

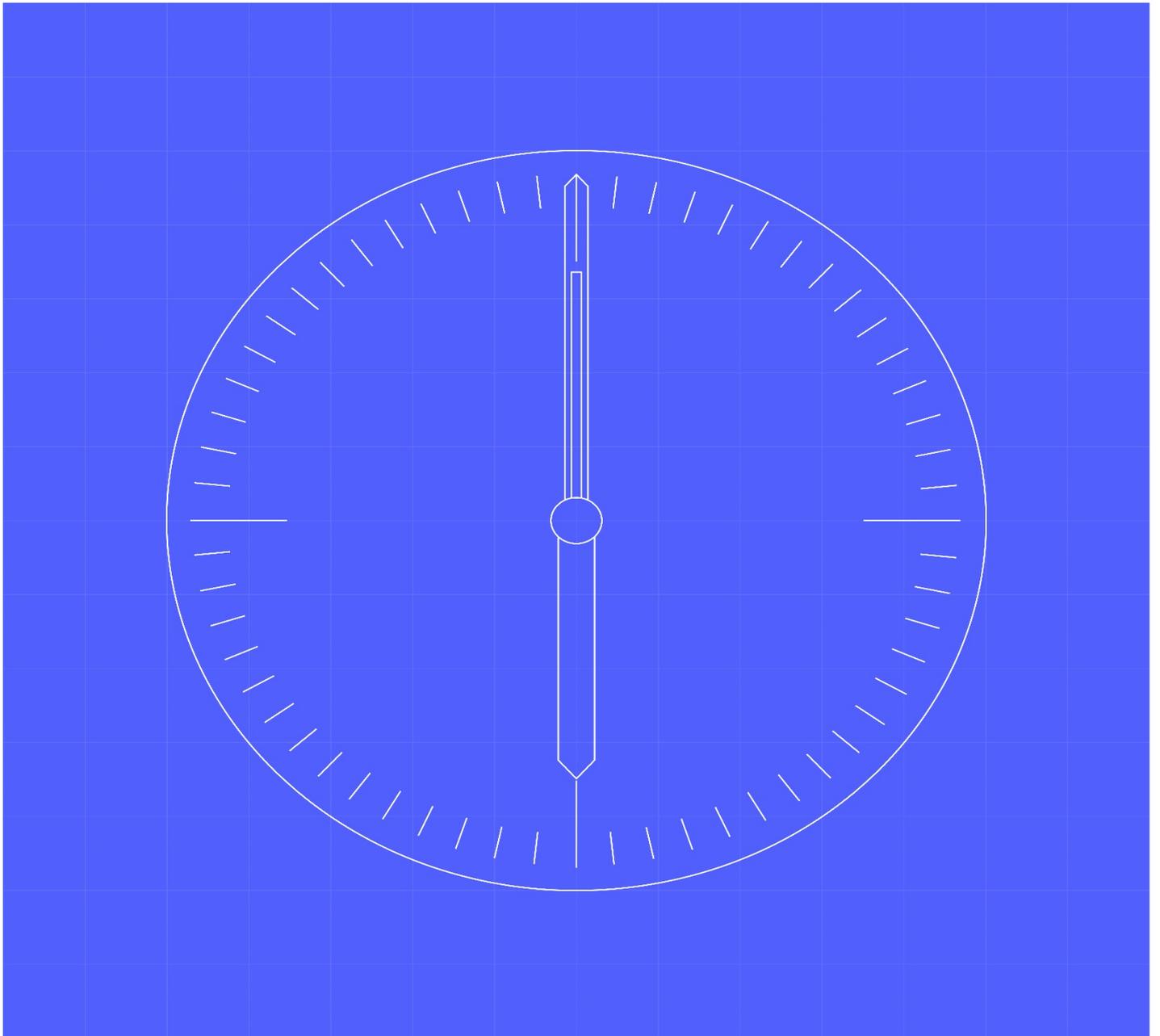


# MHHS Open Day

## Q&A

### 21 & 22 April 2022

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**PPC Team**

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## 2 House Keeping

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### 2.1 Change Record

Date	Author	Version	Change Detail
27 Apr 2022	PPC Team	0.1	Initial Draft
4 May 2022	PPC Team	0.2	Updated following review
11 May 2022	PPC Team	0.3	Updated following review

