

MHHS Qualification – Participant Escalation Process

Date	November 2025	Classification	Public
Document owner	MHHS Qualification	Document version	V1.0

Participant Escalation Process

The MHHS Qualification team have developed the Participant Escalation Process to outline the process by which the MHHS Qualification team will escalate Participants that do not meet the deadlines outlined in the [Qualification Approach and Plan](#) (QA&P) Annex C.

The Participant Escalation Process has been developed to support the successful delivery of the Participant qualification workstream of the Market-wide Half-Hourly Settlement programme under direction from OFGEM.

The Participant Escalation Process will be utilised against specific MHHS Qualification Milestones. The Escalation process will cover four stages of escalation set against specific escalation triggers detailed within this process document.

Escalation Process in relation to Migration Pathways

Code Bodies and the Programme announced the creation of Migration Pathways to help those Non-SIT participants who complete QT before their Qualification Wave deadline to accelerate their Qualification activity, which in turn may support Suppliers to start Migration earlier. Code Bodies will support participants in achieving the associated deliverable deadlines in their requested Migration Pathway by providing clarity on and engaging with participants that miss upcoming deliverable deadlines. Where participants are unable to keep to their requested Migration Pathway deadlines, Code Bodies discuss this with the Programme and support participants in moving to a pathway that matches their progress and supports their accelerated qualification activity.

Code Bodies will not utilise the MHHS Qualification Participant Escalation Process, as outlined in this document, on participants that miss deliverable deadlines outlined in their Migration Pathway that are in advance of the Qualification Wave deliverable deadlines. Code Bodies will continue to operate the Participant Escalation Process in relation to a participants chosen Wave deliverable deadlines.

Requirement to complete MHHS Programme Milestones on time

OFGEM detailed the requirement for Participants to submit their MHHS Programme milestones on time and respond promptly to any feedback about the milestones that they receive from Code Bodies in the [Directions to Market-wide Half-Hourly Settlement Participants](#).

In [Appendix 1 section 8](#), OFGEM directed that each MHHS Participant must, in accordance with Good Industry Practice, to develop, keep up-to-date and comply with its own MHHS programme plan (consistent with the MHHS Implementation Timetable) for MHHS Implementation.

In [Appendix 1 section 11](#), OFGEM directed each MHHS Participant shall, on receipt of a request from an MHHS Affected Code Body, shall submit in a timely manner that part of its MHHS Participant plan that relates to MHHS Qualification.

In [Appendix 1 section 12](#), OFGEM directed where a MHHS Participant makes a material revision to its MHHS Participant Plan, the MHHS Participant shall promptly inform the MHHS Implementation Manager and where applicable MHHS Qualification. For the avoidance of doubt, a material change shall include any revisions to MHHS Participant Plans that may affect the delivery of a MHHS Programme Milestone.

In Appendix 1 section 13, OFGEM directed that each MHHS Participant must complete its MHHS-related activities on time and in line with the Programme's defined requirements, consistent with the delivery commitments made in its MHHS Participant Plan.

In Appendix 1 section 14, OFGEM directed that each MHHS Participant must comply fully with any reasonable request made of it by the MHHS Qualification Team in connection with MHHS Qualification. For the avoidance of doubt, a request shall be considered reasonable if, for example, the MHHS Qualification Team has reasonable grounds for believing that the relevant MHHS Participant poses a risk to the timely and robust delivery of MHHS.

In Appendix 1 section 16, OFGEM directed that each MHHS Participant must identify, allocate and deploy sufficient budget and appropriately skilled resources to promote timely delivery against its MHHS Participant Plan and against MHHS Programme milestones. Where a MHHS Participant contracts with service providers, each MHHS Participant shall be required to ensure that all their service providers are likewise sufficiently resourced.

In Appendix 1 section 18, OFGEM directed that each MHHS Participant must report on progress of delivery against its MHHS Participant Plan in line with any reasonable reporting requirements set out by the MHHS Qualification Team. Each MHHS Participant shall provide such reporting no later than the date and time that it has been requested to do so by the MHHS Qualification Team. For the avoidance of doubt, a request under this paragraph shall be considered reasonable if, for example, the MHHS Qualification Team has reasonable grounds for believing that the relevant MHHS Participant poses a risk to the timely and robust delivery of MHHS.

