



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

Extraordinary Migration and Cutover Advisory Group (MCAG) #18 – 21 October 2025

Version 2.0

MHHS-DEL4272

Agenda

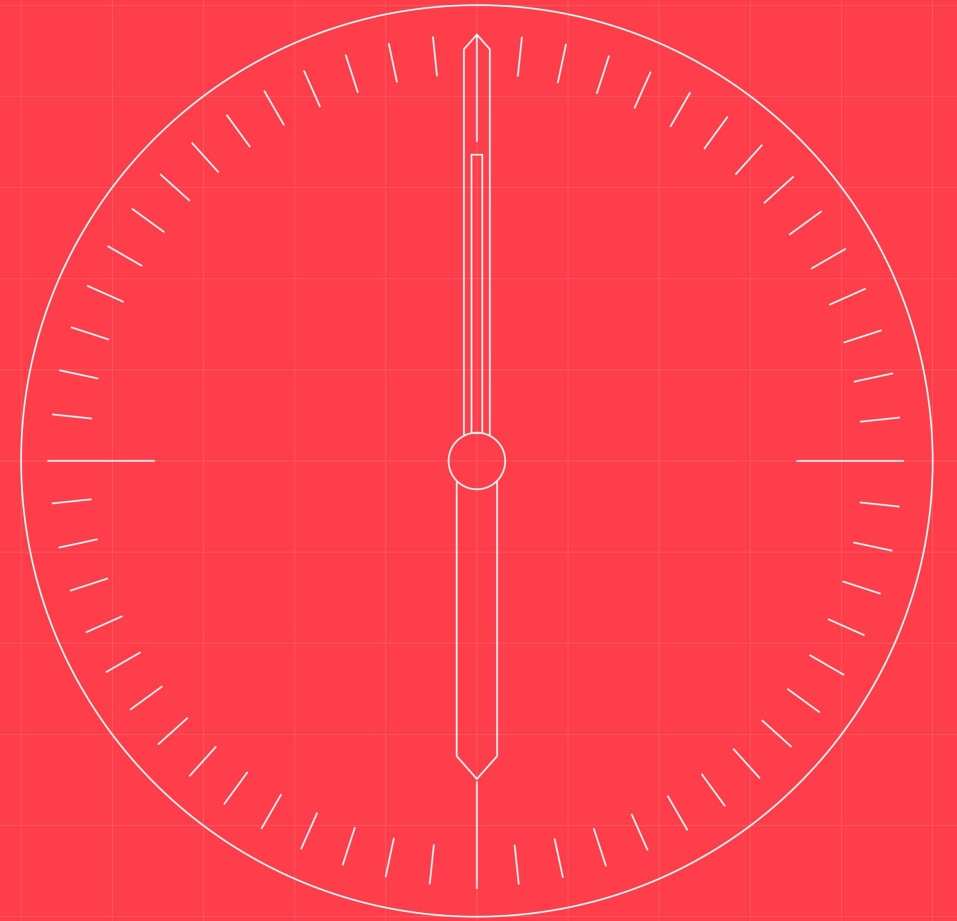
#	Item	Objective	Type	Lead	Time	Page
1	Welcome	Chair welcome	Information	Chair		
2	Headline Report and Actions	Approval of Headline Report of previous meeting and review of outstanding actions	Decision	Secretariat	15:00-15:05 5 mins	3
3	eTORWG recommendation	Provide an update on the eTORWG recommendation	Information	Programme (Matthew Breen)	15:05-15:10 5 mins	5
4	Elexon Update on M11 Readiness & process stability	• Service Management • DIP • ISD • Plan for work-off items	Information	Elexon (John Abbott)	15:10-15:20 10 mins	8
5	Route to M11/M12	Verbal update on the impacts of Elexon issues on M11/M12	Information	Programme (John Wiggins)	15:20-15:30 10 mins	13
6	Programme view of current M11/12 status	• Recap of the relevant M11 Acceptance Criteria progress • Outstanding work-off items	Information	Programme (Lewis Hall)	15:30-15:40 10 mins	14
7	IPA view on M11/M12 Status	IPA view on M11/12	Information	IPA	15:40-15:45 5 mins	32
8	M11/M12 recommendation to PSG	MCAG to provide recommendation to PSG that the Programme can approve M11/M12	Decision	Programme (Justin Andrews)	15:45-15:55 10 mins	45
9	Summary and Next Steps	Summarise actions/decisions and look ahead to the next MCAG	Information	Chair and Secretariat	15:55-16:00 5 mins	47

Headline Report and Actions

DECISION: Approval of Headline Report of previous meeting and review of outstanding actions

Secretariat

5 mins



Actions Review

- 1. Approval of Headline Reports from MCAG held [13 October 2025](#)
- 2. **Review outstanding actions** (actions will be discussed by exception. Please review the action updates ahead of the meeting)

Ref	Action	Owner	Due	Latest Update
MCAG17.1-01	Programme to confirm if there is an open risk around the exit of unqualified parties from the market, post M14. Code Bodies to confirm to Programme the mitigation plan/actions.	Programme and Code Bodies	20/10/25	RECOMMEND CLOSED: New risk raised (R1193) and Code Bodies have put a mitigation plan in place to prepare enforcement action ahead of M14 and also developed the QA&P Annex 4 which looks at preventing new registrations for Non-MHHS Qualified PPs following M14.

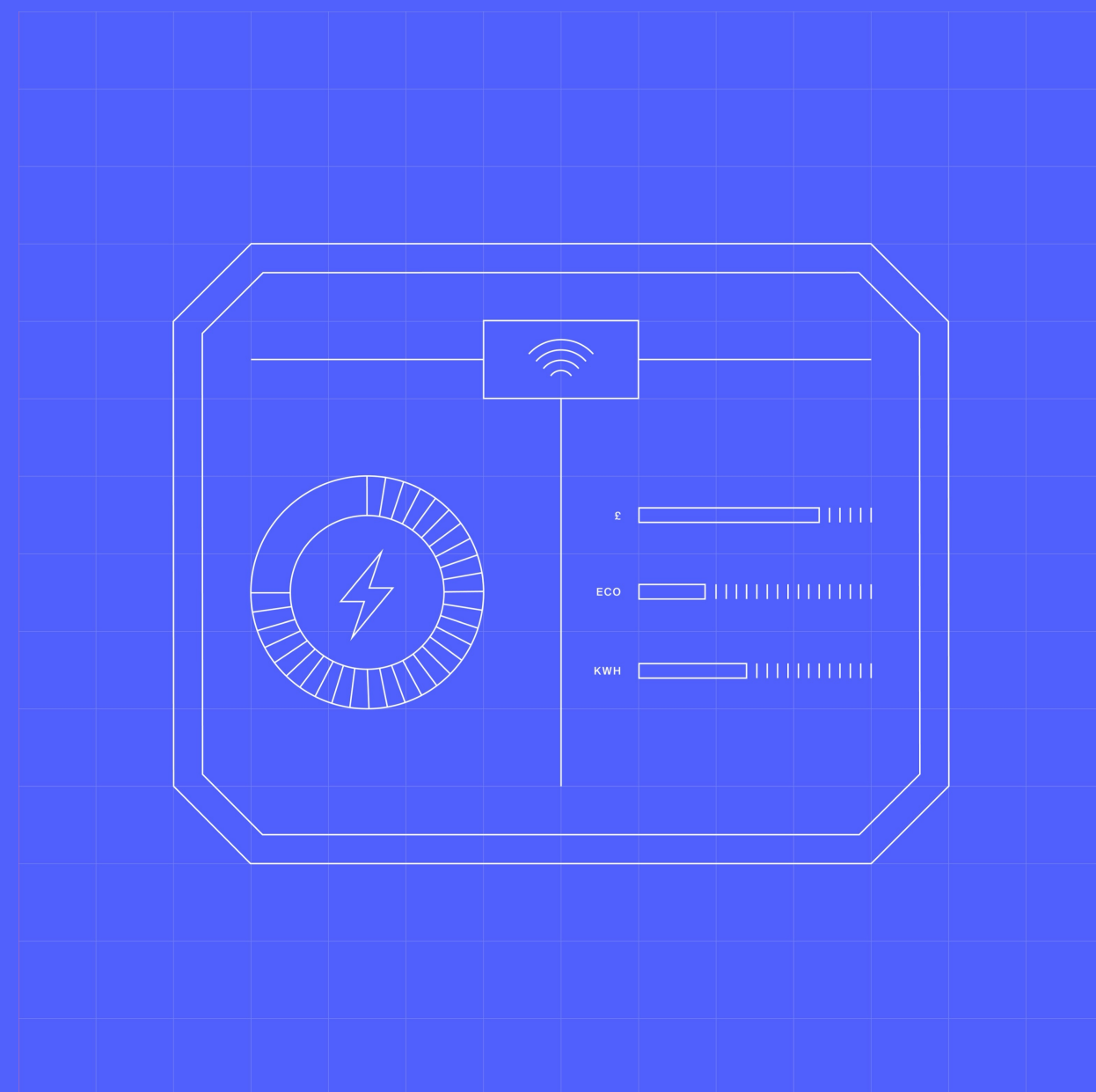
eTORWG recommendation

INFORMATION:

