



## Summary

### About this document

You can find the definitions of the terms and acronyms used in this document in the [DIP Glossary](#)<sup>1</sup>.

This document provides information on a DIP CR. It provides an assessment of the proposed change and its progression.

There are three parts to this document, which are:

- This document. It is the main document providing insight into the change, solution, and progression.
- **Attachment A** contains the DIP CR Proposal Form.
- **Attachment B** contains the red-lined text to DSD002, DIP Connection and Operation.
- **Attachment C** contains the red-lined text to DSD007, Glossary.

### Timeline



### Executive summary

The DIP Rules, outlined in the DIP Subsidiary Document (DSD) 002, titled "DIP Connection and Operation," specify the procedures that DIP Applicants and Users must follow when using the DIP. A key part of this process involves transitioning an Applicant or Potential User to the Production Environment, which occurs after they have qualified under an Industry Code or the MHHS Qualification.

In the coming months, a large number of market participants will pursue the MHHS Qualification and subsequently seek to be on-boarded to the DIP. This situation poses a risk for the DIP Manager and could impact the service and support provided. To mitigate this risk, the DIP Change Request (CR) aims to empower the DIP Manager to onboard select market participants early. This proactive measure is intended to prevent any service or support disruptions that may arise from the increase in MHHS qualification volumes. The DIP Manager plans to implement this change as part of a non-standard release scheduled for **June**.

	Impacts	Explanation
DIP Users	positive	Supports early onboarding.
DIP Manager	positive	Enables proactive support.
DIP Rules	positive	Shows the adaptability of the DIP Rules.
DIP objectives	positive	Enables support.
Industry Codes	positive	Provides support to the MHHS Qualification.
Cost	positive	N/A
Change Tier	2	It is considered all other changes.

## Overview

### Background

Currently, Non-System Integration Testing (SIT) Market Participants are preparing or have prepared to undergo MHHS Qualification. To support market participants who can complete the MHHS Qualification more quickly, the MHHS Programme has developed various migration pathways. These pathways are a series of dates of when Non-SIT Market Participants will seek MHHS Qualification approval from Industry Code Bodies.

For the DIP Manager, this will involve On-boarding Applicants/Potential DIP Users. To do this, Applicants/Potential DIP Users must have fulfilled the On-Boarding checks set out in [DSD002 DIP Connection and Operation](#). These steps include:

- Ensuring they have all the information required for DIP On-boarding
- Agree to comply with the DIP Rules
- Undergoing DIP Manager checks
- Verification process
- Organisation set up
- Functional and non-functional checks, and
- Moving to the Production Environment.

Market participants undergoing Industry Code Qualification cannot transition to the Production Environment until the Code Bodies have informed the DIP Manager that the process is complete.

Under MHHS Qualification, market participants must adhere to any instructions given by the DIP Manager and/or relevant Industry Code to achieve their qualification. These instructions should align, as much as possible, with the requirements outlined in the DIP Rules.

The DIP Manager will assist market participants from the various migration pathways in their onboarding to the DIP. In the upcoming months, a significant number of market participants are expected to seek MHHS Qualification. There is a risk that peak periods could have a knock-on impact on the service, support, and – in an extreme scenario – the migration schedule.

DIP Manager has explored various mitigations for this risk, including holding [drop-in sessions](#) to offer support to those beginning their onboarding journey. The sessions before September occur before and after the Balancing and Settlement Code (BSC) PAB dates; the drop-in sessions occur before the Retail Energy Code PAB.

### What is the issue

There are currently two Migration Pathways that have significantly higher volumes of parties than the others. This situation presents a risk for the DIP Manager, as these peak periods may impact the quality of service provided. For individuals undergoing MHHS Qualification, any delays or service interruptions could significantly hinder their Qualification journey.

### Solution

The DIP Manager will be authorized to onboard individuals seeking MHHS Qualification onto the Production Environment even before their qualification has been approved. To facilitate this, a provision will be added to the DIP Rules (DSD002 DIP Connection and Operation), granting the DIP Manager the authority to invite DIP Applicants to access the Production Environment prior to receiving their MHHS Qualification.

### Proposers rationale

Adding a provision to enable the DIP Manager to invite DIP Applicants onto the Production Environment early will ensure the DIP Manager can provide as much support as possible to those undergoing MHHS Qualification.

