

# Consultation

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## Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants

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Response deadline: 24 March 2025

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Team: MHHS Team

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We are consulting on a suite of directions to be issued to MHHS Participants. The proposed directions are intended to ensure that MHHS Participants fulfil their responsibilities in the delivery of the MHHS Programme milestones in line with the existing MHHS Implementation Timetable. We would like views from people and organisations with an interest in MHHS Implementation.

This document outlines the scope, purpose and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations). If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

**Consultation** – Proposed Directions to Market-wide Half-Hourly Settlement (MHHS)  
Participants

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## 1. Introduction

### Background

- 1.1 On 29 November 2024, Ofgem approved MHHS Change Request CR055 ('Amendments to M10 and corresponding milestones'). CR055 proposed to delay MHHS 'go live' by 6.5 months to enable the full and robust completion of Systems Integration Testing and it also had knock-on effects for subsequent programme milestones. However, in our decision document<sup>1</sup>, we stated that we were determined that there should be no further delays in the delivery of this vital programme. To reduce this risk, we said that we would be taking forward, in early 2025, a package of additional regulatory measures intended to expedite the delivery of MHHS. This consultation is part of the first element of that package.

### What are we consulting on

- 1.2 In the CR055 decision we stated that we were minded to issue a direction on:
- all MHHS Participants to comply in a timely manner with any reasonable requests made by MHHS Programme; and
  - BSCCo as a MHHS Participant to develop, consult on and implement an operational testing plan for Helix and prepare related governance code modifications as necessary on a timescale consistent with the MHHS Implementation Timetable.
- 1.3 Having considered the matter further, including discussing potential directions with MHHS Implementation Manager and the MHHS Independent Programme Assurance provider ('the IPA'), we are now consulting on a suite of draft directions intended to ensure that MHHS Participants abide by the MHHS-related obligations placed on them in industry codes and Programme documents. The draft directions are in appendix 1 of this document.
- 1.4 We welcome views by 24 March 2025.

### Next steps

- 1.5 Subject to responses to this consultation, we intend to issue the directions to MHHS Participants as soon as possible.

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<sup>1</sup> [Market-wide Half Hourly Settlement Change Request CR055 'Amendments to M10 and corresponding milestones' - decision | Ofgem.](#)

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- 1.6 We are intending to consult soon on a proposal to change the MHHS Governance Framework such that any future proposal to change a Tier 1 MHHS Implementation Milestone shall be referred, with a recommendation by the MHHS Senior Responsible Owner, to Ofgem for determination.
- 1.7 Finally, we expect to consult on changes to the distribution and supply licences and potentially also to the Smart DCC Limited's Smart Meter Communications Licence. All these proposals will be intended to expedite the delivery of MHHS and its associated benefits.

## **2. Scope of the proposed directions on MHHS Participants**

### **Introduction**

- 2.1 In our recent decision document on MHHS Change Request CR055, we stated that we “will seek to introduce a package of regulatory measures intended to expedite the delivery of MHHS and avoid further delays”. As noted above, we added that we were “minded to issue directions for example to all MHHS Participants to comply in a timely manner with any reasonable requests made by MHHS Programme; and to BSCCo as a MHHS Participant to develop, consult on and implement an operational testing plan for Helix and prepare related governance code modifications as necessary on a timescale consistent with the MHHS Implementation Timetable”. To be clear, references in this document to BSCCo as a MHHS Participant include BSCCo’s role as the Data Integration Platform (DIP) Manager.
- 2.2 Paragraph 12.12 of section C of the Balancing and Settlement Code (BSC) sets out the general obligations of MHHS Participants<sup>2</sup> in relation to implementing MHHS. All these obligations are important but, in this context, we note particularly the requirements in paragraph 12.12.1 on MHHS Participants to:
- deliver and test their MHHS-related IT Systems and business processes in accordance with the MHHS Implementation Timetable (‘the timetable’);
  - take all reasonable steps in their control to facilitate completion of MHHS Implementation within the timetable, including taking any action reasonably recommended by the IPA;
  - develop, keep up-to-date and comply with their own programme plans consistent with the timetable and refrain from any action that would unduly compromise or delay that timetable;
  - provide the Authority, the MHHS Independent Assurance Provider or MHHS Implementation Manager with such information as they may reasonably request, including progress against their own plans;

