[06] Migration Governance and Escalation Framework

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1 Contents

1.1 Table of Figures

1.2 Change Record

Date	Author	Version	Change Detail
13/06/2024	Migration Team	v0.1	Migration Framework Consultation 2
05/07/2024	Migration Team	V0.2	Updated following Industry Consultation Comments
25/07/2024	Migration Team	V1.0	Version uplifted following MCAG Interim Approval

1.3 References

Document	Publisher	Published	Additional Information
REF-1 MHS-DEL2426-[01] Migration Framework Foundations v2.0	Migration Team	25/07/2024	Migration FW
REF-2 MHHS-DEL2427-[02] Migration Framework - Principles and Guidelines v2.0	Migration Team	25/07/2024	Migration FW
REF-3 MHHS-DEL2428-[03] Migration Capacity Calculations - Method Statements v2.0	Migration Team	25/07/2024	Migration FW
REF-4 MHHS-DEL2429-[03a] Migration Capacity Calculations – Parameters v2.0	Migration Team	25/07/2024	Migration FW
REF-5 MHHS-DEL2430-[04] Migration Requirements and Processes v2.0	Migration Team	25/07/2024	Migration FW
REF-6 MHHS-DEL2431-[04a] Migration Business Process Models v2.0	Migration Team	25/07/2024	Migration FW
REF-7 MHHS-DEL2762-[05] Migration Choreography v1.0	Migration Team	25/07/2024	Migration FW
REF-8 MHHS-DEL2763-[06] Migration Governance and Escalation Framework v1.0	Migration Team	25/07/2024	Migration FW
REF-9 MHHS-DEL2764--[07] Migration Data Requirements and Reports v1.0	Migration Team	25/07/2024	Migration FW
REF-10 MHHS-DEL961 – Migration Design Document v1.4	Migration Team	12/06/2024	
REF-11 MHHS-DEL953 – Data Assessment Report	Migration Team	21/02/2023	
REF-12 MHHS-DEL1128 – Migration, Cutover and Data Strategy v1.0	Migration Team	02/06/2023	
REF-13 MHHS-DEL1648 - Migration Thresholds Document v1.0	Migration Team	20/11/2023	
REF-14 MHHS-DEL813 – Overarching Test Data Approach and Plan	Testing Team	19/07/2023	
REF-15 MHHS-DEL1181 – Data Cleanse Plan v2.1	Migration Team	04/06/2024	
REF-16 MHHS-DEL1792 - M15 Acceptance Criteria v1.0	Migration Team	13/12/2023	

1.4 Terminology

Term	Description
BAU Process	This refers to a process within the MHHS arrangements as set out within the MHHS Core Design.
BSC	Balancing and Settlement Code
Central Services / Systems	MHHS Programme term referring to the parties and systems that comprise the supporting infrastructure for MHHS business processes and services, namely the Elexon Central Services, Electricity Enquiry Service, Data Service Provider,

Term	Description
	Central Switching Service, Data Transfer Network, and the Data Integration Platform.
CoA	Change of Agent
CoS	Change of Supplier
CSS	Central Switching Service
Daily Planned Migration Threshold	This is an industry-wide limit on the maximum planned for number of migrations that can take place on a given day under normal circumstances.
Data Cleanse Plan	The approach and activities required to improve and populate data prior to Migration start.
DC	Data Collector
DIP	Data Integration Platform
DS	Data Service
DSP	Data Services Provider
ECS	Elexon Central Services
EES	Electricity Enquiry Service
Export MPAN	An MPAN that exports energy to the grid from a premises.
Forward Migration	The process through which MPANs will move from legacy arrangements to MHHS arrangements.
IDNO	Independent Distribution Network Operator
Import MPAN	An MPAN that imports energy from the grid to a premises
ISD	Industry Standing Data
LDSO	Licensed Distribution System Operator
LDSO Portfolio Thresholds	Limits set for each LDSO based on the size of their portfolio, ensuring balanced migration across different operators See MHHS-DEL1648 - Migration Thresholds Document v1.0
Legacy Arrangements	The existing arrangements set out under the BSC and REC. For the purposes of the Migration Design, this is primarily the REC Metering Services Schedule and the Balancing and Settlement Procedures related to Data Collection.
MCC	Migration Control Centre
MHHS	Market-Wide Half-Hourly Settlement
MHHS Arrangements	The new MHHS arrangements as set out in the MHHS Core Design Artefacts.
Migration Design	The technical articulation of how MPANs will move from legacy to new MHHS arrangements. See MHHS-DEL961 – Migration Design Document v1.4
Migration Period	The period denoted by the Programme as occurring between the M11 and M15 milestones.
Migration Planning and Management Tool (MPMT)	Application to be developed for use by the MCC to manage the end to end migration process
MOP	Meter Operator
MPAN	Meter Point Administration Number
MPID	Market Participant Identifier
MS	Metering Service
MWG	Migration Working Group
NFR	Non-Functional Requirement
Primary MPAN	The MPAN, within a Related MPAN arrangement, for which a Switch is initiated, or a forward migration (via an IF-031) is initiated.
Qualified Supplier	A Supplier MPID recognised in ISD as both having passed the relevant BSC qualification requirements; and declared that their service is operational within the MHHS arrangements.
Registration Service	The Registration Service is the LDSO service that holds Meter point standing data information about each MPAN within its Distribution Region. Data includes the BRP the processing and metering services appointed to the MPAN. It also includes information on the type of customer, the Measurement Class, Energisation Status and Line Loss Factor Class.
REC	Retail Energy Code

