



**MHHS
PROGRAMME**
Industry-led, Elexon facilitated

CR055 Impact Assessment Response Guide

Version 1.0

MHHS-DEL3100

Document Classification: Public

Purpose of this deck

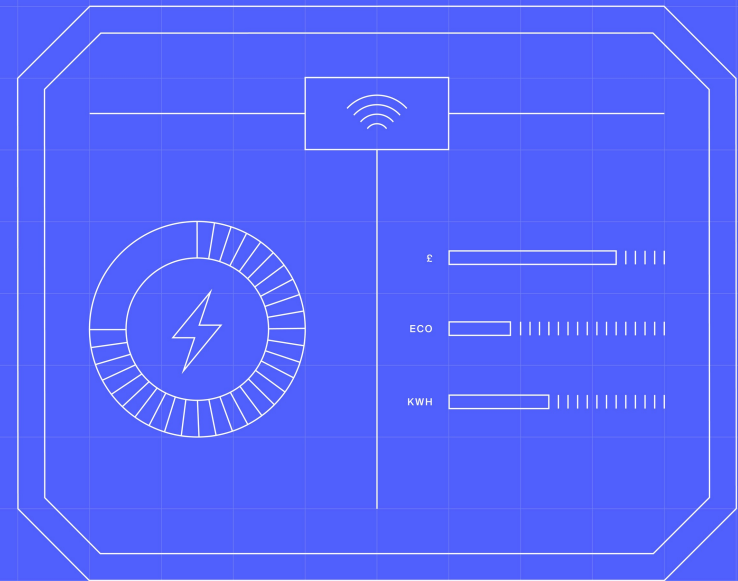
The purpose of this deck is to provide Participants with guidance on how to respond to the Programme Change Request, CR055.

Given the nature of CR055, and it requiring Ofgem approval, the Programme endeavours to support Participants in providing the correct level of detail, evidence, and information in their Impact Assessment response. All Impact Assessments will be reviewed in full by Ofgem in making their decision, therefore quantitative responses are essential for CR055 to build the evidence base to Ofgem.

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CR055 Overview



CR055 Overview

Amendments to M10 and corresponding milestones

Issue Statement:

- SIT is progressing more slowly than the execution models for all SIT Participants, with the implications of this on the downstream activities and M10 milestones meaning that the testing schedule needs to be adjusted to achieve Programme outcomes.
- Several measures have been taken by the Programme and SIT participants to maintain the existing plan outlined in CR022; however, these have not sufficiently increased testing velocity across SIT Functional, Migration and Settlement phases to maintain the M10 date of 07/03/2025.
- At PSG (07/08/2024), a short-term plan was developed where two additional sprints, totalling 5 weeks, were added to the SIT Cycle 3. This is to allow for more testing time but has pushed back the start of Non-Functional Testing and Non-SIT LDSO Qualification Testing.

Description of Change:

- The Change proposed by the Programme is to extend the duration of SIT, which will result in a change to milestone **M10, to 13/08/2025**. Subsequent changes will follow for the **M11 - M16** dates following the same logic as the timing in the existing plan. If the CR is approved, the updates will be applied to the Programme plan appropriately and timelines will move to match the update.
- Dates proposed:

	Current	Proposed
M8	07/03/2025	13/08/2025
M10	07/03/2025	13/08/2025
M11	04/04/2025	10/09/2025
M12	04/04/2025	10/09/2025
M13	07/03/2025	13/08/2025
M14	16/03/2026	07/09/2026
M15	05/10/2026	15/03/2027
M16	07/12/2026	14/05/2027

Target Date of Change and Next Steps:

- The target implementation date for this Change will be dependent on the timing of the Ofgem decision, however the Programme will recommend to PSG that the proposed plan is adopted in the interim as our working Programme plan.
- If approved, the changes will be applied to the Programme Plan and corresponding artefacts (milestone register and implementation approach) appropriately and timelines will move to match.