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<sup>2</sup> Section C 12.2.15 of the BSC states that “MHHS Participant means each of: (a) BSCCo (but excluding its role as MHHS Implementation Manager); (b) each Supplier; (c) each Licensed Distribution System Operator; (d) the DCC; (e) each MHHS Affected Code Body; (f) each Data Collector; (g) each Data Aggregator; (h) each Meter Operator Agent; and (i) any other person or category of person which the Authority directs”.

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- promptly identify, escalate and report to the MHHS Implementation Manager and MHHS Programme Steering Group any and all risks or disputes that may adversely affect MHHS Implementation; and
  - ensure they can meet the various milestones on the dates specified in the timetable.
- 2.3 We further note the obligations under 12.12.3 of section C of the BSC applying to those MHHS Participants required by an MHHS Test Plan to participate in testing
- 2.4 We reiterate the importance of paragraph 12.12.2 of section C of the BSC. This makes it clear that “an MHHS Participant cannot seek to avoid or delay undertaking its obligations as an MHHS Participant by reason of cost” and that if “an MHHS Participant considers that the costs of compliance become (or are likely to become) disproportionate, then it may raise the issue or seek a change under the MHHS Governance Framework, but shall nevertheless continue to comply with its obligations from time to time as a MHHS Participant”.
- 2.5 Finally, we draw attention to paragraph 12.12.7 of section C of the BSC which states that “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”.
- 2.6 Paragraph 12.12.1(h) states that all MHHS Participants shall comply with the Authority's directions from time to time relating to MHHS Implementation. The proposed direction relates to the obligations in paragraph 12.12 of section C of the BSC. Expressions used in the proposed direction shall have the meanings given to them in that paragraph.
- 2.7 The direction under paragraph 12.12.1(h) is without prejudice to MHHS Participants’ other obligations under the BSC. We may supplement, amend or replace this direction from time to time. Different elements of the direction may apply to different types of MHHS Participant. The direction specifies in each case to whom a requirement applies.

## **The proposed scope of the directions**

- 2.8 We are proposing to direct MHHS Participants in relation to MHHS Implementation. The general purpose of our proposals is to ensure that MHHS Participants fulfil their responsibilities in the delivery of the MHHS Programme implementation milestones and report progress against these to the MHHS Implementation Manager.
- 2.9 The proposals cover each remaining phase of the programme from the date on which they come into force, through testing, qualification, migration and – as necessary - until there has been a successful cutover to the faster settlement timetable. They are also intended to complement the directions that we have proposed to issue to the MHHS Implementation Manager.<sup>3</sup>

## **Compliance with MHHS Participants' plans**

- 2.10 Successful implementation of MHHS depends upon MHHS Participants complying with their own individual MHHS programme plans as referred to in paragraph 12.9.2(a) and (b) of section C of the BSC. For example, MHHS Participants undertaking MHHS testing must complete all the remaining phases of testing in line with their plans and with MHHS Programme Milestones.<sup>4</sup> For their part, central parties must be operationally ready to accept migrating Meter Point Administration Numbers (MPANs) from the M10 milestone deadline and all their individual MHHS programme plans must be consistent with meeting that critical deadline (and later ones including M15).
- 2.11 Suppliers, agents and Licensed Distribution System Operators (LDSOs) will be agreeing qualification plans with the code bodies and suppliers will be agreeing Migration Schedules with the MHHS Implementation Manager. These plans and schedules may be adjusted from time to time with the agreement of the code bodies and/or the MHHS Implementation Manager as appropriate, but must in any event be aligned to the overall relevant MHHS plans (such as the MHHS Qualification Plan and the MHHS Migration Plan) and milestones.
- 2.12 Each individual MHHS programme plan must include all activities for which the MHHS Participant is responsible for in the delivery of the overall programme milestones as set out in the Programme Milestone Register and supporting documentation.<sup>5</sup> Each individual MHHS programme plan shall for

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<sup>3</sup> See <https://www.ofgem.gov.uk/consultation/direction-elexon-market-wide-half-hourly-settlement-mhhs-implementation-manager>.

