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21<sup>st</sup> March 2025

Dear MHHS Team,

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

Drax Group plc (Drax) owns two non-domestic retail businesses, Drax Energy Solutions and Opus Energy. Drax also owns and operates a portfolio of flexible, low carbon and renewable electricity generation assets – providing enough power for the equivalent of more than 8 million homes across the UK. This response is not confidential.

We have reviewed the proposed directions on MHHS participants and generally agree that they will help reiterate existing BSC obligations and refocus participants ahead of the core delivery phase, which may help reduce the risk of further programme delays. However, we believe that there are aspects of the proposed directions that require further consideration, as set out below.

### **Participant plans**

We urge Ofgem to instruct the MHHS Implementation Manager to issue participants with guidance on what level of detail is expected in the plans to be submitted by 30<sup>th</sup> April 2025. While we have an in-depth plan, to limit the resource burden and to focus attention on key programme milestones, we'd strongly encourage participants to be able to utilise existing artefacts and provide a plan-on-a-page (POAP), akin to what is expected to be requested from participants in Readiness Assessment (RA) 5/6.

### **Information requests and progress updates**

In principle, we agree that participants should provide full and timely responses to information requests from the MHHS Implementation Manager, Independent Programme Assurance (IPA) provider, and others. However, requests should be proportionate and coordinated to ensure they are not issued concurrently, as this could overwhelm participants and divert attention and resources away from delivering the programme. As an example of previous poor planning, we received 25 information requests from the programme over a 2-month period (June-July 2024), with little or no distinction provided to inform which we should treat as mandatory or which to prioritise.

Moreover, given the proposals for participants to report more regularly on progress against our plans and to provide information to the IPA as part of its assurance activity, we would also appreciate participants being given reasonable advance notice of all reporting and information requests. Ideally, a forward-looking schedule would be provided, confirming the requirements and timing so that we can assign resource in advance to ensure we can provide high-quality responses.

### **Risks and issues**



We recognise that it is essential for the programme to understand if a participant has material risks or issues that could delay the completion of any MHHS activity. However, we have reservations about proposals to direct participants to “*promptly report any risks or issues*”, as this could be interpreted as each participant proactively making the MHHS Implementation Manager aware of its entire MHHS risk register. To avoid the MHHS Implementation Manager being inundated, we’d urge Ofgem to add parameters into the directive to limit reportable risks or issues to those of a high materiality (e.g. those with both reasonable likelihood of occurring and a high impact if they do occur).

We’d be happy to discuss our response with you further if that would be helpful.

Yours faithfully,

Matt Young

Group Head of Regulation  
Drax Group plc