A - Programme Objectives

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

We are broadly supportive of the proposed objectives of the governance framework and are pleased to see the desire or consensus and clear channels of communication. We note that objective a) looks to set the programme up for success from the start, however we request this objective is expanded to ensure the programme itself is not only set up for success but successfully delivers its ambitions in a timely and cost effective manner. We believe that it is critical for the MHHS Governance Framework to set a timely and cost effective delivery as an objective at the outset so that it is a commitment throughout the programme and embedded across the breadth of programme working groups.

B - Governance Structure

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

We are broadly supportive of the proposed Governance Structure and the levels of decision making as articulated in the strawman. However we have the following observations / concerns; firstly, we would strongly suggest that the IPA retains the ability to engage with working groups as should the engagement, leadership or direction fail there may be a need for an independent perspective. Secondly, we are concerned that the proposed governance framework does not appear to offer any scope or room to discuss consequential changes arising from the implementation of MHHS - an issue which has been raised with EUK for escalation.

Lastly, we were disappointed to see Ofgem's decision not to include a group to consider the customer / customer journey implications. Given the importance of consumer engagement to the success of achieving net zero and delivering MHHS, we believe this should be included from the outset to align with the activity Ofgem has already undertaken (as referenced within their 11th August decision on the implementation and governance arrangements for Market-wide Half Hourly Settlement Programme) - can be delivered in a holistic and consistent manner.

- **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 give reasons for your answer)**

We believe there is merit in keeping the PSG and IAG separate, aside from the practicalities of being able to cover all business in sufficient detail in one meeting, we believe each of these meetings have fundamentally different objectives and roles within the programme.

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

We are comfortable with the proposed constituency representatives for Level 2 and 3. As a large supplier we believe there has been a significant benefit of this model in the Faster Switching Programme and are pleased to see this has been replicated, and indeed expanded, within this proposal. While we recognise that this might not be appropriate for all, we would request that given the diverse nature of the constituencies they retain the right to fund and select their own representative should they wish.

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

We are in agreement with the proposed attendee requirements set out in section 3.11 and believe it provides sufficient expertise in the appropriate forum.

- **Do you agree level 4 groups should be open for all parties to nominate members who have relevant expertise? (Please can you give reasons for your answer)**

Yes - we believe this is critical to the success of the programme. Reflecting on the challenges of the Faster Switching Programme, we would encourage Elexon to consider how to engage medium and smaller suppliers (and other smaller industry bodies) to ensure as broad representation and engagement as possible.

- **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 have no preference regarding the constituency arrangements for Supplier Agents

- **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 it is important to have as diverse a constituency representation as possible and that this should include parties such as Supplier's, Supplier Agents, DNO's and National Grid ESO.

It is critical that those who have to deliver compliance with the codes are involved and consulted on their development and changes.

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

We are in agreement that vertical escalation is appropriate.

- **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 propose a similar model to that within the Faster Switching Programme whereby different level milestones are monitored and tracked at the appropriate programme forum - dependent on their importance and severity.

C- Meeting Management

- **Are the proposed 5 working days and 10 working day timescales appropriate?**

We are in agreement that these timescales are appropriate

D- Change Control

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

With consideration to the experiences of the Faster Switching Programme the change control process has been at times difficult to navigate. With this in mind we suggest that all changes follow the same process to ensure consistency and ease of navigation.

E- General Feedback

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