Provide an update on the eTORWG recommendation

Programme (Matthew Breen)

5 mins



TORWG 21/10 – Meeting Input Requirements

Declaration	Summary	Responsible Parties	Declarations Expected	Declarations Received
Self-Declaration that MHHS Functionality will be deployed to Production by Qualified parties	All Qualified Parties have declared that they are in a position to deploy MHHS Functionality to Production ahead of M11	Qualified Suppliers & Agents	13	13
Qualification of all pre-M11 parties	Additional SIT participants have become qualified between M10 and M11 and the Code Bodies have confirmed who these parties are to the MHHS Programme	Code Bodies	2	2
Self-Declaration that ISD file has been manually accessed and applied by all qualified Suppliers and Agents	All qualified parties will be required to inform the Programme that they have accessed the ISD file via the Elexon portal and manually applied this following their qualification to prevent failures when they begin operating in the MHHS arrangements.	Qualified Suppliers & Agents	13	12

MCAG 21/10 – Meeting Input Requirements

Inputs	Summary	Responsible Parties	Declarations Expected	Declarations Received
Confirmation of Qualified Parties from TORWG and their readiness	TORWG will provide confirmation to the MCAG of all the parties that have become qualified and are in a position to start migrating MPANs at M11 / M12	TORWG, MHHS Transition Team	N/A	N/A

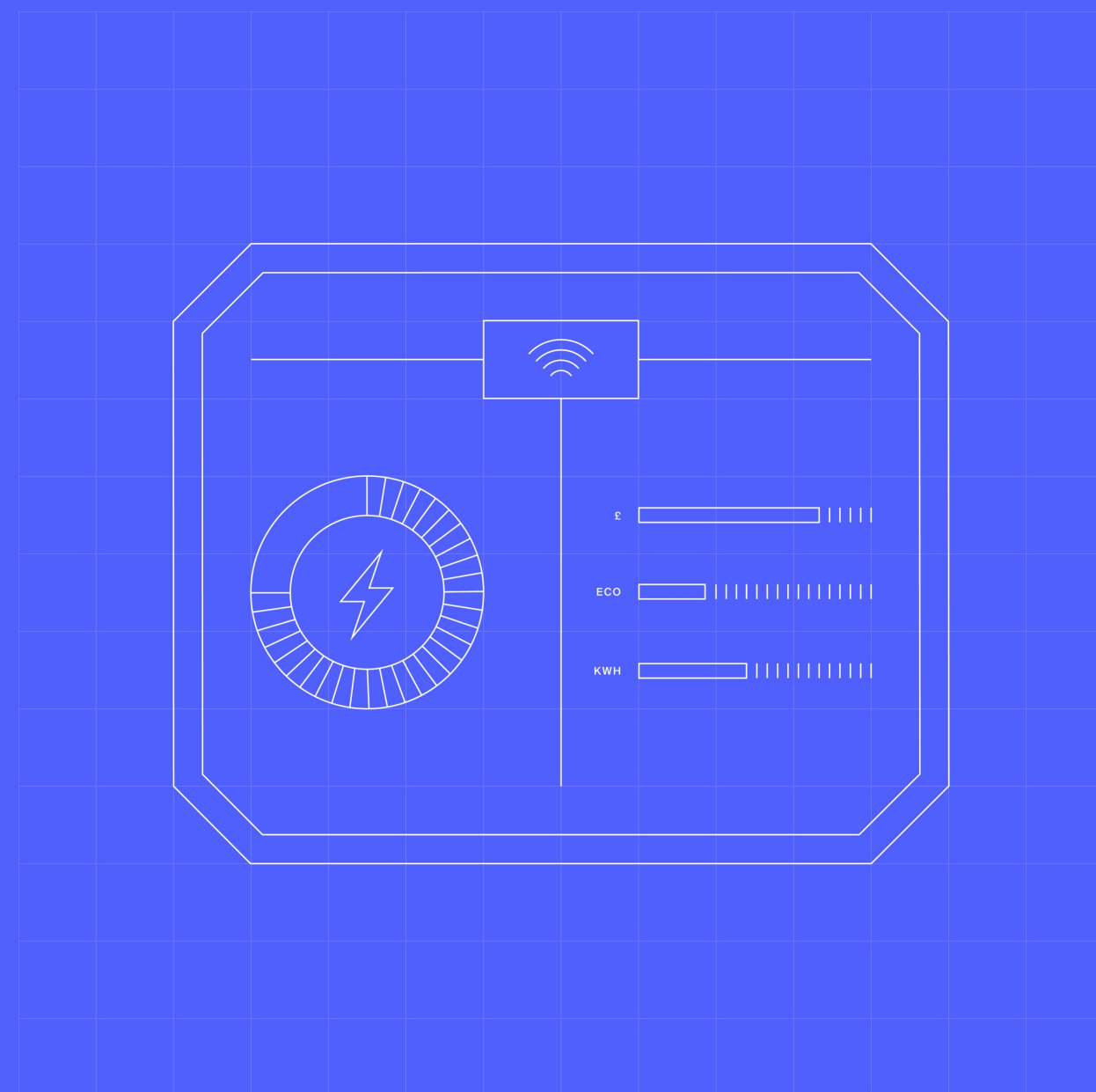
Elexon Update on M11 Readiness & process stability

INFORMATION:

- Service Management
- DIP
- ISD
- Plan for work-off items

Elexon (John Abbott)

10 mins



ISD

The ISD issues captured since the publication of V13 fall into 5 themes detailed below. A significant number of ISD CRs (230) have been implemented since v13 along with CSAD submissions which identified some back-end process issues for the first time.

Issue Theme	Description	Status
Design	A misalignment between BSCP 707 and the ISD design has been identified. The end dating of DUoS Tariff IDs affected data order for loading into MPRS.	A fix has been implemented by SCS to MPRS to mitigate the issue. An enduring fix will be identified in consultation between Elexon and Industry Participants. In the meantime we retain an open P3 incident.
Data	There has been issues identified with incorrect data in ISD since V13 A file from the DIP manager was incorrect which caused an issue in V14 (CS0015003). Issues have affected LLFs, DUoS tariff IDs, Participant Roles, and EFD / ETD dates.	These issues are now all resolved in the Version 15 publish on 21/10/2025 DUoS issue still a P3 (CS0015035 / CS0015036 / INC0107167).
Process	There have been issues since V13 with updating ISD data and CRs into ISD. These have included access issues, data visualization issues and data loading issues in internal Elexon systems.	These are now all resolved and all 230 ISD CRs and mid year CSAD submissions are updated in V15
Publication	There have been Issues since V13 related to publication of ISD 1. Triggered unexpectedly 2. Not happening as expected 3. Coming via IF_47 when not planned	The manual process is defined and working as expected. Proven today. Overnight process failed due to the file being classed as a republish CR/publication process which had different controls. This has been identified as a lesson learned (INC0107532) and run documentation will be updated.
Usability	There have been issues with the filtering tools in the ISD Datastore preventing download of complete ISD file or specific entities. There have been issues with ISD Datastore capacity	Filtering issues have now been corrected and confirmed today by participants as working as expected. We continue to monitor Datastore capacity to ensure it is sufficient and robust.

ISD and IT Service Management lesson learned

As can be seen from the update on ISD we have worked through a significant spike in change and in system incidents over the past 2 weeks.

Primary focus for us has been to support the resolution of all ISD-related issues in order to achieve a stable position with regards Standing Data for M11.

Resolving the changes required and issues faced in time for M11 has required significant support and collaboration from MHHS colleagues and Participants. We are very grateful for the practical help and support we have received.

Whilst we expect ISD to be in a more stable data state post M11, we intend to perform a systematic lessons learned exercise that will include collaboration and review with industry Participants and MHHS colleagues. We will liaise with MHHS on accommodating formal IRG processes to support Root Cause Analysis and improvement steps. Key areas of focus will include:

- Operational processes and quality controls
- Communication procedures for MIMs and coverage of general incident communications including circulars
- Internal communications between service teams, suppliers and triage experts
- Level of reliance on key individuals for specific system issues
- Overall cover for ISD and related systems and review of Out of Hours capabilities
- Categorisation and severity escalation processes for incidents

DIP Environment position

Elxon recognises a risk raised by Participants around the decommissioning of the SIT-A test environment and their inability to conduct end-to-end testing if required.

Our initial review of this risk has concluded that:

- SITAG has provided a directive to remove data from SIT-A by 24th October. REC have also reinforced this directive in accordance with BSCP 458. DIP Manager and Avanade will retain SIT-A but gives assurance that we will cleanse data as per the directive.
- In the event of a Major incident, we are able to support end-to-end testing with specific Participants if required using our Pre-Prod environment with some manual adjustments to support receiving DIP messages from the SIT-B environment.
- Major industry change would be forecast ahead and would have its own SIT environment set up as part of the delivery planning and readiness activities for implementation of the change.
- DIP Manager confirms that the DIP SIM will be retained, supported by MHHS until M14 and that a transition approach will be agreed with the MHHS Programme.
- SIT-A (if repurposed) is currently out of date and would need a complete overhaul before re-use. Helix will conduct a further detailed review of the Industry request for a dedicated replacement for SIT-A with support from DIP Manager for impact assessment of DIP requirements. We will share a proposed resolution approach at TORWG on 12th November.

