

Jenny Boothe
Head of MHHS
Ofgem
10 South Colonnade
Canary Wharf
London, E14 4PU.

Email: half-hourlysettlement@ofgem.gov.uk

10th April 2025

Dear Jenny

Consultation on Amendments to Market-Wide Half-Hourly Settlement Governance Framework

BUUK Infrastructure (BUUK) welcomes the opportunity to respond to the Ofgem consultation regarding proposed amendments to Market-Wide Half-Hourly Settlement Governance Framework

Overview of our business

BUUK is the leading UK multi-utility infrastructure investor, working across Great Britain and competing with incumbent utility companies.

Our initial interest in utilities began with ownership of regulated gas networks and we have gradually expanded our portfolio into other utility sectors including electricity, fibre, water, wastewater, and heat.

We are ready to invest in solutions to support the transition to net zero applying our experience of delivering utility infrastructure and we believe our credentials mean we are well placed to do this.

Our IDNO electricity distribution networks business supplies over 900,000 Customer Connections and our IGT gas transporter over 1.9 million. We have been involved in the MHHS Programme since its conception in 2021 and are keen to support timely but accurate implementation, to realise consumer benefits that the Programme will bring.

Summary of BUUK views

We are an active participant in the MHHS Programme, being one of the two LDSO Systems Integration Testing (SIT) parties and representing IDNOs on the Programme Steering Group. We have a dedicated project team committed to achieving the Programme milestones to timescale, and we supported the approach delivered within CR055 - *Amendments to M10 and corresponding milestones* when it became clear that the then testing timescales could not be achieved. We recognise Ofgem's current involvement in the Programme and the level of transparency that they have on delivery progress. We equally recognise the size and complexity of challenges associated with implementing a Programme of this significance.

We, principally, support the proposals within the consultation and particularly that Ofgem has the decision-making responsibility for any further changes to key milestones. We expect that the current level of Ofgem visibility of Programme progress would enable any such decision process to be managed promptly.

We note the proposal to request the Implementation Manager to consider a version of the Implementation Group, to provide a platform for parties to consider risks arising from the programme implementation and related technical issues. However, it is unclear whether this would be a totally new group or is the recently formed Go Live Implementation Group (GLIG). We see no benefit in a further implementation group being established.

We see merit in aligning the reference of governance framework to that included within the Ofgem August 2021 decision document, although it is unclear why the alignment excludes references within paragraphs 1.2, 1.3 and 1.21.

Please do not hesitate to contact me should you wish to clarify any of the points raised within this submission.

Yours sincerely

Jenny Rawlinson

Jenny Rawlinson
Industry Change Manager

Cc: Keith Hutton, Group Regulation Director
Paul Edwards, Managing Director – Group Customer Experience, People and Support Services