

24th March 2025

To whom it may concern,

Thank you for the opportunity to provide feedback on the consultation regarding the Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants. After reviewing the documentation, I am pleased to share our comments and insights.

We are satisfied with the overall process of the consultation. The structure and clarity of the information provided were effective in conveying the necessary requirements and expectations for MHHS participants.

The tone of the document was professional and constructive, which we appreciated. The content was relevant and aligned with our expectations, offering a clear understanding of the responsibilities and timelines involved, we found the document was generally easy to read and understand.

The conclusions presented to be balanced and reasonable and adequately reflect the needs and responsibilities of all MHHS participants while maintaining a focus on the overall objectives of the program.

The recommendations outlined were well-reasoned and practical. They provide a clear pathway for improvement and align with good industry practices, which we fully support.

While we appreciate the consultation process, we would highlight in the interest of efficiency that LDSO's are required by their licence to comply with Significant Code Reviews. LDSO's are currently deemed 'on track' by the Programme and are not considered a Programme Risk. We are required to report on M10 Acceptance Criteria to the MHHS Go-Live Implementation Group and the Code Bodies are thoroughly ratifying our QAD. There should be sufficient governance and tracking to provide OFGEM with assurance, which we believe negates the need for further consultation and Licence Obligation.

The recommendations outlined were well-reasoned and practical. They provide a clear pathway for improvement and align with good industry practices, which we fully support.

Many thanks

Kelly Kinsman

National Change Manager
Regulatory and Government Affairs / National Systems