Work Off Items

Ref	Issue	Workaround status	Perm fix target release (date)
290856	Legacy interfaces: Messages stuck in messagestore	n/a - Permanent fix deployed.	Completed: R25.14.2 (Sept 5th)
287099	ISD: Unable to send unpublished LLF data to EIS (& DAP)	n/a - Permanent fix deployed.	Completed: R25.14.4 (Oct 2nd)
293188	DAH: File validation failing on 'Losses MSID Count' field (re: D0081 and D0296)	n/a - Permanent fix deployed.	Completed: R25.14.5 (Oct 21st)
285371	DAH: Unable to default to previous DA files received.	Daily manual workaround in place.	Scheduled: R25.14.6 (Oct 30 th)
291098	PARMS: P0136 rejected with error message: Attribute MarketParticipantName is 45 characters long. Max length defined = 40	Weekly manual workaround in place.	Scheduled: R25.14.6 (Oct 30 th)
292055	ISD: On catalogue publish there is not an automatic update to DR side impacting back-up.	Per publish manual workaround in place.	Target 25.14.8 (27/11)
288972	DAH: For file type C0221, DAH does not have functionality to increment the header number. This is a new requirement rather than a defect.	End of month manual workaround in place.	Target 25.14.8 (27/11)

Additional Post M11 Work Off Items	Status
Permanent fix for DUOS data issue encountered within ISD catalogue publication	P3 incident retained to support permanent close out of the issue
Lessons Learned and implementation of required improvement steps from Review of ISD incidents	To be scheduled Post M11

SIT Operational Testing PIT Work off Item	Status
MHHSP-47 VAS: Update on the % of Report Approvals expected to be completed by 24/09/2025 to show that Helix is on track.	- All M11 Required Reports are signed off and ready. - The following 4 (non-M11 required) reports have been developed and are expected to be signed off on 24/10: 1. Annual Demand Volume, 2. Rejected Settlement volume (Data already covered in existing default Volume Report), 3. Retrospective registration data report. 4. Qualification Exception Report.

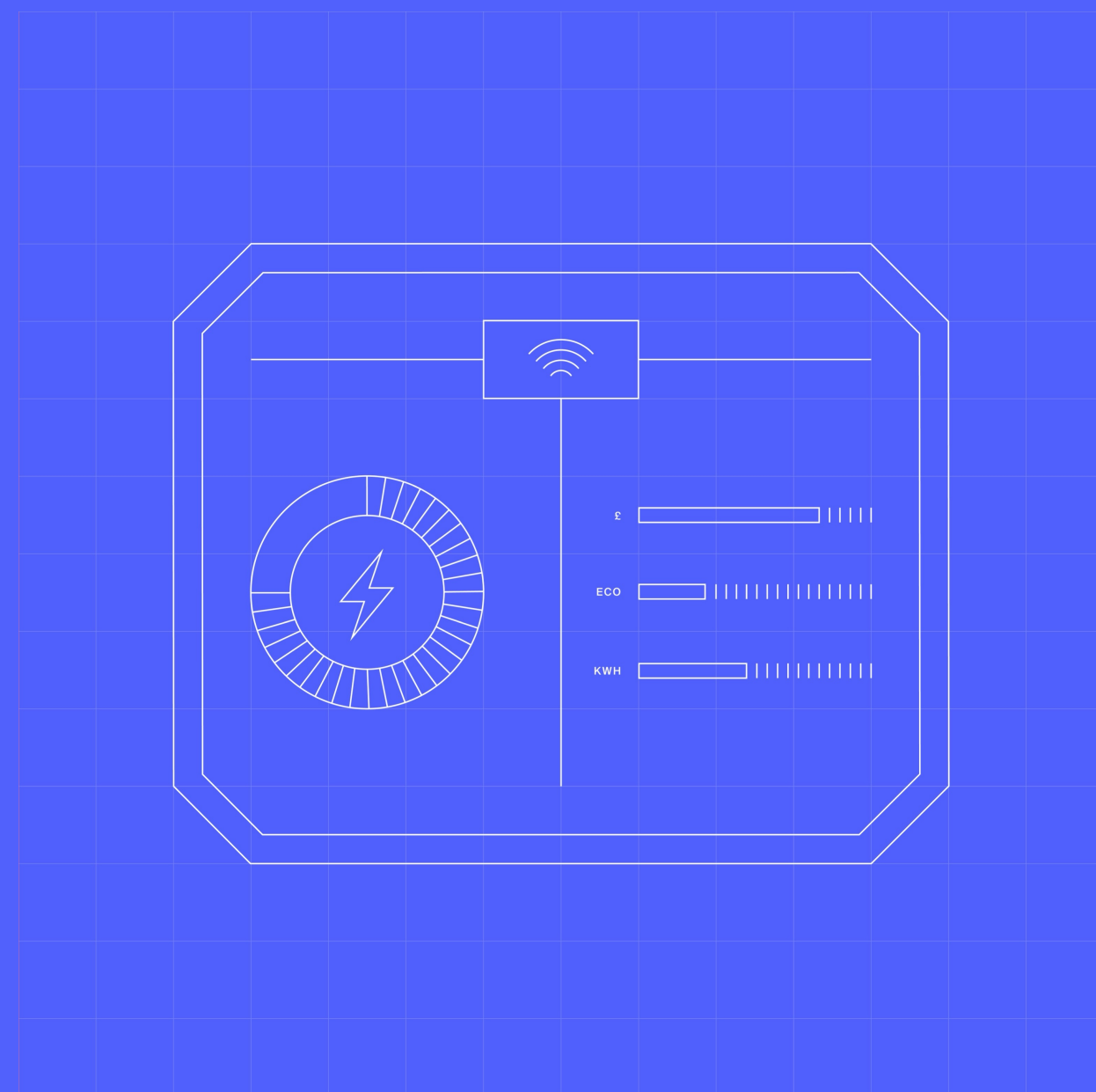
Route to M11/M12

INFORMATION:

Verbal update on the impacts of Elexon issues on M11/M12

Programme (John Wiggins)

10 mins



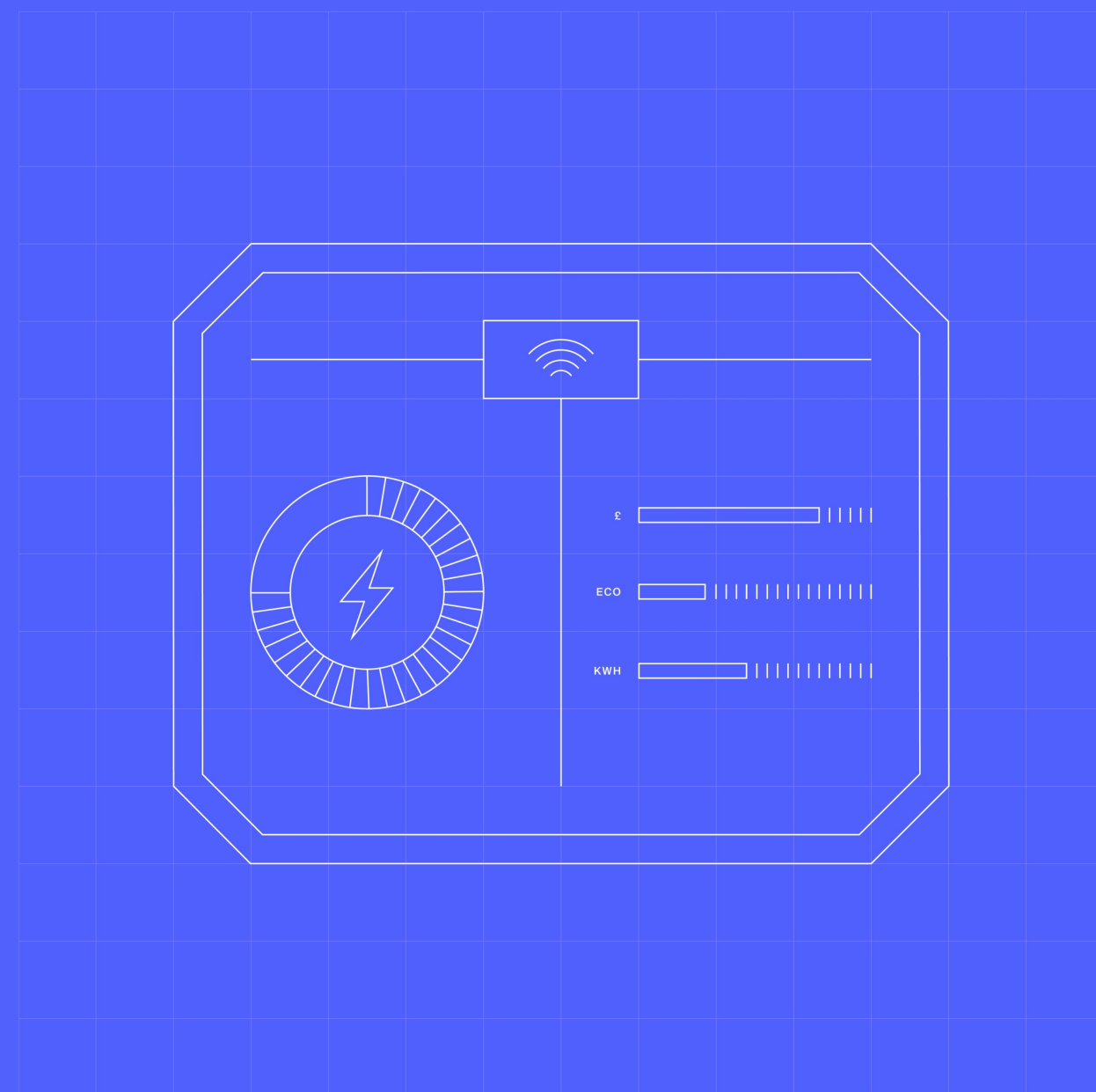
Programme view of current M11/M12 status

