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## Change Request Form

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### Change Request details

*For guidance on how to complete this document please see the supporting Change Request guidance document*

Change Request details			
Change Request Title	Update the MHHS Governance Framework with PSG Agreed Cooperation principles		
Change Request Number	CR005		
Originating Advisory / Working Group	PSG – Programme Steering Group		
Risk/issue reference			
Change Raiser	Jason Brogden, MHHS Programme	Date raised:	23/03/22

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## Part A – Description of proposed change

**Guidance** – This section should be completed by the Change Raiser when raising the Change Request.

Part A – Description of proposed change
<p><b>Issue statement:</b> <i>(what is the issue that needs to be resolved by the change)</i></p> <p>The Programme Steering Group approved the Programme Cooperation Principles in their March 2<sup>nd</sup> 2022 meeting and the approach for including these in the Programme Governance Framework via the Change Control Process. This Change Request implements that change.</p>
<p><b>Description of change:</b> <i>(what is the change you are proposing)</i></p> <p>Update the MHHS Governance Framework to add the Programme Cooperation Principles as below:</p> <p><b><u>Programme Principles for MHHS Programme Party Collaboration &amp; Cooperation</u></b></p> <p><b>The following principles will apply to all MHHS Programme Parties and the MHHS Programme itself:</b></p> <p><b>Delivery Focus</b></p> <ul style="list-style-type: none"><li>• Be delivery-focused in all activities and take responsibility for all relevant delivery activities</li><li>• Be familiar with the detailed MHHS Programme plan and deliver activities and outcomes on time to quality</li><li>• Act to deliver MHHS objectives collaboratively and not take action that would cause detriment to the programme as a whole</li><li>• Be open and proactive in sharing all relevant information to the delivery of the MHHS Programme, including MHHS Programme decision-making</li><li>• Follow industry good practice</li><li>• Actively participate and use the Programme Governance Framework, particularly for change</li><li>• Take reasonable steps to collaborate to resolve issues, mitigate risks and assess change</li><li>• Be mindful of programme costs and not take action that might compromise the business case</li><li>• Technical content should be accurate and unambiguous, ensuring consistency across the programme</li></ul> <p><b>Relationship &amp; Trust</b></p> <ul style="list-style-type: none"><li>• Respond promptly to reasonable requests for information from each other</li><li>• Share information and be transparent unless there are incontrovertible reasons not to do so</li><li>• Respect confidentiality and commercial sensitivity of information and introduce no Conflicts of Interest (e.g., DIP procurement)</li><li>• Be clear what each party wants from the other(s) – and why</li><li>• Promote predictability and trust – parties shall enable the building of mutual trust by consistently meeting obligations and expectations and acting reasonably</li></ul> <p><b>Participation &amp; Proactivity</b></p> <ul style="list-style-type: none"><li>• Be proportionate – collaborative working should not be overly burdensome and should be proportionate</li><li>• Proactively and promptly raise issues and risks when aware of them and provide early warning of material risks and issues and any dependencies</li><li>• Ensure appropriately skilled people are attending the appropriate meetings</li><li>• Encourage informal feedback, participate in any more formal survey or feedback loop</li></ul> <p><b>Expected cooperation activities may include the following:</b></p>

- Bilateral communications (e.g. conversations, email)
- Participation in meetings
- Exchange of information and data (e.g. email, information/data sharing tools, portal)

**The following principles will apply to Central Parties and the MHHS Programme**

Central Parties and the MHHS Programme should:

- Have open, honest, transparent communication between themselves
- Respond promptly to reasonable requests for information from all MHHS Programme Parties and be transparent unless there is good reason not to share information (e.g. GDPR, commercially sensitive, confidential)
- Not give any particular MHHS Programme Parties preferential treatment
- Make information provided to MHHS Programme Parties in dialogue open and available to other similar MHHS Programme Parties – do not give preferential access to information
- Not provide sensitive information to MHHS Programme Parties
- Be responsive to change, being proactive in finding new technical and business features
- Prioritise value over cost, focussing on the value of outputs rather than the cost of inputs

The MHHS Programme and Elexon as the Central Systems Provider will observe the rules of business separation at all time.

The MHHS Programme do not expect to proactively manage Central Parties’ interactions with MHHS Programme Parties, but the MHHS Programme reserve the right to audit interactions between Central Parties and MHHS Programme Parties where there is reasonable evidence to suggest that the principles above have been compromised.

