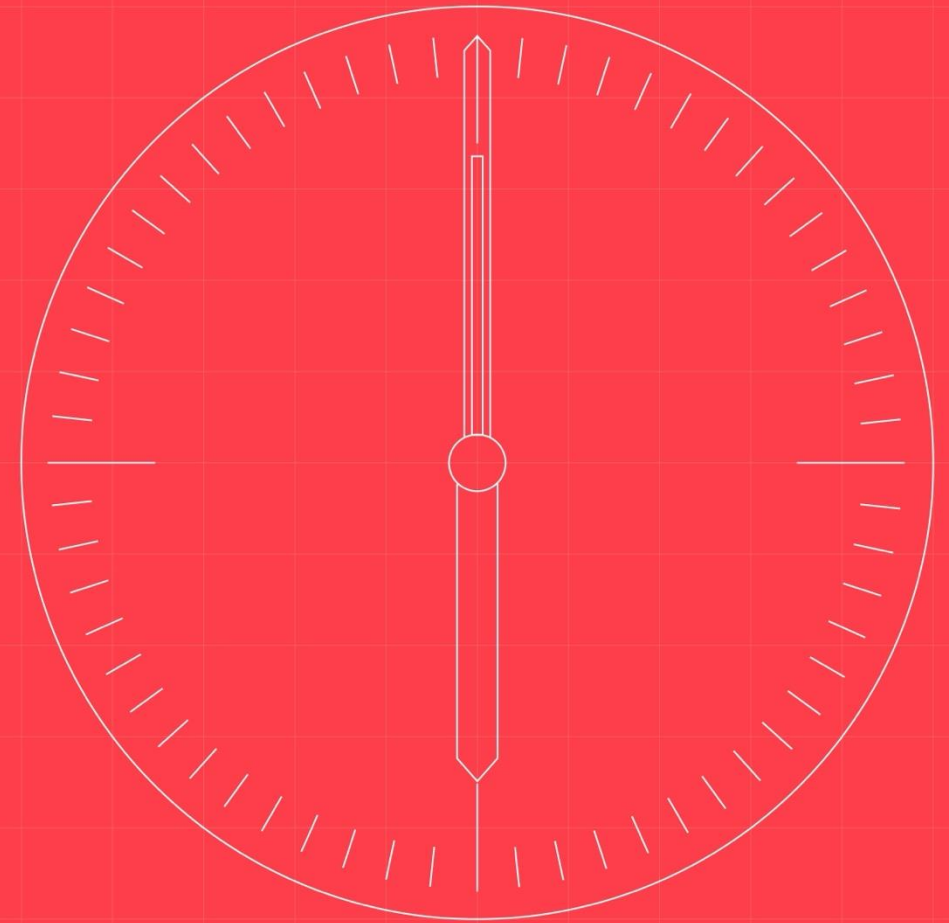
Approval of M10 and M13 milestones

DECISION:

- T1-MI-1000: Central Systems ready for migrating MPANs (M10)
- T1-MI-2000: Load Shaping Service switched on (M13)
- T3-MI-0047: M10 Acceptance Criteria Ratification
- T3-MI-0048: Review the M10 Acceptance Criteria and confirm M13 has completed

Chair

10 mins



FOR DECISION: SRO to approve the following M10 and M13-related milestones

Ref	Milestones for Decision
T1-MI-1000	Central Systems ready for migrating MPANs (M10)
T1-MI-2000	Load Shaping Service switched on (M13)
T3-MI-0047	M10 Acceptance Criteria Ratification
T3-MI-0048	Review the M10 Acceptance Criteria and confirm M13 has completed

Next Steps: Confirmation communication will be sent to all Programme Participants confirming approval of above milestones.

