MHHS Open Day
Q&A
13 June 2023
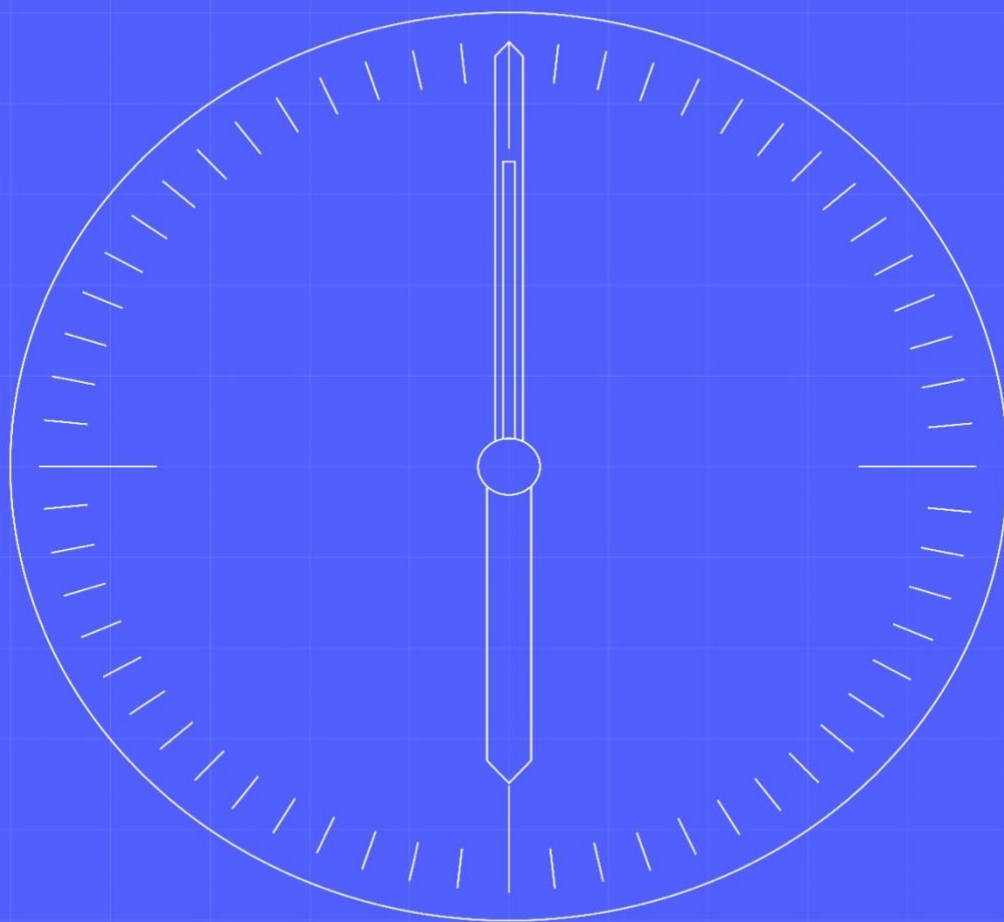
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MHHS Open Day Q&A

1. General Questions

Q1.   Is there an update on the future of Advanced Meters and how their connectivity is affected by the 3G twilight? Is this a risk for advanced agents and consumers?

Communications to meters is the responsibility of the associated agent, and the Programme expects any necessary action to be taken by those agents to maintain communications.

Q2.   Do Smart Meters have both an Electricity Smart Meter (ESME) identification (ID) and a Serial Number?

Yes, each first-generation smart meter (SMETS1) and second-generation smart meter (SMETS2) meter has both an ESME ID and a Serial Number.

Q3.   Is there an intention to codify half-hourly meter reading enrolment with the option for a customer to opt out, rather than opt in as they do presently?

Customer consent arrangements are part of Supplier Licence Conditions (SLC 47) and not within the design of the Market-wide Half-Hourly Settlement (MHHS) Programme, therefore this is a matter for Suppliers to consider.

Q4.   What is the risk that the Meter Asset Provider (MAP) selected MQ ID, which covers both Import and Export, means our meter is incorrectly showing as Export?

This issue was not identified within the Data Cleanse activities. Further information can be provided to the Programme if this is a material issue that requires further investigation.

Q5.   Are any Domestic Indicator/settlement configuration mismatches being ignored or worked at M10. Export Meter Point Administration Numbers (MPANs) in domestic sites currently flag on Electricity Enquiry Service (EES) as not aligned?

This issue was not identified within the Data Cleanse activities. Further information can be provided to the Programme if this is a material issue that requires further investigation.

Q6.   I'm a Licensed Distribution System Operator (LDSO) and my Smart Metering System already holds the ESME ID from the Data Communications Company (DCC). Could I get a quick win by moving this data into the Registration system on Day 1?

This option will be discussed with industry at the Data Cleanse Plan assurance meeting on 7 July.

Q7.   Are there any Smart Energy Code (SEC) requirements for MHHS Qualification?

If Smart Metering Data Service Providers wish to use Meter Data Retrieval (MDR) functionality, then the organisation concerned will have to accede to the Smart Energy Code as an "Other SEC Party" and will need to complete Data Communications Company (DCC) User Entry Process Tests (UEPT) in the new DCC User role of "Meter Data Retriever (MDR)" as a pre-requisite to entering Programme Systems Integration Testing (SIT) or Balancing & Settlement Code (BSC) Qualification. Existing Suppliers already using Import Supplier and Export Supplier roles to retrieve Smart Meter data, who will undertake the role of MDR themselves using those existing Service Requests, do not have to undertake any Smart Energy Code (SEC) accession or DCC User Entry P UEPT activities as a prerequisite to Programme SIT, but will need to provide evidence in the Qualification Assessment Document (QAD) for Qualification.

2. Questions about Testing

Q8.   When can we get more clarity on Operational, Non-Functional & Migration Testing as they were not discussed today?