INFORMATION:

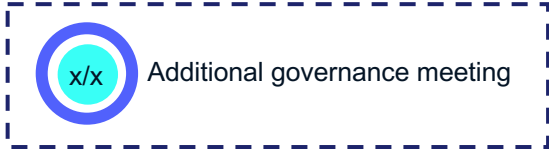
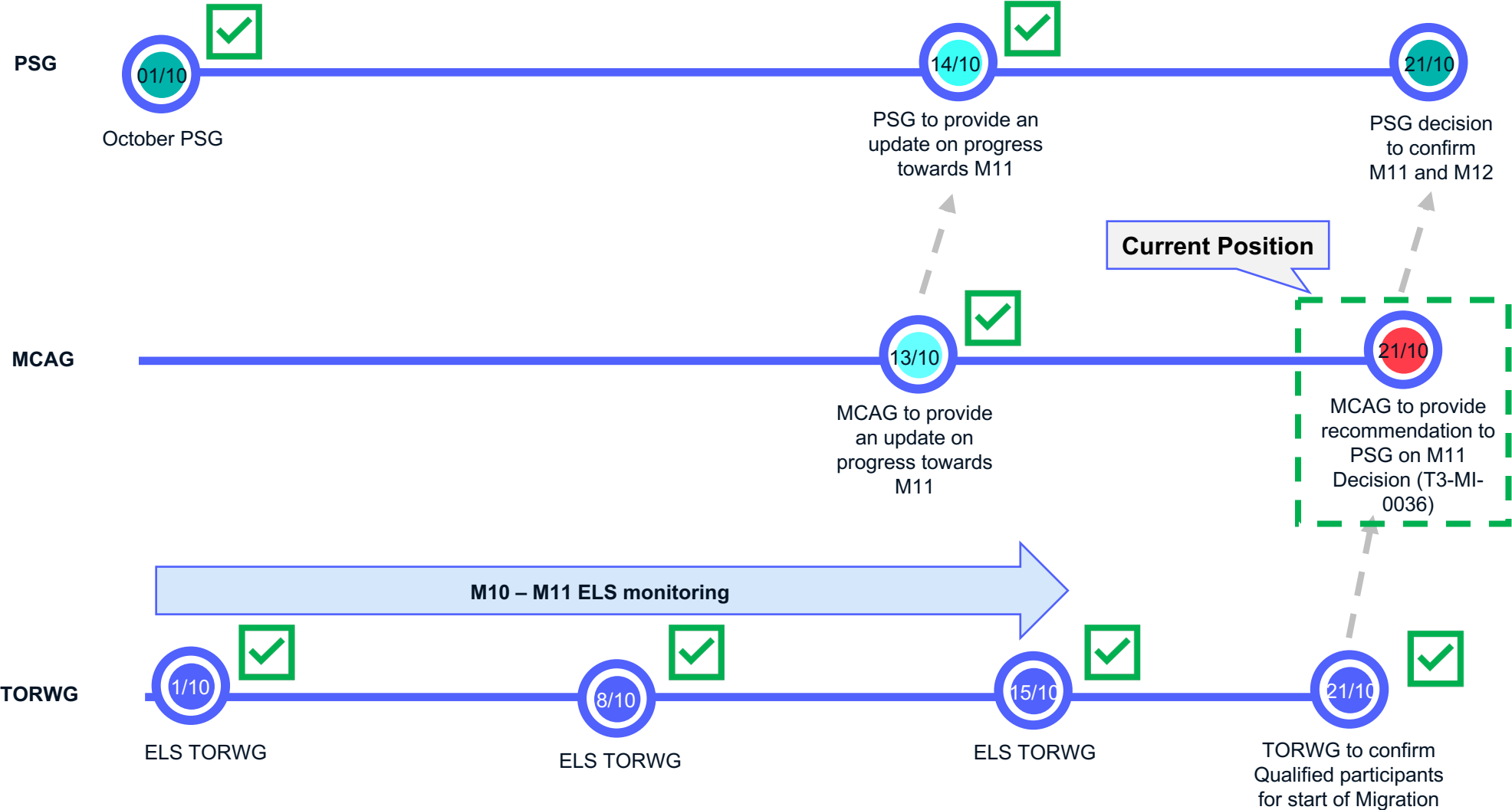
- Recap of the relevant M11 Acceptance Criteria progress
- Outstanding work-off items

Programme (Lewis Hall)

10 mins



M11/M12 Decision Choreography



Agenda no.	Agenda item
1	M10 Work-Off Plan
2	M11 Acceptance Criteria – latest status
3	M11 Acceptance Criteria – future assurance, accepted risk and open items
4	M11 Work Off-Plan

M10 Work-Off Plan (updated following PSG)

#	Work item	Due date	Owner	Latest status
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)	30-Nov-25	Elxon	Now due at the end November. Added to M11 Work-Off Plan.
3	Missing D Flows in Code Drafting (D0164, D0394, D0395) incorporated into regulatory code	22-Oct-25	Programme	To go live 22/10.
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	Added to M11 Work-Off Plan.
6	Outstanding SAT testing for M16 transition	July 2026*	Elxon	Added to M11 Work-Off Plan.
7	Outstanding Helix SIT-Ops PIT work-off plan items	24-Oct-25	Elxon	New date of 24/10 provided. Added to M11 Work-Off Plan.
8	Missing D Flows in Code Drafting (D354, D355 and D356 from DTC and DTS) to be incorporated	22-Oct-25	Programme	To go live 22/10.
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	Confirmation received of completion via Code Bodies

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

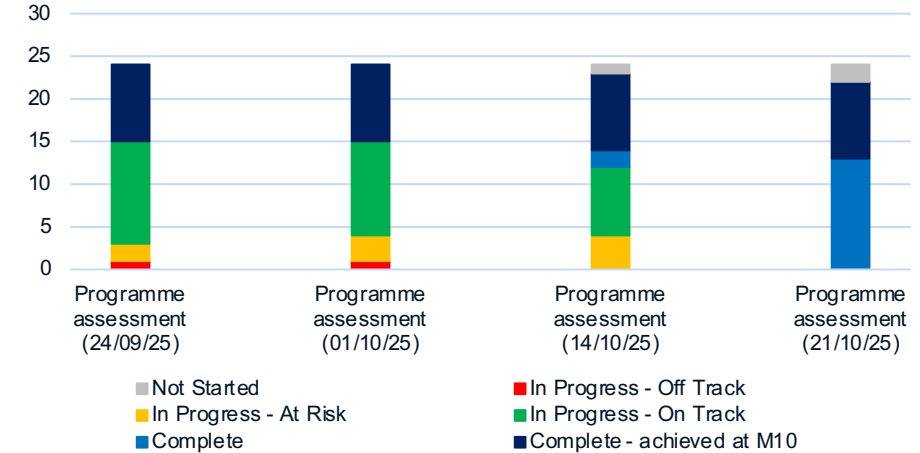
Agenda no.	Agenda item
1	M10 Work-Off Plan
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Progress update - M11 Acceptance Criteria (updated following PSG)

