

Response from ENGIE

to

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

Background to ENGIE

ENGIE is a global energy player, focused on renewable energy and low carbon distributed energy infrastructures. In the UK it owns or is developing the following assets and businesses:

- First Hydro, in a 75/25 joint venture with Brookfield Renewables Partners. First Hydro comprises two pumped storage stations - Dinorwig (6 units, each 300W) and Ffestiniog (4 units each 90MW)
- Two 50MW battery storage projects in Scotland which are expected to become operational in 2025
- The UK's largest natural gas storage facility - Storengy UK's Stublach site in Cheshire
- Four biomethane plants in the UK, with a total production capacity of 226GWh/year.
- A 50/50 joint venture with EDPR, Ocean Winds, which operates and develops offshore wind projects in Scotland.
- A GB retail business supplying electricity and gas across all non-domestic market segments which is also very active in the corporate PPA market supported by ownership of 60MW of onshore renewables

ENGIE's future GB focus is to maintain its position as the market leader in flexible energy storage, to scale up the onshore renewable portfolio, further establish its position in green gases and continue the growth of its non-domestic green energy supply – a GB business portfolio that is aligned with the Government's net zero ambition.

Consultation response

ENGIE is an engaged Programme Participant with a well-developed internal MHHS Programme Plan supported at executive level via a strong governance structure and informed by technical advice from our service providers and external consultancy. We are targeting qualification in Wave 2.

ENGIE is very aware of the importance from both a compliance and a commercial perspective in meeting the final deadlines in the MHHS programme and we are also committed to the realisation of the wider consumer and societal benefits of implementing the programme as these are closely aligned with our own strategic objectives.

In a lengthy and complex programme such as MHHS, however, there needs to be some level of flexibility for Participants where changes in circumstances either at a Programme or individual Participant level may require rescheduling of some activities and deliverables without this necessarily impacting the overall target completion date of the Programme.

With this in mind we welcome the recognition in the Proposed Direction that Participants may need to alter plans and would ask that in the event of any such alterations the MHHS Implementation Manager will work constructively with Participants to re-plan and accommodate these.

As per the Direction we will provide our programme plan and a description of our governance arrangements to the MHHS Implementation Manager by the end of April 2025.

In preparation for this we would welcome further guidance on:

- The type of Programme Plan to be submitted and level of detail required
- The file format of the Programme Plan to be submitted (Excel, Project, etc)
- The content of the written confirmation that appropriate governance is in place and whether there is any template for this
- The method of submission of the Programme Plan and written confirmation of governance (email, secure data portal) and information on how the confidentiality of these documents will be protected

We would also ask that this guidance is provided sufficiently in advance of the deadline to have a positive impact on the consistency and quality of submissions.

For further detail, please contact:

Colin Paine

Regulation Manager, ENGIE Power Limited

colin.paine@engie.com

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