MHHS PROGRAMME
Industry-led, Elexon facilitated

Extraordinary Programme Steering Group #49.1 14 October 2025

Version 1.0

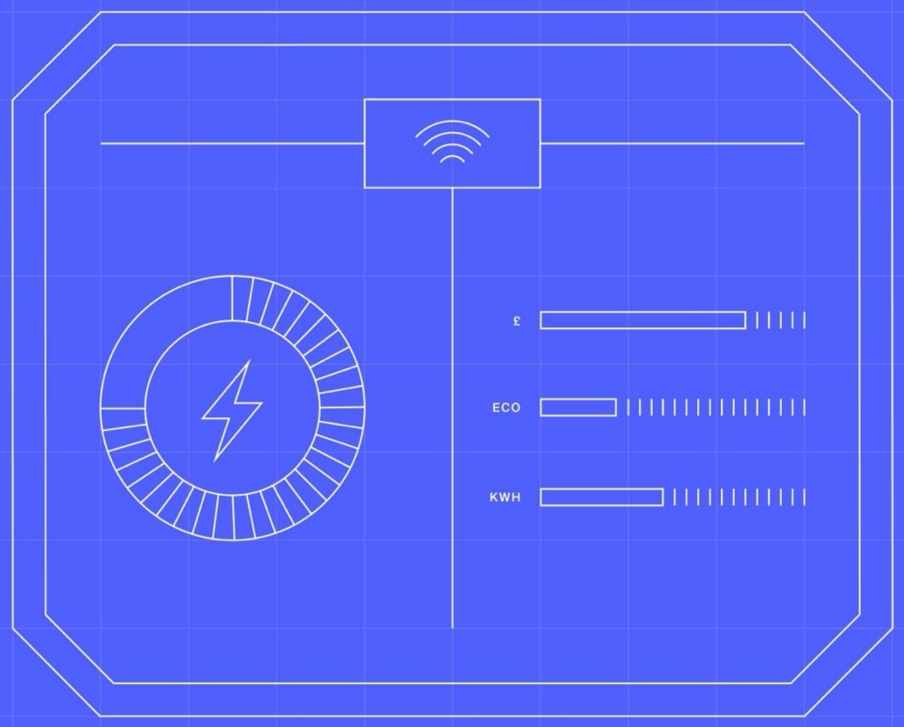
MHHS-DEL4260

Document Classification: Public

Agenda

#	Item	Objective	Type	Lead(s)	Time	Page
1	**Welcome**		-	Chair	10:30-10:35 *5 mins*	1
2	**M11/M12 Decision Making Choreography**	Reminder of M11/M12 Decision-Making Choreography	Information	Programme (Lewis Hall)	10:35-10:40 5 mins	3
3	**Programme view of current M11/M12 status**	• Recap of the relevant M11 Acceptance Criteria progress and their associated risks • M10 work-off items update and progress made towards M11/M12	Information	Programme (Lewis Hall)	10:40-10:55 15 mins	5
4	**Communication plan for M11**	Update on the communication plan for M11/M12	Information	Programme (Lewis McKenzie)	10:55-11:05 10 mins	21
5	**IPA view of current M11 status**	IPA view of M11 progress and risks	Information	IPA	11:05-11:15 10 mins	24
6	**Open Discussion on M11/M12 status**	Open discussion on M11/M12 status	Discussion	Programme (Chair)	11:15-11:25 *10 mins*	32
7	**Summary and Next Steps**	Summarise actions and decisions, and look ahead to next meeting	Information	Chair & Secretariat	11:25-11:30 *5 mins*	34

M11/M12 Decision-Making Choreography

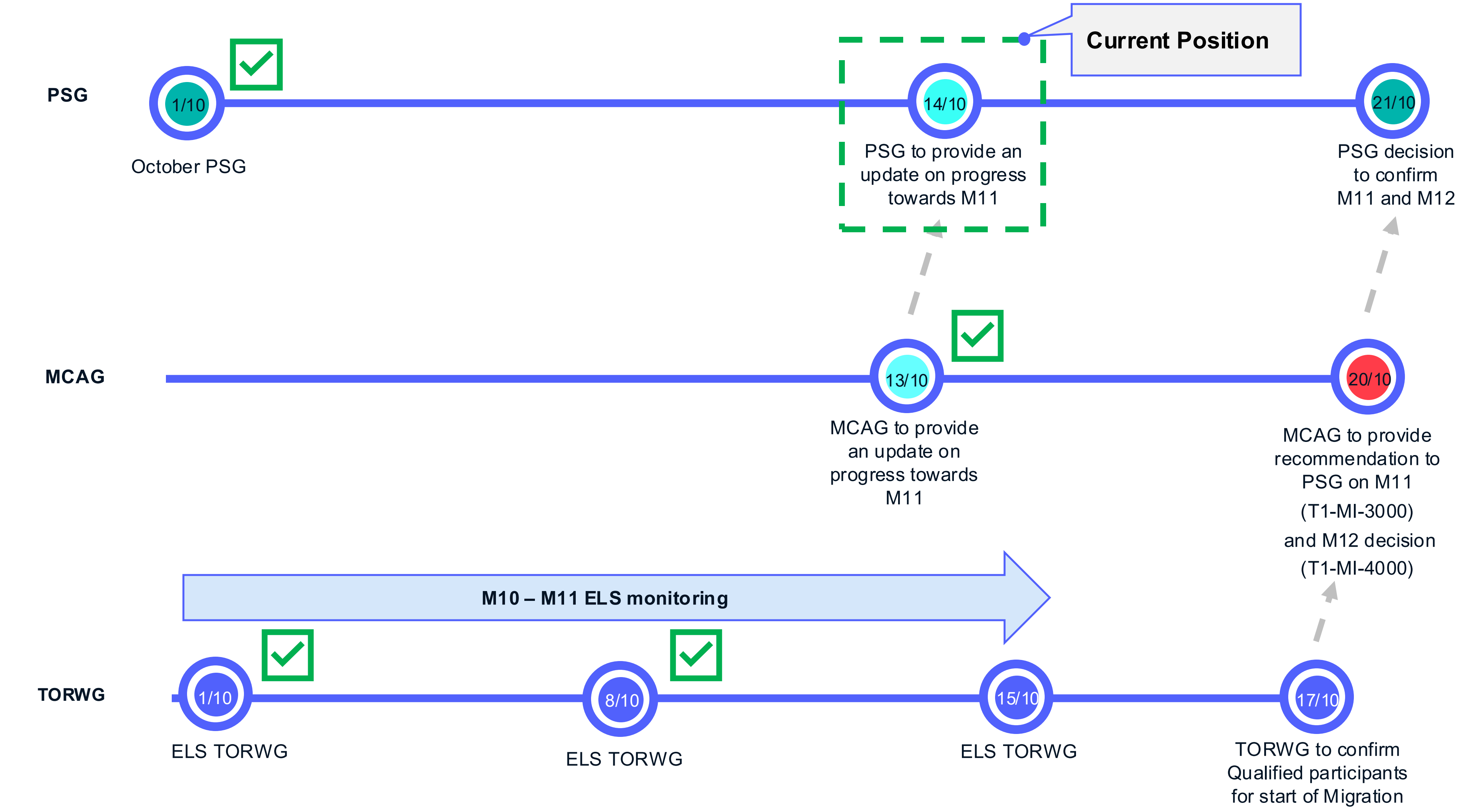


Information: Reminder of M11/M12 Decision-making Choreography

Programme (Lewis Hall)

5 mins

Proposed M11 / M12 Decision Choreography



<u>Updates from MCAG and TORWG</u>

The ELS TORWGs have been mobilised, with a focus on sharing reporting from the relevant parties against the ELS criteria. This includes a view of:

- Elexon Service Management performance
- Settlement performance
- DIP performance
- Migration Progress (Post-M11)
- Risks / Issues raised by industry participants

At TORWG on 08/10 there were no major issues or concerns raised by participants.

MCAG sat on 13/10 and approved the ‘Sprint 0’ Migration Plan. No blockers or major issues raised.