### Proposers red-lining

Document	Section	Amendment
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Potential DIP Users who are undergoing MHHS Qualification before Milestone Fourteen (M14) may be invited to the Production Environment before completing their MHHS Qualification, provided that they have fulfilled the DIP Manager's Checks and On-Boarding Checks. However, if a Potential DIP User is invited to the Production Environment before receiving MHHS Qualification approval, they will not be able to send Messages until their MHHS Qualification is complete. Additionally, Code Bodies retain the right to restrict DIP On-boarding as outlined in Clause 2.9.5.

[DSD002](#)

2.5.2 (new)

[DSD007](#)

New term added

Milestone Fourteen (M14) – 28 October 2026

Note that the full text or amendments can be found within the legal text **amended Attachment(s) B and C**.

**DSD002 – DIP Connection and Operation (red-lined)**

- 2.5.2 → Potential DIP Users undergoing MHHS Qualification before Milestone Fourteen (M14) may, at the discretion of the DIP Manager, be invited to the Production Environment before receiving MHHS Qualification approval, provided that they have completed the DIP Manager's checks and the applicable on-boarding checks.¶
- 2.5.3 → Before inviting a potential DIP User to the Production Environment under 2.5.2, the DIP Manager shall notify the relevant Code Bodies.¶
- 2.5.4 → A potential DIP User that has been invited to the Production Environment in accordance with 2.5.2 shall not be permitted to send or receive Messages until it has completed MHHS Qualification and received the relevant approval.¶
- 2.5.5 → Nothing in 2.5.2 shall affect the rights of a Code Body under Clause 2.9.5 to restrict or otherwise manage DIP On-Boarding in accordance with the DIP Rules.¶

**DSD007 – Glossary**

<u>Milestone Fourteen (M14)</u>	<u>For the purpose of this definition, “Milestone 14 (M14)” shall be the date determined and published by MHSP as part of their programme plan, on which Suppliers must be able to access Metering Systems under the new MHHS arrangements.</u>
<u>Milestone Sixteen (M16)</u>	<u>Shall have the meaning in DSD001 Annex 1 (DIP Rules)</u>

## Impacts, benefits, and risks

### Impacts

This change will affect both DIP Managers and DIP Applicants. The DIP Manager is expected to face an increased demand for support during the MHHS Qualification process, which may impact the quality of service provided

DIP Applicants must ensure they meet all the requirements outlined in DSD002 for DIP Connection and Operation when onboarding to the DIP. Any delays in this process, for any reason, could have significant negative consequences for the applicants.

### Benefits

The change also delivers several important benefits. By introducing different migration pathways, the MHHS Programme provides greater flexibility for market participants who are ready to complete qualification earlier than others, helping accelerate overall programme readiness.

### Risks

The proposed change enables the DIP Manager to onboard those who have not qualified for the MHHS arrangements early. This is a risk as it allows Applicants to be part of the Production Environment whilst still awaiting their qualification outcomes. However, to mitigate this risk, the DIP Manager will:

- Set the Parties' Effective From dates to far in the future (i.e., 2099 if they are not qualified, this is amended afterward), so there is limited possible behaviour on the Production DIP.
- Parties will not begin onboarding earlier than the previous Migration Pathway, so this will restrict this to a 2-week additional onboarding window.
- Parties will only be onboarded early if they have completed all pre-requisite steps required (QAD Signed Off and UIT DIP Onboarding complete)

Affected party/area	Impact, benefit, or risk	Explanation
DIP Rules	positive	This change allows DIP Applicants to be onboarded prior to qualification, which is positive as it shows how the DIP Rules can facilitate support for wider industry programmes of work.
DIP System	Neutral	N/A
DIP User	positive	DIP Applicants will be onboarded early, which will, in certain instances, remove or reduce any delay in using the DIP before they are qualified.
DIP Manager	positive	This change allows the DIP Manager to proactively support DIP Applicants and others by onboarding certain Applicants early.
DIP Service Provider	Neutral	N/A
Industry Codes	positive	This change allows DIP Applicants to be onboarded prior to qualification, which is positive as it shows how the

DIP CR 0021 'Enabling early DIP On-Boarding for Applicants and Potential DIP Users' Decision

DIP Rules can facilitate support for wider industry programmes of work.

