Change Request Form

Change Request details

Change Request details			
Change Request Title	Migration Framework Changes to Clarify and Enhance Controls for the Final Stages of MHHS Migration		
Change Request Number	*CR068*		
Originating Advisory / Working Group	*Migration Working Group (MWG)*		
Risk/issue reference			
Change Raiser	*The MHHS SRO*	Date raised:	*13/11/2026*

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:
MHHS Change Request Form Guidance for Programme Participants
MHHS Change Control Approach
MHHS Governance Framework
Ofgem's MHHS Transition Timetable

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Part A – Description of proposed change

Guidance – ***This section should be completed by the Change Raiser when raising the Change Request.***

Part A – Description of proposed change
Issue statement: *(the issue that needs to be resolved by the change)* As the MHHS Programme approaches the end of the 18 month migration window at milestone M15, additional clarity and controls are required to support the completion of migration. This includes strengthening arrangements for the final migration sprints, clarifying the process for granting SRO Exemptions and administering Customer Acquisition Bans and aligning the Migration Framework with CR067 and the proposed M15a and M15b milestones. Existing arrangements require further clarification and alignment to ensure that responsibilities for administering the Customer Acquisition Ban are explicit, the SRO Exemption process provides sufficient information and defined timescales to support consistent decision-making, and the Migration Framework establishes appropriate planning, monitoring and intervention controls for the final migration sprints. In addition, consequential changes are required to align the Migration Framework with the proposed M15a/M15b milestone structure under CR067, including the relationship between M15a compliance, SRO Exemptions, the imposition of a CAB and the Breach and Default Process. Without these changes, there is a risk that the Programme and relevant industry parties will enter the final migration period without a sufficiently clear, aligned and operationally effective framework for managing outstanding migration activity, assessing compliance and addressing non-compliance. This could reduce visibility of delivery risk and hinder the effective management of the remaining legacy MPAN portfolio ahead of M15.
Description of change: *(the change being proposed)* CR068 proposes a package of changes to strengthen and align the controls supporting the final stages of MHHS migration. The changes cover five areas: 1. Customer Acquisition Ban process • Amend the existing process to clarify the respective responsibilities of BSCCo, RECCo and the MHHS Programme • Glossary Update: Add a definition of Customer Acquisition Ban to the Glossary Document. • Introduce the BSC Breach and Default process into the Customer Acquisition Ban to support management of continued non-compliance. 2. SRO Exemption process: Enhance the process for Suppliers requesting exemption from a Customer Acquisition Ban by specifying the information required to support requests, establishing defined assessment and decision-making timescales, and clarifying the appeals process. 3. Later Migration Sprints: Section 5.10 will introduce enhanced controls for the final migration sprints to improve Supplier planning, increase visibility of outstanding legacy MPANs and support the effective management of migration activity ahead of M15. The changes will introduce: • Revised Sprint 7 and Sprint 8 durations: Extend Sprint 7 by two weeks, from 9 to 11 weeks, and reduce Sprint 8 from 4 to 2 weeks. The overall migration timetable and M15 baseline date remain unchanged. • Detailed Supplier migration plans: Require Suppliers to provide the Migration Control Centre (MCC) with a committed, daily-granularity plan for Sprint 7, covering their full remaining legacy MPAN portfolio. • Earlier completion of planned migration: Set the expectation that Suppliers target completion of migration by the end of Sprint 7, retaining Sprint 8 primarily for exception management and residual migration activity. Migration will not be prohibited during Sprint 8. • Enhanced monitoring and intervention: Strengthen MCC oversight of planned versus actual migration performance and remaining legacy MPAN volumes, enabling earlier identification of delivery risks, bilateral replanning and increased monitoring where required.

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- A formal governance control point: Introduce a Sprint 7 review to assess progress towards M15a and M15b and inform the approach to managing residual migration activity during Sprint 8.
- Controlled flexibility in migration planning: Enable MCC, under proposed delegated authority from MCAG, to adjust specified planning parameters, including the Migration Activation Offset (MAO) and Kestrel Planning Validation, subject to defined controls and the maintenance of applicable LDSO and Central System thresholds.
- CoS Forward Migration requirement: Require Suppliers to use the CoS Forward Migration Process for MPANs gained from 1 April 2027 through to M15b, including business-as-usual gains and MPANs acquired through April 2027 contract rounds.