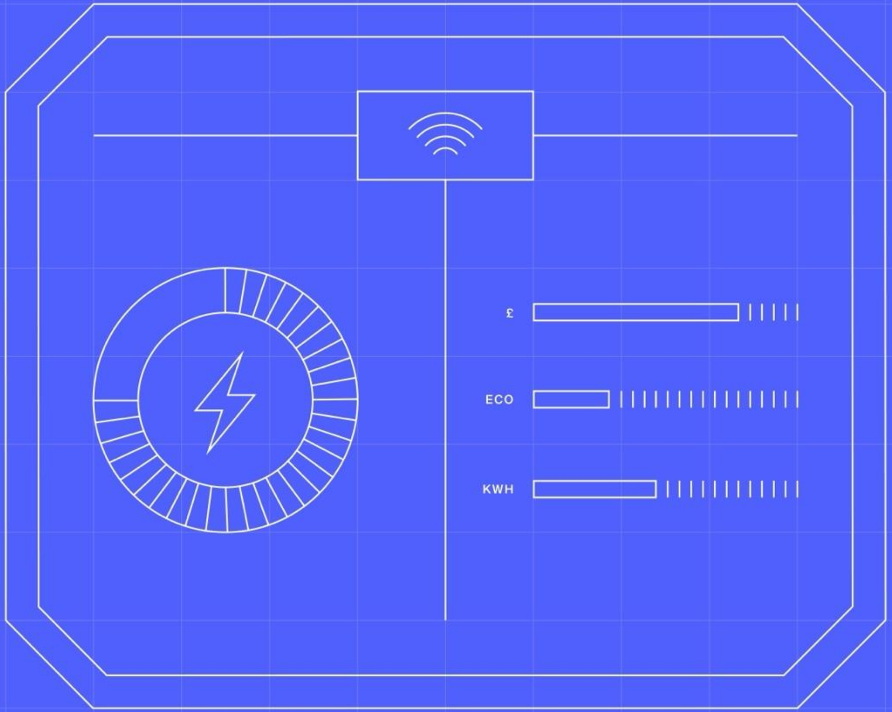
x/x Additional governance meeting

Programme View of Current M11 Status

INFORMATION: Recap of the relevant M11 Acceptance Criteria progress and their associated risks

Programme (Lewis Hall)

15 mins



Contents

M10 Work-Off Plan

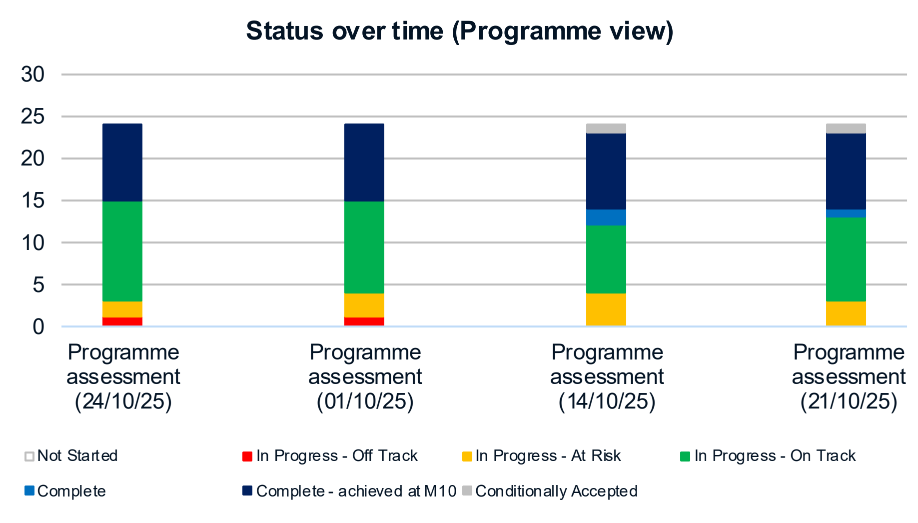
#	Work item	Due date	Owner
1	Deployment of missing D Flows (D0043 and D0079) in Release 25.14.4	02-Oct-25	Elexon
2	Delivery of deferred P Flows (P0275, P0276 and P0277)	Mar-26*	Elexon
3	Missing D Flows in Code Drafting (D0164, D0394, D0395) incorporated into regulatory code	22-Oct-25	Programme
4	Patch (or manual fix) to address final DPI exceptions identified as part of the LDSO data migration activities completed	17-Oct-25	St Clements LDSOs
5	Decision provided on migration incentives (Mod P487)	Q1 2026*	Ofgem
6	Outstanding SAT testing for M16 transition	July 2026*	Elexon
7	Outstanding Helix SIT-Ops PIT work-off plan items	17-Oct-25	Elexon
8	Missing D Flows in Code Drafting (D354, D355 and D356 from DTC and DTS) to be incorporated	22-Oct-25	Programme
9	Publish Settlement Assurance Testing (SAT) Closure Report	26-Sep-25	Elexon
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

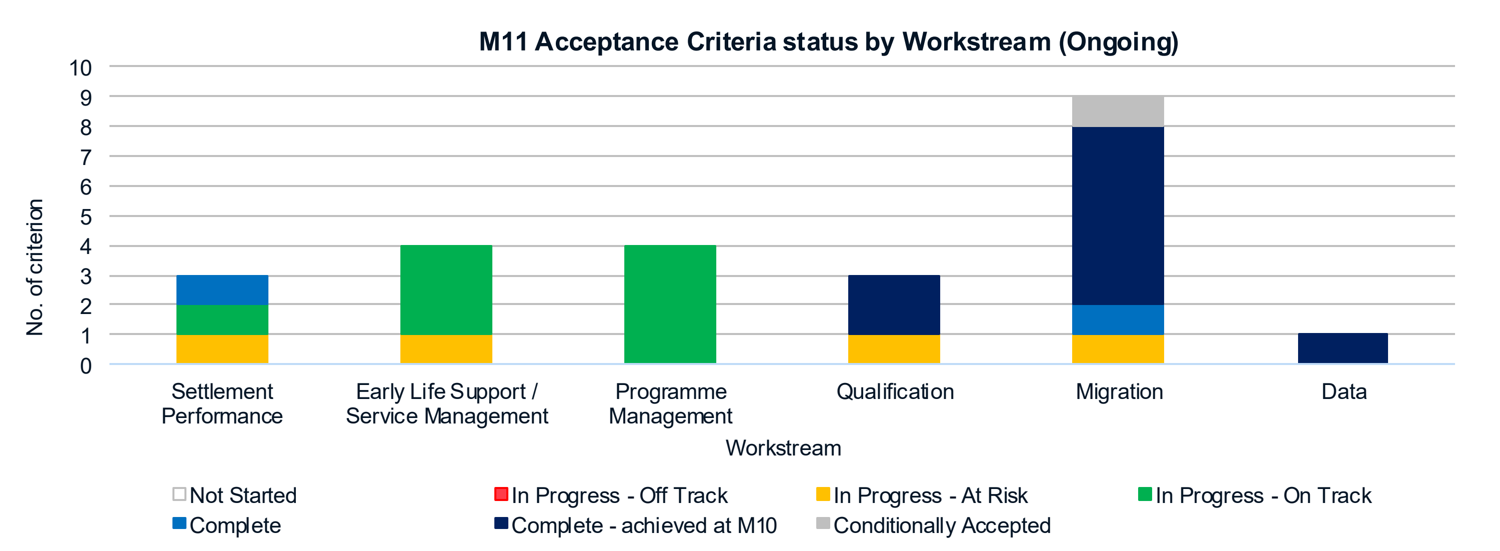
Specific date to be confirmed

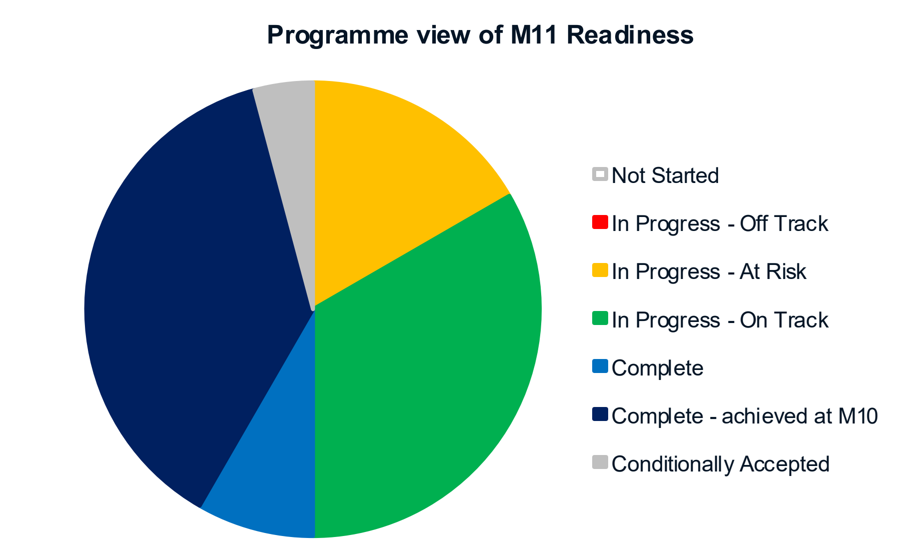
Progress update - M11 Acceptance Criteria

Overview

- Overall, the Programme is on track to commence migration at M11 / M12.
- 11 of 24 acceptance criteria have been met, with first II run completing on 04/10 and running daily since. ‘Sprint 0’ migration plan approved at MCAG on 13/10. SF run executed on 13/10 and validation ongoing.
- There are 4 ‘at risk’ items related to legacy changes to support forward/reverse migration implemented, Service Management Performance, ISD v14, and the Qualification Operating Model. All are being monitored by the Programme.
- *’Qualification Operating Model is fit for purpose to service all post-M10 activities’* was previously being tracked as ‘off track’ but has been moved to ‘at risk’, due to good progress made last week to set out more granular MI and focus reporting and execution towards mandatory tests. While at risk, it is unlikely to impact M11.
- 1 criterion (*Migration Incentives Agreed*) has been moved to ‘conditionally accepted’ given that the due date for completion extends beyond M11 and this was accepted as part of M10 decision making.
- Remaining 10 acceptance criteria remain on track for completion by M11.