Change Request Form

Change Request details

Change Request details	
Change Request Title	Amendments to M10 and corresponding milestones
Change Request Number	CR055
Originating Advisory / Working Group	PSG
Risk/Issue reference	
Change Raiser	Lewis Hall, MHHS Programme
Date raised:	17 Sep 2024

For further guidance on how to complete this document please see the supporting Change Request Form Guidance for Programme Participants. The guidance will support raising a change and responding to a change request via Impact Assessment. The Change Raiser should consider sharing the draft Change Request Form with impacted programme parties, prior to submission to PMO. The guidance, as well as other key documents are referenced below and can be found via the MHHS website.

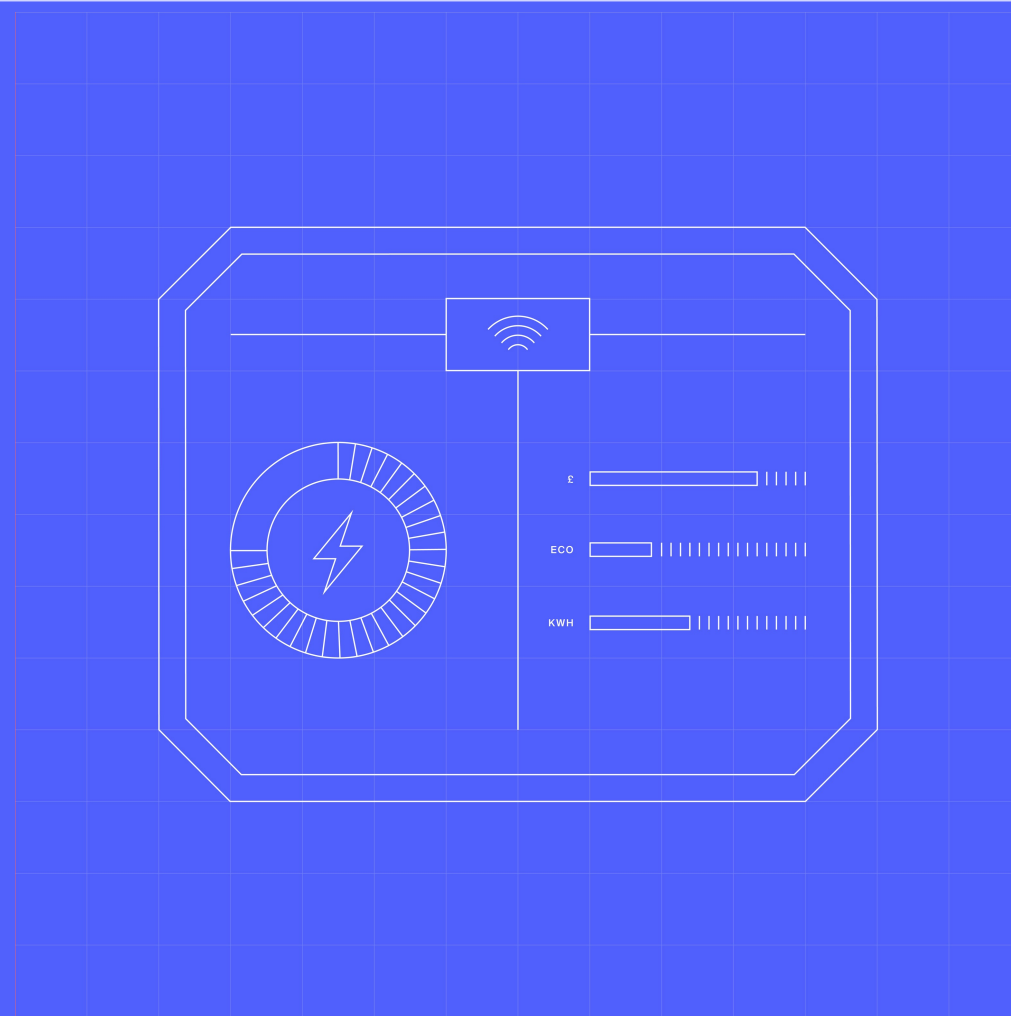
Change Request to be read in conjunction with:	
Title	Reference
MHHS-DEL3198 CR055 Impact Assessment Supporting Document v1.0	(Links to documentation will be available once issued to impact assessment)
MHHS Outline Plan v6.0 (MSP and excel)	(Links to documentation will be available once issued to impact assessment)
MHHS Milestone Register v6.0	(Links to documentation will be available once issued to impact assessment)
M10 Re-calibration Overview v1.0	(Links to documentation will be available once issued to impact assessment)
MHHS Change Request Form Guidance for Programme Participants	(Links to documentation will be available once issued to impact assessment)
MHHS Change Control Approach	(Links to documentation will be available once issued to impact assessment)
MHHS Governance Framework	(Links to documentation will be available once issued to impact assessment)
Ofgem's MHHS Transition Timetable	(Links to documentation will be available once issued to impact assessment)