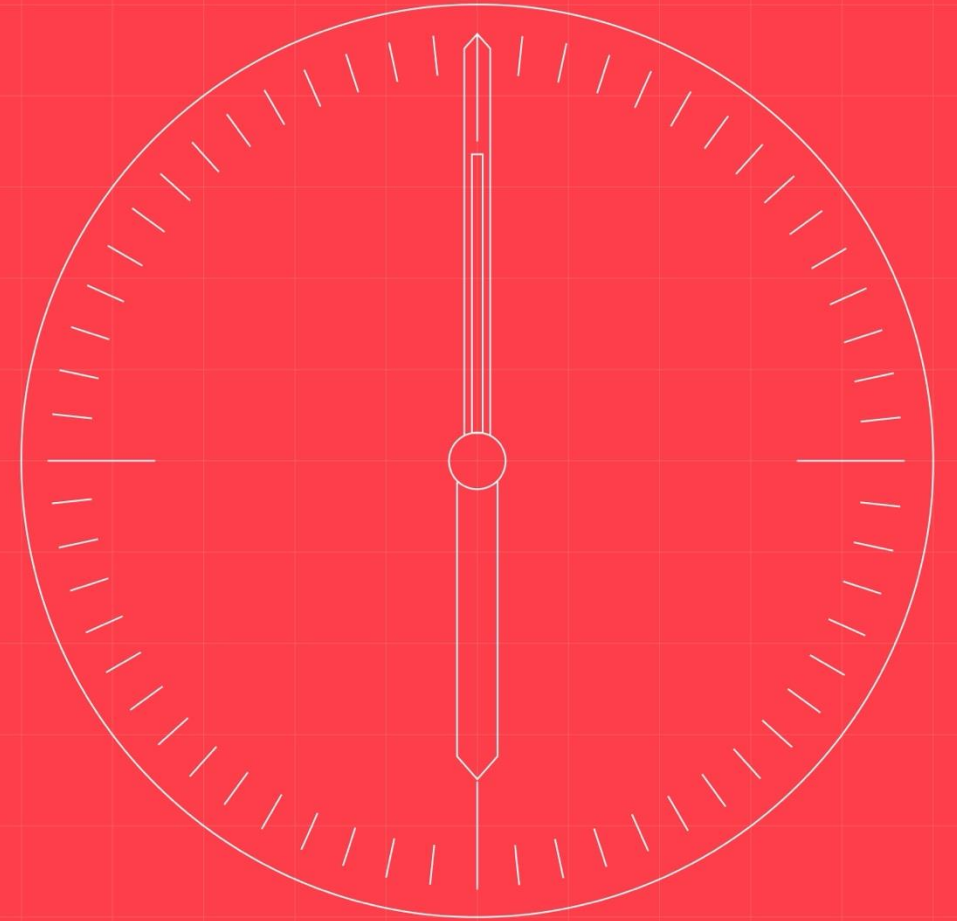
Decision to approve T1-CP-3000 (Control Point 3/4 – Readiness for Migration)

DECISION:

- Programme view on Control Point 3/4
- IPA view on Control Point 3/4
- Decision to approve T1-CP-3000

Programme (Keith Clark) & IPA (Richard Shilton)

10 mins

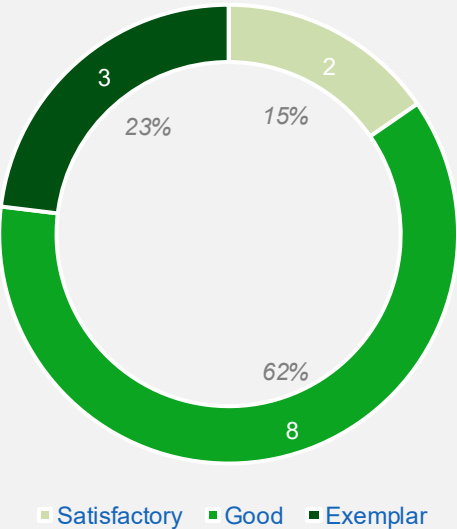


Control Point 3 / 4 – Executive Summary

Control Point 3 / 4 Decision Recommendation

Continue

Health Indicator Assessment Ratings



Programme Health summary

- Main concerns related to Elexon M10 systems and operational readiness and likely incident levels during Early Life. The Programme engaged with Elexon to scrutinise their pathway to M10, particularly focused on clarity, management and controls in their cutover planning – and programme contingency planning should M10 become non-viable near to M10. Associated risk-based scrutiny of other M10 parties, and related checks on contingency planning was also conducted.
- The top-down review reinforces that the focus of the Programme has been moving towards the M10 ‘inflection point’, where after go-live (M10), there is a move into early-life and BAU operations, and the roles and responsibilities of the Programme and industry parties change materially, with that transition needing controlled management.
- Programme has been progressing toward key milestones M10 and M11, with strong industry engagement and a stable design framework boosting confidence in timely delivery. Despite delays originally caused by the elongation of SIT due primarily to industry Participants underestimating the scale of SIT required, and more recently by Elexon Settlement defect levels, SIT parties have gained and sustained momentum with an expected cohort-phased departure from SIT being surpassed by a glut of same-time arrivals, All completing within the original timeline for critical path SIT exit to M10 & M11.
- Effective coordination, prioritised qualification, and robust delivery assurance are essential as the Programme transitions into Early Life and BAU operations. Governance structures are evolving, requiring clear role definitions and stakeholder alignment. Team morale is generally satisfactory, often supported by good collaboration between LDP and SRO teams. Industry commitment has grown, driven by milestone focus and contingency planning, though reliance on industry parties introduces delivery risk.