The Test Approach and Plans for these Test Phases are still to be issued. The detail within them will be reviewed through the relevant Working Groups. The consultation windows are as planned:

- Migration Test Approach and Plan - from 26 October 2023
- Non-Functional Test Approach and Plan - from 25 January 2024
- Operational Test Approach and Plan - from 21 March 2024

Q9.   As it's down to each participant to decide what is covered in Pre-Integration Testing (PIT) why do we need to provide scenarios to confirm coverage?

The deliverables are two-fold. Each participants' Requirements to Test Traceability Matrix (RTTM) will provide an indication of test coverage against requirements. The Test Scenarios provide an indication that testing is appropriate i.e., testing the right things, happy path flows, edge cases, error handling etc.

Q10.   If we are part of later Component Integration Testing (CIT) intervals, why do we need to provide assurance documents by 16 June when Testing won't start for months, and we are still in preparation stages?

Dates for producing PIT artefacts are aligned to the SIT CIT Interval within which you are joining for your role. These dates are in the [Programme plan (.mpp)](#) or alternatively there is a guidance table in the supporting ['MHHS Implementation Approach' slides](#).

Q11.   Using the Programme risk-based delivery approach, is there an increased design risk for non-domestic suppliers (given the low volume of non-domestic participants in SIT)?

More suppliers have volunteered for SIT than is required by the Programme (nine volunteers, two required); most of them are both licensed Domestic and Non-Domestic Suppliers. Therefore, the risk for the non-Domestic market is no different to the Programme overall.

Q12.   If the payload in CIT is not being interrogated, then why is there a need to use live like data?

MHHS Systems Integrator (SI) SIT Test Management will look at payload, but it won't be processed downstream. MHHS SI SIT Test Management looked at options for CIT and considered the option of manufactured data, this can create concerns and risks. It will be better to use production data via the data cut.

Q13.   For a non-SIT LDSO participant, can the test environments be stood down from March 2025? Is there any environments requirement for Tranche testing post Milestone 10?

At present, we do not believe there are any test environment requirements beyond M10, but this will be confirmed by the Programme and Code Bodies through approach and plan deliverables over the next few months.

Q14.   How many Suppliers are going to participate in SIT?

We have nine Supplier volunteers for SIT.

Q15. With lots of SIT participants, how will that be managed through T0 if a number of participants are considered ready? What are the lead times for Programme participants (PPs) in tranches?

The current Programme assumption is that there will be no further Qualification testing for SIT participants, that those SIT participants in Tranche 0 will have completed the Qualification Assessment Document in the time set out in the plan and that the BSC Performance Assurance Board (PAB) and the Retail Energy Code (REC) Manager will approve those SIT participants within Tranche 0.

Q16. What is the data cut requirement for PPs for SIT non-functional?

This level of detail has not been worked through yet. The Test Data Approach and Plan for Non-Functional Testing is planned for Industry consultation from 25 January 2024.

Q17. Do we need to send Draft Pre-Integration Testing (PIT) Completion Report if we are sending the Execution Report at same time? It contains similar info on test progress, defects/issues.

Yes, we will still need the draft Test Completion Report. We need to see how you will be reporting at Test Completion to identify any report queries ahead of Test Completion.

Q18. If SIT non-functional is due in March 2024, how would parties be expected to complete their changes to support Non-Functional Requirements (NFRs) if they are already near to SIT timelines?

Whilst the Test Approach and Plan is due for approval in March 2024, industry will see this document in January 2024 in its first consultation window. In addition, NFRs associated with PPs PIT objectives, and the onward SIT non-functional requirements (NFRs) / SIT Non-Functional Test Scoping will be reviewed via the Non-Functional Test Working Group (NFTWG), with participants being made aware of what they need to do before the end of 2023.

Q19. If suppliers do not have unmetered - will they need to test this functionality?

No, if suppliers do not have unmetered supplies, they will not need to test this functionality. However, if there are regulatory qualification requirements for unmetered supply functionality and the supplier elects to undertake this activity in the future, then they should contact the appropriate Code Body and they may need to do some additional testing.

Q20. What is the Supplier split in SIT (Domestic v Business)?

Programme Steering Group (PSG) and Fast-Track Implementation Group (FTIG) slides include a SIT Dashboard with participant names. Ofgem publish a list of licensees which show which of these Supplier participants have domestic and non-domestic licences. The Programme will be confirming which Market Participant IDs (MPIDs) will be proposed for SIT from those participants and for which customer segment (Smart/legacy, Advanced or Unmetered Supplies).

Q21. How does the PIT reporting change align with the recent Load Shape Category (LSC) proposal and compromise around PIT tranching?

PPs obligation to report against their PIT activities remains the same, only if a PP is planning multiple iterations of PIT in support of entry into CIT, SIT Functional, SIT Migration, SIT Non-Functional and SIT Operational, then PIT artefacts will be required for each PIT activity. This will be up to five different sets of PIT Approach and Plans, RTTMs, Test Scenarios, Test Readiness Reports, Test Execution Progress Reports, Draft Test Completion Reports, Test Completion Reports and Work Off Plans.

Q22. Central Switching Service (CSS) Domestic/Commercial indicator - rules/definitions? Suppliers' old chestnut here on Sole Traders / Housing Associations etc. Clarity? Rules?

The Domestic Premises Indicator identifies the Supplier to Consumer relationship is in place. In the Faster Switching Programme Non-Domestic Suppliers populated the indicator on this basis. For example, MPANs with a domestic profile class were populated as non-domestic if the Supply Contract was between a Supplier and Housing Association.

Q23. Will supplier hub be used for SIT to ensure aligned data and 'real relationships' that will happen in business as usual (BAU)?

The intent is to align SIT participants in this way where possible.

Q24. When discussing PIT, this solely relates to (Design Build Test) DBT1. What happens for DBT2 and what is the timeline?