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DIP Manager Cost	Neutral	N/A
DIP User Cost	Neutral	N/A

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## DIP CR tier, progression, and implementation/recommendation

### Change Tier

Tier	Criteria	Explanation
<b>Tier 1</b>	<ul style="list-style-type: none"> <li>an implementation cost greater than £500,000 for the DIP Manager and/or £250,000 for DIP Users;</li> <li>placing new obligations on DIP Users and/or the DIP Manager that will require a change to the DIP User's business operating model;</li> <li>an Implementation Date will be more than 24 months after the date on which the decision is made.</li> </ul>	This change is not high cost, does not affect a DIP User/DIP Manager business operating model, and will be implemented within 24 months. Thus, it is not a Tier 1 change.
<b>Tier 2</b>	<ul style="list-style-type: none"> <li>All other changes</li> </ul>	This is a Tier 2 change as it is considered 'all other change(s)' as per the DIP Rules.

Objective	Impact	Explanation
<b>Applicable DIP Objective (a)</b> <ul style="list-style-type: none"> <li>Provide accurate and timely support for the sharing of applicable market data.</li> </ul>	Neutral	N/A
<b>Applicable DIP Objective (b)</b> <ul style="list-style-type: none"> <li>Further consumer interests through the appropriately governed sharing of data.</li> </ul>	Neutral	N/A
<b>Applicable DIP Objective (c)</b> <ul style="list-style-type: none"> <li>Facilitate competitive change and innovation through the efficient and economic delivery of reliable and adaptable services.</li> </ul>	Positive	This change allows the DIP Manager to adapt its services to the needs of the industry.

### Consultation responses summary

Five responses were received to DCR0021. All respondents agreed that the DIP Manager had correctly identified the issue and confirmed that the proposed change would not have a direct impact on their organisations. Respondents also indicated that no material implementation costs were expected.

The majority of respondents supported the proposed solution and agreed with the principle of enabling early onboarding. However, respondents requested additional clarification and raised several concerns regarding the proposed approach. The principal concern was whether sufficient controls would be in place to prevent participants who had been onboarded prior to completing MHHS Qualification from sending or receiving Messages.

Respondents generally agreed with the proposed legal drafting as the mechanism for enabling early onboarding, although some requested clarifications and raised drafting and governance comments. These included questions

DIP CR 0021 'Enabling early DIP On-Boarding for Applicants and Potential DIP Users' Decision regarding the treatment of participants who fail the MHHS Qualification after onboarding, the interaction with existing Code Body rights, and the need for greater transparency and communication with Code Bodies involved in the MHHS Qualification.

Respondents also supported the proposed implementation approach, subject to compliance with the timeliness requirements set out in the DIP Rules. No objections were raised to the implementation itself, although some respondents queried whether additional operational mitigations and resourcing options had been considered before introducing the change.

### DIP Manager's response to consultation responses

The primary concern raised by respondents was whether adequate controls would be in place to prevent Potential DIP users who have been onboarded early from exchanging Messages before successfully completing the MHHS Qualification.

The DIP Manager considers that this risk is appropriately mitigated through a combination of technical, operational, and governance controls.

From a technical perspective, a Market Participant may only exchange Messages where the relevant DIP ID is within its valid "Effective From" period. Where a Message is submitted outside of this period, the Message will be rejected, and the sender will receive error code "MSG1009: Sender DIP ID Invalid". This provides a system-level control preventing unqualified participants from using the DIP.

Operationally, the DIP Manager and Qualification Team are also reviewing resource allocation to maintain service levels during periods of increased demand and are seeking, where appropriate, to move participants earlier through the process to smooth demand across migration pathways. Early onboarding will therefore be used only where considered necessary and as an additional mechanism to support delivery.

Where a participant who has been onboarded early does not subsequently achieve MHHS Qualification, the DIP Manager may remove the participant's DIP ID, amend the applicable "Effective From" date, or offboard the participant from the DIP, depending on the circumstances of the individual case.

In addition, the legal text has been amended to expressly prohibit Potential DIP Users who have been invited to the Production Environment before qualification from sending or receiving Messages until MHHS Qualification has been successfully completed and the relevant approval has been granted. The revised drafting also introduces notification requirements for relevant Code Bodies and confirms that existing rights under Clause 2.9.5 are unaffected.

Taken together, these technical, operational, and governance measures address the concerns raised by respondents regarding the risks associated with early onboarding.

### Revised Progression timeline

Event	Date
Initial Assessment published	14/05/2026
Industry Consultation	14/05/2026 – 05/06/2026
Final Assessment published	11/06/2026
DIP CR presented for decision	25/06/2026 (10WD post final assessment being published)
Decision published	25/06/2026
Proposed Implementation Date	25/06/2026

### Implementation

DIP Manager agreed to implement for **CR0021** on:

- **25 June 2026** as part of a **non-standard DIP Release**.