4. Housekeeping updates to the Migration Governance and Escalations Framework document.
5. Consequential changes arising from CR067: Update the Migration Framework to distinguish between M15a, the end of the 18-month Migration Period and associated Supplier compliance requirements, and M15b, Full Transition Complete. Clarify the relationship between M15a compliance, SRO Exemptions, Customer Acquisition Bans and the Breach and Default Process.

The changes are intended to provide a clearer and more effective framework for managing outstanding migration activity, assessing Supplier compliance and addressing delivery risks as the Programme approaches M15.

Desired implementation date and rationale:
(proposed implementation date of the change and why this date is required)

16th December 2027

Justification for change:
(please attach any evidence to support your justification including why it should be exempt from the change freeze)

Additional clarity within the Migration Framework, and alignment with CR067, are essential to reflect the latest planning approach and give the Programme and Programme Participants the best possible chance of completing migration by Milestone M15 in line with the 7 May 2027 baseline date.

Change Freeze criterion impacted	Yes / No
Fixing a design defect	
Critical to M10/M15	**Yes**

Consequences of no change:
(what would happen if the change was not implemented)

Ensuring that the Migration Framework is up to date and reflective of the plan and approach is a cornerstone principle of the Programme to provide transparency to all Programme Participants.

If CR068 is not implemented, the Migration Framework will not contain the proposed enhanced controls and aligned processes needed to manage the final stages of MHHS migration effectively. This would leave existing ambiguities in the allocation of responsibilities for administering Customer Acquisition Bans, the information required and timescales for SRO Exemption requests, and the arrangements for managing residual migration activity in the final migration sprints.

Without the proposed changes to Section 5.10, the Programme would have less structured visibility of Supplier migration plans and remaining legacy MPAN volumes as M15 approaches, limiting its ability to identify delivery risks early, support replanning and intervene where necessary. Suppliers would also not be subject to the proposed explicit requirement to use the CoS Forward Migration Process for MPANs gained from 1 April 2027 through to M15b.

Furthermore, the Migration Framework would not be updated to reflect the proposed M15a and M15b structure approved under CR067, including the documented links between Supplier compliance at M15a, SRO Exemptions, Customer Acquisition Bans and the Breach and Default Process. This could result in inconsistent understanding and application of the Programme's arrangements for assessing and managing any Suppliers who do not meet their M15 Obligations.

Consequently, the Programme would have a less complete and aligned framework for managing outstanding migration activity, assuring progress towards M15 and supporting the effective completion of migration.

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Alternative options:

(alternative options or mitigations that have been considered)

Guidance has been published to date via MWG to help manage risk.

Risks associated with potential change:

The key risks associated with CR068 are:

1. Supplier readiness and implementation

The revised Sprint 7 and Sprint 8 arrangements introduce changes to the timing and expectations of Supplier migration planning, including the requirement for committed, daily-granularity Sprint 7 plans. Suppliers may require time to review and adapt their existing migration plans and operational arrangements to meet these expectations.

Mitigation: The Programme will continue to communicate the revised requirements and clarify expected Supplier deliverables ahead of implementation. The revised Sprint timelines, CoS Forward Migration requirement and proposed MCC flexibility to adjust migration parameters have already been discussed with the MWG. None of these changes alters Suppliers' obligations around M15; they are designed to help Suppliers meet them.

2. Impact on industry participants

The proposed changes may create additional planning, operational and administrative requirements for industry participants, particularly Suppliers.

- Suppliers will need to review their migration plans and resource assumptions to accommodate the revised sprint arrangements and more detailed planning requirements.
- The clarified SRO Exemption process may also require additional information and evidence to be provided within specified timescales. LDSOs and Central System parties may also need to consider the operational implications of the revised arrangements and proposed flexibility around migration parameters.

Mitigation: The Programme will communicate any revised parameters and provide supporting guidance ahead of implementation.

- Flexibility on migration parameters will remain subject to defined governance, operating controls and LDSO and Central System thresholds.
- Only four Suppliers have planned volume in the final two weeks of migration, and the MCC will work with them to mitigate delivery risk.

Stakeholders consulted on the potential change:

(Please document the stakeholders, or stakeholder groups that have been consulted to date on this change. The Change Raiser should consult with relevant programme parties in the drafting of the request, prior to submission to PMO).