In Appendix 1 section 19, OFGEM directed that each MHHS Participant must promptly report any risks or issues that could cause delay in the progression and/or completion of any MHHS-related activity for which it is wholly or partly responsible where that delay could also cause a delay to one or more MHHS Programme milestones. All such MHHS Qualification risks and issues must be reported to the MHHS Qualification Team at the earliest opportunity so as to enable effective mitigating actions to be taken and to avoid any delays to the implementation of MHHS.

Escalation applicable MHHS Milestones

The MHHS Qualification Team will utilise the Participant Escalation process against the deliverables as outlined in the Qualification Approach and Plan, including but not limited to:

- Initial QAD submission
- PIT Checkpoint 1
- Final PIT Approach and Plan
- PIT RTTM (Including list of PIT Test Scenarios)
- QT Entry Checkpoint 1: Programme Participant to provide status of PIT Completion and submit their QT Test Plan
- QT Entry Checkpoint 2: Final date for Programme Participant to confirm and evidence PIT Completion Report for QT Entry
- DIP onboarding window for QT
- QT Execution Window
- Final QAD Submission
- QAD Sign-off deadline

Participants may be escalated for reasons other than the late submission of Qualification Documents, where these impact the Participants MHHS Qualification Process.

Escalation Process

Stage 1

Trigger

Stage 1 escalation will be triggered by a Missed Baselined Wave Deliverable Date, or concern raised regarding Participant Progress.

Code Body Action

Code Bodies will issue Notification of Stage 1 Escalation consistent with the example in the Appendix. The notification will be issued to Participant's Key Contacts, and where required Code Bodies may follow up with a phone call or require a meeting to discuss Participant Performance.

Participant Action

The Participant is required to submit the outstanding deliverable or produce a rectification plan within 5 Working Days of the Notification of Stage 1 Escalation. Where a Participant does not adhere to the requirement they will be escalated to Stage 2 of the Escalation Process.

Stage 2

Trigger

Stage 2 escalation will be triggered by a failure to submit the outstanding deliverable or produce a rectification plan within 5 Working Days of the Notification on Stage 1 Escalation.

Code Body Action

Code Bodies will issue Notification of Stage 2 Escalation consistent with the example in the Appendix. The notification will be issued to Participant's Key Contacts including Board Director contacts where available. Code Bodies will notify the Operational Support Manager, and Operational Account Manager, for the BSCCo and RECCo as required. Code Bodies will prioritise support for the Participant by initiating regular meetings to develop and monitor progress against the rectification plan.

Participant Action

The Participant is required to submit the outstanding deliverable or produce a rectification plan within 2 Working Days of the Notification. Where a Participant does not adhere to the requirement or misses rectification plan milestones they will be escalated to Stage 3 of the Escalation Process.

Stage 3

Trigger

Stage 3 escalation will be triggered by a failure to submit the outstanding deliverable or produce a rectification plan within 2 Working Days of the Notification on Stage 2 Escalation or misses rectification plan milestones.

Code Body Action

Code Bodies will issue Notification of Stage 3 Escalation consistent with the example in the Appendix. The notification will be issued to Participant's Key Contacts including Board Director contacts where available. Code Bodies will notify the Operational Support Manager, and Operational Account Manager, for the BSCCo and RECCo as required. Code Bodies will prioritise support for the Participant by initiating regular meetings to develop and monitor progress against the rectification plan. Additionally, a letter will be sent to the Programme to notify of the risk to the Participant's MHHS Qualification.

Participant Action

The Participant is required to submit the outstanding deliverable or produce a rectification plan within 2 Working Days of the Notification. Where a Participant does not adhere to the requirement or misses rectification plan milestones they will be escalated to Stage 4 of the Escalation Process.

Stage 4

Trigger

Stage 4 escalation will be triggered by a failure to submit the outstanding deliverable or produce a rectification plan within 2 Working Days of the Notification on Stage 3 Escalation or repeated inability to meet rectification plan milestones.