M11 Acceptance Criteria (1 of 4)

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (01/10)	RAG Status (13/10)	Latest status
1	**Settlement Performance**	The first Interim Information (II) run has completed on the new Elexon central systems and outputs validated by Elexon	First II run completes by WD4 and expected outputs produced	Elexon	03/10/2025	In Progress - On Track	Complete	Criterion confirmed as 'complete' with completion of first II run and no material incidents raised.
2	**Settlement Performance**	The first Settlement Final (SF) run has completed on the new Elexon central systems and outputs validated by Elexon	First SF run completes by WD15 and expected outputs produced	Elexon	17/10/2025	In Progress - On Track	In Progress - On Track	SF run executed (13/10). Validation ongoing.
3	**Settlement Performance**	ISD version 14 has been published ahead of M11	V14 of ISD file has been published to industry	Elexon	16/10/2025	In Progress - On Track	In Progress - At Risk	6 P2 incidents open related to ISD. Expected to be fixed by 16/10.
4	**Early Life Support / Service Management**	There are no material incidents open with Elexon Service Management that could impact the ability to begin migrating MPANs at M11	No open Severity 1 incidents. Any Severity 2 incidents that impact the start of migration have clear workarounds	Elexon	17/10/2025	In Progress - On Track	In Progress - On Track	On Track – service management processes in place.
5	**Early Life Support / Service Management**	All 'M11 Ready' participants have self-certified that they are ready to commence migration of MPANs.	Self-certification declarations from all 'M11 Ready' participants received confirming any system changes made at M10 are stable, that any operational issues will not impact their ability to start migrating MPANs and that they are ready to commence migration on 22/10.	Programme Participants	17/10/2025	In Progress - On Track	In Progress - On Track	Self-declaration request issued to M11 parties - responses due back 14/10.
6	**Early Life Support / Service Management**	The necessary operational reporting set out in the ELS Model is in place and sufficient to enable progress towards ELS exit	ELS operational reporting routine functional and reports provide visibility and transparency of system stability.	Elexon	17/10/2025	In Progress - On Track	In Progress - On Track	On track – reporting being reviewed.

M11 Acceptance Criteria (2 of 4)

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (01/10)	RAG Status (13/10)	Latest status
7	**Early Life Support / Service Management**	Service Management processes, structures and reporting in place at M10 are operating effectively.	The Elexon Service Management function demonstrates that it is operating effectively giving confidence to industry participants and the Programme that it can operate at scale during migration. This includes, but is not limited to, evidencing: - Appropriate incident classification and prioritisation - Evidence of timely resolution of incidents within SLAs that would demonstrable ability to operate with increased ticket volumes through migration - Acceptable volume of P3s open to not create too much aggregated risk to M11 - No large clusters of defects that would signal performance issues with a particular central system or process - IRG has not been required to sit due to SLA breaches	Elexon	17/10/2025	In Progress - At Risk	In Progress - At Risk	The Programme continue to assure service management arrangements to ensure processes and procedures are fit for purpose. Actions to work through backlog and reduce volume are in place and approach to correct incident classifications at point of triage being implemented.
8	**Qualification**	Qualification Operating Model is fit for purpose to service all post-M10 activities	The Code Bodies demonstrate that the existing operating model (people, process, governance, technology and reporting) is sufficient to support increased volumes in testing and qualification processes. This includes: - Robust and transparency reporting - Proactive management of participants' test progress - Providing confidence, through delivery, that there is sufficient resource to enable qualification at pace necessary to deliver the Migration Schedule.	Code Bodies (BSC & REC)	17/10/2025	In Progress - Off Track	In Progress - At Risk	Risk level reduced to at risk. Elexon have recut execution plans with Wave 1 PPs which completes QT in time. Improved MI is in place with delineated reporting between mandatory and non-mandatory tests, to provide greater granularity of progress. Wave 1 now within plan but at risk and later Waves subject to further planning, incl. resourcing.
9	**Qualification**	A minimum of 1 supplier & required contracted agents are 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.	Programme Parties	12/09/2025	Complete - achieved at M10	Complete - achieved at M10	-
10	**Qualification**	All LDSOs qualified	T2-QU-0500 approved at QAG - all LDSOs approved for qualification by BSC PAB and REC Manager.	LDSOs	10/09/2025	Complete - achieved at M10	Complete - achieved at M10	-

M11 Acceptance Criteria (3 of 4)

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (01/10)	RAG Status (13/10)	Latest status
11	**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, Programme Participants	21/10/2025	In Progress - At Risk	In Progress - At Risk	1 outstanding non-compliant Participant has provided an acceptable Plan to Code Bodies for compliance by M11 that is now being monitored against for delivery.
12	**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.	Elexon Programme	12/09/2025	Complete - achieved at M10	Complete - achieved at M10	-
13	**Migration**	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.	Elexon Programme	12/09/2025	Complete - achieved at M10	Complete - achieved at M10	-
14	**Migration**	Migration Schedule approved	Migration Schedule approved at PSG.	Programme	19/08/2025	Complete - achieved at M10	Complete - achieved at M10	-
15	**Migration**	Migration Framework approved	Migration Framework approved at MCAG.	Programme	30/04/2025	Complete - achieved at M10	Complete - achieved at M10	-
16	**Migration**	Migration Control Centre (MCC) delegation of authority approved	MCC DoA agreed with MCAG.	Programme	30/04/2025	Complete - achieved at M10	Complete - achieved at M10	-
17	**Migration**	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	31/03/2026	In Progress - At Risk	Conditionally Accepted	Final proposal to be shared with Ofgem in Dec-25. Decision expected in Q1 2026.

M11 Acceptance Criteria (4 of 4)

No. -	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (01/10)	RAG Status (13/10)	Latest status
18	**Migration**	MCC tested and ready to operate	LDP assurance of MCC readiness for managing migration.	Programme	19/09/2025	Complete - achieved at M10	Complete - achieved at M10	-
19	**Migration**	Migration 'Sprint 0' plan defined and published	The 'Sprint 0' plan for Migration start at M11 is set out with industry participants	Programme	16/10/2025	In Progress - On Track	Complete	Approved at MCAG on 13/10.
20	**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 Programme Participants	13/08/2025	Complete - achieved at M10	Complete - achieved at M10	-
21	**Programme Management**	M11 Risk Assessment has been undertaken	A full risk assessment is undertaken to set out risks associated with the Programme and commencing migration.	Programme	22/10/2025	In Progress - On Track	In Progress - On Track	Included in PSG slides (14/10).
22	**Programme Management**	M10 Work-Off Plan delivered *(as required)*	The work off items from M10, due to complete by M11 are delivered.	Programme	22/10/2025	In Progress - On Track	In Progress - On Track	On Track.
23	**Programme Management**	M11 Work-Off Plan Agreed	Any work off items at the M11 milestone are agreed	Programme	21/10/2025	In Progress - On Track	In Progress - On Track	On Track.
24	**Programme Management**	IPA M11 Assurance Report developed and agreed	IPA have undertaken assurance all necessary assurance activities ahead of M11 decision making. Findings have been developed and shared with the Programme.	IPA	22/10/2025	In Progress - On Track	In Progress - On Track	On Track.

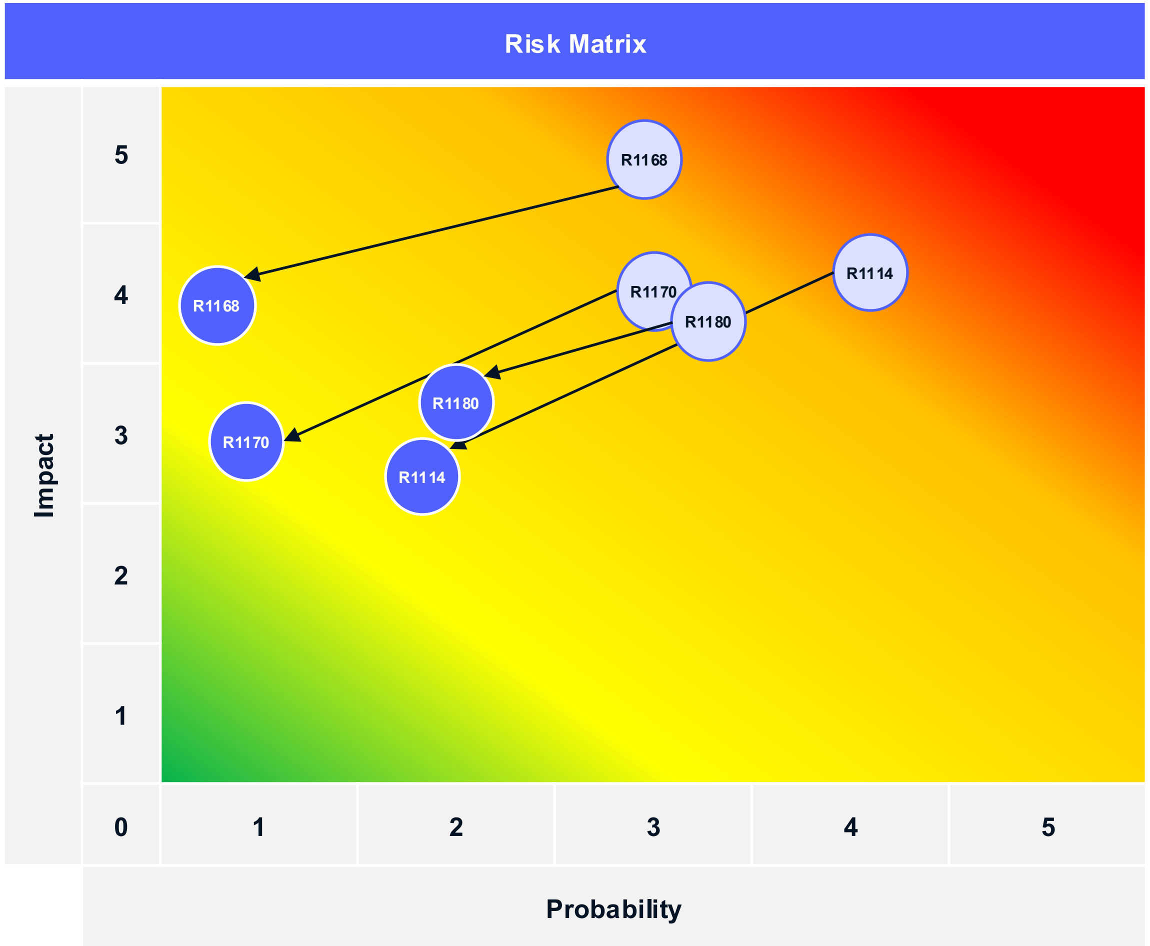
Contents

Agenda no.	Agenda item
1	M11 Readiness progress update
2	**M11 Risk Assessment**

Open Issues (M11 – M15)

