



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

M10 Checkpoint: Programme Assessment

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Date: March 2025

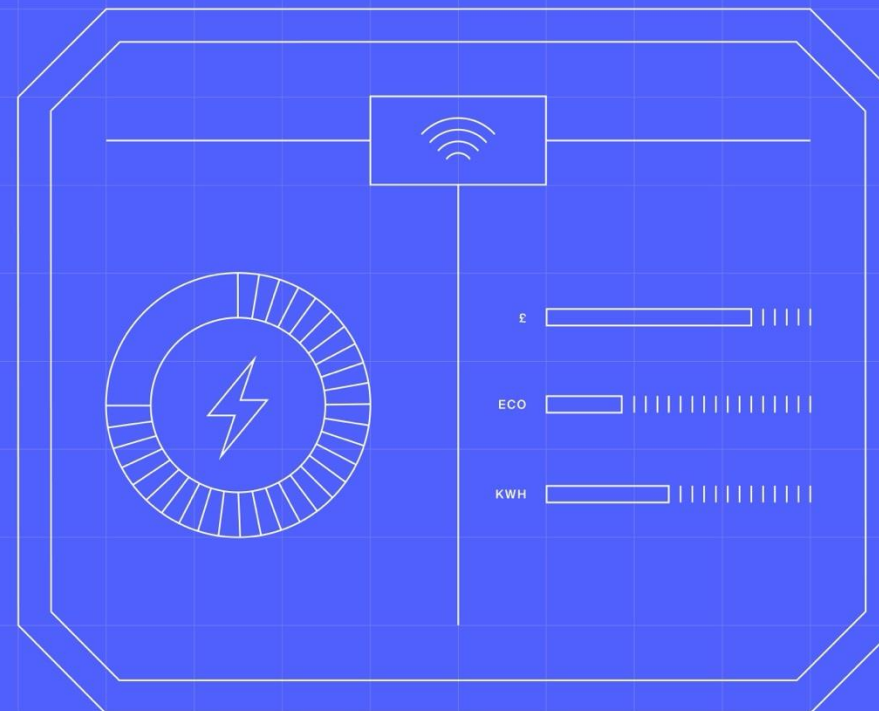
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Introduction

Context and overall approach



Purpose, background and objectives

Purpose

The purpose of the M10 Checkpoint is to answer two key questions:

1. Are we on track to achieve the M10 date of 24-Sep-25?
2. Can the downstream milestones (M14-M16) be brought forwards to conclude the programme earlier?

The Programme also agreed that the M10 Checkpoint would be an appropriate position to confirm if M10 could move forwards (by up to 4 weeks) if testing progress had suggested this was possible.

Background

As part of CR055, Ofgem and IPA requested a checkpoint be inserted into the plan 6 months out from M10.

The checkpoint was intended to review progress against the plan, 6 months out from Go-Live to ensure that the M10 date remained on track to be met.

The Checkpoint also presented an opportunity to bring the M10 date forwards (by up to 4 weeks) if SIT progress indicated this was possible.

The M10 Checkpoint will also act as an important engagement tool for wider industry stakeholders across DESNZ and Ofgem, providing clarity on progress and confidence the planned date will be met.

Objectives



To provide confidence that the Programme remains on track to achieve M10 by the baseline date of 24-Sep-25



(If it were feasible) to confirm that the M10 date could move forwards by up to 4 weeks



To provide transparency and clarity over the risks carried by the Programme and what needs to be done to mitigate their impact on delivery



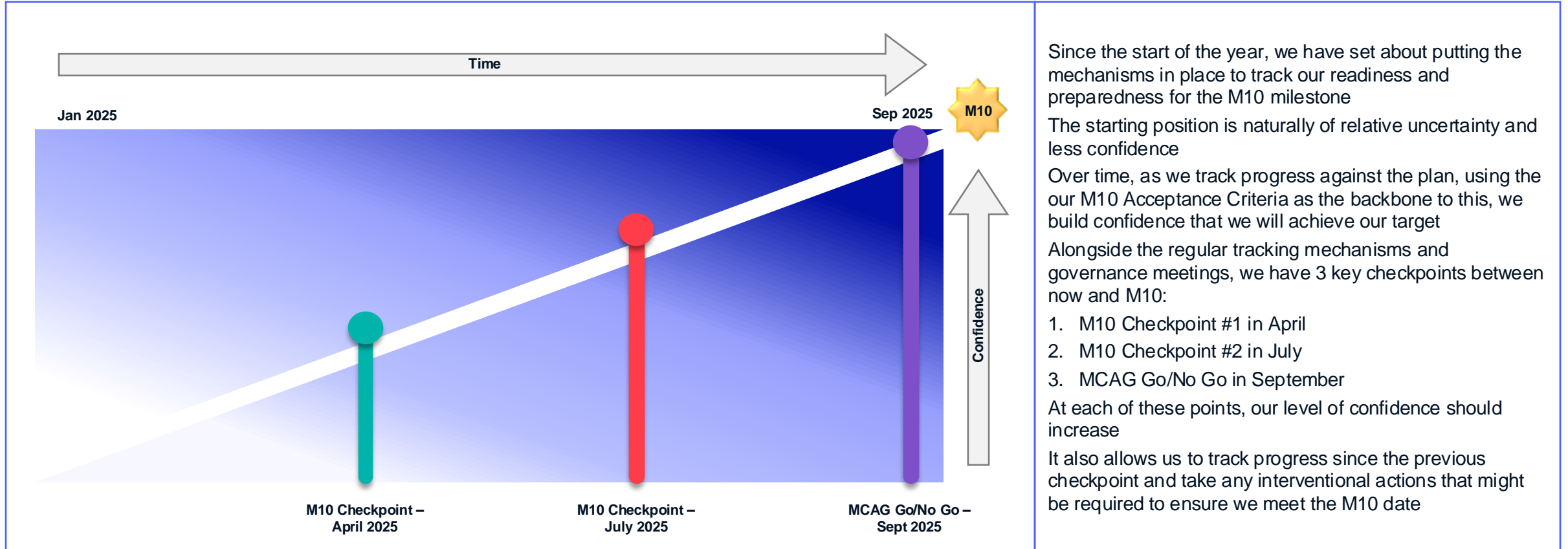
To ascertain the feasibility of bringing downstream milestones (M14 – M16) forwards, enabling the Programme to end sooner than in the current plan