Code Body Action

Code Bodies will issue Notification of Stage 4 Escalation consistent with the example in the Appendix. The notification will be issued to Participant's Key Contacts including Board Director contacts where available. Code Bodies will notify the Operational Support Manager, and Operational Account Manager, for the BSCCo and RECCo as required. Code Bodies will prioritise support for the Participant by initiating regular meetings to develop and monitor progress against the rectification plan. Additionally, a letter will be sent to OFGEM to notify of the risk to the Participant's MHHS Qualification, and the Participant will be named at the Programme Steering Group (PSG)

Participant Action

The Participant is required to submit the outstanding deliverable or produce a rectification plan within 2 Working Days of the Notification. Where a Participant does not adhere to the requirement or misses rectification plan milestones they will be advised of the MHHS QA&P Annex 4 Process and advised of the enduring MHHS Qualification process.

Appendix

Stage 1 – Escalation Notification example

Good [Morning/Afternoon]

As per the Qualification Approach & Plan, as a Qualification Wave [X] Participant you were required to submit your [DELIVERABLE] on **[DATE]**.

Please submit [DELIVERABLE] or advise Code Bodies when they can expect to receive [DELIVERABLE] from your organisation by **COP [DATE] for Code Bodies to support you in meeting your expected MHHS Qualification timeframe.**

Please see the [Qualification Approach and Plan](#) Appendix C for the deadlines of the deliverables for the MHHSP Qualification.

Stage 2 – Escalation Notification example

Good [Morning/Afternoon]

Code Bodies are writing to inform you of the escalation they are undertaking in relation to the lack of progress [Participant] is making in its MHHS Qualification application.

Code Bodies have taken [Action] as [Participant] has not progressed its deliverables for its MHHS Qualification. Code Bodies can confirm that the deliverables have already been missed in relation to the Wave [X] deadlines i.e. [detail of specific deliverables deadlines missed and upcoming deadlines]. Please see [Qualification Approach and Plan \(QA&P\) – Appendix C](#) for the MHHS Qualification deliverable timetable. Code Bodies require [Participant] to complete their MHHS Qualification deliverables on or before the deadlines outlined.

Please note Ofgem's '[Directions to Market-wide Half-Hourly Settlement Participants](#)' dated **9 May 2025**, requires that Participants submit their MHHS Programme milestones on time and respond promptly to any feedback about them that they receive from their code bodies (page 6). To summarise most relevant requirements from Appendix 1:

- Keep up-to-date and comply with its own MHHS Participant Plan (clause 8),
- Provide its Qualification plan on request to Code Bodies (clause 11),
- Inform Code Bodies of material changes to the plan (clause 12),
- Comply with reasonable requests from Code Bodies, (clause 14),
- Complete activities on time and consistent with their plan (clause 13),
- Allocate and deploy sufficient budget and resource to promote timely delivery against its plan and ensure that any service providers it relies on are appropriately resourced (clause 16).

Please see your current status against Wave [X] deliverables in the table below. Please be aware that the 'Overdue' Status on the 'Approval' items outlined below may also include where Code Bodies have provided feedback to [Participant] but have not received a satisfactory response to the feedback.

Milestone	Due	Status
[List of Deliverables]	[Related Dates]	[Related Status]

In summary:

- [Detail the high level impact of Participant delays]
- Should [Participant] be unable to bring its progress in line with the MHHS Deliverable deadlines outlined above, Code Bodies will further escalate [Participant] performance with the MHHS Programme.

Code Bodies require:

- [Detail the high level expectations that Participant must meet]
- Deliver a rectification plan that outlines how [Participant] will become compliant with the MHHS Qualification process.

[IF THE PARTICIPANT IS A SUPPLIER]:

Where [Participant] is unable to complete its MHHS Qualification by M14, then [Participant] (Supplier) will be prevented from registering new MSIDs at M14 as per the Balancing and Settlement Code Section C 12.12.6 and defined in the process outlined in the [Qualification Approach & Plan Annex 4](#).

[IF THE PARTICIPANT IS A DATA SERVICE or MOA]:

Where [Participant] is unable to complete its MHHS Qualification by M14, then [Participant] (Data Service)/(MOA) will not be appointed to any MSIDs from M14.