Term	Description
Reverse Migration	The process through which MPANs will move from MHHS arrangements to legacy arrangements.
Secondary MPAN	The MPAN, within a Related MPAN arrangement, for which a forward migration occurs when an IF-031 is received for a Primary MPAN.
Switch	The process by which a new Supplier Registration supersedes an existing Supplier Registration, managed by the CSS.
Upper Migration Threshold	This is an industry-wide limit on the maximum number of migrations that can take place on a given day under exceptional circumstances. See MHHS-DEL1648 - Migration Thresholds Document v1.0
Supplier Capacity Envelope (Envelope)	A daily profile covering the whole migration period detailing the maximum number of migrations for a given Supplier MPID in a LDSO that may be undertaken. This also includes the submission rules for a Supplier MPIDs deminimus category submissions.
Supplier Submission	A Supplier's forward view of planned migrations by MPID at LDSO level that falls within the Supplier Capacity Envelope provided and includes all MPANs within their portfolio.

2   Introduction

2.1   Purpose of the Document

This document sets out the Migration Governance and Escalation Framework overseen by the Migration Control Centre (MCC) during the execution phase of the Migration between Milestones M11 and M15.

The Migration Governance and Escalation Framework is required to ensure that Suppliers adhere to their migration plans and baselined Migration schedules within the MCC framework.

The Migration Governance and Escalation Framework will enable the MCC to govern and enact measures and interventions as defined in this document.

Note: The Migration Governance and Escalation Framework should not be confused with the BSC MHHS Governance. Framework

This document outlines the following:

- Migration Governance Framework Scope
- Migration Governance Framework Requirements
- Migration Governance Framework Approach
- Migration Governance Escalation Framework
- Thresholds and Tolerances
- Other Escalation Triggers
- Incident Triaging and Classification
- Migration Governance Meetings and Reporting

3   Scope

The Migration Governance and Escalation Framework scope covers deviations from baselined Supplier Migration Plans as a result of behaviours which are not as a result of external factors such as Central Systems issues. A Triage process shall be identified to address incidents in order of magnitude. Suppliers and Agent Incidents shall be reported and monitored.

The scope does not cover Operational Performance of Central Services or Registration Services. Central Services and Registration Services have existing SLAs and KPIs and are therefore out of scope. The MCC will, however, require reports from those parties, in a timely manner, to actively monitor the Migration and ensure Migrating Parties have resources to meet their Migration needs.

4 Migration Governance Framework Requirements

The Migration Governance Framework has several requirements where Suppliers are not complying with their Migration Schedules.

4.1.1 Tracking

The MCC shall track deviations from Baselined Supplier Submissions at Supplier Market Participant Identifier (MPID) and LDSO MPID.

4.1.2 Random Fluctuations against the Supplier Baselined Submissions

Random fluctuations shall be monitored by the MCC but will not trigger any actions by the MCC should they remain within the tolerances. Random fluctuations in completed Migrations against the schedules are expected due to a number of issues including migrations that have failed due to data issues or other unexpected situations.

4.1.3 Reporting of Migration Issues

Migration issues that are likely to cause significant migration shortfalls shall be reported by Participants immediately such that the unused capacity can be re-allocated to other Suppliers.

4.1.4 Tolerances

Tolerances shall be defined against which Supplier migrations will trigger escalations to correct/ adjust the Suppliers migration status.

