

## MHHS Design Advisory Group Headline Report

Issue date: 22/06/22

Meeting Number **DAG010.1 (Extraordinary)**

Venue **Virtual – MS Teams**

Meeting Date and Time **21 June 2022 13:00-15:00**

Classification **Public**

### Actions

Area	Action Ref	Action	Owner	Due Date
Update on design schedule	DAG10.1-01	Discuss transition timetable and go/no-go decision with MH	Programme (Ian Smith)	06/07/2022
	DAG10.1-02	Clarify to JB the optimal communication routes and contact addresses/points of escalation within the Programme	Programme (Claire Silk)	28/06/2022
	DAG10.1-03	Communicate current thinking around transition plan to DAG members	Programme (Ian Smith)	06/07/2022
Review of RAID	DAG10.1-04	Issue design-specific RAID to DAG members as part of communications on design schedule replan to be issued 22 June 2022	Programme (PMO)	22/06/2022
	DAG10.1-05	Issue Programme central RAID log to DAG members	Programme (PMO)	22/06/2022
	DAG10.1-06	Provide any feedback on central Programme RAID prior to next DAG meeting	DAG Members	06/07/2022
Level Playing Field Design Principle	DAG10.1-07	Issue Retail Energy Code Change Proposal R0044 impact assessment document to DAG members	Programme (PMO)	22/06/2022
	DAG10.1-08	Provide update on Retail Energy Code Change Proposal R0044 progress	REC Representative (Sarah Jones)	06/07/2022
	DAG10.1-09	Convene SDS subgroup 30 June 2022	Programme (PMO)	30/06/2022
	DAG10.1-10	Inform constituents of SDS meeting on 30 June 2022	DAG Members	30/06/2022

### Decisions

Area	Decision
None	assurance process.

## RAID Items Discussed

RAID area	Description
None (to be covered at next DAG meeting)	

## Key Discussion Items

Area	Discussion
<b>Update on design schedule</b>	<p><b>Update from MHHS Design Team</b></p> <p>An update was provided on the work to produce a new schedule for Tranche 4 (T4) approval and Design baseline (M5) delivery. This includes consideration of the timeframes to close c.400 tasks for developing all the design artefacts. The new schedule includes two phases:</p> <ul style="list-style-type: none"><li>• Phase 1 – Developing and sharing the design artefacts</li><li>• Phase 2 – Consultation/review and actioning comments/issues</li></ul> <p>The new timetable has been reviewed by the IPA and Ofgem as programme sponsor. It incorporates more time for participants to review the design artefacts and the opportunity to review and comment on any substantive changes to design artefacts emanating from review. Comments returned by participants as part of the tranche reviews which suggest change or indicate issues will be presented to the relevant level 4 design working group with the aim of obtaining consensus on the solution or recording the differing view where necessary.</p> <p>There will also be more signposting for participants to assist in directing them toward relevant artefacts for review. Additional resource is being applied to change control and issues management, to ensure a comprehensive and expedient approach to the review and close-out of comments provided by participants.</p> <p>With the above in mind, the Programme have then considered the risks which could impact the new schedule for Phases 1 and 2. There are three key risks:</p> <ol style="list-style-type: none"><li>1) Phase 1 risk – time required to achieve consensus among participants</li><li>2) Summer Holidays – participant resource availability during peak holiday months</li><li>3) Design Team Resources – any absence or unavailability of expert resource</li></ol> <p>With these risks in mind, the MHHS Design Team propose Phase 1 will complete <b>by the end of August 2022</b> and Phase 2 by the <b>end of October 2022</b>. This timetable mitigates the risks highlighted and provides contingency for review periods and issue resolution.</p> <p>An approach will be taken whereby artefacts will be released as soon as they are ready, to give participants the opportunity for ‘pre-review’ prior to formal request for comments.</p> <p>Transition design schedule will be produced in due course, and this has dependencies with migration activities.</p> <p>Expectations on the level of comments which will be received in response to the T4 design artefact review are there will be a high level of comments given the end-to-end design is being will be available for the first time and it is likely more participants will review and comment.</p> <p>DAG members were keen to see transition design as soon as possible as this will impact costs (see <b>ACTION DAG10.1-01</b> and <b>ACTION DAG10.1-03</b>).</p> <p><b>DAG Members’ Discussion</b></p> <p>It was pointed out that MHHS Change Request (CR) 002 proposed delaying M5 to November, with supporters saying more time was needed to approve the design. Some frustration was expressed that the Programme recommended CR001 anyway, which moved the M5 milestone to the end of July instead, and now it was the case that the milestone must move again. Despite this, several members comments it was positive to see concerns</p>