The MHHS SRO Team have taken the Migration Working Group (MWG) through the scope of Change as part of the drafting of the Change Request.

Target date by which a decision is required:	16/12/2026

Part B – Initial Impact of proposed change

Guidance – ***This section should be completed by the Change Raiser before being submitted to the MHHS PMO.***

Please document the benefits of the change and to delivery of the programme objectives

Programme Objective	Benefit to delivery of the programme objective

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To deliver the Design Working Group's Target Operating Model (TOM) covering the 'Meter to Bank' process for all Supplier Volume Allocation Settlement meters	Indirect benefit. Supports the controlled completion of migration to MHHS arrangements, helping ensure outstanding legacy MPANs are managed and the transition to the target operating model is completed effectively.
To deliver services to support the revised Settlement Timetable in line with the Design Working Group's recommendation	Indirect benefit. Supports completion of migration and management of residual migration activity, helping maintain the conditions necessary for the effective operation of MHHS settlement arrangements.
To implement all related Code changes identified under Ofgem's Significant Code Review (SCR)	Indirect benefit. Aligns the Migration Framework and supporting processes with the proposed M15a/M15b milestone structure under CR067, supporting consistent application of the associated compliance and enforcement arrangements.
To implement MHHS in accordance with the MHHS Implementation Timetable	Direct benefit. Strengthens controls for the final migration period through enhanced Supplier planning, monitoring and intervention, clearer SRO Exemption arrangements, and defined processes for managing non-compliance. This supports delivery against M15a and completion of the transition to M15b.
To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem's Full Business Case	Direct benefit. Supports the successful completion of migration by improving visibility of remaining legacy MPANs, enabling earlier identification of delivery risks, and establishing clearer arrangements for managing exceptions and Supplier non-compliance.
To prove and provide a model for future such industry-led change programmes	Indirect benefit. Establishes a more structured approach to final-stage migration planning, risk management, exemption decisions and compliance enforcement, providing potential lessons for future industry-led change programmes.

Guidance – ***Please document the known programme parties and programme deliverables that may be impacted by the proposed change***

Impacted areas	Impacted items
Impacted Parties	Suppliers, MHHSP, BSCCo, RECCo,
Impacted Deliverables	Supplier Sprint 7 Migration Plan
Impacted Milestones	M15

Note – ***Please refer to MHHS DEL174 Change Request Guidance for Programme Participants for information on how to score the initial assessment.***

Guidance – ***Please include a reference and link to any additional documentation which the change relates to.***

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Change Request to be read in conjunction with:	
Title	**Reference**

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Part C.1 – Summary of Impact Assessment

Note – *This section will be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

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.

Part C.1 – Summary of Impact Assessment (complete as appropriate)

Effect on benefits

CR068 is expected to support the realisation of MHHS Programme benefits by strengthening controls for the final stages of migration and improving the likelihood of completing migration in accordance with the Programme's requirements.

Enhanced Supplier planning, monitoring and intervention arrangements will provide greater visibility of outstanding legacy MPANs, support earlier identification of delivery risks and enable more effective management of residual migration activity. Clearer SRO Exemption and Customer Acquisition Ban processes will also support consistent decision-making and the management of Supplier non-compliance.

The changes are not expected to introduce new benefits directly identified in the Full Business Case. Rather, they support the successful completion of migration and the transition to Full Transition Complete (M15b), helping to protect the delivery of the Programme's intended benefits. No adverse impact on the realisation of benefits has been identified.

<Delete as appropriate>: **Agree / Disagree / Abstain**

1. Minor impact	*2. Medium impact*	*3. Significant impact*

Effect on consumers

No consumer impacts identified

<Delete as appropriate>: **Agree / Disagree / Abstain**

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1. Minor impact	2. Medium impact	3. Significant impact

Effect on schedule

CR068 is intended to support delivery of the MHHS Programme against the existing M15 baseline date of 7 May 2027. The proposed changes to the Migration Framework will extend Sprint 7 by two weeks and reduce Sprint 8 by two weeks, retaining the overall migration timetable and M15 date.

Suppliers may need to bring planned migration activity forward into Sprint 7 where practicable, with the final two weeks primarily reserved for exception management and residual migration activity. The changes also introduce more detailed planning requirements and enhanced monitoring to identify and address delivery risks ahead of M15.

