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Patrick Cassels  
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Dear MHHS team,

## Response to Consultation on Proposed Directions to MHHS Participants

1. I am writing on behalf of SSEN Distribution in response to Ofgem's consultation on proposed directions to MHHS participants. As a Distribution Network Operator (DNO) actively engaged in the MHHS programme, we remain fully committed to the successful and timely delivery of this important industry reform.
2. To date, we have met all required milestones and continue to dedicate the necessary resources to ensure our ongoing compliance with the programme's requirements. In addition, we proactively volunteered as the lead – and sole – fully licenced DNO for systems integration testing, demonstrating our commitment to the programme's success. We recognise the critical importance of MHHS in delivering long-term benefits for consumers and the electricity system, and we remain focused on fulfilling our role in facilitating a smooth transition. Some of the specific steps we have taken include:
  - Ensuring that SSEN is fully resourced until May 2027 to deliver testing, go-live, early-life support, and migration. We have ensured expertise across all elements of the programme for successful delivery and implementation. Our project team includes both SSEN's dedicated team of IT specialists and business colleagues who are working together in close coordination.
  - Ensuring that SSEN's primary suppliers continue to closely engage, working directly with the programme and SSEN as client to respond to feedback from bilateral and industry working group meetings, whilst accommodating fluidity of scope and amendments to the programme plan.
  - We have met all the programme milestones to date, including re-working our internal plan to deliver according to the requirements of CR055 and previous change requests in accordance with the readiness of other industry participants. We have demonstrated flexibility in our approach, having committed additional funding at risk to ensure we deliver on the expectations of the Authority, and which we expect to form part of our Digitalisation Reopener submission in January 2026.
3. Given our strong track record of delivery, particularly in a context where parties in the wider sector have struggled with readiness, we believe that additional regulatory measures specifically targeting DNOs are unnecessary. Our progress, including our leadership role in testing, demonstrates that existing arrangements

are sufficient to ensure our continued contribution to MHHS implementation – noting that there are already requirements set out in the codes relating to operational readiness and cooperation with Significant Code Reviews. We acknowledge the wider challenges affecting the programme and share Ofgem’s concerns about slower-than-expected progress in areas beyond the DNO remit. We are fully supportive of measures that help drive timely delivery across all programme participants.

4. We appreciate Ofgem’s ongoing engagement with industry stakeholders and welcome continued collaboration to ensure MHHS is delivered successfully. Please do not hesitate to contact me if further discussion would be beneficial.

Yours sincerely,



**Patrick Cassels**

Head of Regulation, SSEN Distribution