### 2.2 Reviewers

Reviewer	Role
Jason Brogden	LDP Central Programme Team
Sean Cooper	Business Architect
Chris Welby	Senior Responsible Owner
Chris Harden	Programme Director
Simon Harrison	Design Assurance Lead
Paul Pettitt	Enterprise Architect (Design Assurance)
Rachel Clark	Deputy Director, Ofgem
Andy Manning	Principal Economic Regulation Specialist, Citizens Advice
Richard Shilton	Independent Programme Assurance provider, PwC

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## 3 Summary

The MHHS Open Day Q&A document relays the questions posed by Participants during the Market-wide Half-Hourly Settlement Open Day on 21 April 2022 and the subsequent associated webinar on 22 April 2022. We will be updating this document with responses to several questions that were submitted after these events took place, and need further time to review.

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## 4 General

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### 4.1.1 Would a shift in demand time put a bigger strain on the network cabling system?

There tend to be two electricity demand peaks each day at breakfast and tea-time. MHHS and Time of Use (ToU) tariffs will allow us to use differential pricing to encourage consumers to shift their energy demand away from these peak periods. For example, instead of getting home at 17:00 and putting your electric vehicle (EV) on charge, thereby adding to the tea-time load, the EV would be programmed to start charging later in the evening (e.g. after 23:00). Alternatively, the consumer could override the charging schedule to start charging straight away, but also pay a higher price to charge-up around that tea-time period.

Not all of the load would be shifted to the same time(s). MHHS, ToU tariffs and the automation of EVs and other electric devices will allow load to be smoothed out over longer periods of time. This means that components on the network like cabling and transformers are placed under less stress, therefore perform better and last longer before needing eventual replacement.

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### 4.1.2 For MHHS to be a total success it needs every meter to be Smart. What happens to those meters that can't be changed to Smart?

The design recognises that not every customer might accept a smart meter and provides accommodations to cover this anticipated minority of sites.

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### 4.1.3 Will there be a glossary of terms to clarify the meaning of the acronyms used in slides and project documents?

Yes, you can find this on the Portal here: **MHHS Programme Glossary**.

If you would like to add or comment on an existing term, please use the 'New/Update Term' form provided.

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### 4.1.4 Will there be a similar forum (like for Smart Metering Equipment Technical Specifications (SMETS)) for Data Collectors (DC)/Data Aggregators (DA) agents/prospective new DC/DA and Meter Data Retrieval (MDR) agents and innovative software suppliers to be involved?

There is a monthly meeting for Agents which already takes place. Please email [PPC@MHHSProgramme.co.uk](mailto:PPC@MHHSProgramme.co.uk) to be invited to this.

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### 4.1.5 Is there a dedicated help desk for MHHS?

For IT related support, please email: [ithelp@mhhsprogramme.co.uk](mailto:ithelp@mhhsprogramme.co.uk)

For Design related questions, please email the Design Team: [design@mhhsprogramme.co.uk](mailto:design@mhhsprogramme.co.uk)

For any other support on the Programme, please email: [ppc@mhhsprogramme.co.uk](mailto:ppc@mhhsprogramme.co.uk)

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**4.1.6 Please can you explain the replacement of profiles 1-8 under MHHS.**

The load-shaping service enabled by the MHHS Programme will produce more accurate estimates and billing based on actual data for each half-hourly (HH) period, rather than based on the profile class associated with the meter. The profile classes will no longer be necessary to inform these estimates. Please refer to the Design artefacts on the Portal for more information.

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**4.1.7 Please can you explain non-domestic metering requirements- e.g. smart.**

Half-hourly meters are already mandated for all non-Domestic sites Profile Classes (PC) 5-8. All electricity sites in PCs 1-4 (most non-domestic electricity consumers are in PCs 3 and 4) are part of the mandated smart meter roll-out, although historically installed advanced meters are permitted for non-domestic customers.

Advanced meters can be installed in the non-domestic sector. These meters can provide half-hourly electricity data that can be remotely accessed by an energy supplier and to which the consumer can have timely access. Please refer to the Design artefacts on the Portal for more information.

