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17 April 2025

Amendments to Market-Wide Half-Hourly Settlement Governance Framework

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore and offshore wind and solar generation, as well as energy storage. With over five and a half million electricity and gas customer accounts, including residential and business users, EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

EDF is committed to supporting all its customers to save cash and save carbon. It is why we have completed a successful migration to the Kraken platform. It is also why this past winter we made an additional £29m of support available to help our customers most in need in response to the ongoing Cost of Living crisis. This commitment to our customers is reflected in our Trustpilot score recently increasing to 4.7 out of 5.

EDF welcomes the opportunity to respond to this consultation on the Market-Wide Half-Hourly Settlement (MHHS) Governance Framework. It is right that Ofgem ensure that these arrangements are fit for purpose and support the successful timely implementation of MHHS. We agree with the proposal that Ofgem is the final decision-maker for any changes to Tier 1 Programme milestones.

We also agree with Ofgem's proposal that the MHHS Implementation Manager consider establishing the Implementation Group referenced in the Governance Framework to consider risks arising from programme implementation and related technical issues. We note that Implementation Group established as part of the Switching Programme was an important factor in the successful delivery of that Programme. In addition to the Implementation Group, we suggest that Ofgem should also request that the MHHS Implementation Manager sets up an Implementation Advisory Group to feed into that Implementation Advisory Group. This Advisory Group should be tasked with proactively looking at the critical path to delivery for all key Programme milestones and raise issues with plan interdependencies (for example between Qualification and Migration).

Should you wish to discuss any of the points raised in our response or have any queries, please contact Paul Saker or myself.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Denise Willis', written in a cursive style.

Denise Willis
Senior Manager of Industry Change