

**24 March 2025**

Jenny Boothe,  
Head of MHHS,  
Ofgem,  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Dear Jenny,

### **Proposed Direction to MHHS Participants**

Thank you for the opportunity to review and feedback on Ofgem's proposed direction to MHHS Programme Participants.

As you are aware, we strongly share Ofgem's desire to ensure no further delay to the delivery of the MHHS Programme and are supportive of the proposals Ofgem has put forward in this document. In particular, we welcome the concept of all MHHS Participants having a MHHS Participant Plan and a requirement to adhere to it.

We also welcome Ofgem's support in requiring participants to respond to all reasonable requests from the MHHS Implementation Manager (IM) so that we can track progress and keep Ofgem informed of progress to Milestone 10 (M10) and beyond. We also support the additional requirements and the proposed timing of those requirements on BSCCo as a participant, due to the critical central role they have in delivering MHHS.

With regards to specific Directions on LDSOs we would support this so that LDSOs are in no doubt of their obligations and those of their Service Providers, especially where they are jointly reliant on service providers.

We have the following specific observation on the wording of the Directions themselves.

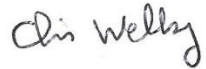
Para. 10 – We would propose that this is quantified as to when a Participant makes a "material" revision to its MHHS Participant plan it should provide a revised copy to the MHHS IM. As the IM we do not want to receive revised copies for minor corrections to text etc. We also believe it would be valuable to make clear that any revision to a MHHS participant's plan must still comply with Programme milestones.

Para 18 – We support the Codification of the Service Management Arrangements, which may reference the Service Operations Manual, however given the technical nature of the Service Operations Manual we are not convinced it needs to be codified in its entirety. The code should refer to the "What, When and by Whom" and the Service Operations Manual is "How" BSCCo will

deliver.

If you require any additional information, then please feel free to get in touch with myself or programme colleagues.

Kind regards,

A handwritten signature in cursive script that reads "Chris Welby".

Chris Welby  
MHHS Strategic Industry Advisor.  
On behalf of the MHHS Senior Responsible Officer