

24th March 2025

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

OFGEM
10 South Colonnade
Canary Wharf
London E14 4PU

Confidential to Ofgem and the Gas and Electricity Markets Authority

Dear Ofgem,

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

Thank you for the opportunity to respond to the above consultation. This response is provided by Last Mile Electricity Limited, an Independent Distribution Network Operator (**IDNO**) operating c320,000 connections across mainland Great Britain.

LMEL have been fully committed to the MHHS programme (**Programme**) from the outset, have been and continue to be actively engaged in the Programme and are currently the IDNO representative on the Programme's Migration and Cutover Advisory Group.

We recognise Ofgem's current involvement in the Programme and its delivery, and we also understand the challenges and complexities involved in implementing a Programme of this magnitude.

We understand the Directions Ofgem propose to implement and support the emphasis of them, recognising that they echo the relevant general obligations (paragraph 12, section C) of the Balancing and Settlement Code (**BSC**). Whilst we appreciate the need for Programme participants to assure Ofgem of their capability to meet the applicable milestones, we would highlight that most of these proposals have been active obligations within the BSC for the majority of the Programme.

Whilst we recognise the logic in implementing a reporting mechanism to support the proposed Directions, we would suggest that it be appropriately aligned to avoid redundant information requests and to ensure it is not excessively burdensome.

Regarding the potential implementation of additional Licence Conditions, we suggest that Standard Licence Condition 20 (Compliance with Core Industry Documents) sufficiently addresses the requirement to deliver

Last Mile Electricity Limited

Registered Office: Fenick House, Lister Way, Hamilton International Technology Park, Glasgow, G72 0FT
Registered in Scotland No. SC234694

MHHS. SLC20 mandates that we must be a party to and comply with Codes, including but not limited to the BSC and Retail Energy Code, thereby ensuring we meet our obligations to deliver the MHHS Programme.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rob Bradley', with a long horizontal flourish extending to the right.

Rob Bradley
Executive Director and MHHS Programme Sponsor