	<p>around timeframes and issues resolution addressed via this delay. The Chair sympathised with members' frustration, but believed it was right to keep up the pressure on delivery of M5 when the decision on CRs 001 and 002 were made to ensure continued design momentum. Regarding CR002, the group were advised the scope of this change was broader than just moving M5 and did not contain a detailed plan or schedule.</p> <p>The group discussed that previously agreed design positions would not be reopened unless major issues of matters of clear materiality were identified from future Tranche comments. Any issues with approved design elements, or any change required beyond changes needed for issues resolution would need to be changed via CR.</p> <p>The group discussed arrangements and scheduled timeframes for end-to-end review of the design and other consistency checking and assurance activities, and how this may affect participant mobilisation and the M3 Programme milestone. It was highlighted this would be discussed at the Programme Steering Group (PSG) and the M3 milestone, which is dependent upon M5, relates to the commencement of participant design and build activities rather than mobilisation specifically. Changes will also be required to code drafting timelines currently under consideration at the Cross Code Advisory Group (CCAG). One member commented industry participants should be given time to review the design artefacts as a whole prior to M5, to ensure everything fits together correctly and to support parties in commencing process and systems' builds. The MHHS Design Assurance Team are working to implement tools which will show many of the interdependencies in the elements of the MHHS design which should assist parties in reviewing design artefacts as a whole. This was considered positive by the group, and a request was made to ensure this is clearly communicated to participants.</p> <p>The group discussed how the change to the design schedule affects CR007, which seeks to move the M3 milestone. The Programme advised M3 will need to move alongside M5, but it was still useful to receive consultation responses on CR007. The Programme urged parties to view M3 as readiness for design and build, not as 'mobilisation' per se, and advised the prospective movement of delivery dates would be discussed at the PSG.</p> <p>A DAG member asked whether deadlines for other Programme milestones or activities would need move. For example, the commencement of industry testing in view of the movement of M5. The Chair highlighted the wider Programme replan activities in the current plan would provide an opportunity to review the impacts on subsequent milestones and activities and whether change is needed.</p> <p><b>Conclusion</b></p> <p>The MHHS Design Team advised a revised schedule for T4 and M5 would be issued to all Programme Participants on 22 June 2022 and urged constituency representatives to raise awareness with constituents also.</p>
<p><b>Review of RAID</b></p>	<p>The group were advised a design-specific RAID, detailing all outstanding design issues and resolution action in response to tranche review comments, would be published with the reviews T4 and M5 schedule (see <b>ACTION DAG10.1-04</b>).</p> <p>An update was also provided on publication of the central Programme RAID log. DAG members were advised this had now been made publicly available with the latest PSG papers and the Programme agreed to issue a link to this to DAG members (see <b>ACTION10.1-05</b>). The Chair invited DAG members to provide any feedback on the central Programme RAID to <a href="mailto:PMO@mhhsprogramme.co.uk">PMO@mhhsprogramme.co.uk</a> (see <b>ACTION 10.1-06</b>).</p>
<p><b>Level Playing Field Design Principle</b></p>	<p><b>Update on SEC MP162</b></p> <p>A Smart Energy Code (SEC) representative provided an update on SEC Modification Proposal (MP) 162, advising this was due to be presented to the SEC Change Board next month with a view to Ofgem decision by the end of August 2022.</p> <p>The Chair highlighted the issue of whether the Target Response Times (TRTs) for parties undertaking a Meter Data Retrieval (MDR) role in Data Communication Company Systems (DCC) was consistent with the Programme level playing field design principle, and whether potential change to the TRTs may be required. The SEC representative advised SEC MP162 was due to progress 'as is' and, subject to the outcome of discussions at DAG, a further modification proposal could be raised in future if change is required in relation to TRTs. The group were also informed of an outstanding issue yet to be resolved relating to the cost allocation under SEC for MP162, given the beneficiaries of the modification are not those most likely to bear the cost.</p>

Several DAG members expressed uncertainty over how to respond to the current consultation on SEC MP162, given their awareness it may not meet the requirements of the Programme's level playing field design principle. The need to ensure alignment between SEC MP162 and REC Change Proposal R0044 was also discussed (see **ACTION 10.1-08**).