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MHHS-DEL3006 CR055 Draft

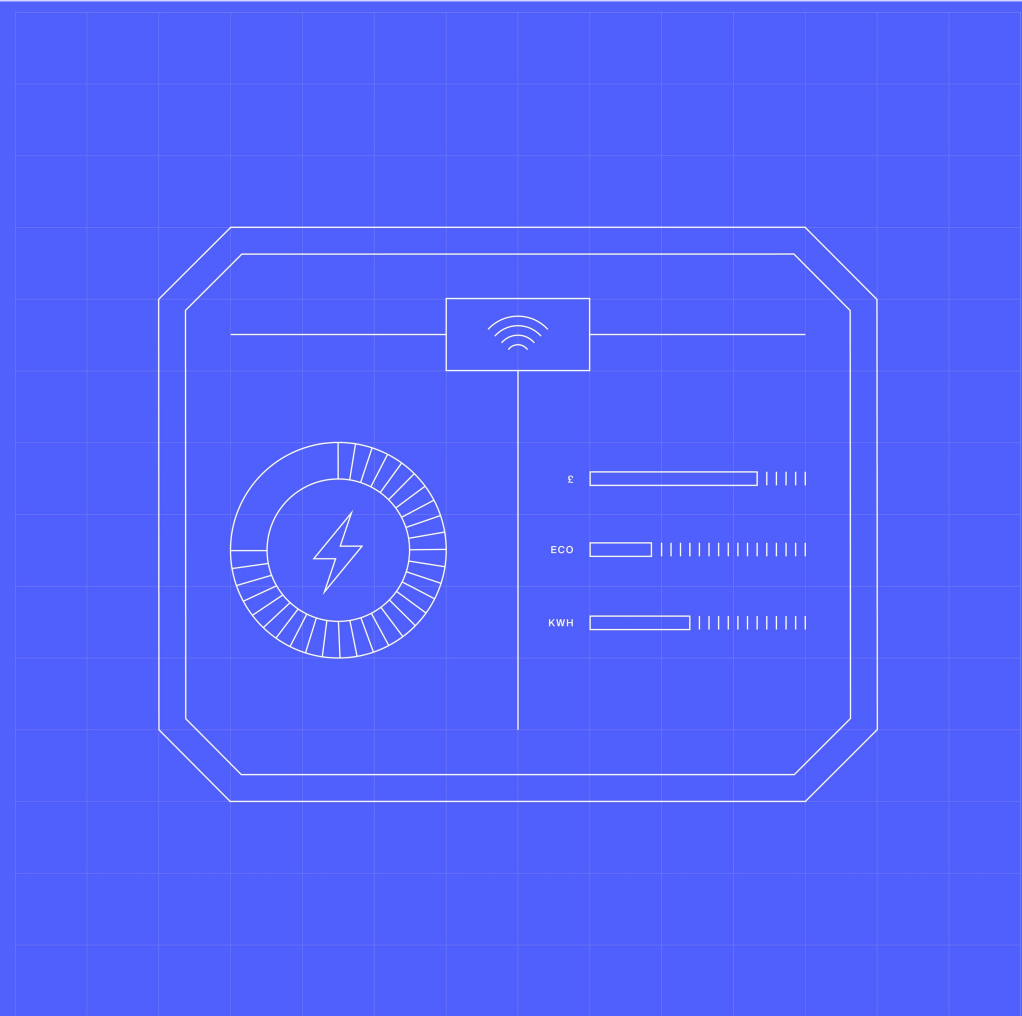
Guiding Principles for IA Submission



Guiding Principles

#	Guiding Principles
1	All responses to each question within the Change Request form must be evidence-based, specific, and have underlying justification and rationale (as defined within this document).
2	Quantified costs are an essential part of the CR Impact Assessment submission, as per Ofgem's request.
3	If responding 'Disagree' to the Change Request, please provide alternative options, or recommended improvements to the Change Request that would enable your endorsement.
4	Please refer to the planning assumptions made by the Programme and captured in the supporting documentation when responding to the Change Request.
5	Please quantify the impacts captured in your assessment. e.g., <i>use GBP (£) to provide a view of costs, X number of service providers impacted, Y FTE to be extended on the Programme</i>
6	Please be clear in your rationale and reasoning when articulating whether you agree, disagree or abstain from making an assessment in each individual section.
7	If you say you agree with the overall Change Request (in Section C.2), the Programme and Ofgem will take this as your organisation's endorsement of the Change.
8	All Impact Assessment responses will be made public on the Collaboration Base, with any specific portions explicitly marked as confidential being redacted before uploading and noting all cost information will be redacted prior to upload.
9	Ofgem have requested to see all the Impact Assessment responses, so all responses will be shared with Ofgem unredacted by the Programme upon providing a PSG recommendation.

Guidance for IA sections C.1



Guide to answering Section C.1 – Effect on Benefits

Statement: The Change would result in a delay in the delivery of benefits due to the delay of Go Live. However, this delay will allow for the robust testing required to take place to achieve Programme outcomes and not compromise benefits through operational issues.

Respondents should either Agree, Disagree or Abstain from responding to the statement that the solution quality resulting from robust testing are necessary for delivering Programme outcomes and outweighs the impact of a delay to Go Live.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state that the delay to industry benefits identified is accurate and that these delays are necessary for achieving Programme outcomes and outweigh the impact of the delay to Go Live.*