To present the opportunity to course correct any deviation from the plan in time to avoid impact on the M10 date

Building confidence in achieving M10

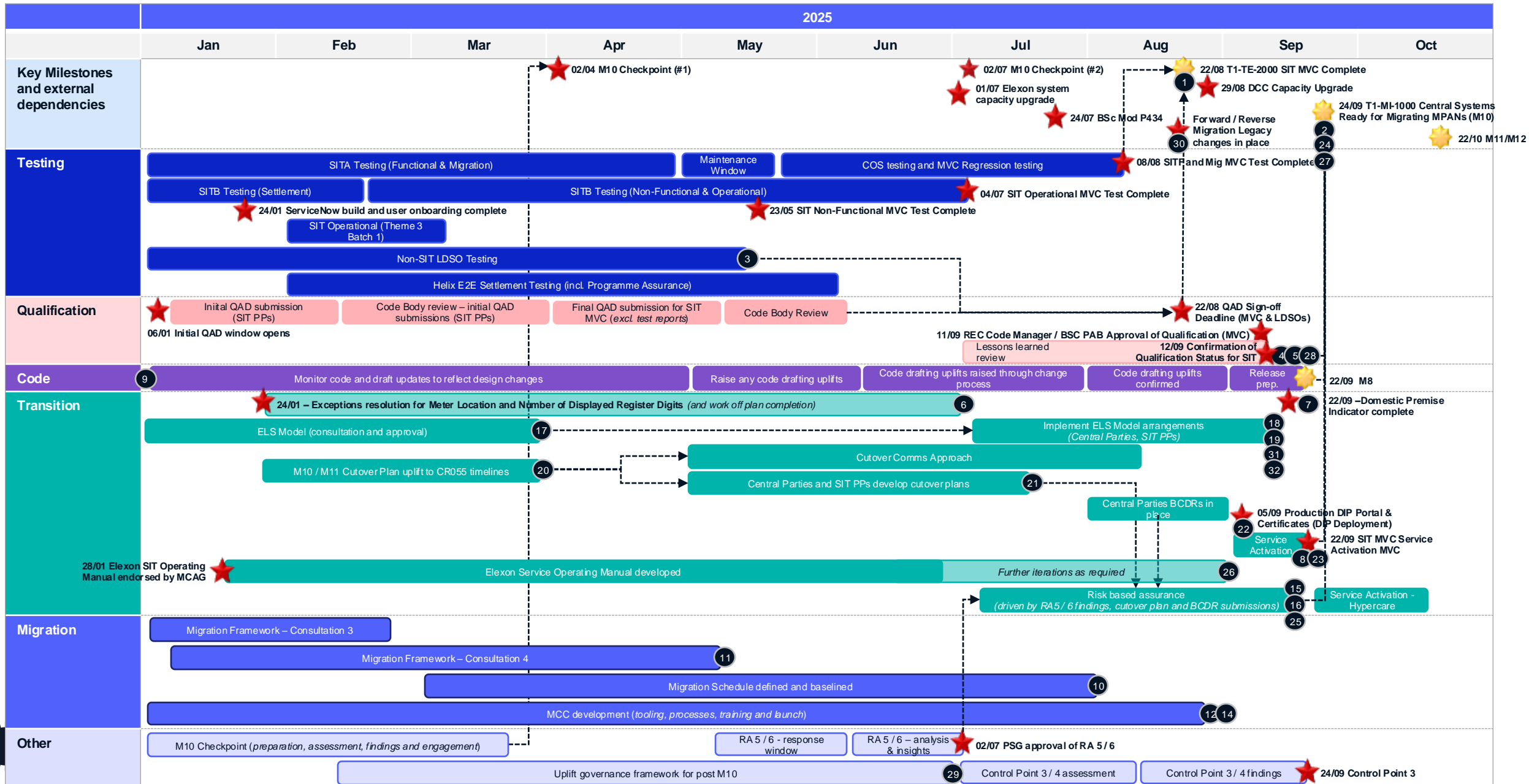
The M10 checkpoint(s) are a critical enabler to instilling confidence in the MHHS Programme's ability to meet the M10 date of 24 September 2025



M10 Readiness Plan

Key

- # Acceptance criteria met
- Key planned activity
- ★ Milestone or external dependency
- ★ Tier 1 milestone
- Internal dependency



Evidence and reference materials

#	Inputs	Q1 - Criterion assessed	Q2
1	MHHS Outline Plan	Various	✓
2	End of Sprint Report (Sprint 14 and 15)	1	
3	Daily Flash Reporting	1	
4	Migration Framework	11, 12	✓
5	Migration Schedule	10	✓
6	Early Life Support Model	17, 18, 19, 29, 30	
7	M10 / M11 Cutover Plan	7, 8, 20, 21, 22	
8	SIT Operational Manual	15, 16	
9	Low Level Service Design documents	15, 16	
10	SIT Operational (daily reporting)	1, 15, 16	
11	SIT Non-Functional (daily reporting)	1	
12	PIT evidence submissions (NF and Ops)	1	
13	Insight from Programme forums/meetings/bi-laterals	Various	✓
14	QAD progress and submissions (via Code Bodies)	4, 5, 28	✓
15	Non-SIT LDSO testing (daily reporting)	3, 5	
16	PPIR – Contracted SIT Parties	4	
17	Data Cleanse Plan	6	
18	Central Party and LDSO Readiness Plans	21, 23	
19	MHHS RAID Log	27	✓
20	RAID strategic themes reporting (PSG)	27	
21	Transition Design		✓
22	PPIR – Bringing M14 forwards		✓