One member advised the matter had been raised with the Independent Programme Assurance team as a competition issue as the potential conflict of the level playing field design principle and SEC MP162 had not yet been resolved.

The group also discussed the wider governance mechanisms in operation, and why R0044 and SEC MP162 are not being progressed under Ofgem's MHHS Significant Code Review (SCR) powers. The group were advised these changes were required now to ensure timeline implementation given their impacts on DCC systems.

#### **Update on 24hr TRT Requirement Discussion at SDS Working Group**

An overview of the key questions for the Programme in relation to MDR TRTs was provided. Specifically, the Programme's primary consideration must be whether the lack of a sub-24 hour TRT for agents would impact settlement accuracy or otherwise confound delivery of the MHHS Target Operating Model (TOM). In other words, is it an overarching requirement of the system to have receive a response to MDR data requests in less than 24 hours. The secondary consideration from a Programme perspective, is whether the Programme design principles are met and whether regulatory mechanisms are required to control the potentially unfair advantage of Supplier-enabled agents using their 30 second TRT function. A further consideration is the material effect of introducing a sub-24 hour TRT for MHHS-related MDR activities, noting previous indications of the significant cost likely to be associated with this.

Several members believed the Programme position on this was not materially different to the position in March 2022 and asked when the Programme anticipated coming to a final view. One member noted the challenge this causes with providing responses to the SECMP162 change report. The DAG agreed a resolution is required as soon as possible. Another member noted the challenge cost allocation under SEC poses, which is a matter outside of DAG but one that is likely to affect participant positions on this matter. It was further noted the assessment of costs, for example in relation to a potential sub-24 TRT for MHHS MDR requests, was difficult where clearly defined requirements have not been agreed. The DCC representative advised the cost increases significantly where '30 sec' on demand MDR functionality is required.

The MHHS Design Team asked whether, if there is not a systemic need for a sub-24 hour TRT for those carrying our MHHS-related MDR, mechanisms should be put in place to obligate parties not to use any existing sub-24 hour functionality for MHHS MDR requests, thereby upholding the level playing field design principle. The group were advised that suppliers and agents cannot currently choose the TRT they receive for these requests. Those meeting the use case criteria for a sub-24 hour TRT automatically receive this and DCC cannot currently differentiate between MDR requests for MHHS or non-MHHS purposes, meaning monitoring and enforcement could be a considerable challenge.

A further issue was highlighted in that supplier-aligned agents could also access faster processing of information requests from the supplier which could contravene the level playing field design principle also.

The challenges of identifying a solution whilst complying with other constraints, and ensuring reasonable cost make this a particular difficult matter to resolve.

#### **Conclusions**

The group concluded the many options and associated benefits and detriments which surround a potential resolution to this matter need to be clearly laid out for DAG to consider. As such, it was an urgent agreed a Smart Meter Segment Subgroup (SDS) meeting was required to elicit these options, identify the benefits and detriments of each and present this to DAG to enable a firm position to be determined at their next meeting in early July.

The group discussed the need for a resolution as soon as possible in view of the potential additional time convening an SDS subgroup would add. It was concluded that a Smart Data Service (SDS) subgroup should be held prior to the next DAG meeting on 06 July 2022 (see **ACTION DAG10.1-09**).

DAG members were asked to notify constituents of the upcoming SDS subgroup and encourage those with relevant expertise to attend.

The matter will then be discussed at the next DAG meeting with a view to determining a firm Programme position.

**Next meetings:**

**SDS Subgroup: 30 June 2022 (invites to follow shortly)**

**Next standard DAG: 06 July 2022**