<sup>4</sup> Programme milestones are available here [Planning - MHHS Programme](#).

<sup>5</sup> See <https://www.mhhsprogramme.co.uk/planning/programme-plan-complementary-documents>.

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the purposes of this direction be referred to as an MHHS Participant Plan. The proposed direction requires each relevant MHHS Participant to comply with its MHHS Participant Plan in full and on time.

### **Resource allocation and deployment**

- 2.13 To promote the timely and robust delivery of plans, it will be vital that all relevant parties and their service providers commit the resources needed. Therefore, the proposed direction requires relevant parties to identify, allocate and deploy sufficient budget and appropriately skilled resources to promote timely delivery against the plans and/or against Programme milestones. Where parties contract with service providers, those parties shall be required to ensure that all their service providers are likewise sufficiently resourced.
- 2.14 We also propose to direct that each MHHS Participant establishes formalised internal governance and senior sponsorship to assure the delivery of its plan, and that each MHHS Participant must confirm in writing to the MHHS Implementation Manager that it has established such arrangements and that they are fully in effect.

### **Progress reporting and risk and issue management**

- 2.15 We are proposing to direct MHHS Participants to report on the progress of delivery against their plans to the MHHS Implementation Manager or code bodies in line with any reporting requirements set out by those bodies. We also propose that MHHS Participants should be directed to report any delivery delay risks and issues to the MHHS Implementation Manager or code bodies at the earliest opportunity so as to enable mitigating actions to be taken in a timely way that preserves the MHHS Implementation Timetable.
- 2.16 We propose to direct that MHHS Participants shall provide information on those matters in a timely manner to the IPA where it requests them to do so.

### **Responding to reasonable requests**

- 2.17 We are proposing to direct that MHHS Participants shall respond in a timely, constructive, efficient and effective manner to any reasonable requests made to them by the MHHS Implementation Manager and to respond similarly to any such requests made by the code bodies in relation to MHHS Qualification.
- 2.18 This includes all requests for information to support the provision of reports by the MHHS Implementation Manager to Ofgem and to the IPA further to the

direction issued by Ofgem to the MHHS Implementation Manager on 28 February 2025. This may include (but not be limited to) information about:

- Central Parties' (including the DIP Manager's) readiness for M10;
- MHHS Participants' progress in relation to qualifying for MHHS; and
- systemic or repeated migration deferrals or failures.

### **Directions to be issued to BSCCo in its capacity as MHHS Participant**

2.19 We are proposing to direct that BSCCo shall be required to

- develop, consult on and baseline a comprehensive M10 'Helix' Readiness plan by [30 April 2025]. This plan shall include:
  - the scope of, and approach to be taken to, service management across all MHHS Participants, which in turn shall include the arrangements for business continuity and recovery, and the enhanced service that shall be provided during the Early Life Support period;
  - the development, baselining and codification of the service management arrangements for MHHS, including the Service Operations Manual;
- develop, consult on and baseline a 'Helix' Plan on a Page covering from M10 to M16 by [30 April 2025];
- develop, consult on and baseline a Service Operations Manual within 1 week of the date on which this direction comes into force and implement associated governance arrangements for that baselined Service Operations Manual, and the wider service management arrangements for MHHS, by M8. This Service Operations Manual should include:
  - an approach to 'Early Life Support' (developed in conjunction with the MHHS Implementation Manager);
  - a robust suite of arrangements to ensure business continuity and 'end-to-end' recovery in the event of a disruption to operations across all MHHS Participants;
- provide information to the MHHS Implementation Manager on a fortnightly basis after M11 about the settlement performance of MPANs that have been successfully migrated to the new settlement arrangements;

- working in conjunction with the MHHS Implementation Manager and the Retail Energy Code Company as appropriate, develop, consult on and baseline, by [30 June 2025], effective and efficient Supplier of Last Resort processes to be used if there is a Supplier of Last Resort event during and after the transition to MHHS; and
- publish a consultation by [30 April 2025] on the development and implementation and of a smart meter data repository that enables efficient and non-discriminatory access by third parties to half-hourly consumption data.

