

MHHS Team

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**SSE Energy Solutions**

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Dear MHHS Team

**Consultation - Amendments to Market-wide Half-Hourly Settlement Governance Framework**

On behalf of SSE Energy Supply Limited, an I&C only supplier, I want to share our views on the consultation on Ofgem's Proposed Amendments to Market-wide Half-Hourly Settlement Governance Framework. We appreciate the opportunity to provide our input on this important matter.

While we agree with most of the suggested amendments, we believe that requiring Ofgem approval for any changes to Elexon's forecasts or re-plans that affect level 1 or tier 1 milestones is unnecessary. Indeed, Elexon has previously managed minor delays robustly and with rigor by following the current governance process, without the need for Ofgem's intervention.

A programme plan contains many components and delivery items. There can often be minor slippage in certain tasks or activities where the Programme can then seek to recover through catch-up delivery in a subsequent phase or use of contingency time. Often these slippages can be of a relatively minor timescale.

It is questionable if it is the best use of resources for Ofgem to approve minor delays which, ultimately, could end up in themselves causing further delays. If there is minor slippage in the Programme it may not be possible to prevent delays, even without Ofgem approval, as some tasks will require the necessary time to complete.

The current three-month slippage allowed at present seems reasonable, especially given the size and number of tasks required to be undertaken by multiple parties to meet the later milestones. Elexon needs to be given the three-month contingency to manage the Programme successfully. The MHHS Programme is very long, and rushing the final stages of it could lead to an extended period of hyper-care and a longer cutover to the shorter settlement timetable due to data quality issues.

If all very minor delays require Ofgem approval, then it could lead to unrealistic milestone targets being kept in order to avoid Ofgem approval. Whilst we are very supportive of no further delays to the Programme, we recognise there has to be some element of flexibility in meeting later milestone dates and that the current three-month period is a reasonable contingency period.

In conclusion, we believe that the current three-month contingency period is sufficient and that requiring Ofgem approval for minor delays would be counterproductive.

Yours sincerely

**Mark Jones**  
Regulation Manager  
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