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**4.1.8 Would you consider having a 'Design Open Day', to present draft process overviews and high-level views of proposed functional changes?**

Due to the positive feedback from Participants regarding the inaugural MHHS Open Day, we are considering further face-to-face events to support Participants in navigating MHHS Design and replan activities. In the meantime, the evolving documentation for MHHS Design is already available via the Design Portal.

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**4.1.9 Please can you clarify further the EV aspects including export and use of Artificial Intelligence (AI).**

As technology develops, suppliers and energy management companies will offer services to automatically help manage energy usage. This will include EV charging, operation of heat pumps, and even your fridge/freezer - so that you're maximising your usage of cheaper electricity, whilst ensuring your EV remains sufficiently charged, your home remains at the right temperature, and your freezer remains frozen.

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**4.1.10 There is an opportunity in MHHS for suppliers to retain customers. Is this in conflict with the Centralised Switching Service (CSS) which encourages faster and more regular switching? The messaging around encouraging/discouraging consumers to switch should be consistent.**

Both initiatives work together to increase consumer choice, drive down electricity bills, and help to support the push to Net Zero.

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**4.1.11 Please can you explain how Suppliers could use AI to help manage customer import and export use.**

Please refer to questions 4.1.1 and 4.1.9. AI will support smart energy management, for example the accurate prediction of energy requirements for consumers and pre-empting exposure to peak-prices, identifying opportunities to shift demand to cheaper and lower carbon times of day. Please use the Consequential Change Impact Assessment Group (CCIAG) forum to address this subject further.

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**4.1.12 Please explain how MHHS will help aspects of EV and DSR.**

Please refer to questions 4.1.1 and 4.1.9. MHHS will require all meters to be capable of delivering HH data so that settlements more accurately reflect energy usage to the periods in which they are used. This greater data granularity will enable more accurate price signals and means suppliers can provide innovative ToU tariffs to encourage consumers to use energy outside of peak times (for example, scheduling an EV to charge after 23:00 when energy is cheaper and greener).

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**4.1.13 If properties end up needing a three-phase supply instead of single phase, who pays? The end customer or the Distribution Network Operator (DNO)?**

Moving from trading in non-Half-Hourly (NHH) to HH will not result in homes needing polyphase supplies. Getting an EV or battery array may, and the customer can go to their DNO or a connections company (e.g. iDNO) to quote for a service upgrade from single phase to three phase which will incur a cost.

Hopefully, the demand side management and load shifting outlined above will go a long way to mitigate and postpone the need for the mass upgrade of supplies. However, the Government and Ofgem would decide whether there is a change required to how the cost burden of such a scheme should be funded if a mass upgrade was required.

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**4.1.14 Will it be possible for a customer to engage for dynamic load requirements via the internet i.e. “I need to weld my classic car on Sunday what rate can you offer?”?**

MHHS facilitates the opportunity for energy management companies and software providers to provide this support to consumers.

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**4.1.15 How does Octopus provide ToU tariffs without MHHS?**

This is a question for Octopus Energy and any information on this topic would be prevented from being relayed by commercial confidentiality.

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## 5 Delivery approach

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### 5.1.1 Over the last 10 years various industry obligations/mandates target dates have been delayed - what makes you confident that 2025 is an achievable deadline?

We are in the middle of the programme replanning exercise discussed at the Open Day that will deliver a plan that we and all of industry should have confidence in.

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### 5.1.2 At this point, what is the greatest challenge to the successful delivery of the Programme?

Currently, the greatest challenge to the successful delivery of this Programme is a lack of mobilisation from Participants. We urge all Participants to mobilise their internal teams and get involved in the replan, to ensure its success. Participants are also advised to mobilise before Design is finalised where possible. Early engagement de-risks Participants' programmes and enables them to reap the benefits of MHHS earlier.

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### 5.1.3 Have you produced a clear document describing the accreditation process so that new agents can complete this qualification?

This document has not yet been produced but we have noted this for future production.

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### 5.1.4 Will all design tranches be complete for M5 at the end of July?

Yes. All design tranches will be complete for M5 at the end of July so that the baseline is established.

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### 5.1.5 What will the Programme do if Participants don't stand up their programmes?