Approach

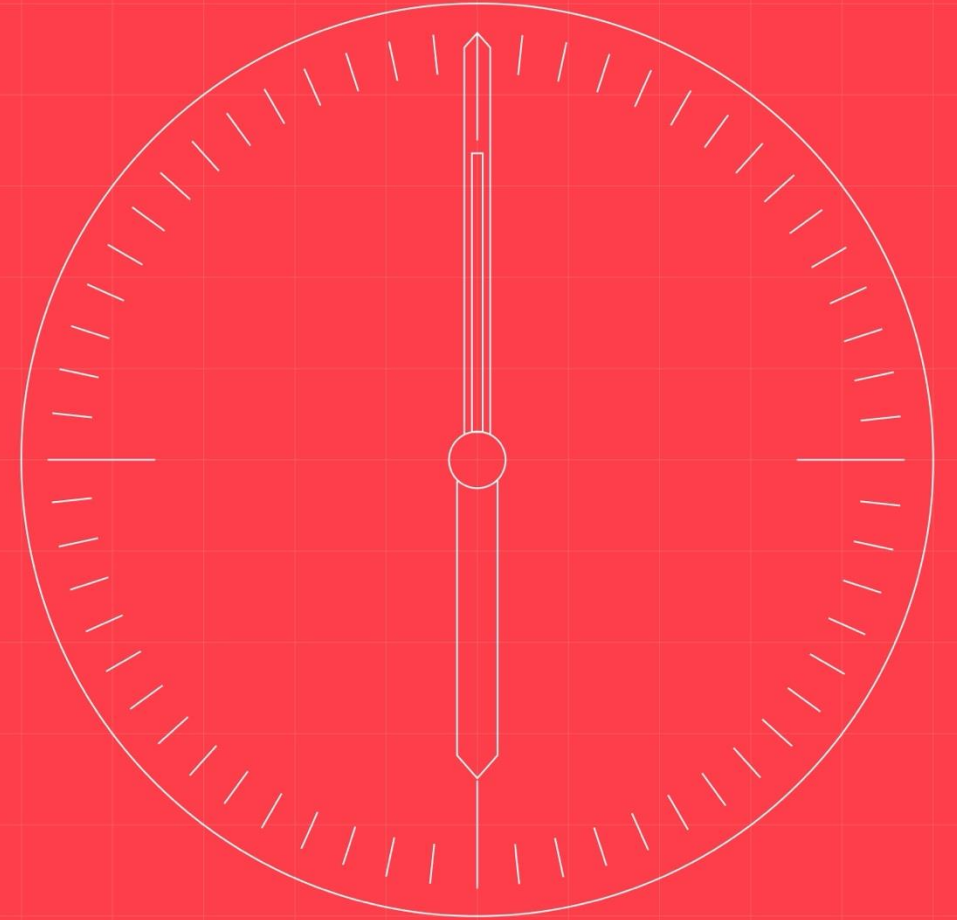
- The M10 Checkpoint assessment considers several different evidence points and insights.
- These cover document creation and approval, governance meetings and decisions and engagement with industry through various channels such as bi-laterals, governance meetings, PPIRs, Change Requests and formal consultations.
- We have used all this information to develop a programme view of progress against each of the 32 individual criterion that forms the M10 Acceptance Criteria.
- These individual findings have been aggregated up to provide an overall view of Programme Readiness for M10, 6 months out from the milestone itself.

Points to note

- The inputs highlighted on this slide are not an exhaustive list but provide a sample of the types of information and insight the Programme has reviewed to arrive at its proposed position for the M10 Checkpoint.
- The Programme and IPA have used this information independently to form a view of Programme status and so we would expect to see areas of misalignment between both assessments.
- The assessment against the acceptance is not against what is required to fulfil the criterion (i.e. the required position for M10 decision making) but instead assesses against where the Programme would expect to be at this point in time.

Q1

Are we on track to achieve the M10 date of 24-Sep-25?



Q1 - Background

Context

The first question that the M10 checkpoint aims to address is whether the Programme is on track to meet the baselined M10 date

To do this, the Programme has undertaken an assessment of progress against each of the 32 M10 Acceptance Criteria within the M10/M11 Cutover Plan

In parallel, the IPA have undertaken their own independent assessment, and their position cross-referenced with that of the Programme

In addition, the checkpoint is also the point where the Programme would review and confirm if it was feasible to bring the M10 date forwards (by up to 4 weeks)

The Programme has taken insight and information from a variety of sources such as the Programme Plan, deliverable creation and approval, governance meetings and bi-lateral engagement with Programme Participants

All of this information has been used to form the following assessment of progress to date.

