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)

Northern Powergrid Metering Limited (NPML) support the proposed objectives.

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?

NPML do not see any issue with the structure proposed, we recognise that largely the MHHS programme will not affect the operation of NPML as a MAP, and therefore MAP representation on the PSG is not necessary, however when necessary in level 3 and 4 working groups NPML would expect that MAP representation is present in order to ensure a balanced view is taken across all industry parties that would be impacted by decisions made.

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)

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NPML believes that these groups should remain separate, this will allow technical discussions to occur in the right forum, and minimise the risk of bogging down the PSG with low level detail when it is not necessary for 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)

NPML for the most part are supportive of the representatives chosen. NPML recognise that we would fall under the registered supplier agent category and whilst there is representation for that category in the working groups, it is worth being aware that it is a broad category with multiple types of industry parties and the views of some will not reflect the views of all who fall into this category and as there is no more than 2 seats available in any one group for supplier agents, ensuring that we do not have 2 seats representing the same type of company will help ensure that all views are taken into account.

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)

NPML supports a member nomination and election process. This will allow for a representative view to be taken to the groups and will reduce the likelihood of the concerns raised in question 4's response from occuring.

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

NPML supports the requirements here, however where necessary in level 4 working groups, inclusion of other appropriate industry parties should be considered as not all industry parties are MHHS programme parties.

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, NPML believe that ensuring the correct expertise is present in working groups is vital to ensuring that appropriate decisions are made.

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)

NPML as a MAP believe that supplier agents should be split into two sub-constituency groups. We believe that asset ownership will be an important part in the evolution of the MHHS programme, and therefore would like to ensure that MAP representation is present going forward. We also recognise that there are many types of company that fall into this category that will need to be present as well. Therefore the best solution we believe would be putting MAPs with trade associations in one group and then an operational group such as shippers, MOPs and service providers in the second group. This will mean that where MAPs are not represented, there is someone in the seat that is responsible for multiple industry groups, and will therefore represent a wider range of views. This will also mean that we will not end up with the two available seats being filled by two similar parties and end up with a constricted view unrepresentative of the whole group.

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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)

NPML believes that this should be reserved for the Code Bodies, as this working group is aimed at resolving cross-code issues, this will mitigate any risk of this unintentionally becoming a supplier lead group.

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?

NPML believe that the current proposal for delegations and escalations is appropriate.

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?

NPML believes that milestones should be managed by the appropriate group, and that these milestones should be visible to industry parties where appropriate.

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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?

NPML believe 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?

NPML believe there should be different processes depending on the impact.

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?

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