DBT1 is in scope of the Design. We're interested in seeing this completed successfully before each section. Consequential change is DBT2. The Target for completion is in line with Qualification depending on your journey. Timelines will be detailed in the Qualification Approach and Plan.

Q25. Please clarify when Supplier PIT completion artefacts are expected. End of September 2023 or a month before entry into CIT Interval 5 (mid Dec 2023)?

Dates for producing PIT artefacts are aligned to the SIT CIT Interval within which you are joining for your role. These dates can be found in the [Programme Plan (.mpp)](#) or alternatively there is a guidance table in the supporting ['MHHS Implementation Approach' slides.](#)

Q26. With security being needed in CIT, when is the Security working group being re-stood up to make sure all security requirements for CIT and SIT are met?

The next Security Design Working Group (SDWG) was on 28 June and covered the Interface Code of Connection (CoCo) and Public Key Infrastructure (PKI) security documents.

Q27. For CIT, how far back into Programme participants' systems does it go? Does it cover orchestration and events to trigger the messages, or does it cover simply the connectivity?

This has been the subject of discussion in Systems Integration Testing Working Group (SITWG). As a Programme we want to bring a good degree of confidence to CIT, and to do that we want to see the interface (IF) message triggering in the Back Office system involved in the end to end (E2E) process. During CIT we will not have a fully connected E2E ecosystem, instead it will be a bi-lateral test between each party and the Data-Integration Platform (DIP), therefore we expect Programme participants will need to trigger IF messages in their system in the same way they did in PIT. If PPs have a challenge in achieving this, then further conversation is needed.

Q28. The August date for the PIT simulator to be developed to Interim Release 2 is quite close to some of the PIT CIT draft and completion dates. Is this a risk?

On Design Releases, Interim Release 2 is the first week in July. This will support all the Design improvements to support System Integration Testing – Component Integration Testing (SIT-CIT). The Data Integration Platform (DIP) Simulator will be developed supporting that Design Release. The DIP Simulator and Data Generator uplift activities to deliver to versions Interim Release 1 and 2 have kicked off (w/c 19th June) and are on track for delivery in August. To mitigate the risk around the PIT CIT timelines, the Simulators, and Emulators (Sims and Ems) team will continue to release uplifted versions of the test stubs fortnightly so participant users will have these as soon as ready. The prioritisation of the test stub uplifts will follow the CIT interval prioritisation approach to ensure Pre-Integration Testing (PIT) CIT timelines are maximised.

Q29. Will SIT be supplier hub delivered?

The Programme will support this approach for participants who are able to enter SIT with counter parties that they wish to test with.

Q30. Is your scope restriction to Testing only? Based on our previous meetings I had assumed the scope was wider.

It is difficult to answer this question without further context. Please get in touch with more information.

Q31. I was under the impression that non-domestic SIT participants were 3 so when have the others joined? Information taken from previous Programme Steering Group (PSG) papers.

PSG and Fast-Track Implementation Group (FTIG) slides include a SIT Dashboard with participant names and Ofgem publish a list of licensees which show which of these Supplier participants have domestic and non-domestic licences. The Programme will be confirming which Market Participant IDs (MPIDs) will be proposed for SIT from those participants and for which customer segment (Smart/legacy, Advanced or Unmetered Supplies).

Q32. CIT excludes payload assessment but will include encryption certification and digital signatures. Correct?

No, CIT scenarios will also require some assessment of payload when the IF has been generated by a PP.

Q33. What would be the timeline of PIT monthly reporting for Non-SIT LDSO testing participants?

It is still monthly for now.

Q34. If we're going to be manipulating common blocks within the messages to match the scenarios of CIT, we are no longer linking the message to the MPAN being used.

This is a level of detail that we suggest is raised in the Data Working Group and SIT Working Group to discuss and be reflected in the appropriate test documentation.

Q35. What happens if market participant misses PIT exit criteria/milestone? How do you play catch-up? Somebody will miss it!

We will be pragmatic and evaluate on a case-by-case basis. It will depend on the participant's role in the market. We will be looking for clear work of plans to help us complete that assessment and whether this puts you in the category of completing the testing in time.

Q36. When can Programme Participants expect to receive the lower-level details/ requirements for the Non-SIT LDSO phase?

The Programme is progressing discussions with the Code Bodies on this phase, and we will share through the Qualification Working Group.

Q37. Clarity is needed on if NFRs apply only at the Adaptor layer or at individual systems. This may be impractical/impossible with some older industry systems and infrastructure. The current NFR document calls out the NFRs at industry and not party role level, how will the NFR testing be validated if participants don't know the criteria?

The Non-Functional Testing approach will undergo further development. The NFTWGwill look to resolve any Non-Functional Requirement queries. The Working Group will also identify which Non-Functional Requirements should be tested and verified during Programme participant's Non-Functional Pre-Integration Testing, and which are relevant for Programme Non-Functional System Integration Testing.

Q38. While we focus on DBT1 delivery, can we have DBT2 SIT plan as well in overall plan including the test environments where the DBT2 testing will be taking place?

CR022 contained a SIT and an Environments Plan on a Page (PoaP) that stated when the various phases of Testing would take place and when each of the environments would be required.

All CIT and SIT functional testing will be executed in the SIT-A Functional environment. DBT2 Testing we expect will either be executed in your PIT environment or within the E2E Sandbox Environment (UIT) or a combination of both.

Q39. What will be the assurance process for PIT DBT2?

The Programme is progressing discussions with the Code Bodies on the potential scope and nature of DBT2 and we expect this to be shared through the Qualification Working Group (QWG).

Q40. The design expects the Supplier-Metering Service-Data Service (SUP-MS-DS) to go through Testing together, particularly if the Supplier is MDR, where 1 of the 3 drop out of SIT, what would be the approach?

