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)

We agree with the objectives drafted as they are all key elements that will support successful MHHS implementation. We suggest that there should also be an objective (or amendment to the existing objectives) relating to enabling transparent and efficient 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?

Overall, we are supportive of the proposed structure. The description of decision-making across the different levels of groups is pragmatic, but it is difficult to form more of an understanding without the criteria which will be used. We note that this will be published in a decision-making framework later this year.

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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No comment

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)

Following the recent Ofgem decision, NGESO should be added to PSG membership. We would also like to see NGESO added to the attendee list of the DAG which will have a similar membership to the PSG.

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)

No comment

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

Yes, but the information in the various Terms of Reference sections needs to be read alongside this in order to fully understand the level/experience/skills expected of attendees.

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. It is important for wider parties to be engaged and contribute to the programme, and the programme will benefit from a broad range of expertise. If groups are over/under subscribed, this should be managed by the SRO.

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)

No comment

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 that other programme participant representatives should be included in the CCAG to support consistency with the wider programme and to adopt an efficient, joined up approach. This is particularly relevant for CCAG as, from our understanding of the proposed governance structure, the Cross Code Working Group will be convened under the Design Advisory Group, but code related outputs and decisions will go to the CCAG. It will be important for decisions to be clearly categorised as design, code or both.

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?

No comment

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 understand that monitoring progress against milestones will sit under the Implementation Advisory Group. The milestones could be built into the decision framework in order for the programme to manage any changes or impacts to milestones.

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?

Yes. It is important that full meeting papers are issued 5 working days in advance to allow for participants, particularly constituency representatives, to be fully prepared. Meeting documentation should include an agenda, meeting papers and slides. Where it is known that decisions are required, this should be made clear.

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?

For simplicity and efficiency, we think that the same change control process should be used. The size of the impact of the change could determine at what level a decision is made. All change would need to be triaged through the Stage 1 of the suggested process.
We note that there is a 10 working day timescale proposed for industry consultation, recommendation and decision, and so this implies that decisions will be made ex-committee if the PSG meet on a monthly basis.

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?

No Comment

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