4.1.5 Escalation Processes and Consequences

The Migration Governance Framework shall set out how such escalations are treated when poor Supplier performance is identified.

The Migration Governance Framework shall set out the governance relating to different levels of poor performance.

4.1.6 Migration Governance Equitability

The Migration Governance Framework shall apply to all migrating parties regardless of their size.

The Migration Governance Framework will not distinguish between Suppliers that have been issued Submission Envelopes and deminimus Suppliers.

4.1.7 MCC Interventions

The Migration Governance Framework shall set out the interventions that the MCC will have to enact on migrating Party performance issues.

5 Governance Framework Approach

5.1 Process

The framework has the following '**TIER**' process:

- Track
- Inform
- Evaluate
- Rectify

5.2 Track (T)

The Migration Control Centre (MCC) is responsible for continuously tracking and analysing suppliers' migration performance against their submitted and approved migration plans.

The MCC will develop automated tools within the Migration Planning and Modelling Tool (MPMT) to flag discrepancies between planned and actual migrations. The tracking will be undertaken across all Migration participants and analysis of root cause will be undertaken where significant deviations are identified.

The MCC will track the number of initiated, failed and completed migrations. See

- MHHS-DEL2764--[07] Migration Data Requirements and Reports v1.0
- MHS-DEL2426-[01] Migration Framework Foundations v2.0

Objective: To continuously monitor and compare Suppliers' planned migrations against their actual migration submissions.

Steps:

- Daily monitoring of migration data submissions.
- Identification and reporting of any deviations from planned migrations.
- Aggregation, analysis and reporting of deviations over-time to identify patterns of deviations

The MCC will track Supplier Migration Performance and deviations from the plan as follows:

- Deviations from Supplier submitted daily migration plans compared to supplier actual daily submissions.
- Deviations against Migration Plans are tracked at both a Rolling Daily Cumulative Level and Daily Level:
  - Large Daily deviations that could cause immediate breach of LDSO and Supplier Migration Thresholds as set out in MHHS-DEL1648 - Migration Thresholds Document v1.0 or that could result in lost migration capacity.
  - Small Daily deviations may not cause significant impacts but the cumulative impacts could mean a Party may not achieve their Migration Plan.
- Deviations will consider pre-agreed migration tolerances before triggering the defined escalation process.

5.3 Inform (I)

Suppliers and Migration participants will be required / mandated to proactively report significant shortfalls in migration that could affect overall schedule adherence immediately to the MCC as soon as they become aware.

The MCC and MPMT shall triage reported incidents from Migration Participants and facilitate the reporting of such incidents and automatically escalate them based on predefined criteria.

Objective: For suppliers to proactively report expected deviations from their planned migrations, and reasons for actual deviations enabling adjustments and capacity reallocation for the current migration sprint.

- Suppliers submit immediate notifications to the MCC regarding any deviations, expected and actual.

-   Log reports

5.4 Evaluate (E)

The MCC expects fluctuations in a Suppliers' migrations against their baselined schedules. These may be due to factors such as portfolio churn, numbers of errors accumulated from previous submitted migrations.

- Evaluate against the defined tolerances for acceptable variances between scheduled and completed migrations.

- Variances falling outside these tolerances will trigger automated alerts within the MPMT, prompting further review for potential escalations.

- Upon triggering an escalation tolerance, the MCC shall conduct an initial review to understand the underlying causes, such as data issues or operational setbacks and use a deviation Tolerance Level as set out below. An intervention may be required if MCC deem this is appropriate

Objective: To assess the severity of deviations based on tracked data, and reported information, and to determine the appropriate level of escalation:

-   to evaluate deviations against predefined tolerances then assign a deviation severity;

-   to escalate significant deviations requiring more immediate action; and

-   to document and report evaluation and escalation events.

5.5 Rectify (R)

Objective: To implement measures based on the level of escalation, addressing the deviation to minimise potential loss of migration capacity and ensure fair and appropriate handling of non-compliance.

-   Development of a corrective action plan, including specific measures tailored to the nature and severity of the deviation.

-   Implementation of interventions and corrective actions, which shall include but will not be limited to:

    o   Identification of a correction window within which it is expected the Parties will aim to get back on track against the baselined plan;

    o   re-allocation of migration capacity to other migrating Parties within the LDSO MPID;

    o   modification of future migration plans to allow rectification of shortfalls;

    o   escalating to appropriate Programme and Regulatory Governance with details of deviation and impacts/risk cause to migration milestones.