Assuming that this relates to a participant that fulfils all three roles, then logically all three roles/services would transition through testing together. However, should a particular service 'fall away' from SIT due to defects/other constraints then this would need discussing bilaterally with the PP in terms of their Qualification. SIT has multiple Sups, MS and DS, more than enough to form the Minimum Viable Cohort enabling SIT to complete.

Q41. Have the parties for P1 been contacted already? Or is this to come?

The 3rd Line Assurance Phase 1 Participants have been nominated and the Independent Programme Assurance (IPA) provider's assurance with those Programme participants is complete.

Q42. If the delivery is "good enough" with a test and learn approach, how does this tie up with fixed plans and milestones?

The timescales through SIT were based on reasonable estimates for testing a system of this scale and complexity, using the Faster Switching Programme as a benchmark. The risks associated with SIT were highlighted in Change Request (CR) 022 and acknowledged by PSG members in approving the Go live range at M10 and introduction of M10* milestone should additional testing be required. The progression through SIT will be closely monitored by PSG and the control point leading up to M10.

3. Questions about Placing Reliance

Q43. Certs into DIPS from Supplier certificate authority. Should Supplier or DIP Connection Provider upload them? Does it matter?

The DIP Platform is integrated with GlobalSign for the management and issuance of PKI Certificates. The DIP will provide PKI Certificates to participants and DIP Connection Providers, via a certificate management screen within the DIP Portal. The DIP does not require any participant or DIP Connection Provider to provide or upload their own certificates for use in the DIP.

Q44. Does placing reliance apply to PIT as well?

Yes it can, for example where you may be delegating your SIT / Qualification testing to a third party it may follow that you're doing the same for your PIT testing. However, if you are placing reliance on another PP who is undertaking testing then this will need to be assessed on a case-by-case basis.

Q45. When should we expect Placing Reliance responses and discussions?

We have received 19 Placing Reliance submissions for SIT participation. We've conducted informal review and have received all requested artefacts. We are now formally reviewing the proposals and discussing with Code Bodies. PPs should expect to receive a formal Programme/Code Body position via bilateral meetings through July and August 2023.

Q46. ISP adaptors out of box is fine but backend bespoke business process / business process layers are differentiators so how does that work?

Placing Reliance is appropriate where there is common IT or software components in use across qualifying parties. Where there are differences, this would require testing by that party. Areas of your software architecture that are different will need to be highlighted to the code delivery bodies during your Qualification Assessment to determine your full MHHS testing requirement.

4. Questions about Data

Q47. What is the data cut strategy for non-SIT qualification route?

This will be confirmed later in 2023, alongside the production of the Qualification test approach. It is likely that the same approach will be taken, and a single data cut taken to support all qualification tranches. Nearer the start of the testing phase, avoiding a large gap between the data cut and use of the data in testing.

Q48. As Data Cleansing activities are ongoing during SIT is there a risk that non-cleansed data could be used and then later cleansed?

This will be a manageable risk as the SI will verify that the data to be used conforms to a required standard. MPANs which do not conform will be excluded from use in testing.

Q49. What learnings are being taken from the extensive Faster Switching Data Cleanse activity? How will the same pitfalls be avoided?

We have engaged participants in terms of learnings. The plan was consulted upon and ended on 23 June, which allowed participants to challenge any aspects of the plan that they believe can be improved.

Q50. How will participant Data Cleanse targets be set? Will they be consulted on for feasibility?

The Data Cleanse Plan was recently consulted upon, the consultation ended on 23 June.

Q51. Where suppliers are supporting (not leading) the Data Cleanse, at what point are they informed and using what process?

This is set out within the plan which was recently consulted on.

Q52. Are participants going to be given process documents for each cleanse activity and any failure plans in case the activity fails? I.e., physical job incomplete

Process documents are not being produced; however, the plan sets out the requirements participants should follow.

Q53. What is the data cut requirement for PPs for SIT non-functional?

A single data cut is being used to support all stages of SIT. The SI will apportion MPANs for each stage by participant.

Q54. Are the MHHS Data Cleanse requests being coordinated and prioritised with the ongoing Data Cleanse requests being made under REC?

The Programme is aligned to REC to ensure that no duplication or conflicting requirements exist.

Q55. Does Ofgem Data Protection Impact Assessment (DPIA) and data sharing agreements also cover data to be used for Qualification?

To clarify, Elexon will complete the DPIA as it will become the joint data controller of the data. Elexon will execute data sharing agreements with SIT participants. There is a potential that the BSC can be modified before qualification which would negate the need for data sharing agreements.

Q56. Test plan feels like it needs a journey or process map to visualise each of the steps and requirements. Is this available?

Further detailed documents will be produced for consultation covering both the CIT and SIT test stages.

Q57. Will a data cut that is used and then modified by CIT be taken into SIT or will SIT revert and commence using the "vanilla" in modified data cut?

CIT and SIT will utilise different MPAN records which will be ringfenced by the SI for specific test cases.

Q58. Apart from MPAN, Address and Meter Serial number, can the participants mask or perform data obfuscation for all the fields?

The DPIA currently being undertaken by Elexon will clarify what data will be obfuscated.

Q59. How will the data validation rules be tested if manufactured data is being used?

Most data utilised will be actual production data. Data will only be manufactured when the data is not available within legacy production systems. For example, new MHHS data or data not yet populated within industry systems (such as import/export associations).

Q60. Can we get any update on the progress around the MHHS Programme DPIA - (any chance it may be ready before 19th July)?

Elexon are currently finalising the DPIA. Updates will be shared through Data Working Group (DWG).

Q61. Test data cut - we are required to take a full production back up. Are we just using this in our test environment, or are we expected to send to SI team?

Each SIT participant will be required to take a data back-up to populate their test systems. The SI will only require a small subset of this data and from a limited number of market roles. Clarification on the data needed by SI will be confirmed to the necessary SIT participants via Programme engagement before 19 July.

