ELEXON

QUALIFICATION APPROACH & PLAN - ANNEX 4: PROCESS FOR PARTICIPANTS THAT DO NOT COMPLETE MHHS QUALIFICATION WITHIN THE REQUIRED TIMESCALES

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1. Requirement to Complete Qualification

1.1 BSC Section C states there is a requirement for MHHS Participants to complete MHHS Qualification. This Annex sets out the Impact of this requirement on Participant Roles and provides the process Code Bodies will follow.

1.2 BSC Section C 12.12.6:

> *Those Parties and Party Agents required by the MHHS Qualification Plan to undertake MHHS Qualification must comply with the MHHS Qualification Plan. No Party or Party Agent will be able to participate in market-wide, half-hourly Settlement until it has successfully completed such MHHS Qualification. Failure to complete such MHHS Qualification by the date set out in the MHHS Qualification Plan shall result in the Party not being able to become a Registrant for Metering Systems for which it is not already a Registrant until it has completed MHHS Qualification.*
>
> *12.12.6A Subject to the provisions of this paragraph 12.12.6A, where a Party has successfully completed MHHS Qualification in respect of one or more Supplier MPIDs, such Party will be considered to have completed MHHS Qualification following the date set out in the MHHS Qualification Plan, provided that the conditions set out in 12.12.6B to 12.12.6I are satisfied.*
>
> *12.12.6B For the purposes of paragraph 12.12.6A:*
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> *(a) the Party must hold at least one Supplier MPID which has successfully completed MHHS Qualification in accordance with the MHHS Qualification Plan and which contains at least one operational Metering System Identifier ('**Operational MSID**'), as defined in paragraph 12.12.6J; and*
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> *(b) any Supplier MPID held by the Supplier which has not completed MHHS Qualification shall be deemed an unqualified MPID.*
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> *12.12.6C In respect of any unqualified MPID, the Party shall:*
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> *(a) provide written notice to the Performance Assurance Board (PAB) identifying such unqualified MPID(s) and confirming its intention for them; and*
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> *(b) submit to PAB a plan in respect of such MPID(s) and obtain PAB's written approval thereof. Such plan shall include a timetable setting out the actions to ensure all Metering Systems linked to the unqualified MPID(s) are migrated to an existing MHHS Qualified Supplier MPID or otherwise de-registered and disconnected by the M15 Milestone Date.*
>
> *12.12.6D Upon receipt of PAB's written approval of its plan under paragraph 12.12.6C(b), the Party shall:*
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> *(a) implement the plan in accordance with its terms; and*
>
> *(b) provide such evidence of compliance as PAB may reasonably request.*

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12.12.6E A Party that holds a Supplier MPID that is MHHS Qualified shall not be prevented, in respect of that Supplier MPID, from registering Metering Systems under paragraph 12.12.6 solely on the basis that the Party holding that Supplier MPID also holds unqualified MPIDs, provided that those unqualified MPIDs have complied with paragraphs 12.12.6C and 12.12.6D.

12.12.6F Any unqualified MPID shall, with effect from the MHHS Qualification date set out in the MHHS Qualification Plan, be suspended indefinitely from registering new Metering Systems.

12.12.6G In respect of any unqualified MPID with no Metering Systems registered, the Party that is the Registrant, shall submit a statement of intent to PAB confirming that the MPID is dormant and will not be used for CSS registrations unless and until MHHS Qualification is achieved.

12.12.6H In the event that a Party is appointed as a Supplier of Last Resort in respect of an unqualified MPID:

(a) the restriction in paragraph 12.12.6 shall not apply to its other Supplier MPIDs, Qualified or unqualified, for the purpose of registering Metering Systems transferred pursuant to such appointment; and

(b) the Party shall:

(i) notify the PAB in writing within 10 Working Days of such appointment; and

(ii) either agree with PAB a reasonable timetable to achieve MHHS Qualification in respect of the unqualified MPID; or

(iii) agree with PAB a proposed onboarding timetable for transferring customers to an existing MHHS Qualified Supplier MPID, recognising that such timetable may be subject to uncertainty due to factors outside the Party's control:

(iv) in either case, the Party shall use best endeavours to ensure that the relevant MPID(s) are compliant with the MHHS Qualification date as set out in the MHHS Qualification Plan.

12.12.6I BSCCo shall maintain a register of Parties and Supplier MPIDs that have invoked the provisions of this paragraph 12.12.6A. This register shall include:

(a) the Supplier MPID(s) covered;

(b) the date of the PAB's approval of the agreed plan; and

(c) the status of implementation of such plan.

This register shall be presented to the PAB under the confidential issues section of its meetings.

12.12.6J For the purpose of this paragraph 12.12.6A-12.12.6I, an 'operational MSID' means a Metering System Identifier which is registered in the SMRS or the CSS to a Supplier in respect of which energy consumption or export is, or is reasonably expected to be, occurring, and shall not include any Metering System which has been fully de-energised and subject to a completed disconnection process, or which is otherwise closed in SMRS or CSS.