*If the respondent **disagrees** with this statement, they should state that there are further effects to industry benefits or that the identified delay to the delivery of industry benefits is incorrect and suggest effects to benefits XYZ that have not been accounted for or improperly assessed or that the identified benefits of the proposed delay are not necessary/do not outweigh the impact to the Go Live. It is suggested that XYZ is considered to better address this.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no impact to industry benefits as an impact of this proposed change.*

Guide to answering Section C.1 – Effect on Consumers

Statement: Consumers would be negatively impacted by the delay in delivering consumer benefits due to the delay of M10 and M11. However, this delay will allow for the robust testing required to achieve Programme outcomes and not compromise consumer benefits through operational issues.

Respondent should either Agree, Disagree or Abstain from responding to the statement that the solution quality resulting from robust testing are necessary to achieve Programme outcomes and outweigh the impact of a delay in realising consumer benefits.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state that the delay to consumer benefits identified is accurate, and that these delays are necessary and outweigh the impact of the the delay to Go Live.*

*If the respondent **disagrees** with this statement, they should state that there are further effects to consumer benefits or that the identified delay to delivery of consumer benefits is incorrect and suggest effects to benefits XYZ that have not been accounted for or improperly assessed, or that the identified benefits of the proposed delay are not necessary/do not outweigh the impact to the Go Live. It is suggested that XYZ is considered to better address this.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no impact to consumer benefits as an impact of this proposed change.*

Guide to answering Section C.1 – Effect on Schedule

Statement: The delivery schedule will be extended as outlined in the Change Request and supporting material. This extended timeline is based on detailed execution modelling and planning assumptions that balance delivery, risk and the need to deliver Programme outcomes with a realistic and industry endorsed timeline.