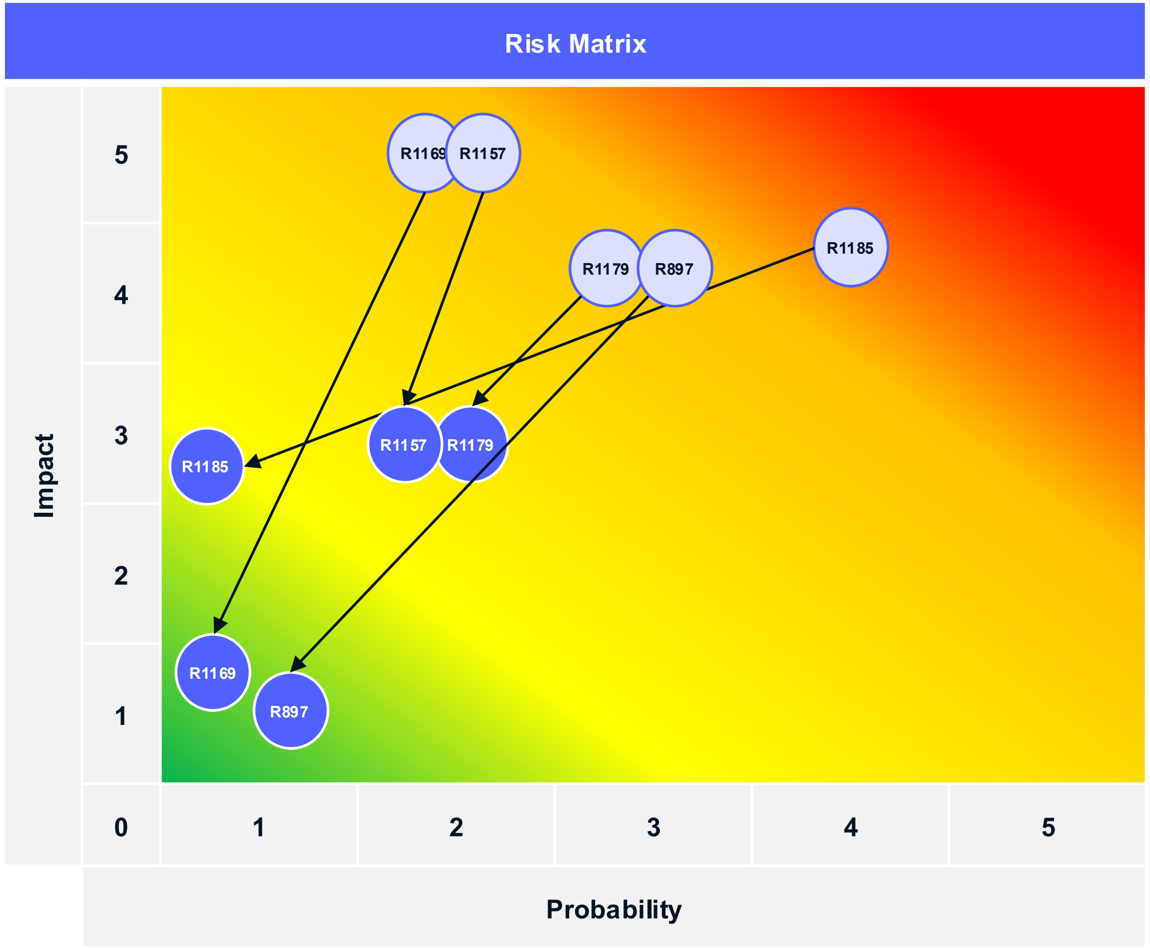
Issue ID	Issue	Milestone impacted	Issue score 1	2	3	4	5	Resolution
I211	There is an issue that 250,000 SMETS2 meters have a number of registered digits which is not supported within the current legacy design or the MHHS design.	M15						BSc to draft CP form for implementation after M10. This is now planned for the June Release, which gives time for migration to complete before M15.
I174	There is an issue that the Elexon / Ofgem Reporting requirements are not clarified in time to be developed and tested (this relates to the Elexon Performance Assurance Framework, out of Programme Scope)	M10						Awaiting confirmation of position from Elexon Performance Assurance that necessary reporting is in place. Not a blocker for M11.
I217	There is an issue that there are traditional meters installed on CT connections. The design does not currently support this, so those MPANs won't be able to be migrated unless changes are made to the design	M15						Elexon to raise change to BSc to update ISD data to support this metering configuration. Change to be implemented after M10. Date TBC.
I234	**Related MPANs with meters in the Advanced and Traditional or Smart Meter Groups** - There is an issue that the current design doesn't support related MPANs which have different market segments. Until resolved these MPANs should not be migrated as they will result in appointment errors which will result in billing and settlement issues. A solution will need to be agreed with industry before these MPANs can be migrated.	M15						c.8000 MPANs impacted by this issue. This is being progressed by RECCo (REC Issue Number: I0275). Not a blocker for M11.
I239	There is an issue that legacy Agents and Suppliers operating MPANs do not make required changes to their existing business processes and Services to support Migration (within the legacy arrangements) (This has customer detriment because customers may find issues following a change of supplier coinciding with Migration/Reverse Migration)	M11						Currently being tracked as part of the M10 work off plan and being managed by Code Bodies. Plan to return to compliance for the 1 non-compliant supplier has been accepted by Code Bodies and progress is being tracked to ensure delivery remains on track.
I242	There is an issue that ongoing interface and quality issues exist as part of ISD	M11						Open issues with ISD to be addressed ahead of ISD v14 deployment on 16/10. Future issues to be managed by BAU release process.
I237	There is outstanding testing from Elexon SAT that was not required for M10 and therefore was agreed to be executed as a work off item post M10. The Programme needs to ensure this testing is planned and executed by Helix and assured by MHHS Programme	M15						Currently being tracked as part of the M10 work off plan. Activities have been built into the Programme Plan for this to be delivered in Jul-26.