**Justification for change:**

*(please attach any evidence to support your justification)*

The MHHS Programme is obligated to ensure it delivers efficiently and economically, therefore, it is vital that the:

- Programme clarifies the industry’s expectations of participation and cooperation with the Programme and amongst themselves
- Programme collaboratively develops and agrees these with industry
- Programme challenges those expectations if they are not efficient / economical
- IPA monitors industry performance to these expectations, to assure the industry that they are being upheld.

We have looked at existing Code/Licence obligations on MHHS Participants (set out in the PSG slides) and considered what additional cooperation commitments we need to support the above.

We have also considered the most appropriate way in which these additional cooperation commitments can be applied to MHHS Programme Parties.

The BSC obligations are focused on MHHS Participants delivering their elements of the Programme in an appropriate way (the what), but doesn’t describe cooperation or how any ways of working may work between parties (the how).

What risks are we trying to mitigate here?

- Inefficient or unclear ways of working for MHHS Programme Parties with the MHHS Programme and between each other
- Actions of MHHS Participants to deliver their own BSC objectives to the detriment of others or the MHHS Programme as a whole
- Inequitable treatment of MHHS Programme Parties with access/information given to some that has not been made available to others (e.g. if some are more proactive)

What are the objectives of cooperation:

- Set the principles of efficient interaction and cooperation for all MHHS Programme Parties and ensure they are fair, appropriate and proportionate
- Set some additional commitments for the MHHS Programme and Central Parties to:
  - help cooperation work optimally between them
- ensure that all MHHS Programme Parties are treated equitably, as the MHHS Programme and Central Parties are likely to be the organisations that Programme Parties approach for information and advice

The MHHS Programme has considered a number of options to apply the cooperation principles to MHHS Programme Parties:

Option	Pros	Cons
Raise a BSC Modification to add cooperation principles to Section C	Legally binding on MHHS Participants through BSC Section C	Very long lead time through Modification Process – likely not to be in place in time to make a difference Not consistent with BSC obligations (what not how)
Incorporate into Governance Framework through MHHS Programme Change Process (once approved)	Legally binding on MHHS Participants through BSC Section C Can be approved swiftly through MHHS Programme Change Process	<b>Recommended Option</b>
Enter into bilateral agreements with Parties (e.g. MoU/ Cooperation Agreements)		Difficult to enforce without consequences Difficult to sign with consequences Additional risk and administration to manage Likely to vary between parties from bilateral negotiations
PSG approve as Programme Principles	Fastest and easiest to approve	Not legally binding on parties

**Consequences of no change:**

*(what is the consequence of no change)*

The MHHS Governance Framework will not accurately reflect the decisions of PSG without including the Programme Cooperation Principles.

If the Change is rejected, this compromises the effectiveness of PSG as the Level 2 decision-making body.

**Target date by which a decision is required:**

**Part B – Initial Impact of proposed change**

**Guidance** – *this section should be completed by the Change Raiser before being submitted to the MHHS PMO.*

**Guidance** – *Please document the benefits of the change and to delivery of the programme objectives*

<b>What benefits does the change bring</b>
<p><i>(list the benefits of the change and how this improves the business case)</i></p> <p>Delivers the decision of the PSG into formal governance.</p> <p>Brings cooperation principles into the binding Governance Framework.</p> <p>The MHHS Programme is more likely to deliver efficiently and economically.</p>

<b>Programme Objective</b>	<b>Benefit to delivery of the programme objective</b>
To deliver the Design Working Group’s Target Operating Model (TOM) covering the ‘Meter to Bank’ process for all Supplier Volume Allocation Settlement meters	More likely to be delivered than if the Programme doesn’t update the cooperation principles in the MHHS Governance Framework.
To deliver services to support the revised Settlement Timetable in line with the Design Working Group’s recommendation	More likely to be delivered than if the Programme doesn’t update the cooperation principles in the MHHS Governance Framework.
To implement all related Code changes identified under Ofgem’s Significant Code Review (SCR)	More likely to be delivered than if the Programme doesn’t update the cooperation principles in the MHHS Governance Framework.
To implement MHHS in accordance with the MHHS Implementation Timetable	More likely to be delivered than if the Programme doesn’t update the cooperation principles in the MHHS Governance Framework.
To deliver programme capabilities and outcomes to enable the realisation of benefits in compliance with Ofgem’s Full Business Case	More likely to be delivered than if the Programme doesn’t update the cooperation principles in the MHHS Governance Framework.
To prove and provide a model for future such industry-led change programmes	Cooperation between programme parties should be a core element of any successful future industry programme and this delivers an effective way of binding parties into cooperation.