Seven strategic themes

- 1. Delivery:** Continue to build confidence in: (1) MHHSP and Code Bodies’ ability to deliver the programme plan; (2) Participants’ ability to deliver their plans, and (3) having robust planning, monitoring and escalation in place to ensure both
- 2. Rhythm:** Continued to move the programme (sustainably) fast enough to enable delivery of customer benefits as early as possible whilst ensuring we don’t lose industry (and ourselves) as we go
- 3. MHHSP People:** Ensure individuals and teams feel valued and supported, we continue to monitor our resourcing, and that SRO and LDP teams work sustainably together to deliver our common outcomes
- 4. Industry commitment:** Demonstrate delivery leadership while building a programme that the whole ‘industry ecosystem’ believes in and is committed to
- 5. Delivery Strategies and Continuous Improvement:** Delivery Strategy is set but needs to remain responsive, adaptable and data-driven – and continuous improvement should be an intrinsic part of our culture and deliver on our promise of an innovative industry programme model
- 6. Change and Risk:** Ensure we have the right operation to deliver inevitable and necessary future programme change, with manageable risk
- 7. Outcomes:** Build on successful early benefits tracking with additional measures established and monitored, with an outcomes-focused mindset

Health Indicator		CP2 Rating	Rating at CP3 / 4
Delivery	1. Delivery in previous phase	Good	Good
	2. Delivery to next Control Point	Requires improvement	Good
	3. Change		
	Change control	Good	Good
	Change strategy	Good	Good
	4. Risk		
Ways of working	RAID operation	Good	Exemplar
	Risk level	Satisfactory	Satisfactory
	5. Outcomes	Good	Good
	6. Financial outlook	Satisfactory	Good
People	7. Strategies and approaches	Good	Good
	8. Delivery rhythm	Good	Exemplar
	9. Continuous improvement	Good	Good
	10. Programme Participants and industry views of MHHSP	Good	Exemplar
	11. MHHSP people	Satisfactory	Satisfactory

Control Point 3/4 Report Review – Executive Summary



Background and Scope of IPA Review

The Central Programme Team has drafted the “**Control Point 3 / 4 Strategy – Final Internal Report**” to support a decision on whether to progress to the next phase of the Programme. At Control Point 3 / 4 the Central Programme Team is aiming to close Integration Testing phase and enter Migration, Preparation and Execution phase. As with previous Programme Control Points, the Central Programme Team Report provides a rating against Health Indicators and a commentary on readiness to progress presented through seven strategic themes.

IPA has assessed whether the evidence provided within the Central Programme Team’s Report (as shared with us on 27 August 2025 and updated on 23 September 2025 to reflect an updated position following the M10 Cutover weekend) and evidence available to IPA supports the assessment against each Health Indicator and the narrative provided for each of strategic theme. Our assessment is based on the assurance activities we conducted throughout the Integration Testing phase and considers the end-to-end MHHS Programme, rather than focusing solely on Central Programme Team delivery. Control Point 3 / 4 was assessed at the same time as M10. Both the Central Programme Team and IPA delivered M10 readiness assessments, providing a detailed view of the current risk profile and associated recommendations to the Programme Steering Group (PSG) on 3, 12, and 19 September 2025 to support decision-making.