2.20 References to baselining in this direction mean securing approval via appropriate MHHS Programme governance arrangements.

### **Post-M10 change management**

2.21 We are proposing to direct BSCCo (including in its capacity as the DIP Manager), the Retail Energy Code Company (RECCO), Distribution Connection Use of System Agreement (DCUSA) Limited and the Smart Energy Code Company (SECCo), in their capacity as code bodies, to ensure that the implementation dates of any post-M10 changes to the BSC, REC and supporting documents are agreed with the MHHS Implementation Manager where the proposed changes have the potential to impact the delivery of MHHS milestones.

2.22 We are also proposing to direct these code bodies to work collaboratively with the MHHS Implementation Manager where urgent changes are identified in the 'Early Life Support' phase of MHHS implementation. In the event of a critical defect in the Early Life Support phase of MHHS Implementation, we expect that the MHHS Implementation Manager will convene a group with appropriate technical expertise to assess how the defect may most rapidly and effectively be remedied. We also expect that, where the remedy requires a modification to an industry code or codes, code modification(s) will be progressed as soon as practicable.

### **Summary**

2.23 For the avoidance of doubt, Ofgem intends that, amongst other things, under this direction

- as noted above, all MHHS Participants undertaking MHHS testing will be required to complete all the remaining phases of testing in line with their plans and with MHHS Programme Milestones;

- in line with the 'M10 Acceptance Criteria'<sup>6</sup>, all MHHS central parties and LDSOs shall be:
  - operationally ready from M10 onwards to accept the migration of MPANs to the new settlement arrangements; and
  - shall from M10 onwards have in place appropriate service management arrangements to provide support for the new settlement arrangements (including providing enhanced levels of support during the 'Early Life Support' period).

**We are considering whether there would be merit in explicitly directing all MHHS central parties and the LDSOs to do these things, rather than relying on the general direction to all MHHS Participants to deliver on their MHHS Participant Plans in line with Programme milestones. We would welcome views on this;**

- suppliers, agents and LDSOs will be required to complete qualification in line with their plans and with MHHS Programme Milestones;
- the BSC Performance Assurance Board and the REC Code Manager will be required to ensure that their approvals processes operate efficiently thus facilitating delivery of qualification in line with MHHS Participants' plans and with MHHS Programme Milestones;
- the DIP Manager will be required to ensure that its 'onboarding' process operates efficiently, thus facilitating timely MHHS qualification approvals and the MHHS Migration Plan;
- suppliers will be required to complete migration in line with their agreed Migration Schedules and with MHHS Programme Milestones; and
- LDSOs and the DCC will be required to ensure that their processes operate efficiently thus facilitating delivery of migration in line with MHHS Participants' Migration Schedules and with MHHS Programme Milestones.<sup>7</sup>

2.24 As noted above, Ofgem is proposing these measures to promote the timely delivery of MHHS. We expect all MHHS Participants to comply in full with the

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<sup>6</sup> The M10 Acceptance Criteria have been baselined through the MHHS Programme governance arrangements and are available here [M10/M11 Cutover Plan - MHHS Programme](#).

<sup>7</sup> We are intending to augment this requirement with modifications to the supplier and LDSO licences and potentially to the DCC's licence. We expect to consult on these and other licence modifications in the spring.

direction insofar as it applies to them. Ofgem will receive regular updates from the MHHS Implementation Manager (and, where relevant, from the IPA) about these matters, including by means of the reporting. Ofgem will, as necessary, undertake targeted stakeholder engagement, compliance or enforcement action to secure compliance with the MHHS Implementation Timetable.