1.3 This provision sets out ~~three~~ requirements for consideration by Code Bodies and Suppliers:

- The need to set out clear timescales within the MHHS Qualification Approach and Plan and ensure participants are aware of these.
- To ensure that participants that do not complete MHHS Qualification by Milestone 14 do not participate in MHHS until MHHS Qualification is completed.
- To ensure Supplier MPIDs~~s~~, in their role as Registrants, that do not complete MHHS Qualification by Milestone 14 do not become a Registrant for any Metering Systems they are not already responsible for.
- The requirement for Suppliers to identify MPIDs that are not intended for MHHS Qualification and confirm intentions for those MPIDs, including a plan for all MPANs on unqualified MPIDs, and confirmation that MPIDs are dormant and will not be used for CSS registrations.

1.4 The BSC goes on to state in Section C 12.12.7:

> *Each MHHS Participant is responsible for ensuring that its agents, employees, service providers and other contractors (including its Party Agents) undertake the activities necessary to enable such MHHS Participant to comply with its obligations as an MHHS Participant. Lack of co-operation from such third parties shall not excuse delays or failures on the part of an MHHS Participant.*

2. Impact of missing M14 for Participant Roles

Role	Applicable Timescales	Non participation in MHHS if Qualification not completed	Cessation of ability for Suppliers to register Metering Systems
LDSOs (including SMRA, UMSO, and existing IDNOs)	Existing LDSOs are expected to undertake MHHS Qualification during SIT[1] if they have volunteered or during the Non-SIT LDSO Qualification phase[2].	As the LDSO, existing IDNOs, SMRA and UMSO roles are integral for the operation of the rest of the market our assumption is that the MHHSP will ensure that all existing LDSOs have completed MHHS Qualification prior to M10 (Central Systems Ready for Migrating MPANs).	This restriction does not apply to LDSOs and Existing IDNOs
New entrant IDNOs	New entrant IDNOs that are too late to join the Non-SIT LDSO Qualification phase but wish to qualify prior to M15 will need to join the main phase of MHHS Qualification execution[3]. If they have not completed MHHS Qualification within that phase, they will need to complete it within the enduring Qualification process.	New entrant IDNOs will not be able to operate in MHHS arrangements if they have not completed MHHS Qualification.	This restriction does not apply to New entrant IDNOs

[1] SIT is currently planned to take place between November 2023 and February 2025.
[2] The Non-SIT LDSO Qualification phase is expected to take place between July 2024 and February 2025.
[3] The main phase of Qualification execution is expected to take place between January 2025 and February 2026 across four waves.

Role	Applicable Timescales	Non participation in MHHS if Qualification not completed	Cessation of ability for Suppliers to register Metering Systems
Suppliers	Existing Suppliers and any new Suppliers that wish to qualify ahead of or during the migration period are expected to undertake MHHS Qualification during SIT if they have volunteered or during the main MHHS Qualification phase. Existing Suppliers must have completed MHHS Qualification for Milestone 14 (M14) "All Suppliers must be able to access MPANs under the new TOM". If new Suppliers, not yet in the market, have not completed MHHS Qualification by M14, they will need to finalise their Qualification within the enduring Qualification process.	Supplier~~s~~ MPIDs will not be able to operate in MHHS arrangements if they have not completed MHHS Qualification. Their unqualified MPIDs will be suspended from completing registrations in Central Switching Service (CSS), therefore they will not be able to register new MSIDs.	This restriction applies to Suppliers. Please see 'Detailed Process' Section for more details. For clarity, Suppliers will be prevented from registering new MSIDs in legacy as well as new MHHS arrangements, as per the BSC obligation.
Data Services (all types)	Participants currently operating as Data Collectors (as known in previous arrangements) and any new Data Services (as known in MHHS arrangements) that wish to qualify ahead of or during the migration period are expected to undertake MHHS Qualification during SIT if they have volunteered or during the main MHHS Qualification phase. If new Data Services have not completed MHHS Qualification by M14, they will need to finalise their Qualification within the enduring Qualification process.	Data Services will not be able to operate in MHHS arrangements if they have not completed MHHS Qualification.	This restriction does not apply to Data Services, as it is a Supplier who acts as Registrant; however, it is worth noting that Suppliers will not be able to appoint a Data Service until it is MHHS Qualified, completed Service Activation, and added to Industry Standing Data. Suppliers will need to appoint a Data Service to all MSIDs by M15 to complete migration.
Metering Services (MEM) (Advanced and Smart)	Participants currently operating as a MEM and any new MEM that wish to qualify ahead of or during the migration period are expected to undertake MHHS Qualification during SIT if they have volunteered or during the main MHHS Qualification phase.	MEMs will not be able to operate in MHHS arrangements if they have not completed MHHS Qualification.	This restriction does not apply to MEMs as it is a Supplier who acts as Registrant, however, it is worth noting that Suppliers will not be able to appoint a MEM until it is MHHS Qualified for MHHS, completed

Role	Applicable Timescales	Non participation in MHHS if Qualification not completed	Cessation of ability for Suppliers to register Metering Systems
	If a new MEM has not completed MHHS Qualification by M14, they will need to finalise their Qualification within the enduring Qualification process.		Service Activation, and added to Industry Standing Data. Suppliers will need to appoint a MEM to all MSIDs by M15 to complete migration.