Q62. In the test data approach document, it was communicated that we have our own or be provided it by the Programme? Is this no longer the case?

A new version of that document has been published (v0.7). Participants will take a backup of the data they require to undertake their testing. The SI will receive data to enable them to validate data, augment the data when required and provide the augmented data back to participants.

Q63.   How does the data cut work with the June data changes like R0032? If the data change is necessary for MHHS then wouldn't the data cut be 'unclean' for testing?

The SI will augment data when required so that the new data delivered as a result of CP1558 and R0032 will be populated by the SI then returned to participants so they can load into their systems.

Q64.   Test data cut - when you say subset, what size and shape? How will this be (Data Protection Impact Assessment) DPIA'd by our own internal DPO teams?

The exact data items to be provided to the SI will be confirmed by the Programme. We will be engaging all SIT participants directly between 19 June and 19 July, to confirm bilaterally, what data is required for each SIT participant.

Q65.   Will the augmented data cut provide enough data sets to support E2E sandbox testing for Qualification?

A separate data cut will be utilised for Qualification.

Q66.   Test day - when will we get details of the mechanism to transfer as this will need to be scheduled with our data engineers? (Outside of MHHS dev teams)

This will be confirmed within technical documentation reviewed by the Data Working group in July.

Q67.   At what point in data transfer will MPANs be anonymised?

MPANs will be anonymised following receipt of the data by the SI. SI Analysis and data augmentation will be undertaken utilising obfuscated data. The DPIA will set this out in more detail.

Q68.   What happens if a customer has declined us access to some data like PSR (Priority Services Register) from being shared, would this still need to be sent as part of the Migration?

The only personal data identified by the Programme, which will be sent to the SI, will be MPAN, Address and Meter Serial Number. The DPIA will set this out in more detail.

Q69.   If Placing Reliance on a Software Provider, what's the view on who actually takes the data cut?

This will differ from participant to participant based on how they operate.

Q70.   Is a data cut only required for the SIT participants? Has this changed from what was discussed in Data working group?

Yes, the approach has changed, a subsequent data cut will be required for Qualification. A new version of the Overarching Test Data Approach & Plan has been released (v0.7) which clarifies this new position.

Q71. Are there going to be any data extraction & augmentation activities specified for other LDSO role types (Unmetered Supplies Operator (UMSO) / Network Operations), or only for the Registration role?

We do not believe that this is required by the SI. However, LDSOs involved in SIT will need to take their own data back-ups of this data to support their own SIT activities.

Q72. Will there be data cuts for later phases of testing, and when will we know the dates for these?

Yes, at least one data cut will be taken to support Qualification Testing, the Programme will confirm when this needs to occur at a later point in time.

Q73. How is Data Cleanse being planned for Automatic Meter Readings (AMRs) specially if their passwords have not been sent to the current Supplier/Data Collector, making it difficult for communications to be set up?

This is an existing industry issue, and related obligations are set out in the REC. The Data Cleanse Plan has identified this issue as a risk to migration. A number of activities are set out within the Data Cleanse Plan to address, noting that the Programme will not be placing additional obligations on parties beyond those that already exist within the REC.

Q74. How will data cuts be co-ordinated to achieve Programme-wide expected results (ERs) What level will ERs be defined at, and will there be a supporting model?

A request for all SIT participants to take a data cut was sent on 19 June. Participants are required to take a data cut on the same day to ensure that data will be aligned across participant systems.

Q75. Will Elexon take a data cut of MPAN to Balancing Mechanism Units (BMU) mappings for 19 August?

Yes, Elexon will take a data cut of Market Domain Data (MDD)/Industry Standing Data (ISD) on that date.

Q76. Are you confirming to participants which systems are required for the back-up?

The Programme does not have a view as to how each participants' systems have been built. Individual participants will be required to identify the data and systems they need to undertake their testing. We will engage with all SIT participants directly between 19 June and 19 July, to confirm bilaterally what data is required for each SIT participant.

Q77. The changes to the test data cut in August only being for SIT participants is welcomed. When will other participants be required to do their test data cut?

This will be confirmed at a later point in time by the Programme.

Q78. What will be the impact if the new production data cut is not taken by August 2023?

Participants within SIT may have misaligned data to other SIT participants which will impact their testing.

Q79. Is there a plan to suggest all participants take regular back-ups of their systems during test phases including Central Parties?

This is not currently identified as a requirement.

Q80. Does the Programme recommend still taking a back-up, even if we do not intend to participate in SIT and CIT? (For mandatory testing required later on).

No, this will not be required. A data cut for Qualification participants will be taken at a later point in time.

Q81. Is there a risk that data cleanse activity could cause a scenario change meaning all participants, including those who have completed SIT enter Qualification?

This has not been identified as a material risk to the Programme. The Data Cleanse activity will not change the baselined MHHS Design.

Q82. What is the enduring approach for test data for UIT (User Integration Testing) and delivering change post Programme? (DCC smart faced challenges with this)

This has not yet been identified by the Programme but will be considered within the transition work stream of the Programme.

Q83. When will we know which specific data items need to be aligned across the industry? This will inform data cut work. If already known where is this, please?

The Programme is currently documenting this data. Clarification will be provided to SIT participants before 19 July.

Q84. Test data cut - when will the Programme confirm what other data cuts are required for later SIT phases; if this one focuses on CIT, functional?

The data cut required on the 19 August will cover all phases of SIT, so only one data cut is required to be made by each SIT participant.

Q85. Ofgem Data Protection Impact Assessment (DPIA): when is this happening?

Elexon (not Ofgem) are currently finalising the DPIA. Updates will be shared through Data Working Group (DWG).

Q86. Parties supply data to The Programme within one week. Where is this detailed? Have timescales considered participants who have multiple data sources to work?

The plan for the data cut is set out within the Overarching Test Data Approach & Plan. A new version of this document has been produced (v0.7).