-   Monitoring the effectiveness of corrective actions and making adjustments as necessary.

6 Governance Escalation Framework

6.1 Triggering an Escalation

The Governance Framework will set out three levels of daily or cumulative tolerances:

- Level 1 - Minor / ad-hoc deviations;

- Level 2 – Moderate deviations, recurring deviations; and

- Level 3 – Significant deviations, systematic deviations or recurring non-compliance.

Figure 1 - Daily or Cumulative Tolerance Levels

Deviation tolerance levels shall be assigned based on the scale and nature of the deviation.

6.2 Tolerance Breach Level 1

Detailed Description

Minor / ad-hoc deviations

- Random fluctuations where Level 2 and 3 tolerances not exceeded

    or

- Irregular/intermittent deviations / No identifiable adverse trend

Action

- Monitor and seek clarification from Supplier and other participants in the Supplier's migration where required.

6.3 Tolerance Breach Level 2

Detailed Description

Moderate deviations, recurring deviations:

- Level 2 tolerance exceeded. See Example in Appendix A.

    or

- Identifiable adverse trend

Action

- Requires enhanced additional commination / support to address underlying issues.

- Agreement of a Correction Window with the MCC.

- Capacity re-allocation (ceded capacity confirmed by Supplier).

- Report from Suppliers and other participants in the Supplier's migration on why deviations occurred

6.4   Tolerance Breach Level 2 – Worked Example

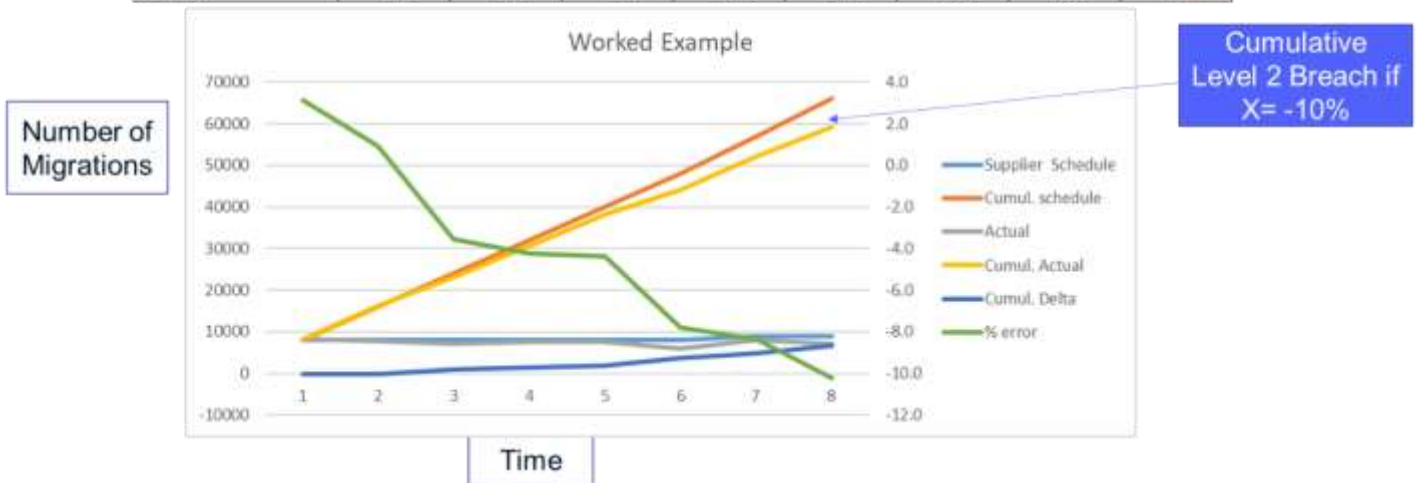| Day/ Week	1	2	3	4	5	6	7	8
Supplier Schedule	8000	8000	8000	8000	8000	8000	9000	9000
Cumul. schedule	8000	16000	24000	32000	40000	48000	57000	66000
Actual	8250	7900	7000	7500	7600	6000	8000	7000
Cumul. Actual	8250	16150	23150	30650	38250	44250	52250	59250
Cumul. Delta	-250	-150	850	1350	1750	3750	4750	6750
% error	3.1	0.9	-3.5	-4.2	-4.4	-7.8	-8.3	-10.2

Figure 2 - Level 2 Tolerance Breach - Worked Example:

6.5   Tolerance Breach Level 3

Detailed Description

Significant deviations, systematic deviations or recurring non-compliance

- Level 3 tolerances exceeded. See Example in Appendix A.

    and/or

- Regular breaches / Strong Identifiable adverse trend

Action

- Higher level escalation to delegated Authorities/ Programme governance / Parties outside the MCC.