**Guidance** – *Please document the known programme parties and programme deliverables that may be impacted by the proposed change*

<b>Impacted areas</b>	<b>Impacted items</b>
Impacted Parties	All Programme Participants, as defined in BSC Section C.
Impacted Deliverables	Updated Governance Framework
Impacted Milestones	N/a

**Initial assessment**

Necessity of change	3 – Potentially Important	Expected lead time	1 - <5 working days
Rationale of change	Programme	Expected implementation window	1 - Imminent
Expected change impact	Very Low		

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## Part C – Summary of impact assessment and recommendation

CR005 Impact Assessment Report & Recommendations was presented to PSG in May 2022. The report can be found via the MHHS Website [here](#).

**Guidance** – This section should be completed by the Change Raiser. Note, this is before impacted parties complete a full Impact Assessment.

**Note** – All Impact Assessment responses will be considered public and non-confidential unless otherwise marked. If there are any specific elements of responses (e.g. costs) that are confidential, please can you mark those specific sections as confidential rather than the response as a whole.

Part C – Summary of impact assessment and recommendation (complete as appropriate)
<p><b>Effect on benefits</b></p> <p>Comments from Change Raiser:</p> <p>Positively impacted as there is a reduced risk of compromising benefits with more efficient and effective delivery through cooperation in the programme.</p> <p><b><i>Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further impacts, quantifying where possible.</i></b></p>
<p><b>Effect on consumers</b></p> <p>Comments from Change Raiser:</p> <p>Positively impacted as there is a reduced risk of compromising benefits with more efficient and effective delivery through cooperation in the programme.</p> <p><b><i>Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further impacts, quantifying where possible.</i></b></p>
<p><b>Effect on schedule</b></p> <p>Comments from Change Raiser:</p> <p>No impact, but there is a reduced risk of compromising timescales with more efficient and effective delivery through cooperation in the programme.</p> <p><b><i>Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further impacts, quantifying where possible</i></b></p>
<p><b>Effect on costs</b></p> <p>Comments from Change Raiser:</p> <p>No impact, but there is a reduced risk of compromising timescales with more efficient and effective delivery through cooperation in the programme.</p> <p><b><i>Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further impacts, quantifying where possible. Specific costs may be identified as confidential where necessary and aggregated by the MHHS Programme.</i></b></p>
<p><b>Effect on resources</b></p> <p>Comments from Change Raiser:</p> <p>No impact, but there is a reduced risk of increased resources with more efficient and effective delivery through cooperation in the programme.</p> <p><b><i>Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further impacts, quantifying (e.g., resource type, duration, skills) where possible.</i></b></p>
<p><b>Effect on contract</b></p> <p>Comments from Change Raiser:</p>

For Programme Participants to consider whether they back off cooperation principles to their service providers.

**Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further impacts, quantifying where possible.**

**Risks**

n/a

**Impact Assessment respondents to review and respond to content provided by the Change Raiser. Impact Assessment respondents to identify and describe any further risks.**

**Recommendation**

Comments from Change Raiser:

It is recommended the change is **approved**.

**Impact Assessment respondents to state whether they agree or disagree with this change. Impact Assessment respondents to provide supporting evidence to justify their reasoning.**

**Impact assessment done by:** <Name>

**Guidance:** *If you are a third party responding on behalf of another Programme Participant, please state this in your response.*

**Impact assessment completed on behalf of:** <Name>

**Guidance:** *The approvals section will be completed by the MHHS PMO once the Impact Assessment has been reviewed.*

**Approvals (to be completed by MHHS PMO)**

Programme Steering Group

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## Part D – Change decision

**Guidance** - This section will be completed by the MHHS PMO following the review of the impact assessment and decision reached by the SRO.

Part D – Change decision			
Decision:	Change approved	Date	04 May 2022
Approvers:	MHHS Programme Steering Group		
Change Owner:	Jason Brogden		
Action:	A1. Principles to be reflected in MHHS Programme Governance Framework.		
Changed Items	Pre-change version	Revised version	
A1	MHHS Governance Framework v2.4	<a href="#">MHHS Governance Framework v2.5</a>	

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## Part E – Implementation completion

**Guidance** - This section will be completed by the MHHS PMO at the end of the post-implementation process.

Part E – Implementation completion			
Comment	MHHS Governance Framework updated	Date	10 May 2022

**Guidance** – This section will be completed by the MHHS PMO at the end of the post-implementation process and should be used to add any appropriate references of the change once it has been completed.

References		
Ref	Document number	Description
MHHS DEL030	<a href="#">MHHS Governance Framework v2.5</a>	This paper sets out the MHHS Programme governance structure