Q87. Data Cleanse Plan (Review 2) - consultation ends 23 June - not this Friday!

Apologies, 23 June is correct.

Q88. Please confirm, only SIT participant LDSO are required to take the data cut?

All SIT participants must take a data cut from their systems that they will require to support their SIT activities. It is likely that only LDSOs will be required to provide data to the SI. This will be confirmed before 19 July.

Q89. Please confirm the data cut on 19 August is only for SIT volunteers.

This is correct.

Q90. Is the participant data cut sent to the Programme or just held (with augmented data then sent to add)?

The Programme will confirm which participants will need to provide data to the SI.

Q91. Does M14 relate solely to new customers being taken on or is it renewals as well?

M14 relates to new customers (via switching).

Q92. Does Ofgem DPIA and data sharing agreements also cover data to be used for Qualification?

The approach for Qualification will be confirmed in Q3 2023. The DPIA is assumed to be unchanged but a different approach for data sharing may be possible if a modification to the BSC is made (to avoid separate data sharing agreements). For clarification, Elexon will produce the DPIA, not Ofgem.

Q93. Can the MHHS Programme provide a smart meter % complete dashboard given the importance of rollout for MHHS?

We will investigate if this can be provided.

5. Questions about MHHS Design

Q94. When will the real Industry Standing Data (ISD) be available to use/get from DIP, as there are a lot of discrepancies between the Interface Catalogue, examples, and the Simulators?

The ISD will be made available in the run up to CIT and SIT for testing purposes. As part of the fast-track design update process discrepancies within the interface catalogue are being recorded in the Design Issues Notification (DIN) log and addressed in future interim releases.

Q95. How are non-communicating smart meters considered in the MHHS Design?

Non-communicating smart meters will be considered as traditional meters for the purpose of readings. Performance assurance will monitor and take appropriate action on the percentage of actual reads being processed in the new Settlements system.

6. Questions about Sims & Ems

Q96. The PIT simulator is still being developed, when will the Programme publish the version all parties are to PIT test against?

Following on from the Design process and the new Programme Baseline Design version, the Sims and Ems team are conducting an impact assessment and has commenced uplift activities. In line with the position articulated by the MHHS design team, PPs will need to conduct their CIT PIT on Interim Release 2 of the design and the DIP Simulator will be made available to support this testing. Please note and as per the PIT guidance, all Programme participants will need to test their own system(s) in a stand-alone manner and each party needs to develop any test harnesses or stubs it needs to adequately test its own systems. The DIP Simulator is the final stage of validation for PIT, PPs are required to use this to test their systems' sending of interface messages and receipt of Publication (PUB) messages; the DIP Simulator will provide logging of test activity which will form part of your evidence for PIT completion.

7. Questions for Ofgem

Q97.   The success of MHHS will be dependent on the roll out of smart meters. Is this concerning given the roll out is not progressing as planned?

The business case for the delivery of MHHS was based on a very low volume of installed smart meters. It was acknowledged that a load shaping service would be required to support the settlement process where smart meter data is unavailable. The more smart meters that are installed will provide more accurate data for settlements and help to realise the MHHS benefits sooner. There are other activities in train to increase the rollout volume of smart meters by end of 2025.

Q98.   Given that time of use tariffs are dependent on smart meters, will some consumers be 'penalised' for not having a smart meter as they cannot access such tariffs?

This question is outside the remit of the MHHS Programme. Provision of Time-of-use (ToU) tariffs or products will be a commercial decision for suppliers.

Q99.   Have you considered scenario(s) where suppliers could fall out of the process e.g., Supplier of Last Resort (SOLR), Mergers & Acquisitions (M&A) (Shell?)

Ofgem will manage any SoLR event in the usual way and inform the Programme as soon as practicable to ensure any impact can be managed. Similarly, in the event of M&A there is an expectation for parties to inform the Programme where this will have a material impact on the participants activity within the Programme.

Q100. Qualification - if tranche & large portfolio are late to migrate, when will it be confirmed what penalties will be incurred if not completely migrated by October 2026?

Ofgem is considering a number of potential incentives to ensure the Programme and participants deliver to the newly agreed implementation timetable. These will be published and consulted upon in due course. The Programme has consulted on the migration approach and the qualification timelines therefore parties should be fully aware of the timelines associated with this approach. Effective reporting by participants will help the Programme to provide additional support, if required.

8. Questions about Delivery Philosophy

Q101. What is 'good enough'? Working Groups design by committee? Who holds the pen to sign-off on risk? How to avoid long tail of deferred risk?

What is 'good enough'? Design, as an example would be deemed 'good enough' as far as it allows industry to function (and deliver MHHS benefits) without material issues impacting stakeholders. Note that the Design was developed by the Industry Working Groups, and it has already been agreed that it is good enough – this response is with reference to future change. Any changes that are required to ensure the benefits of MHHS is delivered, or to ensure that industry processes are not compromised or hampered will be considered for progression, but changes that are deemed 'nice to have' and not essential to deliver MHHS benefits, will not form scope of 'good enough'. The Programme Governance allows the Senior Responsible Owner (SRO) to sign off risk and where applicable, for concerns to be escalated to the Programme sponsor. The key to avoiding the long tail of deferred risk is to ensure that all participants actively engage and feed into any changes/decisions to ensure that the risk involved is adequately addressed as part of the Programme decision-making process.

8. Questions about Data Integation Platform (DIP) Onboarding

Q102. Will the DIP become the natural home for future deprecated Data Transfer Network (DTN) flows? Does DIP eventually replace DTN?

During the Open Day Q&A, Chris Wood from the BSC noted that the Programme is focused on delivering the scope of the DIP to support Market-Wide Half-Hourly Settlement. This is in line with Ofgem's directive from last year, which mandated the Programme to Procure, Design, Build and Test into operation the platform for MHHS. A further mandate was provided by Ofgem earlier this year for the BSC to operate and run for Industry on an interim basis. Any discussions regarding potential enhancements to the DIP or the handling of residual Data Transfer Network (DTN) flows will be undertaken through standard industry processes and are not under consideration at this moment.

