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By email only to: half-hourlysettlement@ofgem.gov.uk

17 April 2025

Dear Jenny

Amendments to Market-Wide Half-Hourly (MHHS) Settlement Governance

Thank you for the opportunity to comment on the above consultation, dated 7 April 2025. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc (EPN), London Power Networks plc (LPN), and South Eastern Power Networks plc (SPN).

UK Power Networks supports the amendments to the MHHS Governance Framework and remains committed to the successful implementation of the MHHS Programme. Amending the decision-making thresholds to allow Ofgem to make the final decisions regarding any movement to Level 1 and Tier 1 milestones, as well as the introduction of new governance groups like the newly established Go-Live Implementation Group (GLIG), should ensure that all Programme Participants remain on track.

In reviewing the MHHS Governance Framework, UK Power Networks identified several opportunities to provide greater clarity and offer these for consideration as outlined in Appendix A.

If you have any queries on these points, please do not hesitate to contact us.

Your sincerely

James Devriendt
Head of Income Management

Copy: James Hope, Head of Regulation & Regulatory Finance – UK Power Networks
Max Taylor, RIIO-ED2 Policy & CEG Manager – UK Power Networks
Sepair Zalmi, Regulatory Reporting & Compliance Manager – UK Power Networks



Appendix A

Section	Observation/Response
1.9. – First sentence	Change “organisation” to “organisational”.
1.9. – Second bullet point, last sentence	Include “of” after “paragraph 12.4.3”.
1.14.	<p>We believe the original text can be revised for clarity and conciseness. Here is a revised version for consideration:</p> <p>Original text:</p> <p><i>“The focus of the IPA will be to provide evidence throughout the implementation of MHHS to the SRO, the PMO, the Programme Steering Group and ultimately to Ofgem, to support key decision points, milestones and quality gates in the programme and to assure that the information the programme is being provided by the relevant organisations is accurate, timely and complete, although the IPA will not be assuring each individual MHHS Participant as a matter of course.”</i></p> <p>Recommended text:</p> <p><i>“The focus of the IPA will be to provide evidence throughout the implementation of MHHS to the SRO, the PMO, the Programme Steering Group, and ultimately to Ofgem. This evidence will support key decision points, milestones, and quality gates in the programme, ensuring that the information provided by relevant organisations is accurate, timely, and complete. However, the IPA will not be assuring each individual MHHS Participant as a matter of course.”</i></p>
1.25. – Bullet points	<ol style="list-style-type: none"> 1. The second and third bullet points are missing semi-colons. 2. Include “and” after the semi-colon for the fifth bullet point. 3. Replace the semi-colon with a full stop for the last bullet point.
1.31.	Define “PSG” earlier in the document, as it is first mentioned in requirement 1.31 but only defined later in requirement 1.36.
1.34.	“- Ofgem” in the subheading “Programme Sponsor – Ofgem” should be in bold for consistent formatting.
1.54.	<p>In the provided text, there is a reference to ‘Section 6’ regarding the criteria for Ofgem intervention. However, the text does not specify the location or context of Section 6 within the document.</p> <p>To improve clarity, consider providing additional context or a brief overview of Section 6 within the text.</p>
1.57 – Second bullet point	For clarity change “TOM services” to “Target Operating Model (TOM) services”.
1.58.	Update first sentence to reference 1.57. Here is a revised version for your consideration: “For clarity regarding the first bullet in 1.57, once a change...”
1.66. – Fourth bullet point	Add “or” after the semi-colon.