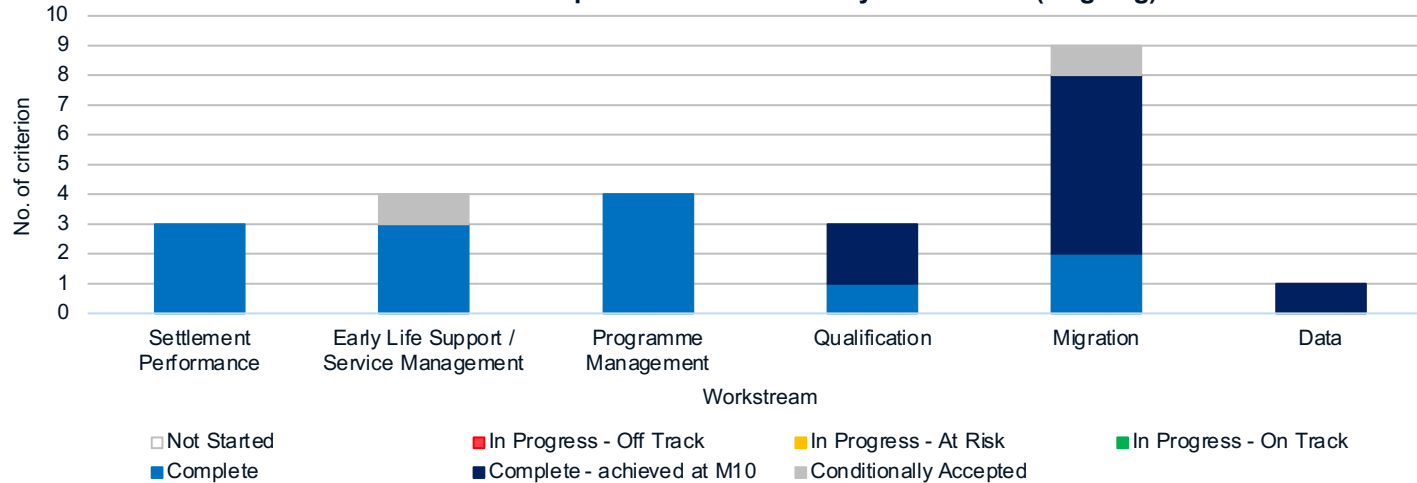
Overview

- Overall, the Programme recommends M11/M12 is approved to enable the start of migration.
- 22 of 24 acceptance criteria have been met. 2 have been conditionally accepted (*migration incentives, service management processes*).
- Of the 22 accepted criteria, the Programme believes 3 required continued review and assurance beyond M11 (*Qualification Operating Model, SF Run, II Run*).
- There were 4 'at risk' items going into PSG on 21/10 (*legacy changes to support forward/reverse migration implemented, no major Service Management incidents, ISD and M11 Self Declarations*). Each of these has now been resolved.
- There were two items marked as 'on track' in the meeting (*M11 Work Off Plan, IPA M11 Assurance Report*) – both have been approved and marked as complete following the session.

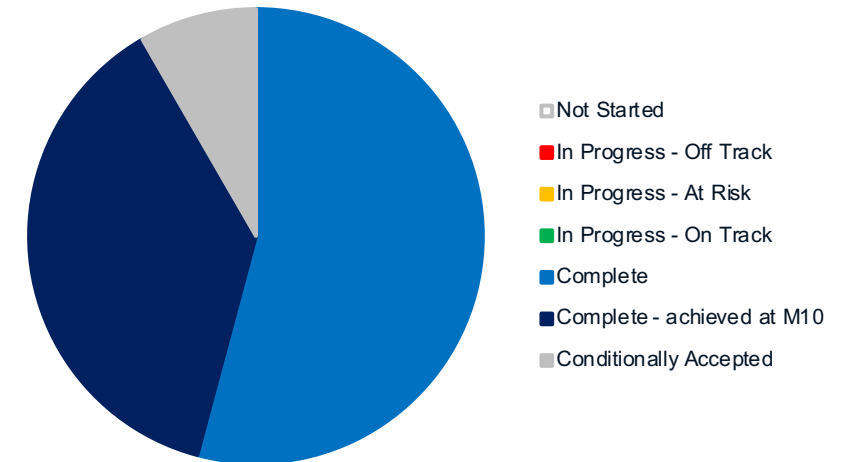
Status over time (Programme view)



M11 Acceptance Criteria status by Workstream (Ongoing)



Programme view of M11 Readiness



M11 Acceptance Criteria (1 of 4)

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	RAG Status (Post-PSG)	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	Complete	Complete	Complete	-
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	Complete	Complete	-
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 - At Risk	In Progress - At Risk	Complete	Full confirmation that v15 of ISD has been loaded by M11 PPs obtained.
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 - At Risk	Complete	INC0106193 (ISD v14 MIM) has been resolved and criterion confirmed as complete following successful load of ISD files. A full review of MIM process and comms approach should be taken in line with the Root Cause Analysis (RCA) required for recent ISD incident.
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 - At Risk	Complete	All respondents have confirmed readiness.
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	Complete	Complete	Proposed status is 'complete'. Reporting routine established at TOG and TORWG weekly and progress towards ELS exit is broadly on track.

M11 Acceptance Criteria (2 of 4)

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	RAG Status (Post-PSG)	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	Conditionally Accepted	Conditionally Accepted	Criterion marked as 'conditionally accepted', as the Programme does not see this as a blocker for M11. The Programme will continue to monitor service management arrangements to ensure processes and procedures are fit for purpose beyond M11. A full review of MIM process and comms approach should be taken in line with the Root Cause Analysis (RCA) required for recent ISD incident.
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 - At Risk	Complete	Complete	Criterion marked as complete. QT testing is now reporting Amber – whilst test execution rate is generally meeting revised plans, we are retaining amber whilst testing velocity is established and plans and resource for later Waves established. Not a blocker for M11.
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	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	Complete - achieved at M10	-

M11 Acceptance Criteria (3 of 4)

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	RAG Status (Post-PSG)	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	Complete	Confirmation obtained from Code Bodies confirming implementation of changes.
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	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	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	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	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	Complete - achieved at M10	-
17	Migration	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	31/03/2026	Conditionally Accepted	Conditionally Accepted	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 (10/10)	RAG Status (20/10)	RAG Status (Post-PSG)	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	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	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	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	Complete	Complete	Presented to PSG on 14/10. ISD MIM identified since assessment – resolution in place, ensuring risk level remains in line with risk assessment.
22	Programme Management	M10 Work-Off Plan delivered (<i>as required</i>)	The work off items from M10, due to complete by M11 are delivered.	Programme	22/10/2025	In Progress - On Track	Complete	Complete	Open items do not impact migration start and have been added to M11 work off plan.
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	Complete	Approved at PSG on 21/10.
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	Complete	Approved at PSG on 21/10.

Agenda no.	Agenda item
1	M10 Work-Off Plan
2	M11 Acceptance Criteria – latest status
3	M11 Acceptance Criteria – future assurance, accepted risk and open items
4	M11 Work-Off Plan

M11 Acceptance Criteria: Complete but require continued monitoring and assurance (1 of 2)

Overview

- There are 3 Acceptance Criteria that the Programme has marked as complete going into M11 but believe require continued monitoring and assurance beyond milestone completion.
- This is either due to:
 - i. The nature of the criteria; for example, reoccurring processes (*II and SF Runs*) that have demonstrated sufficient successful execution to give confidence they are working but have also encountered issues that should be monitored to ensure they do not reoccur.
 - ii. Programme assurance has highlighted areas for improvement in operating structures and processes (*Qualification Operating Model*) that, while not posing a direct threat to the start of migration, should be reviewed and addressed to ensure they do not have detrimental impact on either BAU operations, Qualification or Migration progress.

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	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	Complete	Complete	Criterion marked as complete. Delays to P-Flow outputs and SVAA report sending for 3 II runs executed 14/10. Now released - RCA requested.
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	Complete	Criterion marked as complete. Issue with LLFs in first to runs. Subsequent runs from Day 3 onwards are correct, as confirmed with LDSOs and St Clements.

M11 Acceptance Criteria: Complete but require continued monitoring and assurance (2 of 2)

Overview

- Wave 1 Qualification progress is behind schedule and initial deficiencies in reporting and 'hands on' management highlighted at PSG in October. A resource model to support S&A Qualification Test Management for later waves of testing also needs to be provided.
- Nevertheless, the workstream has made progress to improve position and the Programme does not believe it is a threat to migration start. However, assurance of test progress, resourcing, team structure and reporting should continue beyond M11 to ensure recovery against timeline continues.

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	Latest status
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 - At Risk	Complete	Criterion marked as complete. QT testing is now reporting Amber – whilst test execution rate is generally meeting revised plans, we are retaining amber whilst testing velocity is established and plans and resource for later Waves established. Not a blocker for M11.

M11 Acceptance Criteria: At Risk items

Overview

- Going into PSG on 21/10, 4 Acceptance Criteria remained at risk. These items had not yet completed but actions to resolve were underway and were expected to be resolved within the next day. Each of these has now been completed.
- **ISD (#3)**: All ISD files confirmed as loaded by PPs today – all confirmations across Suppliers, Agents and LDSOs received.
- **Major incidents (#4)**: With ISD file confirmed as successfully loaded the open major incident (INC0106193) can be closed – confirming completion of this criterion.
- **'M11 Ready declarations' (#5)**: Final declarations received by Programme during the meeting – this had been impacted by ISD incident, which has taken priority.
- **Legacy changes – forward/reverse migration (#11)**: Code Bodies confirmed in the meeting that system changes required from single non-compliant party had been implemented.

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (20/10)	RAG Status (Post-PSG)	Latest status
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 - At Risk	In Progress - At Risk	Complete	Major incident associated with ISD v14 (INC0106193) has been resolved and v15 have been loaded by Suppliers, Agents and LDSOs. RCA into issue required.
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 - At Risk	Complete	INC0106193 (ISD v14 MIM) has been resolved. A full review of MIM process and comms approach should be taken in line with the Root Cause Analysis (RCA) required for recent ISD incident.
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 - At Risk	Complete	All respondents have confirmed readiness.
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	Complete	Confirmation obtained from Code Bodies confirming implementation of changes.