- Additional communication / support to address underlying issues to indicate severity.

- Mandatory remediation plans, and increased oversight.

- Capacity re-allocation to other Suppliers may be sanctioned (ceded capacity taken from Supplier).

- Reduction in future Supplier Capacity Allocation

7 Tolerances

The Tolerances for escalations and the escalation routes will be set out in a later consultation.

8 Other Escalation Triggers

This covers escalation for non-compliance with the Migration Framework

The Governance Framework will also escalate Parties for other reasons not connected to deviations from the baselined Submissions. These include:

- Escalations for disengaged Suppliers or other disengaged migration participants
- Escalations for Parties not adhering to the Requirements, Principles and Processes in the Migration Framework
- Escalations for Suppliers that do not provide valid Supplier Submissions within the envelopes provided by MCC
- Escalations for failure by migration participants to report issues and incidents
- Escalations if data quality issues are not addressed

9 Incident Triaging and Classification

The following are the Incident Priority Classifications:

Rating	Incident Priority	Description
P0	External Disruption (Variable)	Incidents outside the standard classification due to their nature, such as natural disasters or geopolitical events.
P1	Critical	Severe incidents that cause complete service disruption to a large number of Live MHHS Migration activities or critically impact key related operations. Requires immediate, coordinated and comprehensive response efforts.
P2	High	Significantly impact the quality of Live MHHS Migration operations but do not completely halt the migration process. Requires action to prevent escalation to critical status.
P3	Moderate	Affect a limited aspect of the Live MHHS Migration activities, with moderate impact. Resolution can be planned while the overall Migration remains operational. Requires workarounds / tactical options to be deployed within reasonable timescales. More permanent fixes may be evaluated and deployed as required.
P4	Low	Minor issues that have minimal impact on the Live MHHS Migration activities. Can be resolved at the next maintenance opportunity or remain on the backlog for suitable opportunity to deploy based on value.

The incidents will be categorised as follows:

Category	Description
Operational Readiness	failures or delays in participant readiness
Compliance and Governance	non-compliance to governance or regulation
External Disruption	large-scale disruptions due to external events
Participant Performance	inadequate performance or non-engagement
MCC Performance	governance and coordination
Technical and System Capacity	technical failures or system capacity shortcomings

10 Governance Meetings and Reporting

Each Sprint will have regular MHHS Governance Meetings with Suppliers to review performance, discuss challenges, and agree on proactive steps including:

- Communication of Escalations.
- Communication of measures taken.

Details to be covered in a later consultation.

10.1 Governance and Escalation Feedback and Continuous Improvement:

The MCC will continuously refine the governance and escalation framework based on lessons learned and the evolving migration landscape, participant behaviour and migration metrics.

