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Dear Jenny

Amendments to Market-Wide Half-Hourly Settlement Governance Framework

Thank you for the opportunity to provide views on Ofgem's proposed amendments to the Market-Wide Half-Hourly Settlement (MHHS) Governance Framework.

We welcome the proposed changes set out in Appendix 1 and 2 of the consultation document, aimed at mitigating delays in the implementation of MHHS arrangements and addressing administrative errors/clarifications.

We support Ofgem's intention to request that Elexon as MHHS Implementation Manager considers establishing the Implementation Group. We believe this group could serve as a valuable platform for parties/stakeholders to discuss/raise risks related to programme implementation and associated technical issues. It is also our view such a forum could be instrumental in tracking progress against plans, identifying potential challenges early and resolving issues proactively to ensure the programme remains on schedule.

We also agree with Ofgem's proposal to be the final decision authority for any changes to Tier 1 Programme milestones as well as forecasts or any re-plan that would move one or more of the level 1 and Tier 1 milestones by any length of time.

Furthermore, we support the additional administrative/minor amendments proposed to the governance framework.

I trust you will find our response helpful. Should you require any further clarification on any aspect of our response, please do not hesitate to get in touch.

Yours sincerely,



Richard Sweet
Director of Regulatory Policy