Respondent should either Agree, Disagree or Abstain with the statement that extension of M10, and subsequent milestones, is sufficient to deliver robust testing balancing quality, risk and the need to deliver Programme outcomes.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state that the assumption that the proposed change to the Programme delivery schedule is sufficient, and balances delivery, risk and the need to deliver Programme outcomes.*

*If the respondent **disagrees** with this statement, they should state that there are further impacts to the delivery schedule or that the identified delay to the delivery schedule is insufficient/unrealistic and suggest impact of XYZ to the Programme schedule that has not been accounted for or improperly assessed. It is suggested that XYZ is considered to better address this.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no impact to the delivery schedule as an impact of this proposed change.*

Guide to answering Section C.1 – Effect on Costs

Statement: The Programme recognises that an extension to the timeline will have cost implications for the central Programme, industry Participants and their contracted Service Providers, with the expectation of costs increasing as a result of the delay. The Programme acknowledges that the extent of the cost impact will differ by industry participant and the phase of testing they are in. However, this additional cost that would be incurred is necessary to achieve Programme outcomes and mitigate the cost of operational issues with untested systems.

Respondent should either Agree, Disagree or Abstain from responding to the statement that the solution quality resulting from robust testing and achieving Programme outcomes are necessary and outweigh the impact on cost.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state the assumption that the proposed change is necessary and will cause an X cost increase/decrease due to the extension of the Programme timelines.*

*If the respondent **disagrees** with this statement, they should state that the assumption that the proposed change will cause X increase/decrease in cost due to the extension of the Programme timelines, which is too impactful to be viable. It is suggested that XYZ is considered to better address this.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no impact on cost as an impact of this proposed change.*

Please provide cost impacts quantified in GBP (£) as part of your response.

Guide to answering Section C.1 – Effect on Resources

Statement: The Programme and Programme Participants will need to make plans to retain resources for longer than initially forecast to support the extension of M10 and subsequent milestones. This will have commercial implications for Participants; however, it is deemed necessary to ensure robust testing takes place prior to migration to deliver Programme outcomes and mitigate the resourcing to resolve operational issues with untested systems.

Respondent should either Agree, Disagree or Abstain with the statement that the additional resourcing implications that are required for supporting M10 and subsequent milestones amendments are necessary in order to deliver Programme outcomes.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state that the assumption that the proposed change will require Programme resources for X more time than initially forecast, which will have commercial impact Y, however this change to resourcing is necessary in order to deliver robust testing and realistic Go Live timelines.*

*If the respondent **disagrees** with this statement, they should state that there are further impacts to resources of X, which will have commercial implications YZ. This outweighs the need to deliver robust testing and the proposed Go Live timeline, with the proposed change needing further review to address these concerns. It is suggested XYZ is considered to address this.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no impact to the Programme resources as an impact of this proposed change.*

Please provide specific FTE changes/extensions (e.g. Increasing the Test team from 4 FTE to 7 FTE)

Guide to answering Section C.1 – Effect on Contract

Statement: The Programme recognises that an extension to the timeline is likely to have contractual implications for Industry Participants and their Service Providers. The Programme assumes this will not constrain Participants' ability to deliver MHHS within the timelines specified, but any impact should be highlighted by Participants in their Impact Assessment of this Change Request.

Respondent should either Agree, Disagree or Abstain with the statement that any change to contracts that are required to support the Change Request will not inhibit ability to meet Programme outcomes.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state that the assumption that the proposed change will have X impact to the contract, which is necessary to support Programme outcomes.*

*If the respondent **disagrees** with this statement, they should state that the contract implications XYZ are great enough to outweigh the need for robust testing and delivering a realistic Go Live timeline and that the proposed change requires further review to address these implications. It is suggested that XYZ is considered to better address this.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no impact to the Programme contract as an impact of this proposed change.*

Guide to answering Section C.1 – Risk

Statement: The Programme has taken a risk-based approach to the modelling of SIT and the resulting M10 milestone and subsequent milestone dates. A number of assumptions, risks and dependencies are outlined in the 'Planning Dialogue' supporting document. The Programme believes the level of risk is proportionate and reflected in the proposed timelines.

