MHHS Programme Governance Framework (Strawman)
Elexon,
350 Euston Rd,
London NW1 3AW

Date: 19 August 2021

Email: SRO@mhhsprogramme.co.uk

Dear Sir/Madam,

Thank you for the opportunity to respond to your consultation on the Market Wide Half Hourly Settlement Programme Governance Framework (Strawman).

As you are aware Energy Networks Association (ENA) is the industry body representing the UK's electricity and gas transmission and distribution network operators. The following comments are provided by ENA on behalf of its electricity distribution network operator (DNO) member companies in response to the Elexon consultation which was published on 30 July 2021.

Some ENA member companies may respond individually to the consultation. The comments in this ENA response are submitted in support of those individual submissions.

Comments on the Consultation

Our members are supportive of the proposed governance framework as it is based on good corporate governance principles.

DNOs are concerned with the short industry consultation timelines. The proposed 10 Working Day timescales for both Stage 1 (MHHS programme review, Cost request and Issue to industry) and Stage 2 (Industry Consultation, Recommendation and Decision) increases the risk that programme decisions fail to fully identify all of the potential issues in the development of proposed solutions. This could lead to sub-optimal solutions and outcomes which may ultimately need to be revisited to deliver an efficient programme.

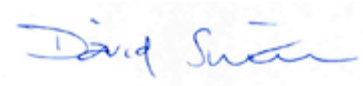
The proposed process would require a significant level of input from DNOs in short timescales at a time when our members are already concerned with the overlap between the Faster Switching and MHHS implementation timelines. This places a risk on each of these projects as DNOs are using the same specialist resources to deliver

both programmes. Our members suggest that both programmes work together to understand the impact each has on the other.

We provide a more detailed response to the consultation in Appendix 1 below.

If you require further information or you wish to discuss any of the content of this response, please contact Fungai Madzivadondo at fungai.madzivadondo@energynetworks.org.

Yours faithfully



David Smith
Chief Executive

APPENDIX 1 - Supporting Information

Consultation on MHHS Programme Governance Framework

Consolidated DNO Responses to Consultation Questions
August 2021

Ref	Q&As
1	**Do you support the proposed MHHS Governance Framework objectives as set out in 3.4? (Please can you give reasons for your answer)**
Our DNO Members agree with the proposed MHHS Governance Framework objectives. It's important that all Parties have an opportunity to influence and participate in the programme decision-making process without delaying the programme. In addition, programme decisions will be clearly communicated to all Parties. However, DNOs note that there should be a balance between delivering Elexon objectives and delivering the MHHS programme.	
2	**What are your views on the proposed governance structure, including decision levels, decision groups and workgroups in sections 3.5 & 3.6?**
Our DNO Members are supportive of the proposed governance structure as it clearly sets out the roles and responsibilities of the different decision and workgroups. The proposed structure will ensure the decision-making process is appropriately balanced, and the SRO is empowered to make decisions on behalf of the industry and engages and consults with the Programme Participants.	
3	**Do you agree that PSG and the Implementation Advisory Group (IAG) should be separate, or would it be better if the IAG role is part of PSG? (Please can you give reasons for your answer)**
Our members believe that it would be better if the IAG role is part of PSG. Under the terms of reference, the group objectives are roughly similar in that both groups will: • be monitoring the programme plan to ensure the programme is delivered according to the agreed TOM. • ensure all programme participant perspectives are appropriately represented during decision making. • receive escalations from lower/other groups • enable Programme transparency for all impacted constituency groups and stakeholders. The IAG (level 3) and PSG (level 2) membership is almost similar with both requiring Senior level attendees. It is likely that the same individuals will be assigned to these groups. While they are at different decision-making levels the groups are carrying out similar tasks and making similar decisions. Having the IAG role as part of the PSG will ensure decisions are made in a clear and timely manner and at the appropriate level.	
4	**Are the proposed constituency representatives at Level 2 and Level 3 correct? (Please can you give reasons for your answer)**
Our members agree with the proposed constituency representatives as all constituencies are represented.	

5	**For your constituency group, would you support the MHHS Programme running a constituency member nomination and election process for all Level 2 and Level 3 meetings? (Please can you give reasons for your answer)**
Our members would support a nomination and election process for Level 2 and Level 3 meetings.	
6	**Do you agree with attendee requirements as set out in section 3.11? (Please can you give reasons for your answer)**
Our DNO members agree with the attendee requirements as this provides the right level of expertise at the different groups.	
7	**Do you agree level 4 groups should be open for all parties to nominate members who have the relevant expertise? (Please can you give reasons for your answer)**
Level 4 groups should be open for all Parties to nominate members as they need to work on the detail of the proposed change. It's important that Parties are involved in developing solutions at earlier stage.	
8	**Specifically for Supplier Agents, should this constituency category be split into two sub-constituency groups and if so what would be the best way to divide them? (Please can you give reasons for your answer)**
N/A	
9	**Specifically, for the CCAG, should the constituency representatives include the Code Bodies only or should it also include other programme participant representatives? (Please can you give reasons for your answer)**
Our members believe that the CCAG should include other programme participants representatives as they will be able to identify unintended consequences of making changes across the different codes and systems. Including programme participants in the CCAG will ensure that impacts to other codes are identified at the early stages of developing a change. Unlike code bodies, programme participants work with the systems and processes and are more likely to have the technical expertise to identify impacts of proposed changes.	
10	**What are your views regarding how decisions should be delegated or escalated?**
As proposed decisions should be made /escalated through the decision groups where appropriate. Programme decisions should reach a consensus.	
11	**When the Programme Plan is fully developed it is likely to contain Level 1, 2 and 3 milestones. How should milestones be linked to the proposed governance framework?**
– Milestones should be linked to the workgroup's plans, clearly showing the tasks/changes to be delivered and when. – Decision group plans should show when key decisions are to be made and whether a milestone has been achieved or not	

– Clearly show dependencies across the different groups, decision making groups – There should be a plan for the industry to refer to as they work on MHHS implementation – The SRO should clearly communicate milestones to programme participants. This could be done when publishing decisions or through consultations to allow participants to see if the programme is going in the right direction or not and assess SRO performance
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12 Are the proposed 5 working days and 10 working days timescales appropriate?
The 10 Working Days may be considered short timescales for programme participant to review and respond to consultations given that most industry consultations are issued for 15 or more Working Days. The consultation is describing a significant amount of input with very tight turnaround for industry consultation. Short timescales reduce the opportunity to discuss the merits of the proposed solution and identify any potential issues and/unintended consequences. Failing to identify any issues with a proposal may lead to delays later in the programme. In addition to the MHHS Programme our members are working on the Faster Switching Programme implementation. A majority of our members are using the same specialist resources on Faster Switching and MHHS and may find it difficult meet the short consultation timescales.
13 Should all changes follow the same change control process, or should there be different routes depending on the impact?
While its good practice for all changes to follow the same change control process, we recognise there may be exceptions where an urgent change may be required or a need to progress a change for a longer period due to the impact and level of expertise/input required. Where such changes are raised the SRO should clearly communicate this to programme participants and effectively manage the change process, so programme activities are progressed to plan.
14 Is there anything further you think we should include in the MHHS Programme Governance Framework?
Nothing further to add.