Objectives



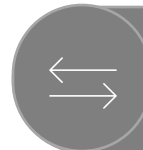
To provide confidence that the Programme remains on track to achieve M10 by the baseline date of 24-Sep-25



(If it were feasible) to confirm that the M10 date could move forwards by up to 4 weeks



To provide transparency and clarity over the risks carried by the Programme and what needs to be done to mitigate their impact on delivery



To ascertain the feasibility of bringing downstream milestones (M14 – M16) forwards, enabling the Programme to end sooner than in the current plan



To present the opportunity to course-correct any deviation from the plan in time to avoid impact on the M10 date



Objective addressed by this question



Objective not addressed by this question

Bringing M10 forwards

Overview

- As part of CR055, the Programme was tasked with seeing if there was any opportunity to bring the M10 forwards from the baselined date of 24-Sep-25.
- As part of the planning exercise, the Programme identified that the M10 could potentially be brought forwards by up to 4 weeks if testing progress allowed.
- Any decision to do this would be predicated on several variables:
 - The risk to the Programme being low
 - The risk to industry, and existing business-as-usual processes, being low
 - The test execution rates in Cycle 3 of SIT Functional and Migration exceeding the execution model to such an extent that the timelines could be brought forwards
 - Operational readiness activities can support a reduced delivery timeline

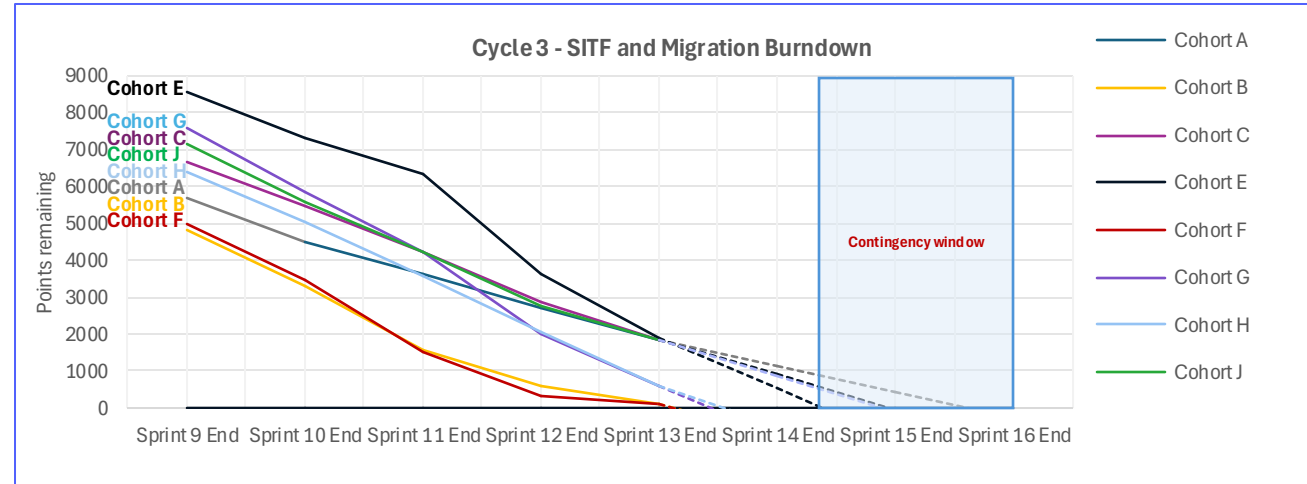
Critical Path review

- SIT Functional and Migration execution formed the new critical path timeline to M10 in CR055.
- To consider bringing M10 forwards, the Programme would firstly have needed to see significant over-performance of the test execution model by at least 2 cohorts.
- Any over-performance would need to be comfortably greater than 2 sprints worth of test points to ensure the benefit of bringing the M10 date forward outweighed the risk to other participants.
- If this over-performance could be seen, operational readiness arrangements would have to be sufficiently progressed to enable this date to come forwards.
- The two leading cohorts are forecast to conclude their testing before the contingency window; however, test velocity is slowing as there are less tests to execute. This makes it difficult to justify bringing the regression test window forwards and ending Cycle 3 early.
- The Programme has also consulted these cohorts and believe that additional time between conclusion of Cycle 3 and the regression test window should be spent on early regression testing to de-risk issues occurring in Go Live and enable as much testing of the Production code base as possible.
- Most importantly operational readiness arrangements are not mature enough to suggest that a 4-week reduction in timelines could be accommodated.

Programme Assessment

The Programme **does not** believe the MHHS Programme is in a position to bring the M10 date forwards.

The MHHS Programme should continue to work to the baselined M10 date of 24-Sep-25.

