



Independent Networks
Association

Rachel Clark
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

25 June 2021

Dear Rachel,

The INA (Independent Networks Association) represent, and consists of, the UK's leading independent utility network owners and operators who serve the domestic and commercial and industrial sectors across the UK.

We thank you for the opportunity to respond to your consultation on the proposed governance arrangements for the Market Wide Half Hourly Settlement (MHHS) Significant Code Review industry programme that Ofgem recently agreed would go ahead.

We are pleased to see that the specific needs, issues, and concerns that affect independent network operators have been recognised in the proposals. We especially welcome the place on the Programme Steering Group for a member to represent the interests of Independent Distribution Network Operators (IDNO).

We would like to see this recognition continue as the other programme governance groups are established and their terms of reference defined. Understanding the impacts of decisions that the programme makes upon all parties is in the best of interests for ensuring that it is successfully delivered on time.

We recognise the intention of the proposals to introduce new obligations upon all electricity distributors to co-operate and participate with this project are aimed at ensuring that all parties are suitably engaged. This has been a successful approach used in several recent Industry programs such as the Faster Switching SCR and Project Nexus.

We have concerns that the obligations, as drafted, include an open-ended commitment for parties to incur costs at the request of the Elexon project. We are concerned that they may not take sufficiently into account the cost implications for parties, especially smaller industry players such as independent networks. The programme governance arrangements need to ensure robust cost benefit assessments are undertaken, there is a clear appeal process to Ofgem for affected parties for any proposals and that robust checks and balances are in place.

We look forward to seeing your response to the concern highlighted.

Yours sincerely,

Vicky Bell
Chair of the INA Regulatory Sub-Committee