

MHHS Implementation Team
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

24 March 2025

Dear MHHS Implementation Team

Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants

Thank you for the opportunity to comment on Ofgem's proposed directions to MHHS Participants.

We welcome Ofgem's proposal to issue a direction pursuant to paragraph 12.12.1.(h) of Section C of the Balancing and Settlement Code (BSC) to MHHS Participants, as set out in Appendix 1 of the consultation document. We agree that all MHHS Participants should be required to comply with the MHHS plan, have sufficient budget, resource allocation, risk and issue management and progress reporting, including responding to reasonable requests from the MHHS Independent Programme Assurance provider. However, we would appreciate additional guidance on the level of detail that we should include in our plan, due to be submitted to the MHHS Implementation Manager by 30 April 2025, and similar such guidance for our written description of the arrangements, due to be submitted by 14 May 2025.

We agree that the proposed directions on MHHS Participants cohere effectively with the direction issued by Ofgem on 28 February 2025 to the MHHS Implementation Manager, and further support Ofgem's view on issuing an explicit direction to all MHHS central parties and the LDSOs, rather than only to BSCCo, in relation to operational readiness and service management provision.

We also agree that all code bodies (BSCCo, the Retail Energy Code Company (RECCo), the Distribution Connection and Use of System (DCUSA) and the Smart Energy Code Company (SECCo)), have a key role to play for pre and post-MHHS implementation activities and should work collaboratively with the MHHS Implementation Manager where urgent changes are identified in the 'Early Life Support' phase of MHHS implementation.

Finally, we agree that the proposals are sufficient in their scope and timing to mitigate any future risks to MHHS delivery, in so far as is possible, and we are not aware at this stage of any further requirements that should be included in these directions.

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

Yours sincerely,

A handwritten signature in blue ink that reads "Richard Sweet". The signature is written in a cursive, flowing style.

Richard Sweet
Director of Regulatory Policy