Risk Assessment – Early Life Support



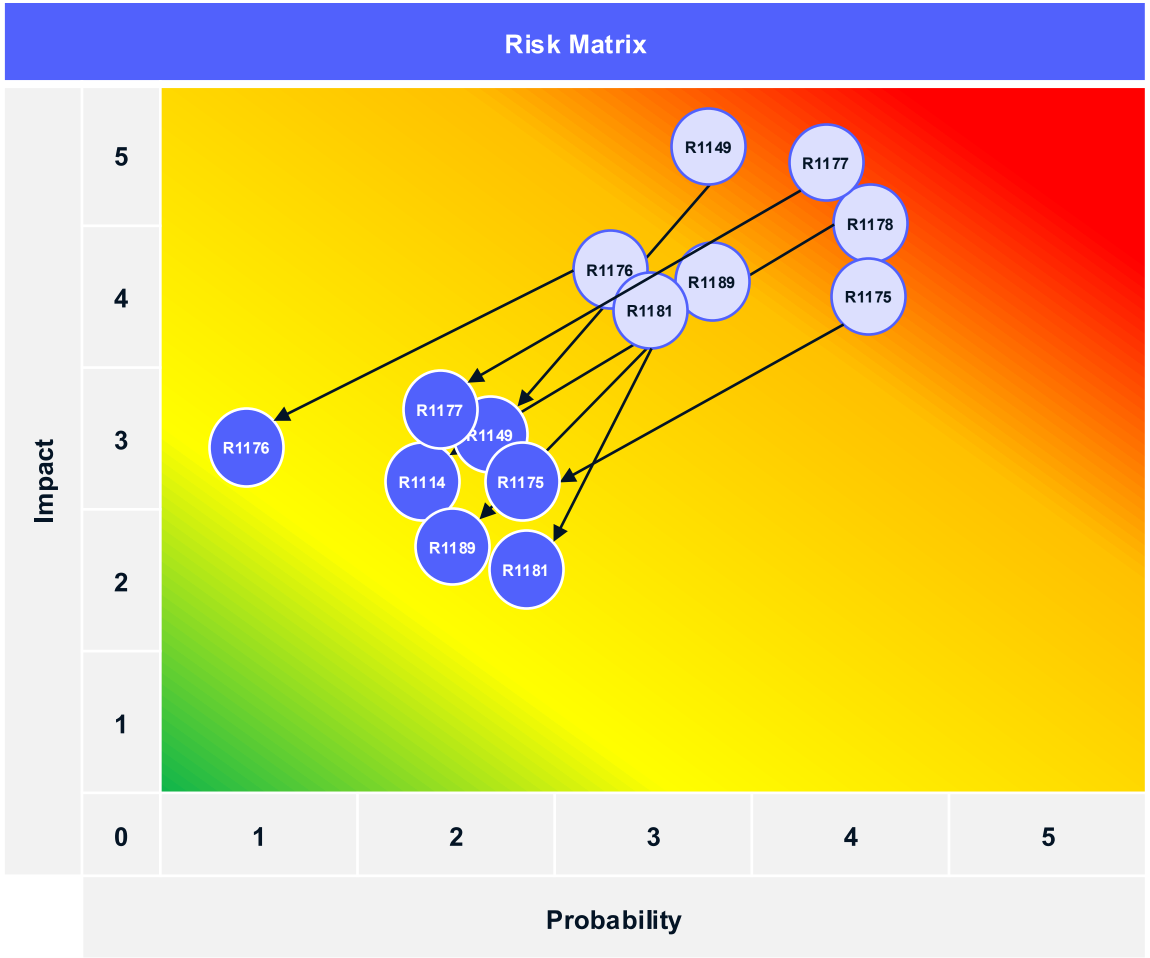
Risk ID	Risk	Mitigation	Contingency Plan
R1168	There is a risk that Service Management processes are not operating effectively ahead of M11/ during ELS	• Operational reporting and assurance of processes between M10 and M11. • TOG established as critical feedback mechanism with industry • Weekly TORWGs	• Additional resource would be deployed to address issue areas
R1114	Existing industry SLAs may not be sufficient to support BSCCo Service Management processes, risking ELS exit	• DIP CR006 raised by Elexon to codify Service Management arrangements for Significant DIP incidents and reference Service Operating Manual KPIs • Discussion had on potential SLAs for other issues, but no further changes raised	• Rely on industry Parties to exceed current SLAs or obligations • Industry to raise a BSC CP to introduce additional SLAs
R1170 (Raised since M10)	There is a risk that Elexon may not be classifying incidents correctly and broadcasting them to industry	• Review of incident classification process • Proposal to capture all new incidents as P3 ahead of triage	• No identified contingencies
R1180 (Raised since M10)	There is a risk that performance during the ELS phase doesn't meet the requisite levels across one or more of the agreed exit criteria which prevents the Programme from moving through the phases of ELS	• Progress against ELS success criteria being tracked weekly through TORWG	• Extension of ELS period

Risk Assessment – M11

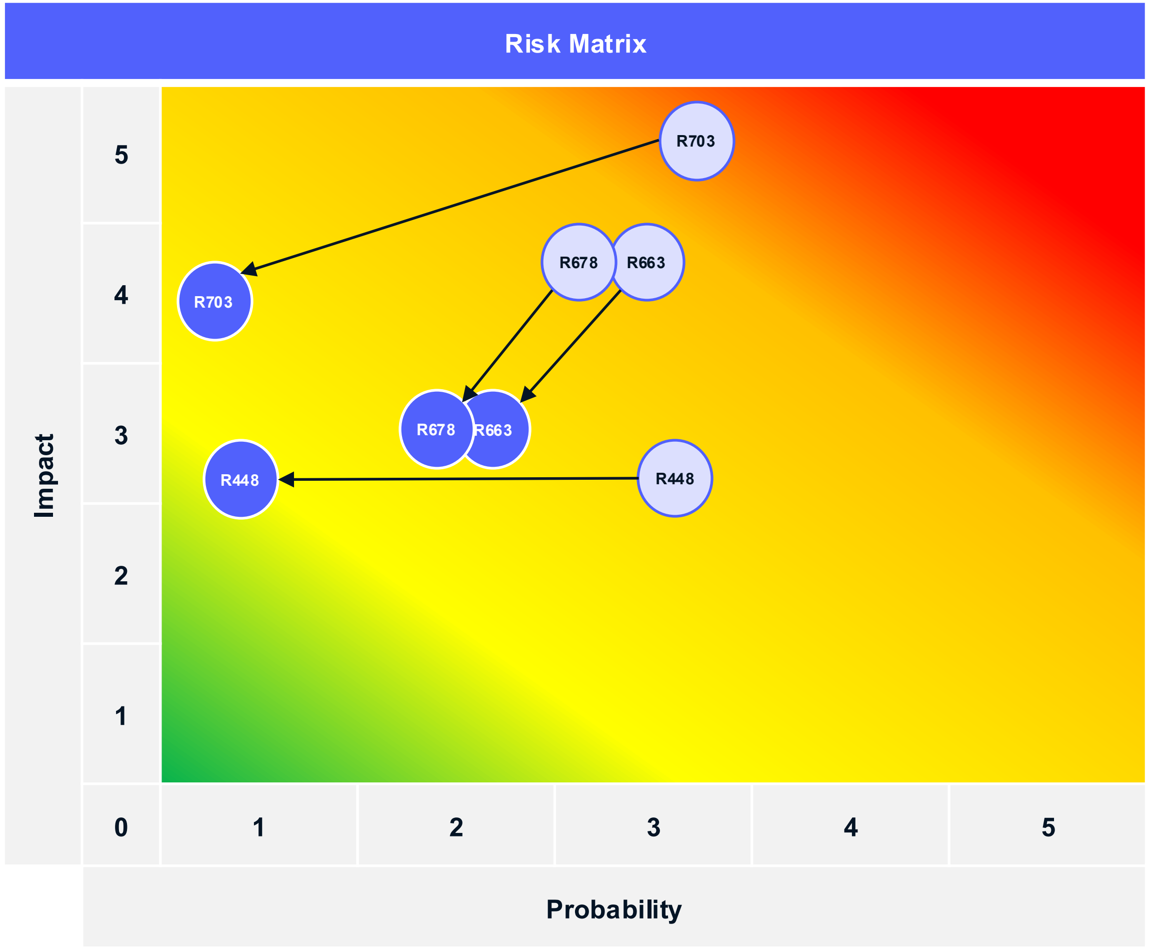


Risk ID	Risk	Mitigation	Contingency Plan
R1185	There is a risk that the deferred P flows are not delivered in time that they are required by industry for processing (P0275, P0276 and P0277)	• Missing P Flows delivered in advance of when they are first required. • Progress against plan tracked via M10/M11 work off plans.	• No identified contingencies
R1179	There is a risk regarding Elexon's M11 readiness, with regards to delivery progress, providing confidence to industry and readiness to support Early Life.	• M10 Work Off Plan and risk glidepath sets out key activities to be delivered before M11 • TORWG and TOG in place	• Review impact on migration of specific issues
R897	There is a risk that not all suppliers will have successfully implemented P434 to make all NHH UMS sites to HH.	• PAB checks that Suppliers being submitted for Qualification have no NHH UMS MPANs and that is the case for all Qualified Suppliers for M11 • Performance Assurance are monitoring outstanding NHH UMS MPANs to ensure they are migrated before Suppliers come to PAB	• No identified contingencies
R1169	There is a risk that there may be open sev 1/sev 2 defects as we go into M11 decision making	• Daily incident triage in place • Programme assurance of incidents and classifications • Fixes to be delivered within SLAs	• Review impact of specific incident on migration and determine if M11 can proceed
R1157	There is a risk that issues may arise as part of the ISD Catalogue publication and that could impact the success of M11 Go Live.	• All incidents with ISD files have clear 'fix by' dates ahead of publication date of 16/10	• Fix forward before M11 decision on 21/10

Risk Assessment – M14



Risk ID	Risk	Mitigation	Contingency Plan
R1178	There is a risk that PPs moving back waves could impact the ability to finish QT before M14	• Regular review of capacity within each wave (incl. no. of PPs and volume of MPANs)	• Reject proposals to move waves
R1149	There is a risk to Code Bodies capacity to support the qualification of all PPs by M14, if PPs move from earlier waves into wave 4 along with new entrants that may enter the market ahead of M14, that may request to join Wave 4	• Review and assurance of Code Body operating model (incl. resource, reporting and processes) throughout S&A Qualification	• Additional resource to address capacity issues
R1189	There is a risk that there is a significant volume of requests for Qualification Testing sandbox activity from Qualification participants and that this will cause resourcing issues within the QT team.	• Monitor volume of sandbox requests	• Additional resource to address capacity issues
R1176	There is a risk that the lack of QT progress could delay the completion of QT for PPs impacting M14	• Progress tracked through governance (QTEF, PSG, QWG, QAG) and via Programme Assurance	• Delayed PPs would be in breach of license conditions
R1175	There is a risk that the lack of QT progress could delay the completion of QT for PPs impacting Migration timelines	• Progress tracked through governance (QTEF, PSG, QWG, QAG) and via Programme Assurance • MCC monitoring of qualified MPANs and impact on migration schedule	• Delayed PPs would be in breach of license conditions
R1181	There is a risk that issues / defects directly associated with the Qualification Test Framework (QTF) impacts Qualification Test participant progress as each new market role and theme tests are exercised, and this undermines PPs forecast test execution schedules.	• Progress tracked through governance (QTEF, PSG, QWG, QAG) and via Programme Assurance	• Delayed PPs would be in breach of license conditions
R1177	There is a risk that the lack of QT progress could delay the completion of QT for PPs increasing the resource required by Code Bodies to support QT impacting the ability to complete QT on time	• Programme request for resource plan for future QT waves on basis of experience • Progress tracked through governance (QTEF, PSG, QWG, QAG) and via Programme Assurance	• Delayed PPs would be in breach of license conditions