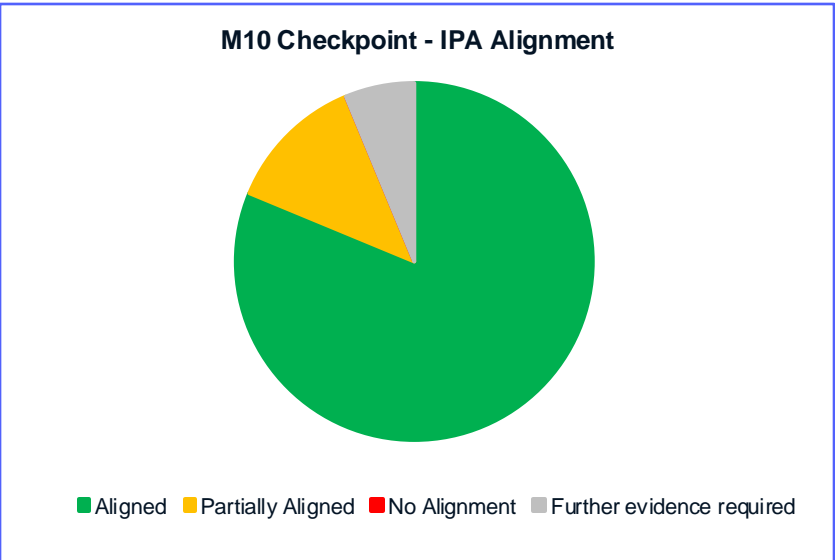
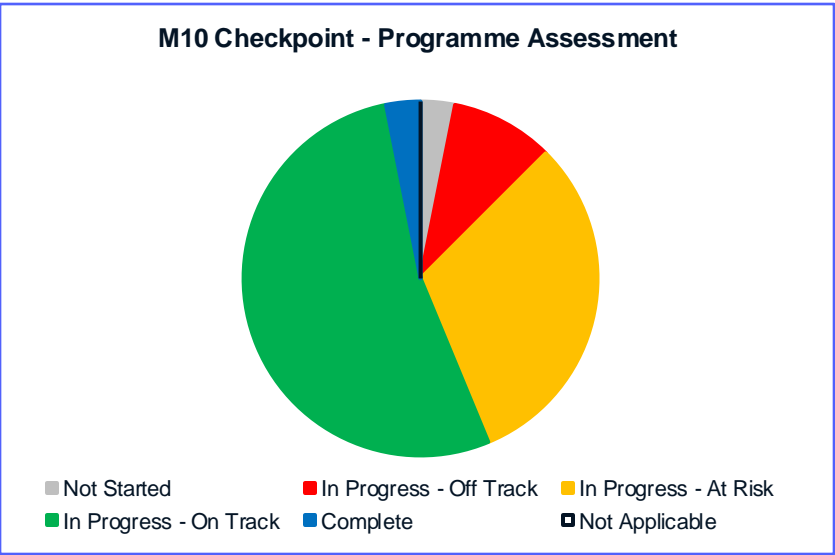
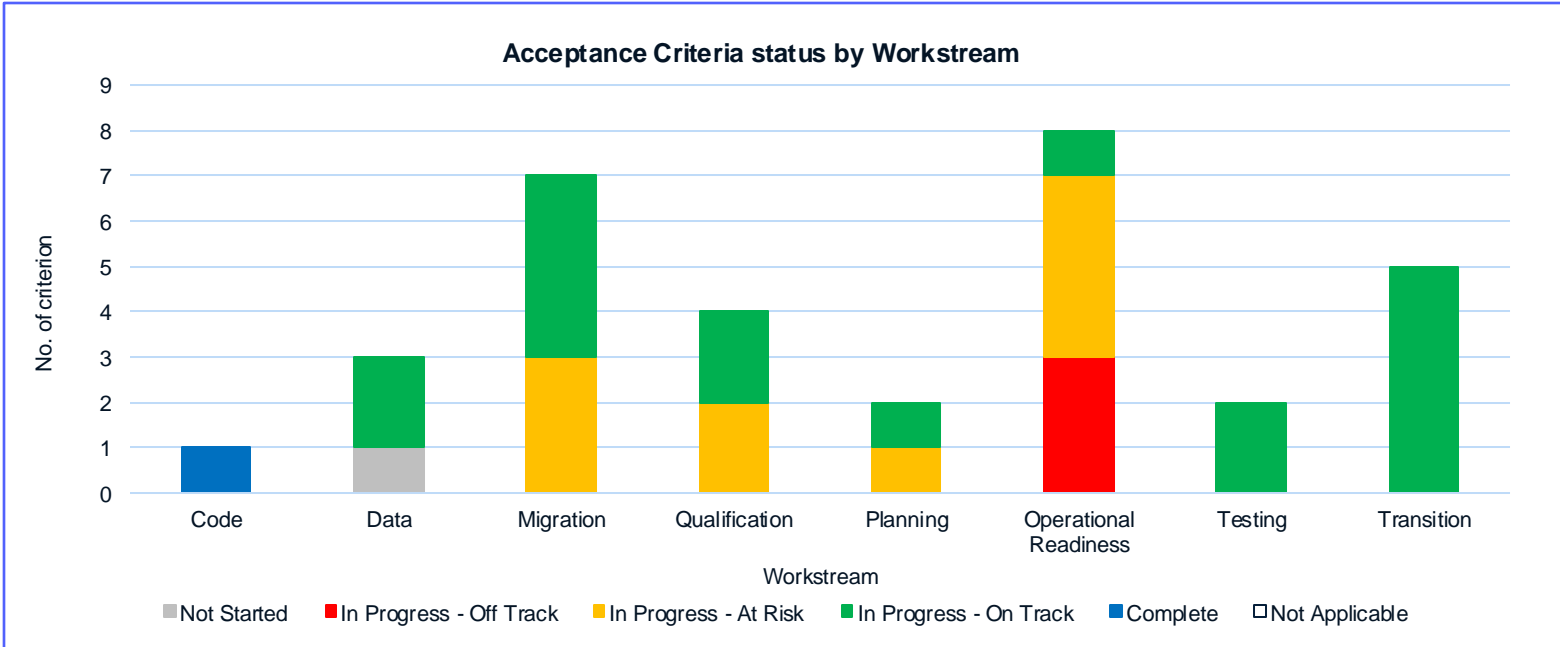


Countdown vs. Actual Cohort Models Test Points Passed / End of Sprint 14				Predicted Completion of Cycle 3 (with 100% Passed Tests)	
Cohort	Current Velocity Test Points / Day (Average of last 3 sprints and current sprint)	Test Points / Day Currently Remaining (to complete in Sprint 14)	Test Points / Day Currently Remaining (to complete in Sprint 16)	Day	Sprint
10 Days to cover SIT scope in Sprint 14					
Cohort A	71	182	61	26	Sprint 16
Cohort B	90	12	4	1	Sprint 14
Cohort C	94	184	61	19	Sprint 15
Cohort E	139	192	64	14	Sprint 15
Cohort F	93	10	3	1	Sprint 14
Cohort G	137	60	20	4	Sprint 14
Cohort H	109	58	19	5	Sprint 14
Cohort J	96	182	61	19	Sprint 15

Overview against the M10 Acceptance Criteria

Overview

- Across the 32 individual acceptance criteria, the Programme assesses 19 of these as on track in line with the expected position 6 months out from M10. 1 of these criteria has already been successfully met.
- Overall the Programme and IPA are aligned in their assessment of the M10 acceptance criteria. With full alignment across 26 criterion (81%).
- There is some minor misalignment across 6 criteria, 4 we are partially aligned and 2 require further evidence.
- There is no criteria with 'no alignment' whatsoever.
- The main risk area to the Programme is in Operational Readiness with 3 of 8 criteria viewed as off track and a further 3 as at risk.
- The main area of concern is in relation to the Service Delivery Operating Model – specifically Elexon Service Management arrangements.