Respondents should either Agree, Disagree or Abstain with the statement that the level of risk is proportionate and manageable within the timelines outlined. Please document any additional RAID items you think the Programme has not captured.

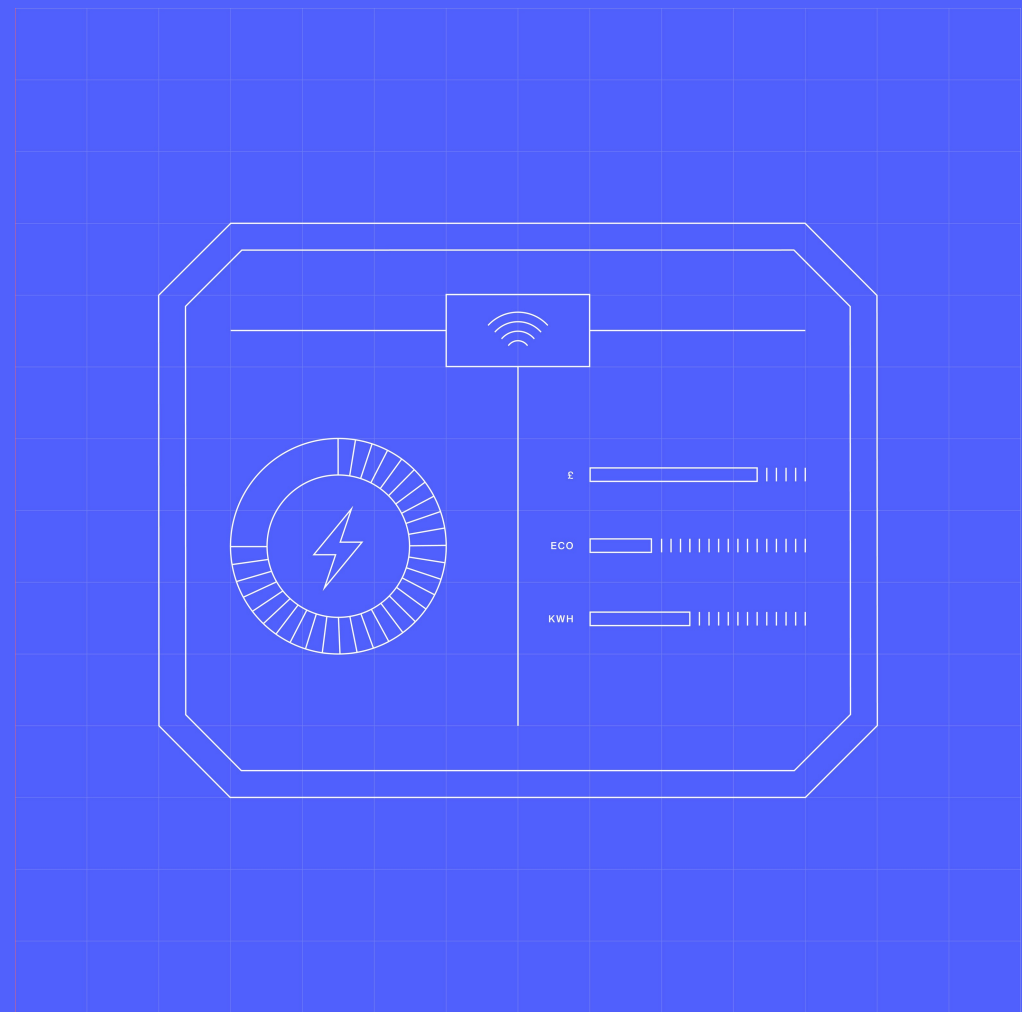
The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

*If the respondent **agrees** with this statement, they should state that the risks identified are accurate, that the anticipated risks are understood and that these additional risks are necessary to support robust testing and deliver a realistic Go Live timeline.*

*If the respondent **disagrees** with this statement, they should state that the risks identified are inaccurate/incomplete and suggest risks XYZ that have not been accounted for or improperly assessed, and therefore the associated risks outweigh the benefit of supporting robust testing and delivering a realistic Go Live timeline. Therefore, XYZ alternative should be considered to make the proposed change viable.*

*If the respondent **abstains** from responding to this statement, they should highlight that there is no additional risk impact to them from this proposed change.*

Guidance for IA sections C.2



Guide to answering Section C.2 – Impact Assessment Recommendation

Statement: It is recommended by the Change Raiser that CR055 be approved.

