

17 April 2025

Jenny Boothe,
Head of MHHS,
Ofgem,
10 South Colonnade
Canary Wharf
London
E14 4PU

Dear Jenny,

Governance Framework Consultation

Thank you for the opportunity to review and feedback on Ofgem's proposals to Change the MHHS Governance Framework.

The Programme is supportive of the textual changes that Ofgem proposes to make.

With regards to Ofgem being the decision maker for a Level 1 milestone change of any length, we are concerned that the robust Ofgem process for approval (CR55 took 3 months) could cause a delay where a small change is required close to the milestone date. We are supportive of Ofgem moving the decision level in from 3 months but feel anything less than 1 month will create traction on the Programme, unless Ofgem can agree delegated authority to the Sponsor without referral to higher levels within Ofgem so swift decisions can be made. Anything less than 1 month should be an SRO decision, with Ofgem retaining its right to intercede in any SRO decision if it has concerns.

We do not see the need to bring Tier 1 milestones which are not level 1 (M10, M12 & M13) into this remit. Any change to these dates will cause a consequential update to Level 1 milestones anyway requiring an Ofgem decision. This is why the CR55 decision was referred even though M10 is not a level 1 milestone.

If this change is implemented, then we believe paragraph 1.66 also needs amending where it talks about a delay of 3 months or more, so that it reflects the change above.

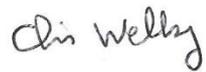
We note Ofgem's desire to set up an implementation group or similar but do not see a gap in the Governance that any such group would be closing. We are currently managing practical implementation issues via FTIG, GLIG and TORWG which are stage specific, the ability to stand up stage specific groups rather than one dominant Implementation group is working well, and this flexible approach is supported by Industry. It also has the additional benefit of engaging relevant parties directly rather than via constituency representatives which, in terms of achieving timely and successful implementation, is more effective. Any formal decisions that are required to be made by the SRO can be referred to PSG or a relevant Advisory Group (e.g. SITAG, MCAG or QAG). We will also be setting up an Issues Resolution Group (level 3) post M10 for ELS and possibly beyond. The

IRG will deal with material issues.

To this end, we will continue to set up stage specific working groups to manage implementation issues so that we can engage directly with relevant parties at the relevant stages.

If you require any additional information, then please feel free to get in touch with myself or programme colleagues.

Kind regards,

A handwritten signature in black ink that reads "Chris Welby". The signature is written in a cursive, slightly slanted style.

Chris Welby
MHHS Strategic Industry Advisor.
On behalf of the MHHS Senior Responsible Officer