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20 March 2025

Dear MHHS Team

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

ENWL remain committed to co-operating with Ofgem as the Programme Sponsor, BSCCo as the appointed MHHS Implementation Manager (IM) and MHHS SRO and PwC as the appointed MHHS Independent Assurance Provider; and being MHHS programme ready – in relation to planning, project assurance and/or coordination/system integration/implementation of the MHHS Programme. The following is ENWL feedback on the specific areas asked for comments by Ofgem in its consultation:

- **We welcome views on any aspect of our proposals.** In addition, to our feedback in the bullet points below to specific areas, we would also request clarity on the interaction of the direction request for MHHS Participants Plans with other similar requests. We request alignment and avoidance of duplication with the existing plan requests from both the Transition and Operational Readiness Working Group (TORWG) and the Go-Live Implementation Group (GLIG) and any future requests under the forthcoming Programme Readiness assessments 5 and 6. There is a risk that MHHS Participants are being asked for the same content, in different formats, and to different deadlines by different governance and working groups, which will lead to unnecessary duplication of effort.

We would recommend, LDSOs submit one version of their high level implementation plans (in one format) which meets the needs of the MHHS Implementation Manager, GLIG, TORWG and IPA. We note the deadline for the plan in this direction is the 30 April, as such would request we would submit our MHHS Participant Plans as part of the evidence for the Readiness Assessment submissions whose window opens between 28 April – 16 May

- **We would welcome views on whether to issue 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 recommend any direction is targeted at the main risk areas and as such focus on BSCCo operational readiness and central service management. Placing a direction on LDSOs could have unintended consequences of diverting unnecessary



attention away from enabling LDSOs to continue to remain on track for their areas of readiness for M10. Our rationale is based on:

- LDSOs are required under codes to be operational ready and to co-operate on any Significant Code Review (including MHHS).
  - Insight from the new Go-Live Implementation Group (GLIG) indicates that the main risk areas to M10 is in operational readiness of central service management arrangements provided by Helix and overseen by BSCCo. Following concerns raised by MHHS participants on a lack of clarity and planning from Helix; the MHHS Programme is reporting that these areas are off track and Elexon have agreed to a lead on a series of service management workshops with those we are directly involved in incident resolution. Elexon have stated that their position is they do not believe LDSOs or RECCo need to amend service desk hours.
  - The GLIG is also requesting and tracking specifically of LDSO M10 criteria and if LDSO are on or off track. The MHHS Programme are not reporting any of the large LDSOs are off track.
- **We also seek views on whether the proposed directions on MHHS Participants cohere effectively with the direction that we issued on 28 February 2025 to the MHHS Implementation Manager.** We welcome the MHHS Implementation Managers response to their new reporting requirements in the creation of the new GLIG. In addition to the examples above regarding service management and tracking if LDSOs are on track with M10 criteria, the GLIG is also providing a useful platform for MHHS participants to raise issues and debate solutions to enable continuous engagement in critical path delivery management.
  - **We also welcome views on whether these proposals are sufficient in their scope and timing to mitigate any future risks to MHHS delivery. If you believe they are not, and that additional requirements ought to be included within these directions, please specify what those requirements should be, on which party or parties they should be placed and when those requirements should be fulfilled.** We have no further comments.

Yours sincerely

**Paul Auckland**  
Head of Economic Regulation