

Rachel Clark,
Deputy Director, Retail System Programmes
By Email Only

25 June 2021

Dear Rachel,

Implementation Arrangements for Market-Wide Half-Hourly Settlement

Thank you for the opportunity to respond to the above consultation, proposing the implementation arrangements for introducing Market-Wide Half-Hourly Settlement (MHHS) within the industry. DCC is supportive of the MHHS programme aims and has recently introduced a modification to the SEC to support its implementation. We provide our full response within Appendix A.

I would like to draw out some important points from our response:

1. Greater clarity is needed as to which of the section 12.12/12.17 obligations apply to which categories of MHHS Participants, as they are currently expressed as applying to "each MHHS Participant". We expand upon this within our response to question 2.
2. SEC Modification MP162¹ will be developed and will have undergone cycles of industry input and review in advance of the proposed governance arrangements going live in Autumn 2021.
 - a. It is important that introduction of the proposed governance arrangements is complementary and not disruptive to the ongoing SECAS modification process.
 - b. We value Ofgem's continued involvement with the development of this modification and related industry code change. It is important to us that this continues within the new arrangement.

We expand upon this in our response to questions 1, 7 and 9.

3. There must be strict change control for section 12 of the BSC. We make some suggestions as to how this can be managed within our response to question 3.

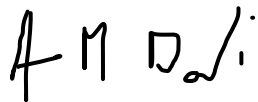
¹ SEC changes required to deliver MHHS

Statutory consultation - proposal to modify the Smart Meter Communication Licence

We are supportive of the proposed licence changes that require DCC to comply with Section 12 of the BSC for the purposes of implementing MHHS. We note however that this could equally be accomplished by amending the Smart Energy Code (SEC) in the same way as proposed for C7.13 and the SECCo. The DCC is a party to the SEC and must comply with its requirements.

Please contact Richard.Vernon@smartdcc.co.uk if you have any questions about our response.

Kind Regards,



Arik Dondi

Head of Regulatory Design and Delivery

Arik.Dondi@smartdcc.co.uk

CC: Richard Vernon

Appendix A: Consultation Response Form - Implementation Arrangements for Market-Wide Half-Hourly Settlement

Appendix A
implementation_and_

DCC Public