### **Key consultation issues**

- 2.25 The detail of the proposed directions is set out in appendix 1.
- 2.26 **We welcome views on any aspect of our proposals. As noted above, we would welcome views on whether to issue an explicit direction to all MHHS central parties and the LDSOs (rather than only to BSCCo) in relation to operational readiness and service management provision.**
- 2.27 **We also seek views on whether the proposed directions on MHHS Participants cohere effectively with the direction that we issued on 28 February 2025 to the MHHS Implementation Manager.**
- 2.28 **We also welcome views on whether these proposals are sufficient in their scope and timing to mitigate any future risks to MHHS delivery. If you believe they are not, and that additional requirements ought to be included within these directions, please specify what those requirements should be, on which party or parties they should be placed and when those requirements should be fulfilled.**

### **Next steps**

- 2.29 Please submit your response to [half-hourlysettlement@ofgem.gov.uk](mailto:half-hourlysettlement@ofgem.gov.uk) by 24 March 2025. We will publish non-confidential responses on our website at [www.ofgem.gov.uk/consultations](http://www.ofgem.gov.uk/consultations) alongside our decision on this consultation.
- 2.30 As noted above, we expect to consult on changes to the MHHS Governance Framework and on modifications to the distribution, supply and smart meter communication licences. All these interventions will be intended to mitigate the risk of further delays to MHHS.

### **3. Your response, data and confidentiality**

#### **Data confidentiality**

- 3.1 You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information, for example under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders and government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.
- 3.2 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 3.3 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations in appendix 2.
- 3.4 If you wish to respond confidentially, we will keep your response itself confidential. However, we will publish the number (but not the names) of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

#### **General feedback**

- 3.5 We believe that consultation is at the heart of good policy development. We welcome any comments about how we have run this consultation. We would also like to get your answers to these questions:

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1. Do you have any comments about the overall process of this consultation?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand or could it have been better written?
4. Were its conclusions balanced?
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

3.6 Please send any general feedback comments to [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk).

### How to track the progress of the consultation

3.7 You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website. Choose the notify me button and enter your email address into the pop-up window and submit. [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations)

Notify me +

Would you like to be kept up to date with *Consultation name will appear here*? subscribe to notifications:

**Email\***

Submit >

3.8 Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

**Upcoming** > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

## Appendices

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## **1. Proposed directions to MHHS Participants**

### **Directions given by the Gas and Electricity Markets Authority ('the Authority') to MHHS Participants pursuant to paragraph 12.12.1.(h) of the Balancing and Settlement Code (BSC)**

Whereas:

1. On 30 September 2021, the Authority approved Balancing and Settlement Code (BSC) modification proposal P423 and the modification came into force on 7 October 2021. Paragraph 12 of Section C of the BSC places obligations on various parties to ensure that they comply with and operate in accordance with the governance and management of MHHS Implementation. This includes obligations for MHHS Participants in relation to MHHS Implementation.
2. Paragraph 12.12.1 of section C of the BSC states, amongst other things, that each MHHS Participant shall
  - (a) deliver the new and modified IT systems and business processes required of it as part of MHHS Implementation, including the mobilisation, design, building and testing of such IT Systems and business processes and their integration with those of other MHHS Participants (and shall do so in accordance with the MHHS Implementation Timetable);
  - (b) take all reasonable steps within its control to facilitate completion of MHHS Implementation in accordance with the MHHS Implementation Timetable, including taking any action reasonably recommended by the MHHS Independent Assurance Provider ('the IPA');
  - (c) (in accordance with Good Industry Practice) develop, keep up-to-date and comply with its own programme plan (consistent with the MHHS Implementation Timetable) for MHHS Implementation;
  - (d) refrain from any action which would unduly compromise or delay MHHS Implementation;
  - (f) provide the Authority, the MHHS Independent Assurance Provider or MHHS Implementation Manager with such information as they may reasonably request in relation to MHHS Implementation, including regarding the MHHS