'Off Track' criterion (1 of 2)

No.	Milestone	Workstream	Criterion	Evidence	Owners	Due date	Expected position at 26 March (PSG Paper Day)	Programme assessment	Programme view
15	M10	<i>Operational Readiness</i>	Service Delivery Operating Model in place	Risk-based assurance of Programme Participants M10 operational readiness complete and outputs shared with Programme.	LDP All SIT Participants	19/09/2025	<p>Assurance of PPs' M10 operational readiness is ongoing in line with Programme Plan.</p> <p>Elexon have outlined a clear view of the Service Management structures and processes to be implemented and followed at M10.</p> <p>SIT Operational (Theme 3, Batch 1) has tested these processes and has concluded. Follow-on actions and any additional testing is understood.</p> <p>SIT Operating Manual has been developed further since SIT Operational (Theme 3, Batch 1) conclusion.</p>	<p>Proposed status is 'off track'.</p> <p>SIT Operational (Service Management testing) has been marked as 'Red' as the testing has concluded with 5 severity 2 defects blocking exit and no clear path to resolution.</p> <p>Testing identified several gaps in training and processes which need to be addressed. Uplifts to the Elexon Low-Level Service Designs and Service Operating Manual are required and consistency between the two documents is required.</p> <p>It has been identified that additional testing, requiring Participant involvement, will be required. The scope and approach of this testing needs to be defined as currently it is unclear.</p> <p>There is a lack of clarity regarding inter-service desk processes and SLAs within the Service Management Model which need to be defined and agreed with industry before testing can take place.</p> <p>There are still no agreed proposals for code obligations for Service Management requirements.</p>	In Progress - Off Track

'Off Track' criterion (2 of 2)

No.	Milestone	Workstream	Criterion	Evidence	Owners	Due date	Expected position at 26 March (PSG Paper Day)	Programme assessment	Programme view
16	M10	<i>Operational Readiness</i>	Service Delivery Operating Model in place (Self-Certification)	LDSOs and Central Parties have self-certified that their service management operating models are in place and ready.	All SIT Participants	03/07/2025	Readiness Assessment preparation is underway when Self-Certification is planned to be provided.	<p>Proposed status is 'off track'.</p> <p>Programme Participants have raised concerns with a lack of clarity regarding the central Service Management Model set out by Elexon and the impacts on their individual organisations.</p> <p>More work is required to define and agree the inter-service desk processes with industry. There is a risk that these processes require changes to be made to individual PPs' existing procedures and arrangements.</p> <p>It essential for participants to have clarity on the central service management model in advance of April 2025 to be able to address questions in RA5/6 sufficiently.</p>	In Progress - Off Track
26	M10	<i>Operational Readiness</i>	Roles and responsibilities post-M10 agreed and accepted	Acceptance of enduring processes, roles and responsibilities for central parties, programme and code bodies.	Code Bodies, LDSOs, Central Parties	05/09/2025	Roles and responsibilities post-M10 are set out and agreed in the Service Operating Manual and Low-Level Design Models.	<p>Proposed status is 'off track'.</p> <p>Roles and responsibilities across inter-service desk processes remain unclear and are not set out in the Low-Level Service Design Models or Service Operating Manual.</p> <p>Personnel for the Design Knowledge Transfer have been identified but there is not an agreed plan yet in place.</p> <p>It has been agreed that post-M10 change processes will align with existing BAU change processes.</p> <p>Wider Elexon Target Operating Model needs to be finalised to ensure all roles and responsibilities are covered to support in live systems.</p>	In Progress - Off Track

Proposed mitigating actions

The Programme has set out a series of mitigating actions for those criterion marked as 'In Progress – Off Track'.

Criterion #	Acceptance Criterion	Acceptance Criterion status	Action	Due Date	Owner
15	Service Delivery Operating Model in place	In Progress - Off Track	Define a recovery plan for Service Management delivery	02-Apr-25	Helix, Programme
			Report to GLIG and PSG on progress until criterion returns to green	<i>Monthly until no longer required</i>	Helix
			Define and agree process and SLAs for inter-service desk processes with industry	30-Apr-25	Helix
			Define and agree scope and timing of additional service management testing and agree this with the Programme and industry	30-Apr-25	Helix, Programme
16	Service Delivery Operating Model in place (Self-Certification)	In Progress - Off Track	Set out clear communications and engagement plan for industry, demonstrating engagement mechanisms, timelines, outcomes and required audiences	02-Apr-25	Helix
26	Roles and responsibilities post-M10 agreed and accepted	In Progress - Off Track	Agree plan for Design Knowledge Transfer with the Programme	30-Apr-25	Helix
			Provide clarity on wider Elexon Operating Model to support live systems post-M10	30-Jun-25	Helix

'At Risk' criterion – Themes

- The Programme Assessment identifies 10 criteria as 'at risk'. This means that there is some risk that the completion date could be missed, or that the activity is behind against the plan but does have a plan in place to address the delay before any impact on overall delivery.
- The Programme sees these as manageable risks that can and are being managed through Programme delivery.
- We have summarised these 'at risk' criteria into the below 6 themes.