Respondent should either Agree, Disagree or Abstain with the recommendation that changes to M10 and the subsequent Milestones (M11 – M16) should be approved.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained with the recommendation, for example:

*'We **agree** with the recommendation for CR055 and the proposed timeline changes. We believe these changes will have X (cost, timeline, resource, etc.) impact on us; however, we recognise that the overall timelines are the most likely / realistic, with logic staying the same. Our modelling for SIT does not exactly align, however, we agree with assumptions to the planning and anticipate an X increase in our testing progress.'*

*'We **disagree** with the recommendation for CR055 and the proposed timeline changes. We believe these changes will have X (cost, timeline, resource, etc.) impact on us, which are unattainable. Based on our modelling evidence, we believe SIT MVC will finish on X. We therefore recommend that the milestone changes are reduced/increased by X. We suggest that the new date for M10 should be Y, and dependency logic for milestones remains the same.'*

*'We **abstain** from responding to the recommendation for CR055 and the proposed timeline changes. We believe these changes will have no implication to us, and therefore it would not be appropriate for us to vote on the matter. However, we have elected to review and abstain from this Impact Assessment to log our assessment of this CR and its impacts.'*

Guide to answering Section C.2 – Change Freeze

Statement: The Programme baseline dates are not going to be achieved without a change to the Programme plan, therefore this Change Request is necessary to achieve M10 and all following T1 milestones. A re-calibration to allow for more appropriate, realistic and accurate timelines needs to occur to allow for Programme wide effective tracking and management of plans. The Change Request gives all Participants greater clarity on realistic timelines for achieving the outcomes of the MHHS Programme.

Respondent should either Agree, Disagree or Abstain with the statement that M10 and subsequent milestone amendments meet the change freeze criteria.

The respondent should then add supporting detail as to why they have Agreed, Disagreed or Abstained.

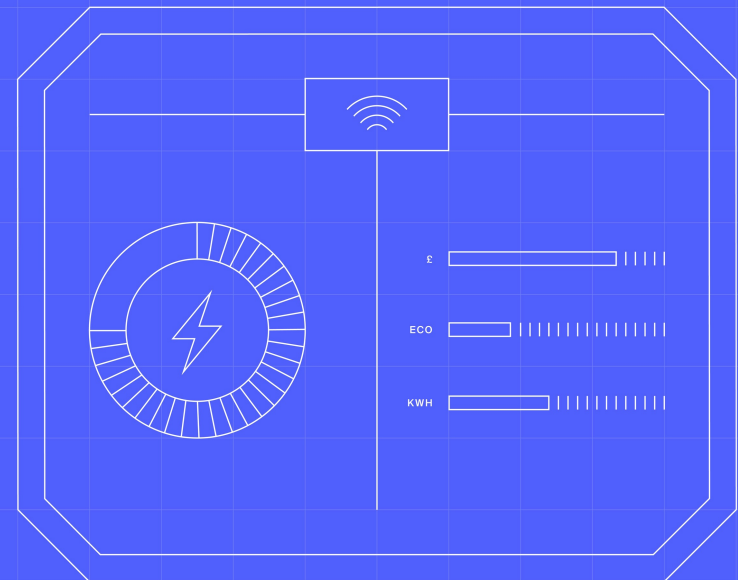
*If the respondent **agrees** with this statement, they should state that the Proposed change does meet the Change Freeze Criteria for M10/M15.*

*If the respondent **disagrees** with this statement, they should state that the Proposed change does not meet the Change Freeze Criteria for reasons XYZ. To address this, XYZ is suggested as an alternative.*

*If the respondent **abstains** from responding to this statement, they should identify why the Change Freeze Criteria does not apply to the proposed change.*

The Change Freeze criteria state that a Change must be critical to M10 or fix a defect in the design. Design changes are only accepted if without which the system would not work. “Nice to haves” will go into the backlog. Only P1 and P2 defects are facilitated post M9 pre M10. P3 and P4 defects are going into the backlog.