- Participant's planning for and progress in relation to MHHS Implementation (including progress against its own programme plan);
- (g) promptly identify, escalate and report to the MHHS Implementation Manager and MHHS Programme Steering Group any and all risks or disputes that may adversely affect MHHS Implementation;
- (i) ensure it is able to meet the various milestones on the dates specified in the MHHS Implementation Timetable”.
3. Paragraph 12.12.3 of section C of the BSC requires MHHS Participants taking part in MHHS testing, amongst other things, to comply with the MHHS Test Plan; to participate in testing in a reasonable, fair and cooperative manner; to provide test reports demonstrating their successful completion of the test phase (or an intermediate stage) as required; and to provide all information, access and co-operation reasonably required by the MHHS Systems Integrator (MHHS SI) and to act in accordance with the reasonable instructions of the MHHS SI.
4. Paragraph 12.12.2 of section C of the BSC makes it clear that “an MHHS Participant cannot seek to avoid or delay undertaking its obligations as an MHHS Participant by reason of cost” and that if “an MHHS Participant considers that the costs of compliance become (or are likely to become) disproportionate, then it may raise the issue or seek a change under the MHHS Governance Framework, but shall nevertheless continue to comply with its obligations from time to time as an MHHS Participant”.
5. Paragraph 12.12.7 of section C of the BSC states that “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”.
6. Paragraph 12.8.2(f) of section C of the BSC requires the MHHS SI to “propose, consult on and obtain approval for...the "MHHS Migration Plan". The MHHS Migration Plan is defined at paragraph 12.2.14 of section C of the BSC as “the plan for the migration of Metering Systems as required for MHHS Implementation”. Paragraph 12.16.2 of section C of the BSC states that “Each Supplier must comply with the MHHS Migration Plan”.

7. Paragraph 12.11.3 of section C of the BSC requires BSCCo to “undertake the following in relation to the migration of Metering Systems required for MHHS Implementation:
  - (a) BSCCo shall provide access to any of its IT Systems and business processes necessary to enable the relevant MHHS Participants to complete the required migration of Metering Systems; and
  - (b) BSCCo shall provide such access on the basis that all such MHHS Participants can access such systems and processes simultaneously, or (if this is not reasonably practicable) on the basis of a non-discriminatory order of access.

Now the Authority directs **each MHHS Participant** as follows:

8. Pursuant to paragraph 12.12.1(h) of section C of the BSC, the Authority hereby directs each MHHS Participant, in accordance with Good Industry Practice, to develop, keep up-to-date and comply with its own MHHS programme plan (consistent with the MHHS Implementation Timetable) for MHHS Implementation. Each such MHHS programme plan shall for the purposes of this direction be called the ‘MHHS Participant Plan’.
9. Each MHHS Participant Plan must cover all MHHS-related activities for which the MHHS Participant is responsible for in the delivery of the overall MHHS Programme Milestones, as set out in the Milestone Register and supporting documentation. For example, therefore, a Supplier’s MHHS Participant Plan shall include its Migration Schedule once that has been agreed with the MHHS Implementation Manager. Each Migration Schedule may be adjusted by agreement with the MHHS Implementation Manager but in any event it must be consistent with the MHHS Migration Plan and the M15 milestone delivery date.
10. Each MHHS Participant shall develop and submit its MHHS Participant Plan to the MHHS Implementation Manager (and, if requested, to the IPA) by 30 April 2025. Where the MHHS Participant Plan relates to MHHS qualification, the MHHS Participant shall submit that information also to the BSC Performance Assurance Board and REC Manager. Where an MHHS Participant subsequently revises its MHHS Participant Plan, the MHHS Participant shall provide the revised version within 3 working days to the MHHS Implementation Manager (and to the IPA where it has previously requested to see the MHHS Participant Plan. Where the revisions

to a MHHS Participant Plan relate to MHHS Qualification, that information shall be sent to the BSC Performance Assurance Board and REC Manager.