M11 Acceptance Criteria: Conditionally Accepted

Overview

- There are two criteria the Programme have marked as conditionally accepted. This means they are not yet complete and require further action but do not pose an immediate threat to migration start.
 - Migration incentives implemented – as a final decision is not expected until Q1 2026
 - Service Management processes, structures and reporting in place at M10 are operating effectively – while these processes are in place, and do not pose an immediate risk to the start of migration, the Programme does not believe they are operating **effectively** enough to meet the criterion and require further review and assurance after M11.

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	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	Conditionally Accepted	Criterion marked as complete, as the Programme does not see this as a blocker for M11. The Programme will continue to assure service management arrangements to ensure processes and procedures are fit for purpose beyond M11. A full review of MIM process and comms approach should be taken in line with the Root Cause Analysis (RCA) required for recent ISD incident.
17	Migration	Migration incentives implemented	Migration incentives agreed and implemented.	Programme	31/03/2026	Conditionally Accepted	Conditionally Accepted	Final proposal to be shared with Ofgem in Dec-25. Decision expected in Q1 2026.

M11 Acceptance Criteria: Open items

Overview

- 2 M11 Acceptance Criteria remain open.
- Both items are to be presented and approved as part of this meeting (M11 Work Off Plan, IPA M11 Assurance Report).

No.	Workstream	Criterion	Evidence	Owners	Due date	RAG Status (10/10)	RAG Status (21/10)	RAG Status (Post-PSG)	Latest status
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	Complete	Approved at PSG on 21/10. No blockers for M11.
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	Complete	Approved at PSG on 21/10.

Agenda no.	Agenda item
1	M10 Work-Off Plan
2	M11 Acceptance Criteria – latest status
3	M11 Acceptance Criteria – future assurance, accepted risk and open items
4	M11 Work-Off Plan

M11 Work-Off Plan (updated following PSG)

#	Work item	Due date	Owner
1	Delivery of deferred P Flows (P0275, P0276 and P0277)	30-Nov-25	Elxon
2	Decision provided on migration incentives (Mod P487)	Q1 2026*	Ofgem
3	Outstanding SAT testing for M16 transition	July 2026*	Elxon
4	Outstanding Helix SIT-Ops PIT work-off plan items	24-Oct-25	Elxon
5	Elxon undertake a full post incident review of ISD v14 and v15 issues	03-Dec-25	Elxon
6	Programme to convene IRG to consider all of the issues associated with the publication of ISD v14 & v15	03-Dec-25	Programme
7	ISD v15 (emergency release) is published, validated and successfully loaded by relevant industry participants	21-Oct-25	Elxon M11-ready PPs
8	All Elxon 'readiness and stability' resolution activities (as per slide 12) are completed as agreed	03-Dec-25	Elxon
10	Obtain final M11 readiness declarations from outstanding parties	22-Oct-25	Programme M11-ready PPs
11	Major incident related to ISD has been closed	22-Oct-25	Elxon

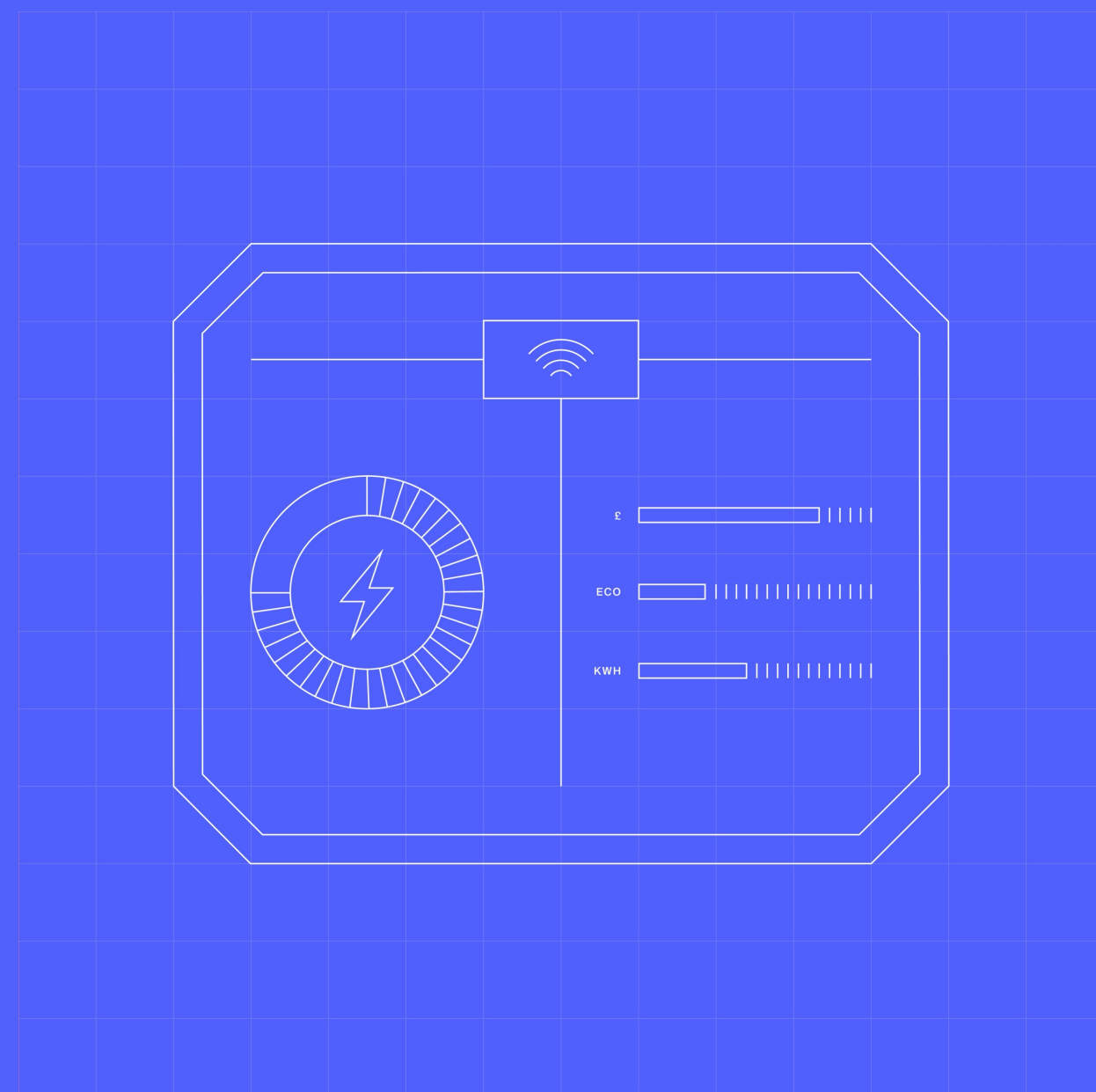
****Specific date to be confirmed***

IPA view on M11/M12 status

INFORMATION:
IPA view on M11/M12

IPA

5 mins





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Executive Summary

Background and purpose

The Programme is approaching the M11 milestone on 21 October 2025, which aims to confirm that Participants can begin to migrate MPANs onto the new arrangements.

The Central Programme Team has assessed M11 milestone readiness against 24 'M11 Acceptance Criteria' that were presented at the Programme Steering Group (PSG) on 1 October 2025. Progress towards M11 has been reported on at the Transition & Operational Readiness Working Group (TORWG) and the Migration and Cutover Advisory Group (MCAG).

The M11 readiness position will be presented at the MCAG on 20 October 2025, where a recommendation will be made to PSG. The decision as to whether to confirm M11 and proceed with commencing Migration will be taken to the Programme Steering Group on 21 October 2025.

This report provides IPA's assessment of end-to-end Programme readiness for M11 and will serve as an input for decision making at PSG on 21 October 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 24 September 2025 and 17 October 2025.

1. Does the Central Programme Team's assessment of the M11 Acceptance Criteria provide a fair and accurate view of readiness based on the evidence provided?
2. Based on the evidence provided, are the M11 Acceptance Criteria either complete or sufficiently on-track to achieve readiness on 21 October 2025?
3. Have the work-off plans documented at M10, which outlined all the activities required to be implemented by M11, now completed or are on track to be completed?
4. Are there documented and agreed work-off plans for any deferred or outstanding items that need to be performed post M11? Is the level of risk contained within those work-off plan acceptable to enable progression through the milestone?

IPA Assurance Activities

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

- Review of the M11 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
- 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.

M11 Readiness - Key Messages

The following key messages are based on our independent assurance assessment of evidence available up to **17 October 2025**.

Key Messages

1 **M11 remains achievable; however, resolution of the ISD v14 major incident is critical** as any further delays in resolution will likely impact the achievement of the M11 date.

2 **19 of 24 M11 Acceptance Criteria are complete or on track, 4 at-risk**, 1 is conditionally accepted. One at-risk criteria is critical for M11, mitigating actions for the remaining at-risk criteria are currently on track.

3 **There are no major issues being reported with the operation of central systems** which increases confidence to commence Migration.