11 Appendix A

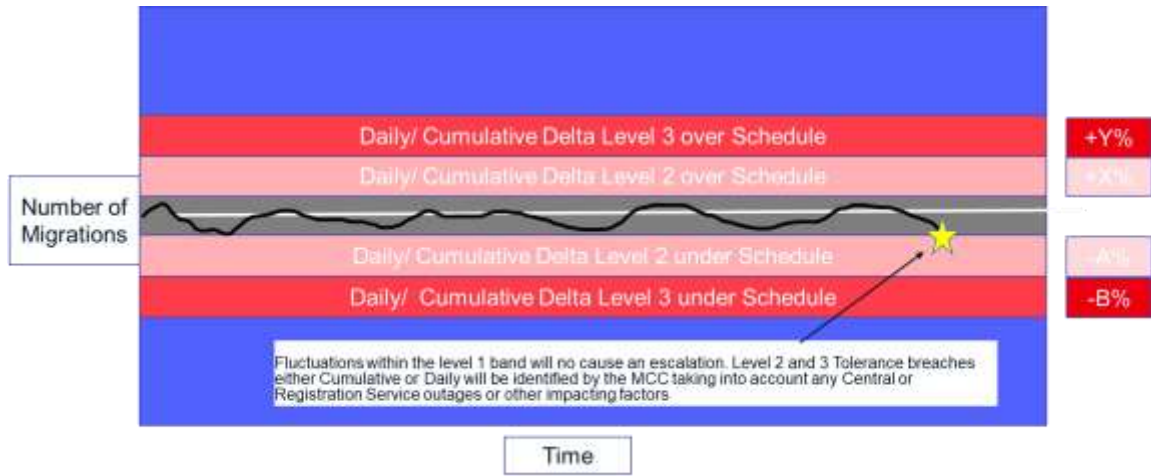## 11.1 Level 2 Tolerance Breach Example

Figure 3 - Level 2 Tolerance Breach Example

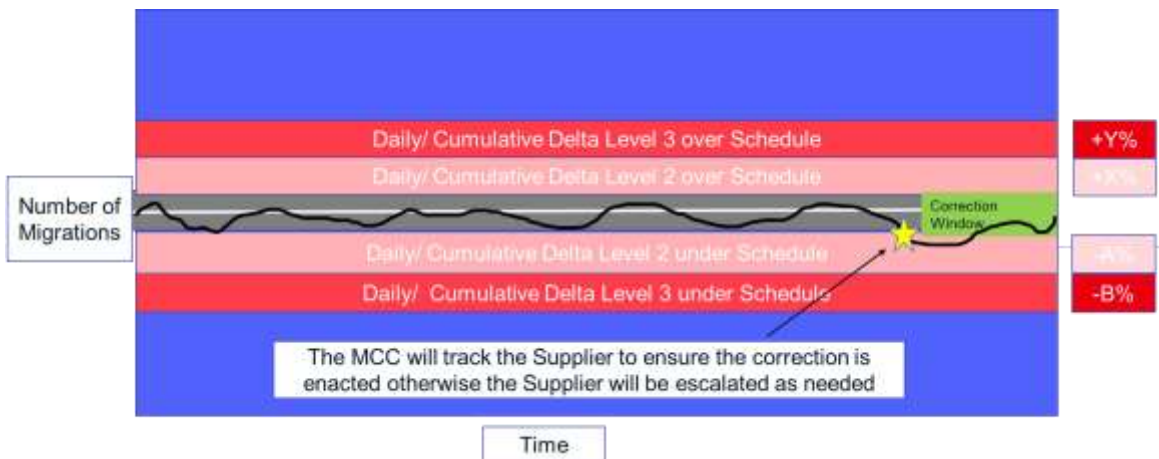## 11.2 Level 2 Tolerance Breach Example Correction Window

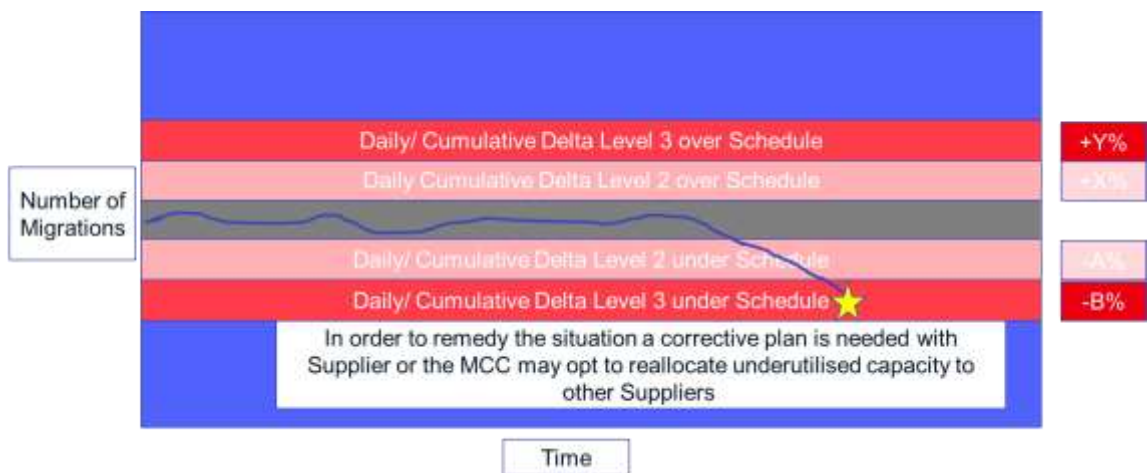*Figure 4 - Level 2 Tolerance Breach Example Correction Window*

11.3 Level 3 Tolerance Breach Example

Figure 5 - Level 3 Tolerance Breach Example