11. Each MHHS Participant must complete all of its MHHS-related activities on time and to the required standard, consistent with the delivery commitments made in its MHHS Participant Plan. To this end, each MHHS Participant must comply fully with any reasonable request made of it by the MHHS Implementation Manager or by an MHHS Affected Code Body in connection with MHHS Qualification or by the IPA in connection with its MHHS assurance activities.
12. Each MHHS Participant shall comply fully and promptly with all reasonable requests from the MHHS Implementation Manager to provide information that is required support the provision of reports by the MHHS Implementation Manager to Ofgem and to the IPA under the direction issued by Ofgem to the MHHS Implementation Manager on 28 February 2025.
13. Each MHHS Participant must identify, allocate and deploy sufficient budget and appropriately skilled resources to promote timely delivery against its MHHS Participant Plan and against MHHS Programme milestones. Where a MHHS Participant contracts with service providers, each MHHS Participant shall be required to ensure that all their service providers are likewise sufficiently resourced.
14. Each MHHS Participant must establish, by 30 April 2025, formalised internal governance and senior sponsorship to assure the delivery of its MHHS Participant Plan. Each MHHS Participant must, by 14 May 2025, provide a written description to the MHHS Implementation Manager of those arrangements and confirmation in writing that they are fully operational. These arrangements shall continue in place until the relevant MHHS Participant has complied in full with the obligations set out in its MHHS Participant Plan.
15. Each MHHS Participant must report on progress of delivery against its MHHS Participant Plan in line with any reporting requirements set out by the MHHS Implementation Manager or, in relation to MHHS Qualification, by the BSC Performance Assurance Board and the REC Code Manager. Each MHHS Participant shall provide such reporting no later than the date and time that it has been requested to do so by the MHHS Implementation Manager, the BSC Performance

Assurance Board and/or the REC Code Manager.

16. Each MHHS Participant must promptly report any risks or issues that could cause delay in the progression and/or completion of any MHHS-related activity for which it is wholly or partly responsible. All such risks and issues must be reported to the MHHS Implementation Manager, the BSC Performance Assurance Board and/or the REC Code Manager at the earliest opportunity so as to enable effective mitigating actions to be taken and to avoid any delays to the implementation of MHHS.
17. Where the IPA reasonably requests, as part of its assurance activities, information about an MHHS Participant's progress against its MHHS Participant Plan, each MHHS Participant shall provide that information promptly and comprehensively, no later than the date and time requested by the IPA. In so doing, the MHS Participant shall explain any risks and issues that could delay progress.

Now the Authority directs **BSCCo as an MHHS Participant** as follows:

18. Pursuant to paragraph 12.12.1(h) of section C of the BSC, the Authority hereby directs the Balancing and Settlement Code Company (BSCCo) to
  - develop, consult on and baseline a comprehensive M10 'Helix' Readiness plan by [30 April 2025]. This plan shall include:
    - the scope of, and approach to be taken to, service management across all MHHS Participants, which in turn shall include the arrangements for business continuity and recovery, and the enhanced service that shall be provided during the Early Life Support period;
    - the development, baselining and codification of the service management arrangements for MHHS, including the Service Operations Manual;
  - develop, consult on and baseline a 'Helix' Plan on a Page covering from M10 to M16 by [30 April 2025];
  - develop, consult on and baseline a Service Operations Manual within 1 week of the date on which this direction comes into force and implement associated governance arrangements for that baselined Service Operations Manual, and the wider service management arrangements for MHHS, by M8. This Service Operations Manual should include:

## **Consultation** - Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants

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- an approach to 'Early Life Support' (developed in conjunction with the MHHS Implementation Manager);
- a robust suite of arrangements to ensure business continuity and 'end-to-end' recovery in the event of a disruption to operations across all MHHS Participants;
- provide information to the MHHS Implementation Manager on a fortnightly basis after M11 about the settlement performance of MPANs that have been successfully migrated to the new settlement arrangements;
- working in conjunction with the MHHS Implementation Manager and the Retail Energy Code Company as appropriate, develop, consult on and baseline, by [30 June 2025], effective and efficient Supplier of Last Resort processes to be used if there is a Supplier of Last Resort event during and after the transition to MHHS; and
- publish a consultation by [30 April 2025] on the development and implementation and of a smart meter data repository that enables efficient and non-discriminatory access by third parties to half-hourly consumption data.

