

Overall comments

- We are supportive of Ofgem's proposal to modify the MHHS Governance Framework to make Ofgem the final decision-maker for any changes to Level 1/Tier 1 Programme milestones and change the thresholds on decision making for Level 1/Tier 1 milestones.
- Although a new Implementation Group is a useful consideration, we believe the current profile of working groups, advisory groups, governance forums and the recently implemented Go-Live-Implementation-Group (GLIG) provide sufficient coverage and oversight, based on the current risk profile. However, the effectiveness of these groups should be continually assessed, particularly in light of parallel activity through June and July within the MHHS Programme plan.

Proposal to modify the MHHS Governance Framework

- We are supportive of the proposal for Ofgem to be the final decision maker for changes to Tier 1 and Level 1 milestones, irrespective of the timeframe.
- We recommend that consideration is given as to *how* Ofgem will make Tier 1 or Level 1 milestone movement decisions such as the inputs required of the Programme (e.g. Elexon as SRO and LDP, and IPA) and through which means or forum these decisions will be recorded. This could be achieved through creating and communicating an efficient change request process that provides the means to request a change to Ofgem and provide the supporting information to support Ofgem in making an informed decision. As with existing Governance arrangements, IPA will continue to provide independent input into Programme decision making.
- We recommend that Ofgem consider how approvals could be expedited in the face of an emergency which requires movement of a Programme Level 1 milestone at speed and/or retrospective approval of a movement due to emergency circumstances.

Consideration for a new Implementation Group

The consultation (section 2.3) asks the MHHS Implementation Manager to *consider* a version of an Implementation Group which would provide a platform for all parties to consider risks arising from Programme implementation and related technical issues.

- We are in agreement that at the current proximity to go-live, this is an important consideration to ensure the necessary oversight. However, we believe the current structure of governance meetings and working groups across the MHHS Programme is sufficient, based on the current risk profile of the Programme.
- The Go-Live Implementation Group (GLIG) has been recently set up as an overarching, industry-wide MHHS group which provides opportunity to raise and course correct any risks in the lead up to M10. We attend both the SIT and M10 alternating agendas of GLIG and are supportive of the way it is currently operating.
- The GLIG is also an addition to the existing suite of working groups and advisory groups attended by Participants. Based on our attendance, we are also supportive of the way these meetings operate and the opportunity it provides participants to raise concerns. These groups also operate as a key communication mechanism for the Programme, at a more detailed and phase specific level.
- As opposed to the creation of a new forum, we would recommend that both Ofgem and the MHHS Central Programme team consider the frequency of existing forums, such as the GLIG SIT and M10 agendas (which currently alternate on a weekly basis and therefore each agenda is tabled every two weeks).
 - Given parallel activity in the MHHS Programme plan in June and July, and the proximity

to M10, it may be worthwhile considering whether a weekly SIT GLIG and weekly M10 GLIG during this period would be of use and practical for both the Programme team and Participants.

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