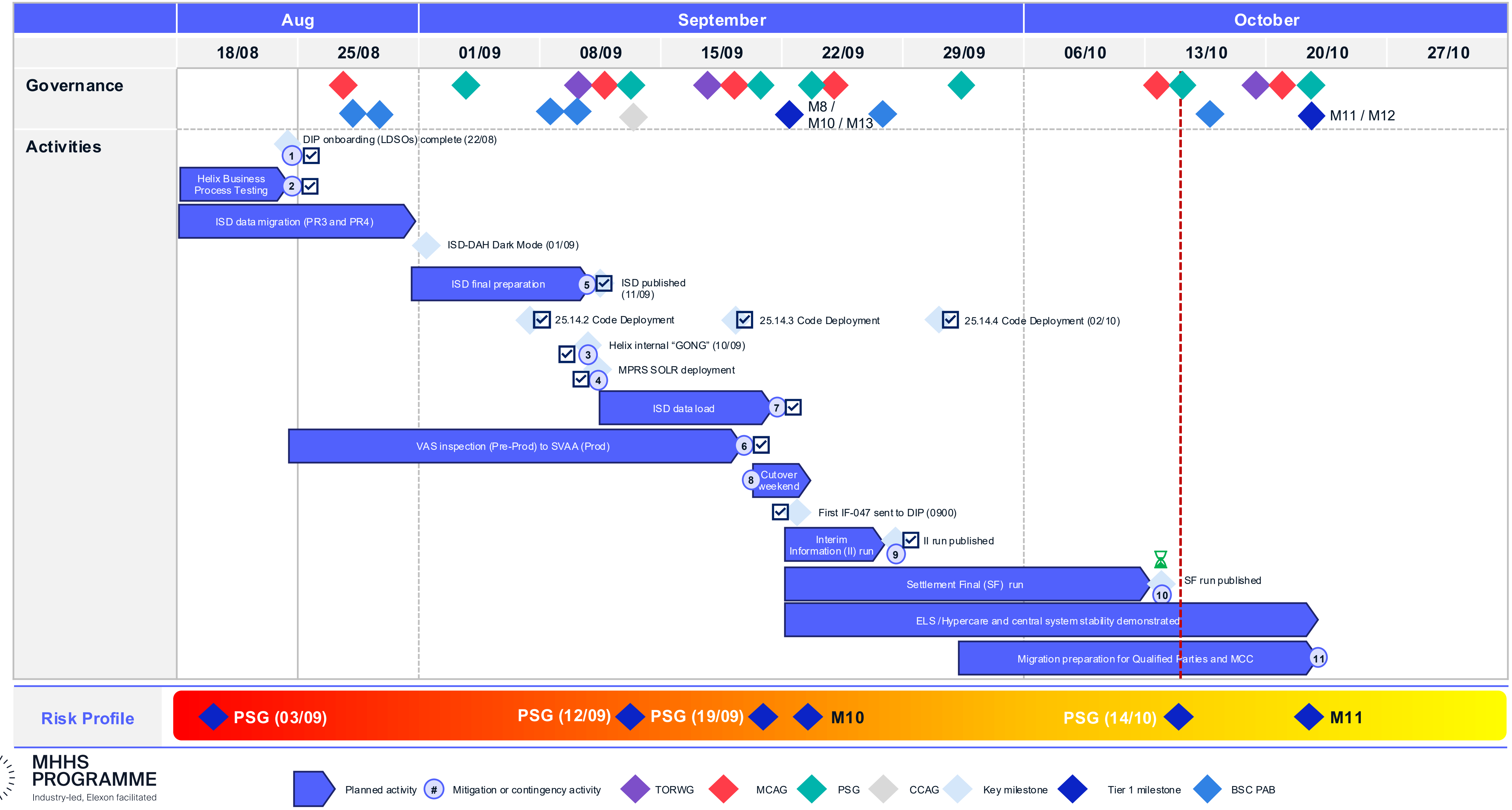


Risk ID	Risk	Mitigation	Contingency Plan
R703	There is a risk that there are a large number of poor quality and problematic MPANs that will not be migrated until the end of the migration period, and if significant issues arise in migrating this population, this could place M15 at risk.	• Develop solution(s) for migrating problematic MPANs	
R663	There is a risk that those large Supplier Agents, who support multiple large Suppliers, will not be able to support planned migration volumes due to operational or technical constraints	• Operational performance to be tracked daily through MCC • Escalation processes defined within Programme	• Use contingency within daily migration envelopes
R678	There is a risk of Supplier Systems submitting unplanned migration messages that exceed LDSO volumes during the Migration Period	• Planning and controls of when messages will be sent has been incorporated into MCC design.	• Use contingency within daily migration envelopes
R488	There is a risk that a significant volume of export MPANs created within Programme transition timescales will impact the ability of suppliers and DNOs to deliver Programme Migration	• Engage Ofgem to clarify what existing obligations mean for Programme and Parties	• Use contingency within daily migration envelopes

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

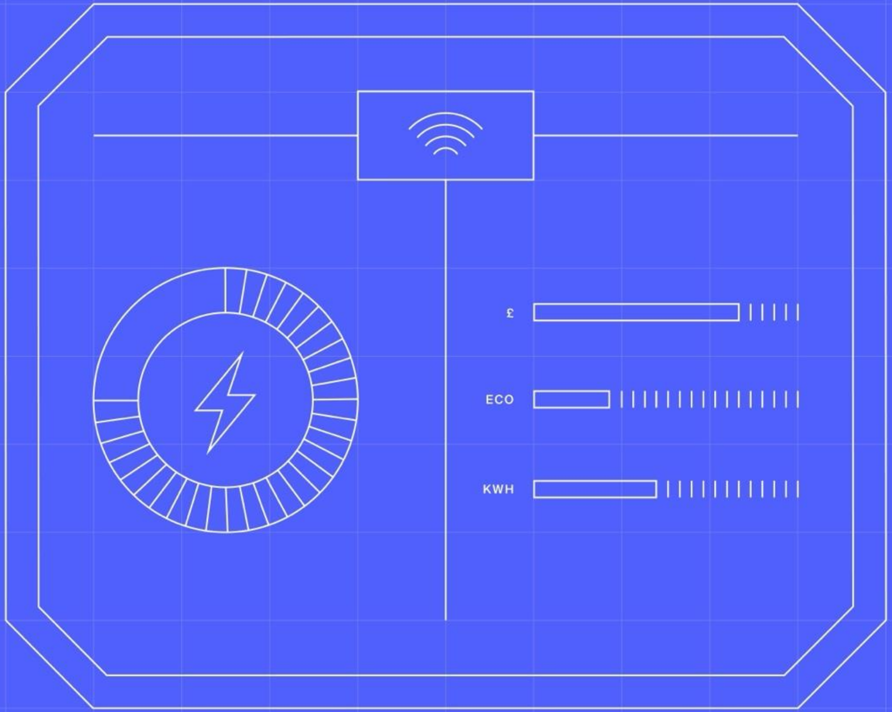
No.	Action	Mitigation	Contingency	Associated Risk ID	Owner(s)	Due Date
1	LDSOs are onboarded to DIP	• LDSO onboarding brought forward to August and decoupled from Supplier and Agent onboarding	• If an LDSO is late – cutover proceeds. LDSO has time to onboard before later Go-Live decisions.	R1121, R839, R1137	DIP Manager	Complete
2	Helix Internal Testing is complete; Helix Service Activation GoNG	• No known mitigation	• Use Helix contingency ISD load activity (PR4) and delay Helix Service Activation GoNG declaration to Programme to 29-Aug	R1152, R1137, R839	Helix	Complete
3	Helix internal "GoNG" – Helix declaration to Programme	• No known mitigation	• If Elexon No Go - Programme, Ofgem discussion required for M10	R1137, R1152	Helix	Complete (w/ conditions)
4	MPRS SoLR patch is deployed by LDSOs	• No known mitigation	• Patch is deployed after as soon as possible after M10 and before M11	R1156	St Clements, LDSOs	Complete
5	ISD files are published	• Early 'mock' file to be shared with LDSOs by 01/09 to allow for early format and quality checks	• SFTP mechanism in place to allow M10 parties to access ISD • If ISD cannot be made available – Programme, Ofgem discussion required for M10	R1156	Helix	Complete
6	VAS inspection against SVAA system	• Further Helix internal business process testing is being executed	• All M10 ready parties go live but legacy settlement processes remain	R1103, R1152	Helix	Complete
7	ISD Data Load complete	• 7-day window from 11/09 – 19/09 to load ISD files	• If LDSO is late – M10 proceeds. LDSO updates MPRS feature switch to later M10 date. Suppliers directed not to migrate MPANs belonging to LDSO. • If Supplier or Agent – resolution plan to be M11 ready submitted to Programme	R1144	All M10 Parties	Complete
8	M10 Cutover Weekend "GoNG"	• Weekly Cutover Progress Reporting • GLIG reporting • Additional governance meetings for early intervention	• Any late Non-Helix parties submit resolution plans to go live • If Helix (incl. 25.14.3 build complete), all other central systems go live but legacy settlement processes remain (subject to feasibility) – Programme, Ofgem discussion required for M10	R1152, R1137, R839, R1151	Programme (PSG)	Complete
9	Interim Information (II) Run	• VAS/SVAA inspection exercise should validate new vs legacy outputs and identify any discrepancies	• Not due until WD4 post M10, providing time to address any issues before industry impact	R1136, R1082	Elexon	Complete
10	Settlement Final (SF) Run	• VAS/SVAA inspection exercise should validate new vs legacy outputs and identify any discrepancies	• Not due until WD15 post M10, providing time to address any issues before industry impact	R1179, R1180, R1157	Elexon	13-Oct-25 (WIP)
11	Qualified Parties M11-ready	• Readiness for M11 tracked via Programme and MCC	• If a PP is not ready, there will be a Migration Schedule update	R1110, R897	All M10 Parties	17-Oct-25

