

Ofgem
10 South Colonnade
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24 March 2025

Dear Ofgem MHHS Team,

Consultation Response: Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants.

Following the release of, and request for feedback on, a suite of directions to be issued to MHHS Participants. Please see below feedback on behalf of SmartestEnergy Business Limited (SEBL).

We offer feedback with regards to section 2.27 “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”:

With regards to Appendix 1. Proposed directions to MHHS Participants Directions given by the Gas and Electricity Markets Authority (‘the Authority’) to MHHS Participants pursuant to paragraph 12.12.1.(h) of the Balancing and Settlement Code (BSC). Paragraphs 8 – 17:

The dates stated for the provision of deliverables conflict with Readiness Assessment 5/6, 28th April to 16th May 2025, this assessment already places significant strain on our resources to provide an appropriate detailed response. Presenting an additional request on Participants poses a query over which Participants should look to prioritise whilst also looking to continue their progress on delivery efforts.

In conjunction with time and resource conflicts, we also have concerns regarding the visibility of the proposed deliverables, we have been unable to find where these are stated in the MHHS Programme plans and Participant checklist and so, what content is expected. Wave 3 and 4 participants are many months from testing and migration efforts, as such migration schedules are not yet firm nor are they confirmed with the programme. As a result, senior sponsorship cannot commit to, as yet undefined timelines.

With regards to paragraph 10, the 3 working day turnaround for revisions to the currently unspecified MHHS Participant Plan, is a very short timeframe and does not allow for senior leadership review and approval. A trigger point is not associated to the timeline, for example it is unclear if this is upon a participant becoming aware of a revision being likely required or on a solution being confirmed for write up and presentation.

Where revisions are required, appendix 1 also states that the MHHS Implementation manager, IPA, BSC and REC may require receipt. Who will, and how will, this be facilitated, tracked and what feedback mechanism will be in place to confirm receipt as well as further action being required?

Overall, we feel the proposed direction for MHHS Participants, if implemented, will require an incredibly fast turnaround to deliver. Awareness of the deliverables has only been notified via this consultation; content is still unspecified for the deliverable and so will require resource to be diverted away from delivery and test planning to fulfil these by the 30th of April and 14th May 2025.

We also offer feedback with regards to section 2.28 “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 are supportive of monitoring and assurance that participants can and will meet programme milestones, however applying a blanket approach does not facilitate this. Any request for documentation, evidence or assurance must be aligned to the Qualification wave a participant is allocated. Without this alignment, viewpoints will not be consistent or accurate, a participant may be looked upon negatively simply due to being present within a later wave.

Where requesting additional documentation, participants will require a view of what this reporting is and time to collate and implement. One month, pending feedback review and Ofgem direction following the consultation does not allow for sufficient time to investigate, document, sign off and provide any level of detail.

Kind regards,

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