There are licence conditions and Code obligations for Programme Participants to participate in the MHHS Programme. If Participants do not stand up their programmes, we will engage with them via the Programme Party Coordinator (PPC) team to understand the reasons behind their lack of engagement and help provide them with the right support so they can mobilise their programmes. If Participants continue not to stand up their Programmes after ongoing PPC engagement, we may refer the matter to Ofgem which may result in Ofgem enforcement of those licence conditions. We also recognise that there will be some Participants capable of moving at pace and will stand up their programmes later and still meet the delivery timescales.

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### 5.1.6 Is there a cap on volunteers for the Replan?

There is no cap on Replan volunteers and we strongly encourage you to get involved in the Replan.

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### 5.1.7 When will the Replan be complete?

After M5 (July) we will go through three months of industry consultation. It will take another month for the replan to go through the escalated change control process. The replan will be finished by the end of the year and we are looking to finish by the end of November 2022 if the process allows.

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### 5.1.8 How will the planning approach differ to other programmes?

This is an Industry-shaped programme, informed by lessons learned from other programmes. We are engaging with industry to contribute towards the Programme from the outset, when we are forming views about the approach to delivery, the structure of the plan and the assumptions being made within it. In that way we can ensure that when the plan goes out for formal consultation, it's more likely to be a plan that Participants can understand and comment on. The more Participants get involved with the Programme, the more you can influence it.

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### 5.1.9 Who (which party groups or systems) need to be able to move at the rate of the fastest?

We are still confirming which organisations need to be prioritised, but this includes Elexon (Helix programme), the Data Communications Company (DCC) and DNOs. Additionally, Data Services and Metering Services need to move at pace to offer MHHS compatible and compliant services. Registration Systems need to move at pace as many of the new data exchanges and updates will now flow via the Registration Systems. The MHHS Programme also needs to move at pace to procure, test and deploy the DIP. Once these core elements are in place, the focus will be for suppliers to complete their Qualification and confirm they are ready to start migrating customers.

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### 5.1.10 For the Industry plan to be robust it needs to consider the key downstream system changes (e.g. supplier billing systems). Will this be done?

Considering these changes is the responsibility of all Participants and will be addressed at the Consequential Change Impact Assessment Group (CCIAG) forum going forward. The MHHS Programme team, the Programme Party Coordinator (PPC), and Independent Programme Assurance (IPA) provider are all in place to help encourage and support industry participants to deliver the change required to make MHHS a reality.

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### 5.1.11 Does phasing create risk of added complexity? Please can you explain how phasing could work if not all parties are ready?

Phasing is generally considered to be best practice, de-risking the Programme so that those that are not ready can go-live later, as opposed to big-bang approaches seen with the Faster Switching Programme (FSP) and Nexus. We are looking at opportunities to move at the pace of the fastest and not wait for the slowest. We will only need two-three of each party type to execute Systems Integration Testing (SIT), therefore there is an opportunity for early involvement for parties. For parties not participating in SIT, they will have to wait for the Qualification window to open after functional SIT is complete. We will likely offer multiple tranches of Qualification in a similar way to the FSP - a lesson learned from FSP.

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### 5.1.12 How will consequential impacts on network charges be considered?

There is an interface to network operations from the settlement systems that is being developed as part of the design work in Tranche 4 of the design artefacts.

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### 5.1.13 If different parties are going live at different times, how will the current and future processes be integrated between the parties?

That is a matter for the transition and migration arrangements which we are considering. If you would like to get involved with the relevant working groups, please let us know by emailing us at [PPC@MHHSProgramme.co.uk](mailto:PPC@MHHSProgramme.co.uk).

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**5.1.14 What happens if a customer wants to switch from a ready party or party agent to one that isn't ready?**

That is also a matter for the transition and migration arrangements which we are considering, but the current proposals are for a one-way gate which will prevent customers going backwards.

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**5.1.15 If some Suppliers can move sooner, will they be exempt from charges related to current systems to minimise the period of double-charging?**

We are considering that as a matter for the transition and migration arrangements.

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## 6 Transition timetable

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### 6.1.1 Suppliers are being taken through the Design in September. How will this be managed considering that the Design could change considerably after this point?

Design will be finalised in July and we will walk parties through the design after this point to help them understand and consume the design. We do not expect Design to change significantly after July. Any changes after this point will happen through the formal change process.