Key Messages:

- As of 23 September 2025, we are aligned with the Central Programme Team’s recommendation to ‘Continue’, as set out in their Control Point Report. While the level of risk across the end-to-end Programme was higher than desired in the lead-up to M10, the Central Programme Team report reflects that this has since reduced following the successful execution of the MHHS M10 Cutover Plan. Risks related to M11 and the Early Life Support (ELS) period remain, however there are plans in place to manage them, alongside closing out M10 work-off items.
- The Central Programme Team’s Control Point report sets out its view against seven strategic themes including actions for the next phase of delivery. We have provided additional commentary on these themes on Page 3 and support the actions proposed by the Central Programme Team. On the right-hand side of the page, we have outlined the IPA’s view of the key priority areas for the next phase of the Programme, leading up to Control Point 5, planned for the end of the Migration, Preparation & Execution phase in May 2027.
- The Central Programme Team has also provided assessment ratings against 13 Health Indicators, aligned to the seven strategic themes. While the rationale for these ratings is not included in the report, we have formed our own assessment of the Health Indicators based on the information provided under the strategic themes. In summary:
 - IPA is aligned with the Central Programme Team’s assessment for eight out of 13 Health Indicator ratings.
 - IPA has assigned lower ratings to four of the Health Indicators, reflecting a more cautious outlook and an end-to-end programme perspective.
 - IPA has not assessed the Financial Outlook health indicator, as it is not in scope for our assurance activities.
- Whilst we have taken a different view on five of the health indicators, we are aligned to the Central Programme team’s overall summary and conclusions.

IPA view of priorities for the next phase to Control Point 5

Priority	Associated Health Indicator(s)
1 Operationalising and embedding the post-M10 governance framework and managing post-M10 incidents	Delivery Rhythm
2 Assurance over settlement performance and accuracy of post-M10 with both legacy and new settlement arrangements	Delivery to next Control Point
3 Participant completion of all requirements to be qualified in alignment with their assigned Pathway	Delivery Rhythm
4 Achieving exit of Early Life Support and achieve migration targets	Change and Risk
5 Monitoring of migration progress through the established mechanisms	Delivery Rhythm

DECISION (T1-CP-3000): SRO to approve Control Point 3 / 4 – Readiness for Migration

Next Steps

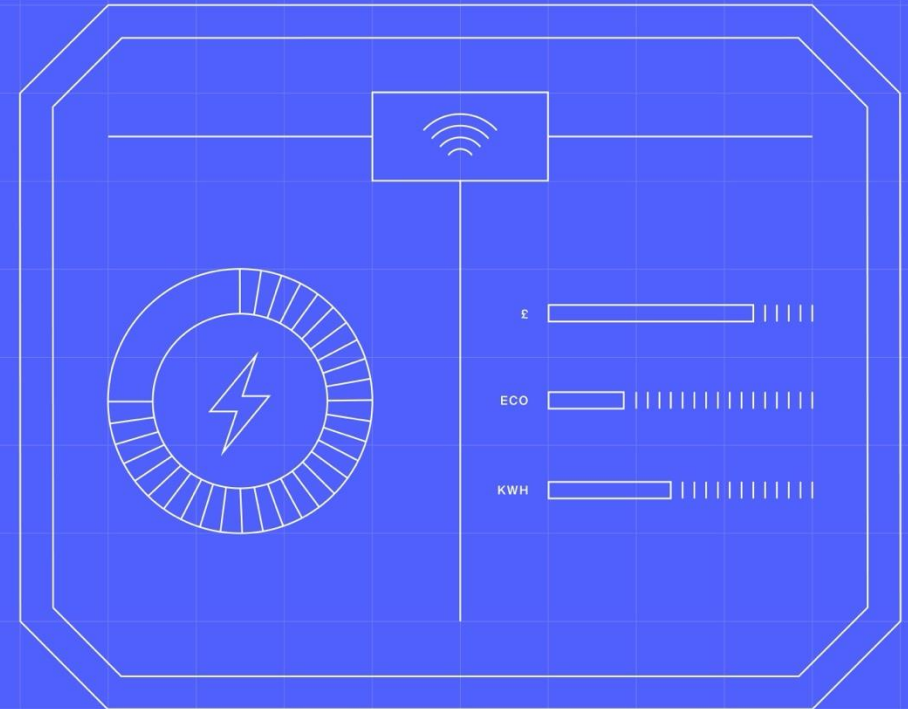
- Next Control Point: 23 June 2027 (T1-CP-4000 Control Point 5 - Cut Over to New Settlement Timetable (incl. Control Point Report approval))

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. **01 October 2025 10:00 – 12:30 (virtual)**

Meeting dates		01 October 2025
Relevant milestones or activities		
Agenda items		• Ofgem Messaging • M10 Update • M11 Readiness • Qualification Progress • ELS/Hypercare Readiness Update • Migration Update
Standing items		• Minutes and Actions • Programme Reporting • Delivery Dashboards • Summary and Next Steps

Thank you