Appendix



CR Process Summary

Change Request process:

After a Change Request is submitted, it is assessed by the Change Board (CB) who review the request decide if the change should progress to Impact Assessment. If a CR is approved for Impact Assessment, a webinar covering the details of the change is organised for all Programme Participants. After the webinar, the CR is sent for Impact Assessment amongst the Programme constituents, to assess if the constituents agree, disagree or abstain for the proposed change, and detail what impact implementing this change would have to them. Once the Impact Assessments are received, the Change Board review the responses and assess if the change is necessary. If the CB agrees, they recommend the change for approval at PSG.

However, for T1 milestone changes of more than 3 months, the PSG must escalate the CR to Programme Sponsor Ofgem for Approval. Given the nature of the change in CR055, it is the case and therefore the MHHS PSG will recommend CR055 for approval or rejection to Ofgem following CB recommendation.

*All Impact Assessment responses will be considered public and non-confidential unless otherwise marked. If there are any specific elements of the response (e.g. costs) that are confidential, please **mark the specific sections as confidential** rather than the response as a whole. The MHHS Programme will publish all Impact Assessment responses and redact any confidential information as noted.*

Guidance – Programme Participants are required to:

- A. **Respond with ‘Agree’, ‘Disagree’ or ‘Abstain’, deleting as appropriate. If the respondent agrees, they can provide additional evidence to further support the assessment. If the respondent disagrees or abstains, they should provide a detailed rationale as to why.**
- B. **Add any additional effects that have not already been identified. In doing so, they should provide as much detail as possible to allow a robust assessment to be made.**
- C. **Indicate whether the change would have a minor, medium or significant impact on their activities, referring to slide 16 of *MHHS-DEL171 Change Control Approach* to assess each criterion, using N/A to indicate no impact.**
- D. **Proceed to Part C.2 for Impact Assessment Recommendation response once completed.**

Change Request assessment scoring

The Programme is being more explicit in their guidance for qualitative evidence for CR055, but this is the generic guidance in the Change Control procedure.

When assessing the impact for each assessment criteria in the Impact Assessment, use this guide to determine whether the proposed change has minor, medium or significant impact to the Programme.

All criteria will be summed up in the impact assessment report, and an overall change rating will be derived. The overall rating will help to determine whether the change should be accepted, rejected, or escalated.

Impact Scoring	Assessment Criteria						
	Benefits	Consumers	Schedule	Costs	Resources	Contract	Overall
1. Minor impact	Delay to Programme benefits by less than a month or no delay. All benefits still realised.	Delay to delivering consumer benefits by less than a month or no delay. All benefits still realised.	No milestones moved or minor movement to a small number of T3 milestones.	Implementing the change will incur a cost of <£50k.	No additional resource required, or resource requirements can be absorbed.	No impact on contracts.	Overall, implementing the change will have a negligible impact on Programme activities.
2. Medium impact	Delay to realisation of Programme benefits by 1-3 months, or benefits realised reduced marginally.	Delay to delivering consumer benefits by 1-3 months, or consumer benefits reduced marginally.	The change will move a T2 milestone or more than five T3 milestone.	Implementing the change will incur a cost of £50-250k.	10-40 additional working days of resource required.	Manageable impact on contracts.	Overall, implementing the change will have a medium impact on Programme activities.
3. Significant impact	Delay to realisation of Programme benefits by more than 3 months, or benefits realised reduced significantly.	Delay to delivering consumer benefits by more than 3 months, or consumer benefits reduced significantly.	The change will delay a T1 milestone.	Implementing the change will incur a cost of >£250k.	More than 40 additional working days of resource required.	New contractual arrangements required which will cause a delay.	Overall, implementing the change will have a significant impact on Programme activities.