No change to the overall Programme schedule is currently anticipated as a direct consequence of CR068. However, implementation is dependent on Ofgem approval of CR067, and any delay to that approval could affect the timely implementation of the consequential changes required to align the Migration Framework with the proposed M15a and M15b milestones.

<Delete as appropriate>: **Agree / Disagree / Abstain**

1. Minor impact	2. Medium impact	3. Significant impact

Effect on costs

No additional costs have been identified as a direct consequence of implementing CR068.

<Delete as appropriate>: **Agree / Disagree / Abstain**

1. Minor impact	2. Medium impact	3. Significant impact

Effect on resources

No significant additional resource requirements have been identified for the MHHS Programme as a direct consequence of CR068. The changes are expected to be managed through existing Programme governance, operational and assurance arrangements.

The MCC will require sufficient capacity to review detailed Supplier migration plans, monitor planned versus actual migration performance and remaining legacy MPAN volumes, support bilateral replanning and undertake increased monitoring or intervention where delivery risks are identified. Additional resource may also be required from the MHHS Programme, MCAG, the SRO, BSCCo and RECCo to support the enhanced SRO Exemption process, associated decision-making and administration of Customer Acquisition Bans.

Suppliers will need to allocate resource to prepare and maintain the required migration plans and to comply with the revised later-sprint arrangements, including the CoS Forward Migration Process requirement.

<Delete as appropriate>: **Agree / Disagree / Abstain**

1. Minor impact	2. Medium impact	3. Significant impact

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Effect on contract

No effect on contracts has been identified as a direct consequence of implementing CR068.

<Delete as appropriate>: **Agree / Disagree / Abstain**

1. Minor impact	*2. Medium impact*	*3. Significant impact*

Risks

Change Raiser to provide initial impact assessment.

CR068 is intended to reduce risks associated with completing MHHS migration by strengthening controls for the final migration period. Enhanced Supplier planning, monitoring and intervention arrangements will improve visibility of outstanding legacy MPANs and support earlier identification and management of delivery risks ahead of M15.

The changes also seek to reduce risks arising from unclear responsibilities and processes by clarifying the administration of Customer Acquisition Bans, defining the information and timescales required for SRO Exemption requests, and aligning the Migration Framework with the proposed M15a and M15b milestones and associated compliance arrangements.

<Delete as appropriate>: **Agree / Disagree / Abstain**

Part C.2 – Impact Assessment Recommendation

Note – *This section must be completed initially by the Change Raiser and then by Programme Participants as part of the full Impact Assessment.*

Guidance – The primary reporting metric of the Impact Assessment is the recommendation response. The consolidated response will be presented to the relevant governance group(s) and decision maker(s) with the totals for 'Agree', 'Disagree' or 'Abstain'. As such, please ensure this section is completed before the form is returned to MHHS PMO. Provide detailed rationale and evidence in the commentary field.

Part C.2 – Impact Assessment Recommendation (mandatory)

Recommendation

Change Raiser to provide initial recommendation.

<Delete as appropriate>: **Agree / Disagree / Abstain**

1. Minor impact	*2. Medium impact*	*3. Significant impact*

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Impact assessment done by:

Guidance*: If you are a third party responding on behalf of another Programme Participant, please state this in your response.*

Impact assessment completed on behalf of:

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Part D – Change approval and decision

Guidance*: The approvals section will be completed by the MHHS PMO once the Impact Assessment has been reviewed.*

Part D - Approvals
Decision authority level <Based on the impact assessment, state who is required to make a decision concerning this change>

Guidance - ***This section will be completed by the MHHS PMO and Change Owner following the review of the impact assessment and decision reached by the SRO.***

Part D – Change decision			
Decision:		Date	
Approvers:			
Change Owner:			
Action:			
Changed Items	**Pre-change version**	**Revised version**	

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Part E – Implementation completion

Guidance - ***This section will be completed by the MHHS PMO at the end of the post-implementation process.***

Part E – Implementation completion			
Comment		Date	

Guidance – ***The Closure Checklist in MHHS DEL175 Change Log must also be completed by MHHS PMO at this stage.***

Checklist Completed	Completed by
Yes/No	

Guidance – ***This section will be completed by the MHHS PMO at the end of the post-implementation process and should be*** **used to add any appropriate references of the change once it has been completed.**

References		
Ref	**Document number**	**Description**

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