Risk glidepath to M10 and M11 – reducing the risk profile



MHHS PROGRAMME
Industry-led, Elexon facilitated

Communication plan for M11



INFORMATION: Update on the communication plan for M11

Programme (Lewis McKenzie)

10 mins

Communications Planning for M11 and M12

	Monday 20/10	Tuesday 21/10	Wednesday 22/10
Governance	eMCAG to provide recommendation to ePSG on M11 and M12 decisions.	ePSG decision to confirm M11 and M12.	TORWG - update on M11 and M12 progress.
Industry Comms/ Governance Comms	Email to all MCAG Attendees **by 13.00.**	Email to PSG Attendees, Principal Contacts & Migration Contacts **by 14.00.**	Email to all TORWG attendees **by 17.00.**
The Clock, Collaboration Base & Website		Collaboration Base & website update.	Article published in The Clock citing M11 and M12 update.

Communications Principles

- Timely
- Transparent
- Governance Aligned

Note: The Programme will communicate with the IPA and Ofgem throughout the process in line with industry communication touchpoints.

Additionally, parallel comms will be taking place involving MHHS Operational Readiness and M11 Participants.

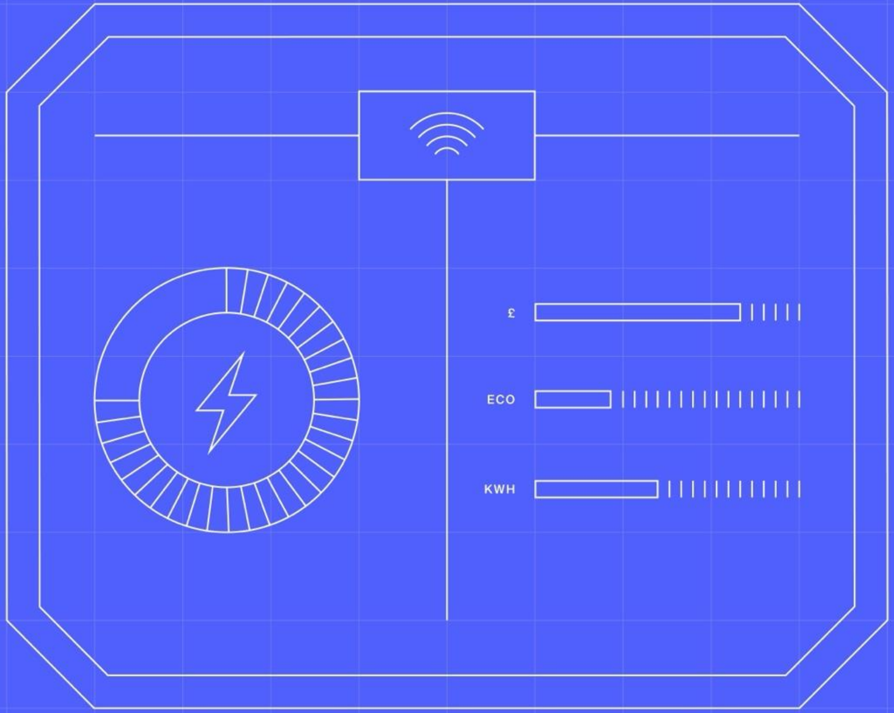
Communications Planning for M11 and M12

Date	Activity	Recipient	Comms Channel		
Monday 20 October 2025	eMCAG to provide recommendation to PSG on M11 and M12 decisions.	MCAG Attendees	• Email	• 13.00	• PMO
Tuesday 21 October 2025	ePSG decisions to confirm M11 and M12. Collaboration Base and Website update.	PSG Attendees, Principal & Migration MHHS Contacts	• Email, Collaboration Base and Website	• 14.00	• PPC
Wednesday 22 October 2025.	TORWG update on M11 and M12 Progress. Update in The Clock citing M11 and M12 updates including ePSG decision.	TORWG Attendees	• Email & The Clock	• 17.00	• PMO

Note: The Programme will update the IPA and Ofgem on key decisions and progress in parallel with the above touchpoints.

5

IPA view of Current M11 Status



INFORMATION: IPA view of of M11 Progress and risks

IPA

10 mins

MHHS IPA

M11 Readiness Report

This document has been prepared by PwC for Ofgem only, and solely for the purpose and on the terms agreed with Ofgem in PwC's Order Form (Con/Spec 2021-086), as part of PwC's call-offs under the Economic, Financial and Other Consultancy framework. PwC accept no liability (including for negligence) to anyone else in connection with our work or this document.

DRAFT

8 October 2025

Contents

A

IPA M11 Readiness update for ePSG on 14 October 2025

M11 Readiness Update – Executive Summary

Background and purpose: As part of IPA's M11 assurance activities, we have been monitoring the Central Programme Team's assessment of the M11 Acceptance Criteria, progress against the M10 work-off items, key risk themes and participant readiness ahead of M11. For the Extraordinary Programme Steering Group ('ePSG') on 14 October 2025, we have presented a summary of IPAs key messages and risk themes. We will present a full M11 Readiness Assessment at the ePSG on 21 October 2025.

	Key Messages	Overall Commentary
1	We are **aligned with the Central Programme Team's** view of readiness against the M11 Acceptance Criteria	We have independently reviewed evidence for all 24 M11 Acceptance Criteria and considered the status of these criteria as reported by the Central Programme Team for the 14 October 2025 PSG meeting. Based our review, we are aligned with the Central Programme Team's assessment on all 24 out of 24 criteria. This provides confidence that decisions can be made on an informed basis.
2	Status against M11 Acceptance Criteria **demonstrates a manageable level of risk** with appropriate actions in place to address the remaining areas of concern	As at the 1 October 2025 PSG, four out of 24 criteria were assessed as either at-risk or off-track. Since then, IPA has observed positive progress to execute mitigation strategies and reduce the overall risk profile. Qualification Testing, previously assessed as at-risk, has been brought back on-track against the original plan for all but 1 Participant. Clear actions have been put in place to address concerns regarding Service Management, which are in-progress. The remaining two risk areas relate to; Migration Incentives (which will not be completed by M11 but should not block achieving M11); and two Participants that were non-compliant with implementing the required legacy changes to support forward and reverse migration (this is planned to be completed 21 October 2025).
3	**System stability and performance has been demonstrated** so far post-M10, building confidence in technical readiness to commence migration. Key events remain to demonstrate readiness ahead ofthe M11 decision	Confidence in system stability and performance is increasing through successful validation of Interim Information (II) run outputs; consistently meeting the three defined targets for DIP availability and performance post-M10; and Helix core services (e.g. Volume Allocation Service) operating within SLA targets (as reported through TOG on 10 October 2025). Overall, Helix Hypercare / Service Management teams have experienced a low volume of high priority incidents, building confidence in overall system performance. Whilst the volume of incidents being raised on a weekly basis has increased, the majority are classified as low priority and low impact incidents and does not currently present a significant risk to M11. Key upcoming events, such as Settlement Final run (commencing 10 October 2025) and ISD v14 publish (16 October 2025), are essential for final demonstration of system readiness ahead of the M11 decision on 21 October 2025.
4	Progress has been demonstrated against **M10 work-off items** which are being monitored closely	Seven out of a total of 10 M10 work-off items are planned to be completed prior to M11. Out of those seven, two have been completed, four remain on-track and one is at risk (related to the forward and reverse migration process noted above). Three M10 work-off items are planned to be delivered post-M11 - this will not impact the Programme's ability to progress with M11.

Risk Themes and Key Confidence Points

The IPA has been tracking five key risk themes ahead of M11, relating either to risks within the end-to-end programme or inherent to the overall delivery approach. **There are key activities that must be delivered to enable M11 and M12, providing 'confidence points' that, if achieved, build confidence towards attainment of the milestones**. As 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
			8 Oct 25	Trend	
1. Settlement Runs	Successful completion of II and SF settlement runs, and the required outputs validated is needed to provided assurance over settlement performance of post-M10 with both legacy and new settlement arrangements.	✓ **Interim Information (II) run to commence [Complete 24 September 2025]** ✓ **Expected outputs of II run produced and validated [Complete 3 October 2025]** • **Settlement Final (SF) run to commence [13 October 2025]** • **Expected outputs of SF run produced and validated [17 October 2025]**	HIGH		The II run has been executed multiple times and the outputs validated successfully. No major incidents have been raised as a result. The focus now moves to the SF run which is due to commence on 10 October.
2. Qualification Operating Model	Initial progress on Supplier & Agent Qualification Testing, has not yet provided the confidence that the Qualification Operating Model is fit for purpose post M10.	✓ **Weekly Qualification Testing Execution Forum (QTF) implemented [Complete 30 September 2025]** ✓ **Remedial activities and actions implemented [Complete 1 October 2025]** ✓ **Progress reporting review at QTF Execution Forum and Qualification Working Group (QWG) and improved execution rate in line with revised plans [Complete 7 October 2025]**	HIGH		Code Bodies have implemented several remedial actions and activities to support with recovery of the QT execution rate. Based on the reporting provided on 7 October, the QT execution rate has improved in line with both the revised test plans and original test plans for all but 1 Participant. Confidence is high, however progress must continue to be monitored closely.