LDSO Qualification	Early Life Support	Migration incentives	Performance Assurance and Monitoring	Risk of work off items	Migration supporting legacy changes
<ul style="list-style-type: none"> • There is a risk that 1 of the 9 LDSOs in Non-SIT LDSO testing may be late in completing their testing. • This risks the LDSO qualification timelines and raises concern that LDSO coverage will not be in place by M10. • This risk is compounded by the fact that the LDSO in question is building bespoke software (other than MPRS) and therefore cannot place reliance on another LDSO to complete its testing. 	<ul style="list-style-type: none"> • The Early Life Support (ELS) Model is being delivered later than originally planned. • This means that progress of central parties, LDSOs and PPs in putting these arrangements in place is behind where we would have forecast it to be at this stage. • The ELS Model should be signed off in April, which does give PPs sufficient time to prepare for this phase of the Programme. 	<ul style="list-style-type: none"> • There is a lack of clarity on whether any migration incentives or modifications can, or will, be implemented by Ofgem. • Clarity is needed to ensure the Programme and industry can act accordingly with any incentives or modifications to be put in place. • The Programme does not consider this a risk to M10 decision making but it is something that needs to be tracked through to completion. 	<ul style="list-style-type: none"> • Greater clarity is required on the Performance Assurance reporting arrangements to be put in place in the build-up to M10 and during Migration. • Processes regarding escalation, rapid resolution and emergency change all require final agreement. • This is being progressed between PAB, Code Bodies, Programme, DIP Manager and the Migration team. 	<ul style="list-style-type: none"> • There is a risk at this stage of the Programme that the number of work-off items open at M10 could increase the aggregated risk level beyond a manageable threshold. • At this stage, more work is needed to define, implement and test the central service management arrangements – until complete this risks creating several high-risk work off plan items. • This could impact decision making at M10. 	<ul style="list-style-type: none"> • There is a lack of clarity on delivery of the forward and reverse migration changes that all PPs need to make in advance of M10 • These changes need to be enabled to allow Migration to commence and currently if PPs are on or off track to deliver these changes in the required timelines. • Regular status reporting is required from the BSCCo Performance Assurance team to track progress and identify areas of risk early.

Proposed mitigating actions

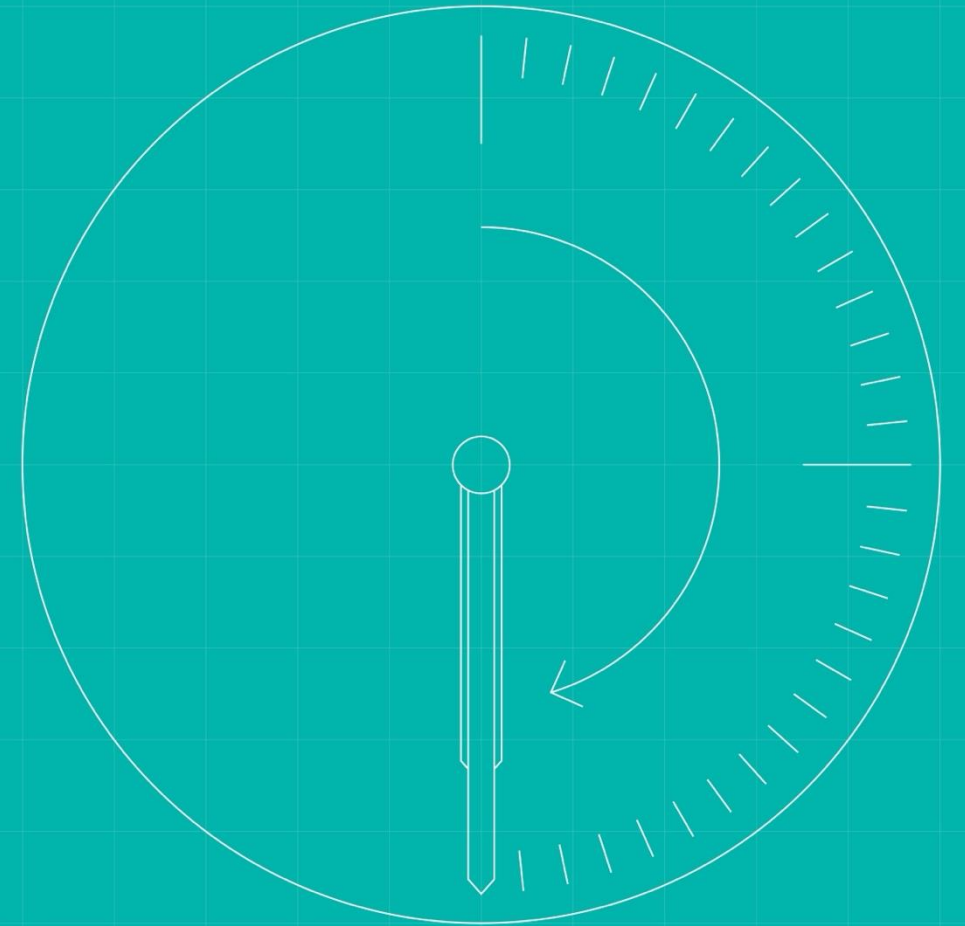
The Programme has set out a series of mitigating actions for those criterion marked as 'In Progress – At Risk'.