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### 6.1.2 Will delays on other industry projects (Faster Switching/Smart etc) impact the M15 completion date?

We are dependent on the Faster Switching Programme being live to make changes to the new Central Switching Service and this is reflected in our plans. Smart metering infrastructure is in place for us to make the necessary changes for MHHS and the roll-out will affect the number of smart meters, and therefore the volume of data being sent in MHHS. Other industry change is being monitored through the Cross Code Advisory Group (CCAG).

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### 6.1.3 Do you still aim to start meter migration in the second half of 2024?

This will be subject to the programme replan that was discussed at the Open Day.

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### 6.1.4 When do you expect all suppliers to start testing?

Suppliers will start testing at different points based on whether they are involved within the Systems Integration Testing (SIT) phase, which is the start of the Integration and Test phase, or Qualification testing, which comes later.

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### 6.1.5 Is Stage 0 completion still aimed for Q1 2023? If not, when will we know the new dates?

This will be subject to the programme replan that was discussed at the Open Day.

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### 6.1.6 How do you intend to mitigate the risk of numerous change requests arising after the design is baselined in July? The risk is that not all impacted Parties will have input to the design before then.

This is already a risk being tracked by the programme. There are several mitigation actions to promote engagement with the design process before July, to implement a robust design change control process post-baseline.

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## 7 Ofgem

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### 7.1.1 As the sponsor of the Programme, what is Ofgem's main concern?

Ofgem's main concern is the readiness and engagement of Programme Participants. Ensuring that Participants are fully engaged and mobilised is key to the successful delivery of this Programme, and currently remains a large risk factor.

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### 7.1.2 How involved in the replan will Ofgem be?

Ofgem will have no direct role with the Replan process. If the replan results in recommendations for the movement of any level 1 milestones by three months or more, the plan would need Ofgem's approval. Consequently we will remain up-to-date with developments to ensure eventual decision-making is well-evidenced and all relevant risks are understood.

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### 7.1.3 As sponsor, how close is Ofgem's relationship with the Programme team - what role do you play?

As Sponsor, Ofgem has regular meetings with the Central Programme Team as the transition is still relatively new. Going forward, Ofgem will remain involved where necessary and up-to-date with the Programme's development but should not get involved in the day-to-day running of the programme.

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### 7.1.4 What are the key lessons learned from Faster Switching that can be taken to the MHHS programme?

The key lessons learned, and that we are implementing for MHHS, is the value of:

- Transparency and engagement with programme parties to build confidence around programme delivery.
- Developing a robust and credible plan built on realistic shared assumptions.
- Independent assurance to provide objective information and recommendations to support programme delivery.
- Clear and timely programme communications and an easy to navigate document repository.

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## 8 Citizens Advice (CA)

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### 8.1.1 What plans does CA have to tackle consumer reluctance to take up smart meters?

Citizens Advice provide a range of advice and tools on our website to improve consumers' understanding of smart meters. We have also published a number of advocacy blogs and research about the benefits and opportunities of smart meters.

Local Citizens Advice offices have also done local engagement on smart meters funded by Communities Fund, which is run by National Energy Action on behalf of Smart Energy GB, the national campaign on smart meters.

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### 8.1.2 What is CA's view regarding the focus of the Programme being on the meter to bank process & deeming customer experience / journey as out of scope?

We think that delivering a good consumer experience is vital to realising the benefits case for MHHS. The technical design and the implementation decisions within the scope of the programme, such as the system go-live strategy, will likely shape the options for consumers. To align with governance best practice, this means that the Programme should recognise the impact beyond the meter. We think that further work beyond the Programme as it is currently designed is needed to optimise the consumer benefits.

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### 8.1.3 This isn't the first mass migration from NHH to HH. What lessons have been learned from P272, given the consumer didn't have as much (if any) say in that?

Citizens Advice requested and was granted a role in the MHHS governance programme that provides an opportunity to engage with the migration more directly. On P272 our input was largely limited to monitoring the code modifications. We think a key learning from the P272 process was the lack of strategic direction and siloed codes delaying the implementation. We are keen to avoid these issues in MHHS.

