MHHS PROGRAMME

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

Consultation Questions

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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)

Yes we agree with the proposed objectives of the governance framework.

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?

We agree with the proposed governance structure.

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)

We believe that the PSG and IAG should be separate groups. We understand that the focus of these two groups is very different, even if there were to be overlapping membership we feel it is important that implementation can be discussed separately to the overall programme steering group.

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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)

We agree that proposed constituency representatives while give all parts of the industry the opportunity to contribute to MHHS Programme, which we believe is very important. However the decision making process for these groups needs to be appropriate for groups constructed in this way, i.e. representatives of all participants rather than proportional to the impact on those sectors of the industry.

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 would support the proposed election process.

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

We agree with proposed attendee experience set out in 3.11.

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)

We agree that these groups should be open to all experts in the required area. However we believe the size of these groups needs to be managed to ensure they work effectively.

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)

We think it may be beneficial to split the supplier agent constituency, one criteria to be divided it could be based on if they work only for suppliers or if they also work directly for consumers. We believe these two groups would have slightly different views as the MHHS changes will impact them differently.

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)

We believe the CCAG should include programme participant representatives, as the users of the codes it is important they have input to ensure the codes are complete, consistent and usable.

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?

We think the proposals for delegation and escalations are sensible.

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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?

We expect the PSG to have ultimate responsibility for the Programme Plan and all the milestones in it. Under the proposed governance framework responsibility elements of the plan could be delegated to other groups.

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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?

We think issuing meeting papers 5 working days before a meeting is appropriate. Given the relative short timescales for the MHHS programme post meeting papers should also be issued in 5 working days if they are a record of the meeting, if post meeting papers require approval by the group before publishing then this should be completed within a further 5 working days, i.e. they should be published within 10 working days of the meeting.

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 change control process should impact assess each change, the initial IA will determine the appropriate path for each change. In our experience it is important to maintain central coordination of change to assess impact on the overall programme. The smallest change could have a big impact, e.g. change or inclusion of a data item.

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?

Please can you provide consideration to the following:
An indication of the expected frequency of meetings. We believe this is required before nominations are made for the constituency groups.
Please confirm attendance to any/all meeting would be possible via video conference..
Please can consideration be given in scheduling of meetings it is likely that some individuals will be members of more than one group,.
We recognise that some meetings may need to be face to face. Please can you confirm the proposed policy on travel expenses for face to face meetings. Given the nature of the businesses involved many are not located in London.

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