



Melissa Giordano
Deputy Director, Retail
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

E.ON UK plc
Westwood Way
Westwood Business Park
Coventry
West Midlands
CV4 8LG
eon-uk.com

Sent via email only to Half-HourlySettlement@ofgem.gov.uk

DATE 24.03.2025

Dear Melissa,

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

Thank you for the opportunity to provide feedback to the above-mentioned consultation.

E.ON, in its capacity as both SIT and non-SIT participants, remains committed to the successful delivery of MHHS requirements. We continue to be fully engaged and proactively involved with Programme developments.

We understand and support the need for timely and accurate reporting on the progress of delivery against plans. We have always provided information when it has been requested and will continue to do so.

We would appreciate clarification on the following:

- In paragraph 10 of the proposed Directions it states that each MHHS Participant shall develop and submit its MHHS Participant Plan to the MHHS Implementation Manager (and, if requested, to the IPA) by 30 April 2025. We are not clear on how and when this request will come through to participants.
- In paragraph 15 of the proposed Directions it states each participant must, in relation to MHHS Qualification, report to the BSC PAB and REC Code Manager on progress of delivery against its MHHS Participant Plan in line with any reporting requirements and such reporting should be provided no later than the date and time that it has been requested to do so by the BSC PAB and/or the REC Code Manager. We have not seen anything to say there will be reporting requirements outside of Qualification Assessment Document (QAD) submissions made via the QAD portal. There are work

E.ON UK plc
Registered in
England and Wales
No 2366970
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG



off plans for our SIT participants, but we are unclear whether this is indicating there will be further reporting required as a result of the additional reporting Ofgem is requesting from the Programme.

We do believe there is merit in Ofgem issuing an explicit direction to all MHHS central parties and the LDSOs rather than only to BSCCo in relation to operational and service management provision.

We are happy that the proposed directions on MHHS Participants cohere effectively with the direction that Ofgem issued on 28 February 2025 to the MHHS Implementation Manager and believe these proposals are sufficient in their scope and timing to mitigate any future risks to MHHS delivery.

Yours sincerely

Louisa Stuart-Smith
Regulation Manager
E.ON UK, on behalf of E.ON Next Limited & npower Business Solutions (Npower Commercial Gas Limited)