Now the Authority directs **BSCCo, RECCo, DCUSA Ltd and SECCo as MHHS Participants** as follows:

19. Pursuant to paragraph 12.12.1(h) of section C of the BSC, the Authority hereby directs the BSCCo, the Retail Energy Code Company (RECCo), the Distribution Connection and Use of System (DCUSA) and the Smart Energy Code Company (SECCo)<sup>8</sup> to work with the MHHS Implementation Manager to ensure that the implementation dates of any post-M10 changes to the BSC, REC and supporting documents (including the Data Integration Platform Rules) are agreed with the MHHS Implementation Manager where the proposed changes have the potential to impact delivery of MHHS milestones. The above-named code bodies shall also work collaboratively with the MHHS Implementation Manager where urgent changes are identified in the 'Early Life Support' phase of MHHS implementation.

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<sup>8</sup> Each of which are already under an obligation in the relevant industry codes to comply with the obligations expressed to apply to them (either specifically or generically as a category of participant) under section C12 of the BSC.

Now the Authority directs **BSCCo and RECCo as MHHS Participants** as follows:

20. Pursuant to paragraph 12.12.1(h) of section C of the BSC, the Authority hereby directs the BSCCo and the RECCo, in their capacities as MHHS Affected Code Bodies, to ensure that the MHHS Qualification approvals processes administered by the BSC Performance Assurance Board and the REC Code Manager operate efficiently thus facilitating MHHS Qualification in line with MHHS Participants' Plans, the MHHS Migration Plan and with MHHS Programme Milestones.
21. This includes
  - completing, by [22 August 2025], the approval of Qualification Assessment Documents submitted by SIT Participants and by non-SIT LDSOs that have met all necessary Programme requirements and timelines and are otherwise ready for M10;
  - completing, by [28 November 2025], the approval of Qualification Assessment Documents submitted by other SIT Participants that have met all necessary Programme requirements and timelines;
  - completing, by [11 September 2025], Qualification Approvals for SIT Participants and for non-SIT LDSOs that have met all necessary Programme requirements and timelines and are otherwise ready for M10;
  - completing, by [18 December 2025], Qualification Approvals for other SIT Participants that have met all necessary Programme requirements and timelines;
  - completing the approval of Qualification Assessment Documents submitted by all other non-SIT MHHS Participants and all Qualification Approvals in respect of all other non-SIT MHHS Participants that have met all necessary Programme requirements and timelines in line with each MHHS Participant's planned Qualification Wave, such that all Qualification Waves are completed by [24 September 2026] in line with the MHHS Migration Plan.
22. In support of the above, the Authority also directs the BSCCo, in its capacity as the Data Integration Platform (DIP) Manager, to ensure that the DIP 'onboarding' processes operate efficiently, thus facilitating timely MHHS qualification approvals.
23. BSCCo and RECCo shall identify, allocate and deploy sufficient budget and appropriately skilled resources to promote timely delivery of all qualification-related Milestones for which they are responsible. For the avoidance of doubt, the requirement on BSCCo also includes the activities of the DIP Manager referred to in paragraph 22.

24. This direction shall have effect on and from [insert date and month] 2025.

Melissa Giordano

Deputy Director, Retail

Duly authorised on behalf of the Gas and Electricity Markets Authority

[Insert date and month] 2025



## **2. Privacy notice on consultations**

### **Personal data**

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

#### **1. The identity of the controller and contact details of our Data Protection Officer**

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at [dpo@ofgem.gov.uk](mailto:dpo@ofgem.gov.uk)

#### **2. Why we are collecting your personal data**

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

#### **3. Our legal basis for processing your personal data**

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

#### **4. With whom we will be sharing your personal data**

(Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be as specific as possible.)

#### **5. For how long we will keep your personal data, or criteria used to determine the retention period.**

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. 'six months after the project is closed')

## **6. Your rights**

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with third parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/> or telephone 0303 123 1113.

**7. Your personal data will not be sent overseas.**

**8. Your personal data will not be used for any automated decision making.**

**9. Your personal data will be stored in a secure government IT system.** (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

**10. More information** For more information on how Ofgem processes your data, click on the link to our "[ofgem privacy promise](#)".