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

Positive progress has been made against the majority of M11 Acceptance Criteria to demonstrate readiness to commence migration at M11. However, a major incident was raised on 15 October 2025 relating to ISD v14 publication, which risks delaying the current M11 date if not resolved. While resolution is in progress, the incident has already reduced the window between publishing ISD v14 and Go-Live of ISD v14 by at least 2 days, increasing the risk there will not be sufficient time to publish, load and resolve any issues before M11.

At the time of reporting, 19 out of 24 M11 Acceptance Criteria are either complete or on-track. Four criteria are at-risk, of which one relating to ISD v14 publication is critical to M11 and must be resolved to avoid delay to the milestone. The other three at-risk criteria relate to Qualification operating model, Elexon Service Management and a Participant who is non-compliant with implementing the required legacy changes to support forward and reverse migration. Further detail on these areas can be found in section 3.

Following central system go-live at M10, confidence has increased in the readiness of central systems to commence migration of MPANs at M11. Key confidence points have been met, such as the execution of system process (e.g. validation of Interim Information (II) runs) and reporting of compliance with system availability SLAs for central systems such as DIP, VAS and EES.

We have independently reviewed evidence for all 24 M11 Acceptance Criteria and assessed the status of these criteria as reported by the Central Programme Team for the 14 October 2025 PSG meeting. Based on our review, we are aligned with the Central Programme Team's assessment on all 24 out of 24 criteria.

IPA M11 Assessment – Key Assurance Exam Questions

Exam Question	RAG	IPA Assessment Summary
1. Does the Central Programme Team's assessment of the M11 Acceptance Criteria provide a fair and accurate view of readiness based on the evidence provided?	G	The Central Programme Team's assessment against the M11 Acceptance Criteria provides a fair reflection of current progress against each criterion based on the supporting evidence that we have reviewed and IPA is fully aligned with the Central Programme Team's assessment across the 24 criteria.
2. Based on the evidence provided, are the M11 Acceptance Criteria either complete or sufficiently on-track to achieve readiness on 21 October 2025?	R	- Of the 24 M11 Acceptance Criteria, 20 are either complete (11), conditionally accepted (1) or are on-track to complete (8). As at 17 October, 4 criteria are assessed as at-risk. - Of the four at-risk criteria, one relating to ISD v14 publication is critical to M11 and must be resolved to avoid delay to the milestone. The other three criteria at-risk relate to Qualification operating model, Elexon Service Management and a Participants who is non-compliant with implementing the required legacy changes to support forward/reverse migration. Each of the remaining three risk areas has mitigating actions in-progress and do not present significant risk to proceeding with the current M11 date, collectively and individually.
3. Have the work-off plans documented at M10, which outlined all the activities required to be implemented by M11, now completed or are on track to be completed?	A	- The M10 work-off plans were presented and agreed at PSG on 19 September 2025. Of the 10 M10 work-off items agreed, seven were due to complete by M11. Regular reporting on the progress of these items has been provided to MCAG and PSG in the period between M10 and M11. - Two are complete (Elexon SAT Closure Report and missing D-Flows released in Helix 25.14.4 release on 2 October 2025); one is on-track to complete by 17 October 2025 (fix to address DPI exceptions); two are on-track to complete by 22 October 2025 (both relating to missing D-flows in code drafting); one item is planned to be completed by 22 October 2025, but is at-risk (relating to one supplier being compliant with forward / reverse migration). One item is now off-track and will complete post M11, by 24 October 2025 (outstanding Helix SIT-Ops PIT items). Elexon have reported there is no impact to M11 by this not being met on time.
4. Are there documented and agreed work-off plans for any deferred or outstanding items that need to be performed post M11? Is the level of risk contained within those work-off plan acceptable to enable progression through the milestone?	G	- The M10 work-off plan had three known items which are scheduled to complete beyond M11. These items, and any other conditionally accepted items from the M11 criteria will need to continue to be tracked by the Central Programme Team in a consolidated M10 / M11 Work-off plan. - The currently known items that will extend beyond M11 carry an acceptable level of risk, and do not pose a risk to delaying M11. The latest status on these items and any risk or work-off plans will need to be assessed through MCAG and PSG on 20/21 October 2025.

 **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 with M11.

 **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, enabling the Programme to proceed with M11.

 **Green:** Based on the evidence reviewed, the exam question has been met, with only minor risks or issues remaining, enabling the Programme to proceed with M11.

2

IPA assessment against M11 Acceptance Criteria

Acceptance Criteria Assessment – Summary

Overall Summary: We have independently reviewed the evidence provided by the Central Programme Team against the 24 M11 Acceptance Criteria. Following our review, we are aligned with the Central Programme Team's assessment on 24 out of 24 criteria (100%), as published at the ePSG on 14 October 2025. We are aligned with the key risk areas identified by the Central Programme team in their M11 Acceptance Criteria assessment.

M11 Acceptance Criteria Summary

At the ePSG meeting on 14 October 2025, the number of completed and conditionally accepted M11 Acceptance Criteria stood at 12 and there are a further 8 criteria that are on-track. However, four criteria are 'at-risk'. We consider the level of risk at this point to be acceptable.

The **key issues / risks** driving four criteria to be "At-Risk" are:

- **Criteria 3:** ISD version 14 has been published ahead of M11.
 - Rationale: A major incident was raised on 15 October 2025 confirming a delay to the publication of ISD v14. At the time of reporting, this issue is unresolved and has already reduced the time available for Participants to load (and for Elexon to resolve any resultant issues) ahead of Go-Live on 22 October 2025.
- **Criteria 7:** Service Management processes, structures and reporting in place at M10 are operating effectively.
 - Rationale: Actions have been put in place to work through the cases & incident backlog and refine incorrect incident classifications at the point of triage.
- **Criteria 11:** 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.
 - Rationale: There is 1 outstanding non-compliant Participant has submitted an updated implementation plan which planned to complete by 21 October 2025.
- **Criteria 8:** Qualification operating model is fit for purpose to service all post-M10 activities.
 - Rationale: A defined resource model for Waves 3 and 4 is not yet complete and is currently being progressed by Elexon, however this is not seen as a blocker for M11.

IPA Alignment

We have independently reviewed the evidence provided by the Central Programme Team against all 24 M11 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.
- Mitigation strategies and activities have been put in-place for the 'at-risk' criteria and IPA expects completion of those ahead of M11.

3

Key risk themes and confidence points ahead of 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. A further risk theme has been identified following the major incident communication for ISD V14 publication.

Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			17 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 [Completed 26 September 2025] ✓ Expected outputs of II run produced and validated [Completed 3 October 2025] ✓ Settlement Final (SF) run to commence [Completed 13 October 2025] • Expected outputs of SF run produced and validated [17 October 2025]	MEDIUM		II runs since 26 September 2025 have been successfully executed by Elexon and no major incidents raised. The first SF run commenced on 13 October 2025. There was an issue with runs 1 and 2 (regarding a missing P239 file) which has now been fixed for subsequent runs. Investigation is being undertaken by Elexon to understand the impact of this on the outputs of runs 1 and 2. The outputs of the SF runs are currently being validated with Participants.

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
			17 Oct 25	Trend	
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 [Completed 30 September 2025] ✓ Remedial activities and actions implemented [Completed 1 October 2025] ✓ Progress reporting review at QTF Execution Forum and Qualification Working Group (QWG) and improved execution rate in line with revised plans [Completed 7 October 2025]	HIGH		Code Bodies have successfully implemented several remedial actions to recover the execution rate of Wave 1. Based on the current execution rate, 7 of 8 Wave 1 are on track to complete to the planned milestone. Code Bodies are monitoring preparatory activities for later Qualification waves.
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 [Completed September 2025] ✓ Plans reviewed by Code Bodies [Completed October 2025] • Successful implementation of legacy changes by remaining Participant [21 October 2025] • Acceptance criteria fully met [21 October 2025]	MEDIUM		Code Bodies continue to monitor one Participant's progress in completing the required legacy changes. Implementation is expected to complete by 21 October 2025. Mitigating actions have been identified by Code Bodies if further delays arise.

Risk Themes and Key Confidence Points



Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			17 Oct 25	Trend	
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*. <i>*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.</i>	✓ Progress reporting against M10 work-off items at PSG demonstrating sufficient progress [Completed 1 October 2025] ✓ Progress reporting against M10 work-off items at PSG demonstrating sufficient progress [Completed 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 14 October 2025. 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. One item (outstanding Helix SIT Ops PIT items) is now expected to complete post M11, but Elexon have reported that this is not expected to have an impact on commencing Migration.