Confidence Point: ✓ Confidence point met **Confidence Level:** HIGH / MEDIUM / LOW degree of confidence that risk will not impact M11 **Confidence Trend:** Increasing Confidence Maintaining Confidence Decreasing Confidence

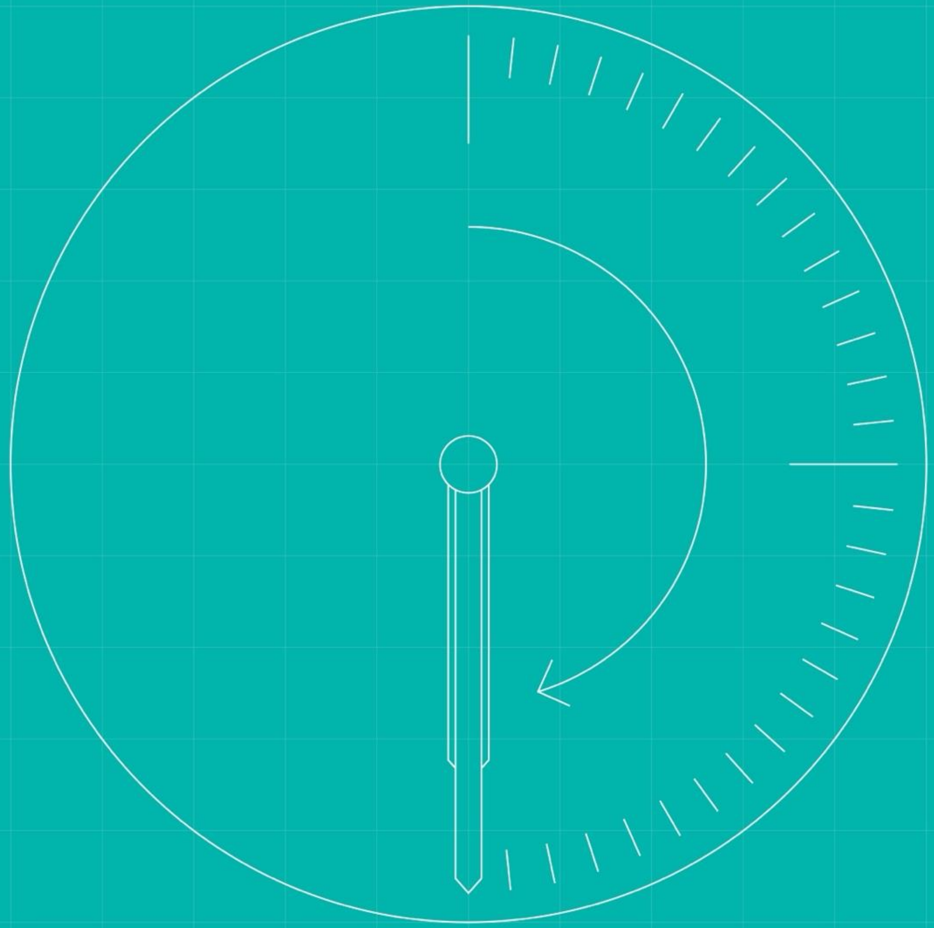
Risk Themes and Key Confidence Points

Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			8 Oct 25	Trend	
3. Forward and Reverse Migration Changes	At M10 there were two Participants that were non-compliant with implementing the required legacy changes. These Participants should ensure the relevant changes are implemented ahead of M11 to ensure there is no consumer impact in migration.	• **Delivery plans provided by Participants to Code Bodies showcasing route to compliance [Complete September 2025]** • **Plans reviewed by Code Bodies [Complete October 2025]** • **Successful implementation of legacy changes by Participants [21 October 2025]** • **Acceptance criteria fully met [21 October 2025]**	MEDIUM		Code Bodies have requested updated delivery plans from the two non-compliant Participants. One Participant has now implemented their solution. BSC and REC have confirmed that they have agreed to the remaining Participant's delivery plan and proposed implementation date.
4. M10 Work-Off Items	M10 work-off items that are required for M11 should be successfully completed. If not, there may be risk to M11 and the commencement of migration*. **Note: We have not included the M10 work off item relating to forward and reverse migration changes within this list, so as to not duplicate with the risk area above.*	✓ **Progress reporting against M10 work-off items at PSG demonstrating sufficient progress [Complete 1 October 2025]** • **Progress reporting against M10 work-off items at PSG demonstrating sufficient progress [14 October 2025]** • **Successful delivery of all M10 work-off items that are required for M11 [21 October 2025]**	HIGH		The Central Programme Team provided an update against the M10 work-off items at PSG on 1 October. IPA continue to engage directly with Elexon, Code Bodies and Central Programme Team on their responsibilities to implement their required work-off items ahead of M11.

Risk Themes and Key Confidence Points

Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			8 Oct 25	Trend	
5. Service Management	Elexon need to demonstrate appropriate performance and effectiveness of Service Management operations ahead of M11. If not demonstrated, incidents that are being raised by Participants and not being adequately addressed could impact Migration.	• **Hypercare reporting through TORWG and TOG demonstrating compliance with SLAs and acceptable volume of incidents [Ongoing to 21 October 2025)** • **Timely review and resolution of service management cases [ongoing to 21 October 2025]**	MEDIUM		Elexon Service Management / Hypercare reporting is in place. A low volume of P1 and P2 incidents has been experienced to date and the majority of SLAs have been complied with. Feedback has been provided to Elexon Service Management Team, through TOG, regarding the clarity of reporting, classification of P4 incidents and a growing backlog of cases and incidents. These feedback points are being addressed and will be monitored through upcoming reports, TOG and TORWG meetings.

Open Discussion on M11 Status



DISCUSSION: Open discussion on M11 status

Chair

10 mins

Question to PSG:

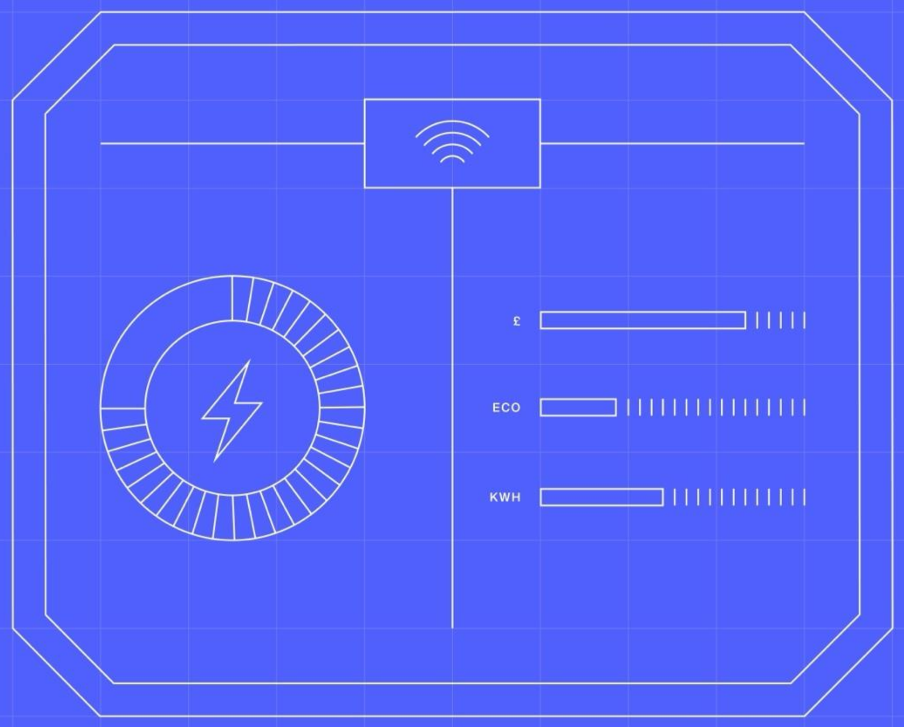
Do PSG members see any issues or blockers to progressing towards M11/M12, in addition to those the Programme has highlighted in the M11 assessment (please provide evidence and rationale)?

Next steps:

- M11/M12 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 17/10, to confirm qualified parties for the start of Migration

7

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. **21 October (ePSG)**
    2. **03 November 2025 10:00 – 12:30 (virtual)**

Meeting dates	21 October (Extraordinary)	03 November 2025
Relevant milestones or activities	• T1-MI-3000 • T1-MI-4000	
Agenda items	• Decision to confirm M11 and M12	• Ofgem Messaging • Migration Update • Qualification Progress • ELS/Hypercare Update • PSG Evolution post-M11
Standing items	• Summary and Next Steps	• Minutes and Actions • Programme Reporting • Delivery Dashboards • Summary and Next Steps

If you would like to propose an agenda item for the PSG, please contact the PMO at PMO@mhhsprogramme.co.uk

Thank you