Criterion #	Acceptance Criteria	Acceptance Criteria status	Action	Due Date	Owner
3, 5	LDSO Qualification	In Progress - At Risk	Agree recovery plan for LDSO currently behind schedule in Non-SIT LDSO testing to prevent impact on M10	02-Apr-25	LDSOs, Programme
31, 32	PAB monitoring and performance measures	In Progress – At Risk	Agree monitoring, reporting and escalation processes to track BAU performance during Migration window	30-Apr-25	BSC PAB, Programme
17, 18, 19	Early Life Support Model development, implementation and understanding	In Progress – At Risk	Baseline ELS Model following industry consultation at MCAG	30-Apr-25	Programme
			Implement ELS Model arrangements following approval of the document at MCAG	30-Jun-25	Programme, Central Parties, LDSOs, SIT PPs
27	M10 Work off plan agreed (if required)	In Progress – At Risk	<i>See slide 14 and actions to recover service management progress</i>	-	-
30	All Suppliers and Agents have made the necessary changes to support losing an MPAN via the Forward Migration Process and gaining an MPAN via the Reverse Migration Process.	In Progress – At Risk	Implement reporting processes at agreed cadence with the Programme on the progress of legacy system changes required by all PPs to be implemented before M10	30-Apr-25	BSCCo, RECCo
13	Migration incentives implemented	In Progress – At Risk	Provide clarity on any Migration incentives or modifications that will be applied to enable migration success	30-Apr-25	Ofgem

- **Overall Status: On track (with known risks)**
 - Based on the assessment of progress against the M10 Acceptance Criteria, the Programme believes that MHHS is on track to achieve the M10 date of 24-Sep-25.
 - The Programme acknowledges that there is significant risk regarding the readiness of the Service Management arrangements that need to be in place ahead of M10 and some risk within Non-SIT LDSO testing which could impact the full LDSO coverage required for M10.
 - In both cases (as per slides 14 and 16) the Programme is actively working with these parties to ensure recovery plans are in place to protect the M10 date.
 - Delivery against these recovery plans should be tracked through PSG and GLIG until no longer deemed a risk.
 - A further M10 Checkpoint is scheduled for July 2025, and this should focus on the progress made against each of these critical items between now and that date.
-

Q2

Can the downstream milestones (M14-M16) be brought forwards to conclude the programme earlier?



Q2 - Background

Context

The second question within the M10 Checkpoint assesses the feasibility of bringing downstream milestones beyond M10 (M14 – M16) forwards.

This is in response to an Ofgem and IPA action raised as part of CR055.

The Programme has tackled this question in 3 parts:

- **M14:** Can Qualification finish sooner than in the current plan?
- **M15:** Is there scope to migrate more MPANs sooner and condense the migration period from 18 months?
- **M16:** Could transition to the new settlement timetable happen sooner than currently planned?

The Programme has taken insight and information from a variety of sources such as the Programme Plan, deliverable creation and approval, governance meetings and bi-lateral engagement with Programme Participants

All of this information has been used to form the following assessment of progress to date.

Objectives



To provide confidence that the Programme remains on track to achieve M10 by the baseline date of 24-Sep-25



(If it were feasible) to confirm that the M10 date could move forwards by up to 4 weeks



To provide transparency and clarity over the risks carried by the Programme and what needs to be done to mitigate their impact on delivery



To ascertain the feasibility of bringing downstream milestones (M14 – M16) forwards, enabling the Programme to end sooner than in the current plan



To present the opportunity to course-correct any deviation from the plan in time to avoid impact on the M10 date



Objective addressed by this question



Objective not addressed by this question

Conclusion

Milestone	Our findings	Proposed decision
M14	<ul style="list-style-type: none">• Of 17 Wave 4 respondents, 71% said they would not be able to expedite delivery to move into Wave 3.• Of 14 Wave 3 respondents, 100% said they would not be able to expedite delivery to move into Wave 2.• Several respondents called out resourcing constraints, complexity of change, outstanding commercial arrangements and ongoing re-platforming as reasons for this.• Several earlier wave participants also called out concerns with constraining migration envelope capacity if M14 were to be brought forwards.	<ul style="list-style-type: none">• Assessment: Based on the findings from the recent PPIR, it is not feasible to bring M14 forwards from the current date.
M15	<ul style="list-style-type: none">• We have reviewed the migration capacity envelopes against the maximum migration volumes and confirmed capacity is available to migrate more MPANs sooner within the migration window if they are made available through SIT or Non-SIT participants.• This means M15 could potentially move forwards, provided M14 was able to move and there was a consistent pipeline of Qualification participants to support increased migration volumes.	<ul style="list-style-type: none">• Assessment: There is capacity to migrate more MPANs faster than profiled. However, to bring M15 forwards and maintain the 6-month migration window for wave 4 participants, M14 would also need to move forwards and this is not feasible.
M16	<ul style="list-style-type: none">• The Transition Design has been reviewed and is being uplifted in line with CR055. The question of bringing in M16 forwards was assessed through this exercise.• This review determined that there is insufficient evidence to determine if M16 could be brought forwards and a decision on this could only be made when a sufficient volume of MPANs have been migrated to the new settlement arrangements and performance monitored accordingly.• This would likely be c.7 months in advance of M16 at the earliest, as per the Transition Design.	<ul style="list-style-type: none">• Assessment: The Programme is not in a position to determine whether M16 could be brought forward.• This should be revisited when migration is underway, and settlement performance is being monitored.

Overall Summary

- While there is capacity to migration more MPANs sooner than currently forecast, later Qualification wave participants would not be able to expedite their delivery plans to bring M14 forwards. Therefore, M15 could not be brought forwards without introducing significant risk to the ability of the Programme to meet M15 conditions.
 - There is no information available at this stage to assess the impact of MHHS on settlement performance and so a decision on whether M16 could be brought forwards cannot be determined.
 - The Programme recommends that M14 and M15 dates remain as per the CR055 plan and that the M16 date is revisited closer to the milestone date when a critical mass of MPANs have been migrated to the new settlement arrangements that their impact on settlement performance can be monitored and understood.
 - It is important to note that none of the above prohibits the ability to migrate MPANs sooner than initial forecasts, provided system capacity and availability of MPANs allow.
 - The Programme believes if more MPANs can be migrated sooner, and the risk managed, then they should.
 - It is important to note that there is a firebreak between end of SIT and the start of migration for Qualification participants and this was consulted and agreed on in CR022 and reinforced in CR055.
 - This firebreak should be upheld as it was the basis upon which SIT participants volunteered and invested in the SIT process.
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Thank you