3. Detailed Process[4]

Ref	When	Action	From	To	Information Required
1	6 months prior to the end of the MHHS Qualification phase at M14	Remind all participants (excl. LDSOs and IDNOs) that have yet to MHHS Qualify that if they fail to complete MHHS Qualification they will be unable to operate within the MHHS arrangements and remind participants that unqualified Suppliers would also be unable to register new MSIDs	BSCCo	Participants that have not yet completed MHHS Qualification	Reminder of C12.12.6 and 12.12.7 requirements by email to participants that have not yet completed MHHS Qualification By email
2	~~43~~ months prior to the end of the MHHS Qualification phase at M14	Notify Participants that have yet to MHHS Qualify of the obligation to provide written notice identify MPIDs and submit a plan for all impacted MPANs	BSCCo	Participants that have not yet completed MHHS Qualification	Template for Notice and Plan for MPANs
3	Within [5/10]WDs of 2	(a) Provide written notice identifying MPIDs that are not intended for	Participants that have not yet completed	BSCCo	

[4] Please be advised that these are the current arrangements agreed by the Programme and Code Bodies' Performance Assurance Boards (PAB) and the view may be revised.

Ref	When	Action	From	To	Information Required
		MHHS Qualification and confirm intentions. (b) Submit a Plan including a timetable for all MPANs to be migrated to a MHHS Qualified MPID or re-registered and disconnected by M15 (c) for MPIDs with no MPANs; Submit a statement of intent confirming the MPID is dormant and will not be used for CSS Registrations	MHHS Qualification		
4	At the next PAB Meeting	BSCCo to notify participant of the outcome of PAB's decision on approval of Plan.	BSCCo	Participant	
5a	Following notification that the PAB has approved the Plan	(a) Participant to implement the plan in accordance with its terms (b) Participant to provide evidence of compliance as requested by PAB	Participant	BSCCo	
5b	Following notification that the PAB has not approved the Plan	Participant to resubmit their plan to respond to any feedback from the PAB	Participant	BSCCo	
6~~2~~	At a point sufficiently in advance of M14 to allow consideration by Ofgem, e.g. 2 months	Notify Ofgem whether there are any material issues with Central System, Code Body or MHHSP issues during the MHHS Qualification phase that could be considered to impact Programme Parties' ability to hit M14	Code Bodies: BSCCo RECCo MHHSP	Ofgem Programme Participants	Notification of Central System, Code Body or MHHSP issues which have resulted in failure for participants to MHHS Qualify By email
~~3~~7	At the end of the MHHS Qualification phase at M14 and if there have not been Central System, Code Body or MHHSP issues during the MHHS Qualification phase	Contact all participants that have MPIDs that have not completed MHHS Qualification for all their Roles to inform them that they are unable to operate within the MHHS arrangements and those participants	Code Bodies: BSCCo RECCo	All unqualified Programme Participants	Information set out in the action column and providing a deadline of 5WDs to confirm intentions and agree the process from the

Ref	When	Action	From	To	Information Required
		who wish to conclude Qualification through the enduring process must contact Code Bodies to agree the process. In the case of Suppliers, inform them that action will be taken to restrict their registration of further MSIDs on MPIDs that have not MHHS Qualified			date the email was sent By email
48	Within 1WD of 73	BSCCo requests REC Code Manager revokes Supplier's ability to register further MSIDs	BSCCo	REC Code Manager	Details of Suppliers who should no longer be permitted to register MSIDs
59	Within 2WDs of 84	Take action to prevent Suppliers notified in 3 from registering Metering Systems and provide notification to BSCCo	REC Code Manager	BSCCo	Confirmation that Suppliers notified in 3 are no longer permitted to register MSIDs
610	Within 5WDs of 95	Inform Suppliers notified in 3 that they are no longer able to register MSIDs on impacted MPIDs in accordance with Section C 12.12.6 of the BSC and ask them to confirm whether they wish to continue Qualification via the enduring process or understand next steps	BSCCo	Suppliers notified in 3 CC RECCo Ofgem MHHSP	Information set out in the action column and providing a deadline of 5WDs, to confirm whether they wish to complete Qualification via the enduring process, from the date the email was sent By email
711	Suppliers that have chosen to join enduring Qualification process successfully complete it	Confirm completion of successful Qualification and request restriction on registration of MSIDs is lifted	BSCCo	REC Code Manager CC Ofgem	Information set out in the action column with details of relevant Suppliers By email
812	Within 2WDs of 117	Confirm restriction on registration of MSIDs has been lifted	REC Code Manager	BSCCo	Information set out in the action column with details of relevant Suppliers By email
913	Within 5WDs of 128	Confirm requirements of Section C 12.12.6 of the BSC have been met and restriction on registration of MSIDs has been lifted	BSCCo	Supplier RECCo MHHSP CC Ofgem	Information set out in the action column with details of relevant Suppliers By email