MHHS PROGRAMME

# Market-wide Half Hourly Settlement (MHHS) Programme Governance Framework

# Consultation Questions

| Document owner | Document number | Version Number | Date |
|---|---|---|---|
| **Andrew Margan** | **MHHS_DEL032** | **Version 1.0** | **30 July 2021** |

© MHHS Programme 2021

# Market-Wide Half Hourly Settlement – Programme Governance Consultation Questions

## Introduction

It is anticipated that the high-level Programme governance structure will be directed by Ofgem in autumn 2021 through their SCR powers. Ofgem's proposed direction will place programme governance arrangements under the BSC. All programme governance documents will sit below this overarching framework.

The MHHS Programme is consulting on a proposed governance framework because:

1. Programme governance arrangements are likely required before autumn 2021.
2. MHHS Programme documentation needs to be more detailed than the overarching BSC framework.
3. The MHHS Programme wishes to be transparent and build a stronger framework through consulting with programme participants.

To support the Governance Framework we would be grateful if responders can provide their views of the proposed framework and the questions below. All comments received will be assessed by the MHHS Programme and used to feed into an amended MHHS Governance Framework documentation. Outstanding issues will be noted and taken to an appropriate programme decision group for discussion and action.

Feedback and comments should be sent to SRO@mhhsprogramme.co.uk.

## MHHS Programme Governance Framework Questions

### A - Programme Objectives

We have proposed programme governance framework objectives.

**1) Do you support the proposed MHHS Governance Framework objectives as set out in 3.4? (Please can you give reasons for your answer)**

AIMDA supports the delivery of MHHS and the proposed objectives are noble, but are they realistic? How will successful delivery be measured? By adherence to the timescales in the Ofgem plan? If so, AIMDA would point out that there is insufficient momentum currently and the programme is late setting up. Similarly, expecting to reach consensus could be time consuming and actually result in poor decision making.

### B - Governance Structure

The MHHS Programme has created a four level governance framework model. Ofgem are the highest decision maker at Level 1. PSG are proposed to be the primary programme decision maker at Level 2. Other decision making groups will be at Level 3. It is proposed this will include Implementation, Design and Cross Code decision groups. Workgroups and subgroups will be at Level 4.

**2) What are your views on the proposed governance structure, including decision levels, decision groups and workgroups in sections 3.5 & 3.6?**

AIMDA's view is that the proposed levels and structures are a suitable governance structure for the programme.

**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)**

© MHHS Programme 2021

AIMDA's view on this is that they should operate together. The advantage of putting them together is that as the primary purpose of the programme is to implement something, this may avoid duplication and speed up decision making.

The Level 2 and Level 3 decision groups will have nominated and elected constituency representatives, empowered by their constituency members to make decisions on their behalf.

**4) Are the proposed constituency representatives at Level 2 and Level 3 correct? (Please can you give reasons for your answer)**

Yes, it is a balanced approach and ensures that all facets of the industry 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)**

Yes, this would be a fair and open process, and ensure that these groups are populated with people who will represent their constituents.

**6) Do you agree with attendee requirements as set out in section 3.11? (Please can you give reasons for your answer)**

Not entirely, as too strict adherence to making the groups homogenous from a skills and experience perspective could lead to bad decision making.

**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)**

Yes, although membership should be screened to a) prevent the groups getting too large; b) ensure that participants are there to contribute and not just learn

**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)**

Supplier Agents representatives should be taken from the independent Supplier Agent community as Suppliers (and therefore in-house agents) are already very well represented. Ensuring a balance across domestic/non-domestic and data/metering is also desirable.

**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)**

The CCAG should also contain programme participants as a) the Code Bodies do not always understand the operational impacts of changes to the codes and b) it will lead to faster and more effective decisions

The governance structure has a general principle of higher decision groups being able to delegate decisions to groups below them and for lower level groups being able to escalate to a group above them

**10) What are your views regarding how decisions should be delegated or escalated?**

© MHHS Programme 2021

In principle, the proposal is OK, but the detail needs to be worked through. When consensus cannot be reached, how will decisions be made? Is there a role for independent assurance or Ofgem in this? Is there a process of appeal?

**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?**

The proposed governance framework helps facilitate work, which of course will be reflected in the plan. The activities of work groups should be planned at the right levels of detail, progress monitored and interventions made where required to ensure progress.

© MHHS Programme 2021

## C – Meeting Management

We propose meeting papers are issued at least 5 working days in advance of a meeting and post meeting papers are issued no later than 10 working days after a meeting.

**12) Are the proposed 5 working days and 10 working days timescales appropriate?**

| |
|---|
| AIMDA agree that these timescales are appropriate |

## D – Change Control

We have proposed high-level change control principles and a high-level change control process in section 8. We will consult upon a detailed change process in the future.

**13) Should all changes follow the same change control process or should there be different routes depending on the impact?**

| |
|---|
| The risk of all changes following the same route is that the process could become very congested and slow. This depends on the quality of the first design baseline: this is the point at which AIMDA assume change control will kick in. Having alternative pathways available to deal with different situations will speed up the programme. |

## E – General feedback

Please share any further thoughts you have regarding our proposal.

**14) Is there anything further you think we should include in the MHHS Programme Governance Framework?**

| |
|---|
| Nothing further at this stage |

© MHHS Programme 2021