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### 8.1.4 What would be the red flags to CA that the Programme may not benefit consumers i.e. What would cause you to agree with journalists who hold this opinion?

We see Market-wide Half-Hourly settlement implementation as an essential service development that is required to offer consumers efficient energy services. However, the Programme needs to be implemented in a way that focuses on positive consumer outcomes. We think the Target Operating Model will support this objective. We hope that the benefits realisation strategy will take good account of the distributional impact and will work to shape a strategy in the first instance.

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### 8.1.5 Are the MHHS benefits and ToU tariffs too complicated for consumers to understand?

We think there is a good argument to provide a simple default offer for consumers that can boost understanding and engagement, while also offering significant system benefits. This should be considered as part of a benefits realisation strategy.

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**8.1.6 If MHHS drives greater ToU, this will lead to winners and losers. Who should lead on the dialogue with customers about this?**

Uptake of ToU tariffs should reduce overall system costs, to the benefit of all customers regardless of whether engaging with ToU. However, we recognise the way that ToU tariffs are implemented will determine the outcomes for individual consumers. As an advice provider, Citizens Advice's role is to support consumers whatever the outcome. However, we think there should be a more substantial strategy needed to ensure that regulation, consumer engagement and support, led by a suitable body, ensure that there are both the correct incentives for those who can use electricity flexibly and the correct protections for those who cannot.

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**8.1.7 Does CA have consumer education on what a smart meter is? Many consumers believe the in-home display is the smart meter.**

See 8.1.1

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**8.1.8 How will the price cap work with ToU tariffs? Will it be scrapped, or will it still exist?**

We have discussed with Ofgem about the information we can provide consumers and the potential value of clear consumer communications.

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## 9 Independent Programme Assurance (IPA)

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### 9.1.1 As the Independent Programme Assurance (IPA) provider, do you feel the current DIP procurement is sufficiently outcome based to obtain industry latest thinking?

IPA activities to date have focused on mobilisation of the role and assurance over CR001 and CR002. Assurance over the design activity, including procuring the DIP, will be covered in more detail as part of the 'Baseline Assurance Health Check', which starts in mid-May.

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### 9.1.2 Is there a role for the IPA in resolving disputes between parties and the Senior Responsible Owner (SRO)/Central Programme Team (CPT) where there are concerns that risks/issues aren't appropriately addressed?

In the first instance, any disputes should be managed and resolved via the existing governance arrangements, including bilaterals between the parties. If these disputes cannot be resolved using these mechanisms, they can be escalated to include the IPA, who would look to support mediation to drive to a solution, as appropriate.

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### 9.1.3 What is the difference between the IPA and the Programme Party Coordinator (PPC) readiness assessment activity?

The PPC's readiness assessments (as seen in RA1) are designed to gather information from Participants regarding their progress on the Programme. The surveys that the PPC send out are supported by evidence reviews and interviews and support overall programme reporting of progress across programme participants.

The IPA's role is to ensure that the PPC questions, evidence reviews and interviews are conducted in a way that delivers the maximum understanding/insights for the Programme. The IPA will also perform independent assessment, on a sample basis, over whether the evidence provided through the readiness assessments and from their own interviews with participants supports readiness for key milestones and control points. The PPC and IPA will coordinate to ensure that the same participants are not selected for interviews by both the PPC and IPA during the same readiness assessment.

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### 9.1.4 What lessons are the IPA taking from previous Programmes that influence your assurance approach?

The IPA role has been set out by Ofgem, as part of the overall governance framework, based on lessons learned from previous programmes to provide independent review, challenge and advice to the programme, Ofgem and the SRO. The purpose of the IPA is to build trust, transparency and confidence in the end-to-end delivery of the MHSS Programme, and that quality decision-making and actions are taken by all participants to successfully achieve the overall programme outcomes for the benefit of consumers.

The IPA approach has been developed based on their previous delivery and assurance roles in similar programmes including Project Nexus and the Faster Switching Programme. The IPA brings direct delivery and assurance experience of these programmes within the team. For example, team members who were intimately involved in the replanning exercise on the Faster Switching Programme during Covid will be an integrated part of the MHSS Programme approach to developing the full plan baseline, as set out during the Open Day.

The IPA welcomes feedback from participants on our approach and delivery of assurance activities.