

ELEXON

24 March 2025

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

Dear Jenny,

Re: Consultation on Proposed Directions to MHHS Participants

Summary of Elexon response

Thank you for consulting on the proposed directions to MHHS Participants and for providing the opportunity to review and provide comments and feedback on these proposals.

This response covers Elexon's feedback as a programme participant and code body within the MHHS Programme, including the delivery of the Helix programme.

The Elexon team has reviewed the proposals, and we have provided our response across the following areas:

1. Elexon general feedback
2. Feedback on proposed directions

1. Elexon general feedback:

- Elexon welcomes the opportunity to provide additional delivery confidence via the directions outlined in the consultation, with the overarching aim of de-risking the programme. We are fully committed to meeting all MHHS milestones, including Milestone 10 (M10).
- It is imperative for all parties to deliver MHHS successfully and Elexon is fully committed to this outcome and any additional measures that will support successful delivery.
- We will work closely with the MHHS Programme team and the IPA to ensure that the purpose of additional measures can be met as effectively as possible, and that reporting formats are agreed and aligned.
- We believe it is important to set the correct balance between reporting, assurance and delivery to enable efficient decision making and avoid creating excessive overheads that may impact delivery focus and

execution.

2. Feedback on proposed directions:

The Elexon team has reviewed the proposed directions, and we have provided specific feedback and suggestions on these where we believe we can add value, which are listed below:

Section	Elexon feedback
2.19	<p>The MHHS consultation on ELS is still open for review and Cross Service Desk processes are being agreed with service Participants before consultation with wider industry. Embedding an agreed approach to the ELS requirements and for end-to-end Business Continuity and Disaster Recovery requirements (including Cross Service Desk processes) that have been through consultation with industry the requirements of ELS into the Service Operations Manual within 1 week of the date of this direction does not appear to allow time for industry consultation and acceptance.</p> <p>We would suggest conclusion of this task to be end of May 2025.</p>
2.19	<p>Consultation for an effective and efficient Supplier of Last Resort (SoLR) process is unlikely to be concluded by the end of June. Elexon has been working with REC Code Manager, Ofgem, DIP Manager, MHHS Qualification and MHHS Migration on a Business Process Map for the transitional SoLR process. The agreed outcome of meeting held with Ofgem on 14th March was that several workshops between these parties needed to be set up to align and ensure timings and approach are understood and agreed.</p> <p>Areas to agree include:</p> <ul style="list-style-type: none">• How/when to issue a consultation to Industry.• Testing of the SoLR processes.• Timings agreed for key steps of the process/SLAs.• If only specific groups within each team have access to the SoLR information or if we require NDA's.• Valid scenarios that a SoLR can be applied to. <p>Based on the upcoming Easter break, and Ofgem advising some of their resource will be unavailable for 3 weeks in June, we would suggest a target date of 31st July.</p>
Appendix 1.10	<p>The Qualification Approach and Plan sets out several checkpoints whereby participants going through the Qualification Waves must submit their PIT Plan and Qualification Test Plan to the "Code Bodies". We would suggest continuing to track Participants via these milestones</p>

	rather than an additional plan submission date for all Participants. We would request that any plans and communications from MHHS Qualification Participants are directed to the "Code Bodies" rather than Balancing and Settlement Code (BSC) Performance Assurance Board (PAB).
Appendix 1.11	We would like to request this also includes "In line with their delivery commitment deadlines in Qualification Approach & Plan for their allocated wave where applicable".
Appendix 1.15	We would like to request that this is updated to reflect requirements set out by the "Code Bodies" rather than BSC PAB.
Appendix 1.16	We would like to request this is updated to reflect risks and issues being reported to "Code Bodies" rather than BSC PAB.
Appendix 1.21	We would like to request that this specifies all SIT Participants required for M10 as well as meeting all Programme and "Code Bodies" requirements. While "Code Bodies" will support participants through Qualification as efficiently as possible, priority must be given to those participants required to meet M10 entry criteria.

Yours sincerely,



Victoria Moxham

Director of Customer and Code Management
Elexon