Stage 3 – Escalation Notification example

Good [Morning/Afternoon]

Code Bodies are writing to inform you of the latest progress of the escalation they are undertaking in relation to the lack of progress [Participant] is making in its MHHS Qualification application.

Code Bodies can confirm that **[Participant] has not progressed against the plan to return to compliance with the MHHS Qualification Deliverable Deadlines** and there is a risk to your MHHS Qualification within allocated timescales and therefore we are escalating your case for additional support to the MHHS Programme.

Please note Ofgem's '[Directions to Market-wide Half-Hourly Settlement Participants](#)' dated **9 May 2025**, requires that Participants submit their MHHS Programme milestones on time and respond promptly to any feedback about them that they receive from their code bodies.

Please see your current status against Wave [X] deliverables in the table below. Please be aware that the 'Overdue' Status on the 'Approval' items outlined below may also include where Code Bodies have provided feedback to [Participant] but have not received a satisfactory response to the feedback.

Milestone	Due	Status
[List of Deliverables]	[Related Dates]	[Related Status]

Code Bodies will initiate the following actions:

- Escalate the lack of [Participant] Progress with a letter to MHHS Programme
- Notify OFGEM of the risk to your MHHS Qualification
- Follow up this notification with a meeting to discuss the outstanding issues and [Participants] rectification plan
- Implement regular catch ups with Code Bodies and The Programme to monitor the progress of the rectification plan

[IF THE PARTICIPANT IS A SUPPLIER]:

Where [Participant] is unable to complete its MHHS Qualification by M14, then [Participant] (Supplier) will be prevented from registering new MSIDs at M14 as per the Balancing and Settlement Code Section C 12.12.6 and defined in the process outlined in the [Qualification Approach & Plan Annex 4](#).

[IF THE PARTICIPANT IS A DATA SERVICE or MOA]:

Where [Participant] is unable to complete its MHHS Qualification by M14, then [Participant] (Data Service)/(MOA) will not be appointed to any MSIDs from M14.

Stage 4 – Escalation Notification example

Good [Morning/Afternoon]

Code Bodies are writing to you to raise concerns over [Participants] ability to complete its MHHS Qualification ahead of M14. Due to the risk to your MHHS Qualification within allocated timescales Code Bodies are escalating your case for additional support to OFGEM.

Where [Participant] is unable to progress their MHHS Qualification in the Transitional Qualification Wave process. The [Participant] will be required to complete their MHHS Qualification in the Enduring MHHS Process.

Please note Ofgem's '[Directions to Market-wide Half-Hourly Settlement Participants](#)' dated **9 May 2025**, requires that Participants submit their MHHS Programme milestones on time and respond promptly to any feedback about them that they receive from their Code Bodies.

Please see your current status against Wave [X] deliverables in the table below. Please be aware that the 'Overdue' Status on the 'Approval' items outlined below highlights where Code Bodies have provided feedback to [Participant] but have not received a satisfactory response to the feedback.

Milestone	Due	Status
[List of Deliverables]	[Related Dates]	[Related Status]

Code Bodies will initiate the following actions:

- Escalate the lack of [Participant] Progress with a letter to OFGEM
- Submit the rectification plan to OFGEM
- The Programme Steering Group (PSG) will name [Participant] in relation to this escalation
- Follow up this notification with a meeting to discuss the outstanding issues and [Participants] rectification plan
- Implement regular catch ups with Code Bodies and The Programme to monitor the progress of the rectification plan

- Provide OFGEM with regular updates to the progress of the rectification plan.

[IF THE PARTICIPANT IS A SUPPLIER]:

Where [Participant] is unable to complete its MHHS Qualification by M14, then [Participant] (Supplier) will be prevented from registering new MSIDs at M14 as per the Balancing and Settlement Code Section C 12.12.6 and defined in the process outlined in the [Qualification Approach & Plan Annex 4](#).

[IF THE PARTICIPANT IS A DATA SERVICE or MOA]:

Where [Participant] is unable to complete its MHHS Qualification by M14, then [Participant] (Data Service)/(MOA) will not be appointed to any MSIDs from M14.