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FAO MHHS Team, Ofgem  
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By email only

21 March 2025

Dear Melissa,

**OVO response to Ofgem's consultation on Proposed directions to Market-wide Half-Hourly Settlement (MHHS) Participants**

Thank you for the opportunity to respond to this consultation and to provide our views on the proposed Ofgem directions to MHHS Participants.

OVO continues to strongly support MHHS and its implementation as soon as practicably possible. We agree with Ofgem on the importance of avoiding further undue delays in the delivery of MHHS.

Overall, we are supportive of the proposed directions, and consider that the outcomes of these directions, including greater clarity on progress against MHHS delivery plans, should provide additional assurance to Ofgem and industry that MHHS will be delivered without further delay. We note that a number of the directions (for example the requirement to develop individual programme plans) are broadly aligned with existing obligations on MHHS Participants, and therefore we expect that complying with these directions should not require significant additional time or resource. We also agree that these proposed directions are aligned with the previous direction issued to Elexon as the MHHS Implementation Manager.

We would stress however that it is important that any additional reporting requirements, or requests for information from the MHHS Implementation Manager, code bodies or the Independent Programme Assurance (IPA) provider, do not place an undue burden on code participants. This could risk diverting resource and time away from other activities related to MHHS delivery. We would therefore welcome further clarity on the likely frequency and timing of any new reporting requirements or information requests.

With regards to directions to MHHS central parties and LDSOs, given the integral role that these bodies will play in the operationalisation of MHHS arrangements, we would be supportive of an explicit requirement being placed on each of them to ensure operational

readiness and the provision of effective service management. We consider that this would give MHHS Participants, and the wider industry, confidence that MHHS delivery will be successful and completed on time.

We would be happy to discuss our response further, and should you have any questions please contact [policy@OVOenergy.com](mailto:policy@OVOenergy.com).

Kind regards,

**Jonathan Coe**

Industry Change Manager, OVO