Q103. We now have a nom officer, Senior Responsible Owners (SRO) and Authorised Responsible Owner (ARO) for smart, Central Switching Service (CSS) and now the DIP. Why do we have duplication if it's the same officer, can the same verification apply?

You can use the same people; however, you still need to complete the process for the DIP as Global Sign need to do their own verification.

Q104. DIP connectivity - Can Supplier X with MPID ABCD have both a direct and adaptor connection to DIP for the same Market Participant Identifier (MPID) ABCD?

Yes, suppliers have almost total flexibility in how they manage their IF's. It is possible to retain direct control, or "outsource" to a Third Party Service Provider (TPSP) (Adaptor Service). This delegation is done at the individual IF level so suppliers could have a mix of in-house managed IF's and delegated IF's. It is also possible to delegate different IFs to different third parties.

Q105. Can we leverage the Nominating Officer verification process undertaken for faster switching for MHHS DIP onboarding?

No, vetting and registration is a requirement for the DIP and must be completed before entry into SIT.

Q106. Is the DIP Identifier embedded in event message traffic?

The *Sender* DIP ID is sent in the message header [payload/CommonBlock/S1/senderDIPID]

Q107. DIP connection ID - Where is this used? in message payload or as part of the Transport Layer Security (TLS) connection?

The DIP Connection Provider ID is sent in the message header (when appropriate or null if not relevant) [payload/CommonBlock/S1/DIPConnectionProviderID].

Q108. Why is the DIP using a different PKI/Certification to that of Central Switching Service (CSS)? Can the same methods not be re-used to avoid having to deal with multiple methods.

To use the same PKI solution as CSS would require integration with the DCC and use of the DCC provided Service Now platform. Technically who provides the certificate is less of an issue as there is no direct relationship between a user and the certificate provider. The DIP is aligned with CSS

regarding the PKI roles used; however, we have made some changes to the process to better fit a self-service model. For example, the DIP Manager will not require vetting of SRO, ARO or TCs.

Q109. Does Registration Services role come under LDSO?

Registration Service is a separate role mentioned in several documents.

Q110. Can supplier Y with MPID BCDE have multiple different adaptor providers connecting to DIP for supplier MPID BCDE?

The Registration Service is a recognised Service in its own role within the DIP - but there is functionality to "group" roles together under a single "organisation", so we would expect this to be the case. For example, "Big LDSO Org" would have both its LDSO and REGS function sitting underneath it, DIP IDs / MPDIDs etc are held at the role level.

Q111. What are the lead times ahead of the test phases to gain accreditation and Certs?

The Global Sign (Certs) process is estimated to be less than two weeks end to end, as long as all relevant resources have been lined up for the completion of their required tasks.

Q112. As a Software Provider to many UK Suppliers, can we sign up to the DIP to be able to access HH data history for an MPAN as part of the quoting journey?

No, this is not an option. The initial phase of the DIP does not include providing data to non-licenced parties. However, we believe it was Ofgem's expectation that the DIP would form the basis of wider data sharing – this would be for a later phase of DIP delivery to explore. In the meantime, EES is planning to make an API available to allow (price comparison sites, Energy Advisory services etc) to reference a more accurate annual consumption (not HH data).

Q113. Is there official Qualification criteria to become a DIP connected party?

If the question is about the DIP Connection Provider, you will first need to be partnered with a (at least one) qualified Programme participant.

Q114. Is there a DIPS emulator from Avanade that we can use for emulation in PIT?

No, the DIP simulator is being developed by the Lead Delivery Partner (LDP) for PIT testing.

Q115. For new entrants without existing MPIDs or ISD, how are the DIP IDs allocated? Would it be against testing MPIDs?

For new entrants they will be going through the relevant (BSC / REC) Code Body Qualification process which is where they will allocate themselves their MPID. This can then be inputted into the DIP also. Within the DIP the participant will also allocate themselves their DIP ID in a similar manner.

Q116. DIP PKI - does the company operating in two different roles (Sup + Mop) need two different Certs to connect to DIP or can it use a single Cert?

If the Sup and Mop are registered under the same company, then yes, the same Certs can be used. If separately registered with companies house different certificates will be required.

Q117. Is there going to be capacity to deal with the requests for onboarding and Nominating Officer (N.O) checks for each round of Qualification?

The N.O will need to complete organisational vetting and registration once with GlobalSign. This needs to be completed before certificates can be requested for SIT. There is no requirement for the N.O to register again in production.

Q118. Do we need to go through N.O process etc for SIT?

Yes, this is needed.

Q119. Will N.O still be nominated by the Service Now lead contact as per switching?

The Nominating Officer (N.O) needs to be someone at a senior level – someone listed on Companies House so that Global Sign can do their verification checks.

Q120. As a DIP Connection Provider how does the allocation of DIP IDs operate? We will have ~ 20 MPIDs connecting multiple systems for each MPID?

Programme participants will be responsible allocating their own DIP IDs against their own MPID/roles. The DIP ID/ MPID pair could then be allocated to a DCP by associating a DCP ID. The DCP ID would have been provided by their DIP Connection Party. Once the DCP ID is allocated to the DIP ID, the DCP then has responsibility of the DIP ID.

Q121. Do we need to go through DIP on boarding if we're SIT participants?

Yes, everyone that wants to use the DIP will need to go through onboarding.

Q122. Is this process going to be the same for getting Certs and DIP ID for Testing?

The process for Programme and enduring phases is the same, so yes, the process will be the same.

9. Questions for IPA

Q123. How does test assurance work if PP places reliance on their third-party Software Provider?