Risk Themes and Key Confidence Points

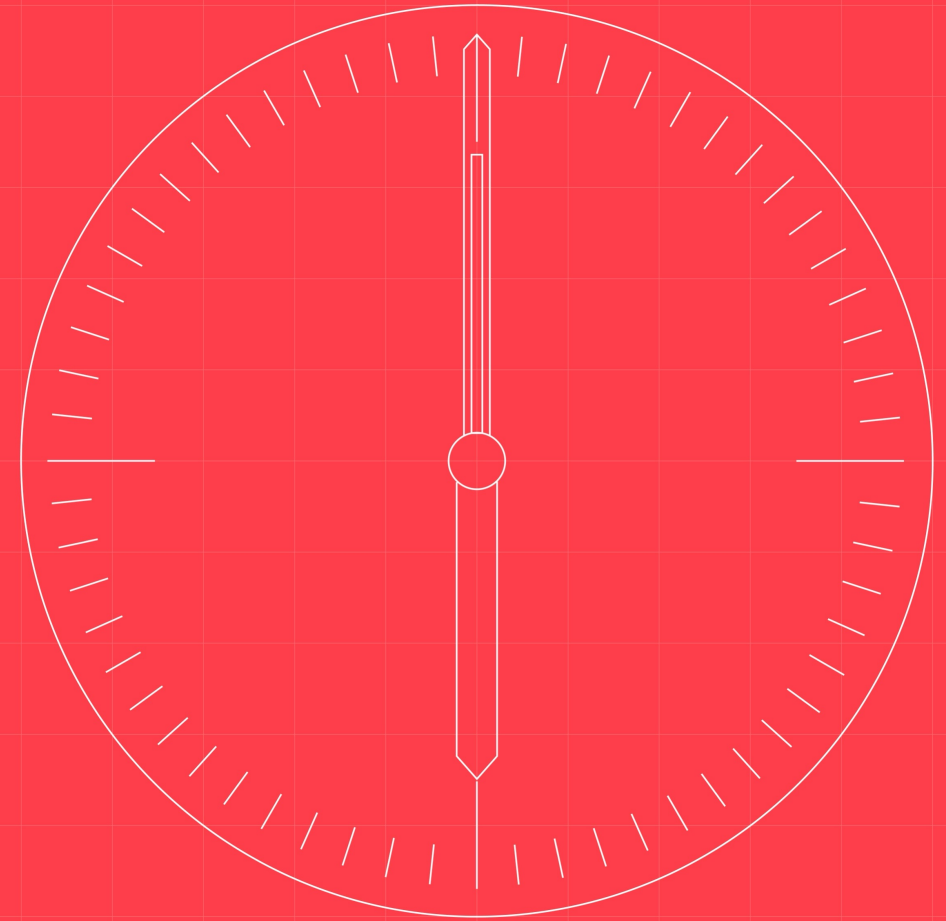
Risk Area	Risk Area Description	Key Confidence Points	Confidence Level		Rationale
			17 Oct 25	Trend	
5. Service Management	Elxon need to demonstrate appropriate performance and effectiveness of Service Management operations ahead of M11. If not demonstrated, incidents that are being raised by Participants 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]	HIGH		Elxon Service Management / Hypercare reporting is in place. 13 P2 incidents have been experienced to date and the majority of SLAs have been complied with. Feedback has been provided to Elxon 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. Despite this, confidence is high that this will not impact achieving the current M11 date.
6. Industry Standing Data (ISD) version 14 Publication	Elxon are required to publish v14 ISD to Industry and for Industry (EES, LDSOs, M11 Ready Suppliers and Agents) to load the data in readiness for ISD v14 Go-Live on 22 October 2025. This is a key requirement to enable the achievement of M11.	• Publication of ISD v14 to Industry [Delayed - 16 October 2025] • Confirmation from Industry that ISD v14 has been loaded and confirmation from Elxon that all major incidents have been resolved [21 October 2025]	LOW		ISD was originally scheduled to be published at 00:15 on 16 October 2025. However, a Major Incident [INC0106193] was raised on 15 October 2025 confirming the delay to the publication of Industry Standing Data (ISD) version 14. The resolution and subsequent publication date is not yet known, but if later than 19 October 2025 will likely impact the M11 date. This has also reduced the window for Participants to upload the files and resolve any potential issues that may occur following the load, by at-least 2 working days.

M11/M12 recommendation to PSG

DECISION: MCAG to provide recommendation to PSG
that the Programme can approve M11/M12

Programme (Justin Andrews)

10 mins



Do MCAG members have any objections to recommending to the PSG that the Programme can approve M11/M12 (please provide evidence and rationale)?

RECOMMENDATION

SRO to approve the milestone T3-MI-0036 (Recommendation from MCAG that the Programme can approve M11 / M12)

Next steps:

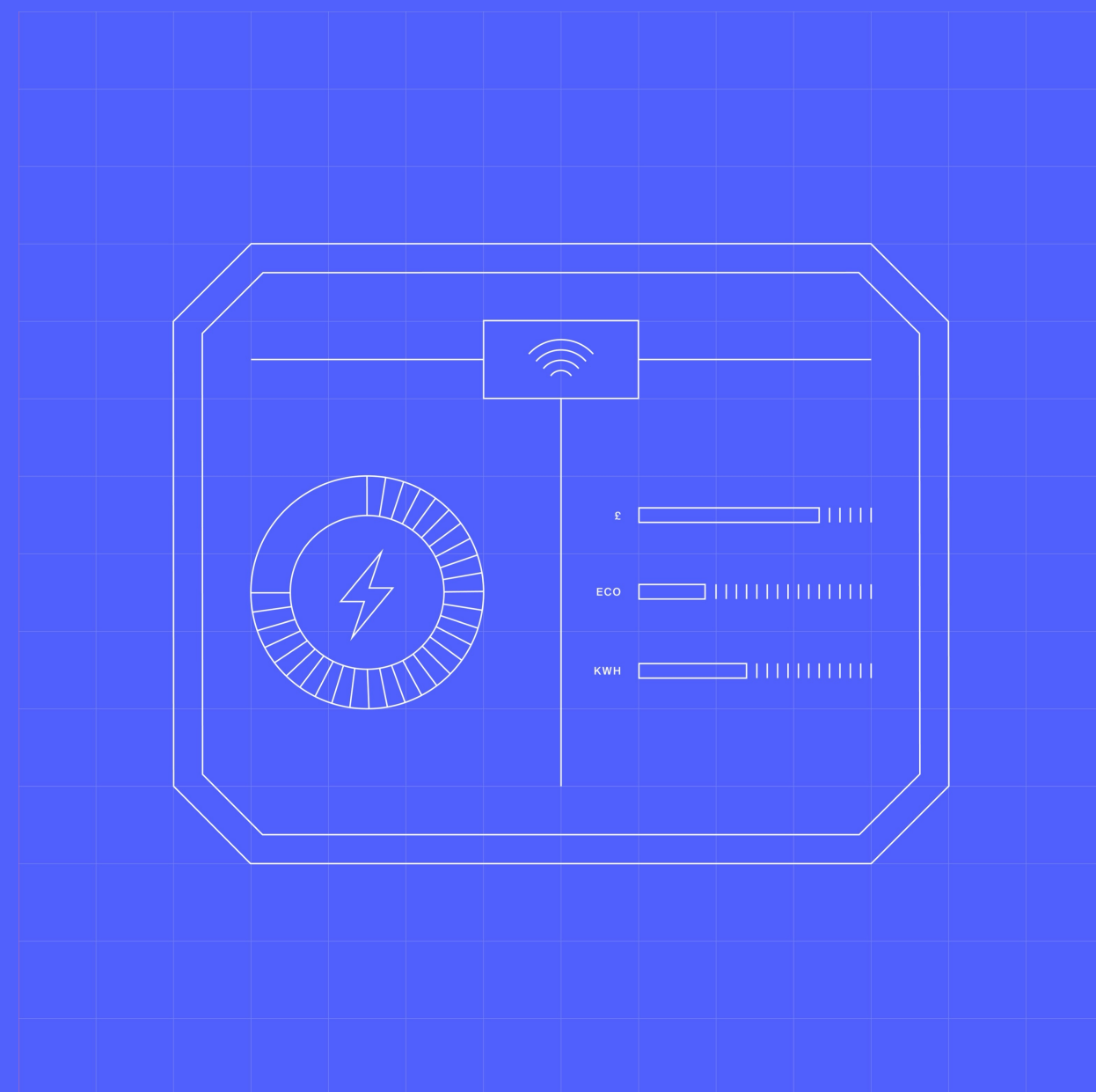
- A summary of these discussions and recommendation will be provided to PSG for their meeting this afternoon at 4pm.
- PSG will make the decision on whether to approve the milestones:
 - T1-MI-3000 – Start of 18-month migration for UMS/Advanced (M11)
 - T1-MI-4000 – Start of 18-month migration for Smart/Non-Smart (M12)

Summary and Next Steps

INFORMATION: Summarise actions/decisions and look ahead to the next MCAG

Chair & Secretariat

5 mins



Summary and Next Steps

Next steps:

- 1. Confirm actions and decisions from meeting
- 2. Date of next MCAG:

Tuesday 25 November 2025 at 2pm

- 1. Dates of next working groups:
 - Date of next TORWG: **22 October 2025 at 2pm**
 - Date of next MWG: **13 November 2025 at 2pm**

Upcoming agenda items:

Meeting dates		25 November 2025
Relevant milestones or activities	• Migration progress • ELS progress	
Agenda items	• MWG Update • TORWG Update	
Standing items	• Headline Report and Actions • Programme Milestones related to MCAG • Top Programme Risks related to MCAG • Programme Updates • Summary and Next Steps	