During the initial briefing session with each selected sampled participant, the IPA team will check whether they are placing reliance on third party software providers. Where this is the case, we will also seek to meet with the third party to understand progress (either together with the participant or separately).

Q124. Where parties are Placing Reliance, will IPA be aware of the party having reliance placed on them to prevent that party being assessed multiple times?

We will work closely with the Programme to understand which participants are placing reliance on which third parties and this will be used as an input into sample selection. Where a number of participants use the same third party, we will look to consolidate this into a single session with the third party where it makes sense to do so.

Q125. Are there any common assessment templates which the participants need to follow which will used as part of Test Assurance by PwC and evidencing required?

For each period report, we will prepare a set of assurance exam questions that we will share with all participants via the Testing and Migration Advisory Group (TMAG) and during the initial briefing session for each selected sampled participant. The exam questions will vary for each Assurance Period depending on the phase of Testing. This will include a list of the evidence we wish to review based on the exam questions, which will include artifacts that we would expect to be produced during the normal course of Testing (e.g., test plan, test status report). We will also seek to leverage evidence/reports previously shared by the participant with the Programme to minimise any disruption on the participant and to make the visit as efficient as possible.

Q126. Is there an overarching assurance framework & plan that covers both Programme and IPA activity? What will be asked to demonstrate / attain & by when?

We are currently working with the Programme to incorporate the IPA activities in the overall Programme plan to provide greater visibility of IPA activities to participants. The Independent Programme Assurance Framework, which is available on the MHHS Programme's Knowledge Base, provides the overarching framework for our work. If you are selected as a sampled participant, we will brief you on the exam questions we wish to cover during an assurance period and the evidence we wish to attain and by when. The exam questions and evidence are aligned to the overall Programme test phase entry and exit criteria that participants should be seeking to attain, and our assurance activities focus on assessing readiness against these.

Q127. What's the logic selecting sample PPs? is it random or targeted?

Participant samples will be selected based on a number of factors including an element of random selection to remove any potential bias and further strengthen the independence of the assurance activities. These factors include:

- The role and criticality of certain groups of participants in relation to the particular phase of Testing.
- Representation across different constituent groups is included in the sample.
- Whether an organisation has previously been subject to IPA assurance activity (Note: it may be that a participant is asked to engage in more than one Assurance Period depending on their role in the Programme).

Q128. What prep time will be given for sample participants?

If a participant is selected as part of the sample for an Assurance Period, we will hold a briefing session with the individual participant within one week of the notification. During the briefing session, we will provide the participant further background to the assurance meeting so they know what to expect and answer any questions they may have. This will include sharing the objectives of the meeting, the key exam questions to be covered and the supporting evidence that we will request to see. The assurance meeting will then be scheduled for approximately two weeks after the briefing session. Following the assurance meeting, the IPA will share any key observations and recommendations identified with the participant to provide visibility and validate them for factual accuracy.

10. Questions for Code Bodies

Q129. Will there be headroom in Tranches for potential Tranche 0 'drop-outs' from SIT?

Code Bodies are aware that this is a scenario that will need to be considered and it is set out in section 11.3 of the Qualification Approach and Plan (Scenario 5) which sets out the following next steps for SIT 'drop-outs': Code Bodies will require the participant to follow all entry criteria for re-entry to QT, however QT scope will be defined based on below additional considerations:

- MHHS Qualification report outlining the execution status and coverage achieved in SIT.
- Defect status report with outstanding issues/ impacts and timeline for resolution in readiness for re-entry to QT.
- Based on the above, Code Bodies will recommend a full/subset of Testing scope and/or regression testing for Qualification. Allocation to a tranche will be based on the current capacity.

Q130. Can we submit our intent to qualify preferred tranche earlier than Feb 2024?

As noted in the presentation, Code Bodies considered this option following feedback but the majority of respondents when asked stated they would prefer for this to be requested in February 2024 and not earlier. In order to ensure a clear and fair process, Code Bodies will not accept responses before this date. However, Code Bodies keep the approach to tranche allocation under constant review based on the MHHS Programme Plan and participant feedback.

Q131. Did the BSC legal advice on non-discriminatory tranche allocation consider that Ofgem is exploring a penalties regime for failure to achieve migration?

The BSC legal advice did not consider the overall MHHS Programme Plan but the very specific requirements on Elexon as an MHHS participant delivering the Qualification process for MHHS. These requirements set out that access to Qualification should be undertaken with a non-discriminatory approach. The legal requirements do not provide a means for this approach to be adjusted based on expected participant activity during the Migration period. Participants with concerns on the approach set out in the BSC have the option to raise a BSC Modification.

Q132. Does Non-SIT LDSO have tranches? Will all the LDSOs move into Qualification at the same time from July 2024?

There is a specific tranche allocated for Non-SIT LDSOs at the start of Qualification in July 2024 to enable them to be ready to support Migration activity as other participants complete Qualification. The expectation is that all Non-SIT LDSOs will enter this tranche. The timetable for Testing within the tranche is still under development and will be subject to any capacity constraints for the environments. This detail will be communicated via the Qualification Working Group and the further iterations of the Qualification Approach and Plan.

Q133. When do Qualification participants need to submit their intention to qualify submission?

Formally this will take place in February 2024 and participants will have four weeks to respond. However, Code Bodies will be requesting informal information to support planning prior to this.

Q134. Can a company request for a particular tranche?

A participant can request a particular tranche as part of its 'Intention to Qualify' in February 2024. Code Bodies will work to allocate the tranche closest to this based on the tranche capacity and on a first come first served basis from the submission of the request in February 2024.

Q135. Where Third Party Software Provider (TPSP) is needed to support Qualification, can a question be added to confirm the TPSP has capacity to support?

It is the responsibility of the participant to liaise with any of its required third parties prior to submitting the 'Intention to Qualify' and tranche allocation request to ensure they have adequate capacity to support Qualification as required.