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Ofgem MHHS Team

*By email only*

24 March 2025

Dear Colleague,

**RE: DCC response to Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants<sup>1</sup>**

Thank you for the opportunity to respond to the above consultation. As a MHHS Participant and central system provider, DCC supports the intention that there should be no further delays to delivery of MHHS and the benefits that it will bring to GB consumers. There are several points that we make below in relation to specific parts of your proposals.

**Compliance with MHHS Participants' plans**

DCC is reporting to the MHHS Programme Steering Group as 'green' against our planned activities, and we are supportive of any additional measures that make timely delivery of MHHS more likely, providing that quality and robustness are not compromised. As a MHHS Central Party, DCC is confident that we will be ready, in line with our programme plan, to support MHHS migrations from the M10 milestone. We take our existing MHHS requirements seriously and our delivery requires no additional layers of regulation, but we will provide comment on the specifics of any licence changes if they are proposed. We advise against implementing additional requirements that may be disruptive to existing baselined industry delivery plans.

We reiterate the point we made in our response to the Ofgem January MHHS consultation<sup>2</sup>, that an additional impact assessment of central system capability would be needed if migration timelines are accelerated, and proposals exceed the agreed MHHS documented migration thresholds that Central Parties are required to meet.

<sup>1</sup> <https://www.ofgem.gov.uk/sites/default/files/2025-03/Consultation-on-proposed-directions-to-MHHS-Participants.pdf>

<sup>2</sup> [https://www.ofgem.gov.uk/sites/default/files/2025-01/Proposed\\_directions\\_to\\_Elexon\\_about\\_reporting\\_on\\_Market-wide\\_Half-Hourly\\_Settlement\\_implementation\\_and\\_managing\\_MHHS\\_testing\\_cohorts.pdf](https://www.ofgem.gov.uk/sites/default/files/2025-01/Proposed_directions_to_Elexon_about_reporting_on_Market-wide_Half-Hourly_Settlement_implementation_and_managing_MHHS_testing_cohorts.pdf)



## Resource allocation and deployment

We are supportive of Ofgem proposals to make clear that relevant parties and their service providers commit the resources needed to deliver on MHHS plans and that each MHHS Participant establishes formalised internal governance and senior sponsorship to assure the delivery of its plan. DCC has a baselined plan in place to support current MHHS requirements. Changes to existing or new requirements would need to be communicated in a timely manner by the MHHS Programme to allow for impact assessments to take place.

## Progress reporting and risk and issue management

DCC has worked closely with both the MHHS Implementation Manager and MHHS Independent Assurance Provider since governance arrangements were first established. We support requiring MHHS Participants to report on progress of delivery plans, where doing so would support visibility and control of MHHS implementation. It is important that any new reporting requirements are clear and meaningful to avoid industry efforts being detracted from the implementation objective.

The existing MHHS framework requires '*MHHS Participants to promptly identify, escalate and report to the MHHS Implementation Manager and MHHS Programme Steering Group any and all risks or disputes that may adversely affect MHHS Implementation*'.<sup>3</sup> We have no objection to the proposed Ofgem Directions, but the existing requirement appears robust.

## Responding to reasonable requests

DCC is supportive of the intention to direct MHHS Participants to respond in a timely, constructive, efficient and effective manner to any reasonable requests made to them by the MHHS Implementation Manager. Ofgem and the MHHS Implementation Manager may be able to further support MHHS Participants by providing clarity on sharing of information between MHHS Participants, where doing so supports wider MHHS implementation. This is not presently clear within the MHHS Framework and may benefit where MHHS Participants do not have a regulatory relationship outside of the MHHS Programme.

<sup>3</sup> Balancing and Settlement Code C12.12.1(g)

## **Directions to be issued to BSCCo in its capacity as a MHHS Participant**

We support the proposed Directions to be issued to BSCCo that apply to implementation of MHHS arrangements. However, we have concerns regarding the proposed Direction that Elexon should consult industry on a smart meter data repository. In context with the proposed Directions to be issued to Elexon 'to publish a consultation by [30 April 2025] on the development and implementation and of a smart meter data repository' – we note that Elexon appears to have now published this consultation.<sup>4</sup>

We strongly urge Ofgem to rescind this Direction and that the current consultation is paused until greater alignment with DESNZ has been established.

The DESNZ funded Smart Meter Energy Data Repository (SMEDR) Programme, for which DCC has been a project partner, has been running since 2022 and will conclude imminently, following which DESNZ intends to review the outputs and decide if and how to progress a SMEDR.

The programme - under-pinned by extensive stakeholder engagement - has explored, in depth, many of the high-level questions posed within Elexon's current consultation. For example, the use cases a repository could support and the technical, commercial, data privacy, access and implementation considerations that would need to be addressed for a SMEDR.

Efforts were made, unsuccessfully, to engage Elexon during the project, and with DESNZ's approval, we remain willing to share the stakeholder feedback captured (thus avoiding potential duplicative efforts).

In addition, the SMEDR programme has established several differentiators with Elexon's proposed data repository. Notably, these include the scope of data required and critically, the implications of data retrieval to populate a repository on the existing capacity of the smart meter network.

Given the existing body of detailed SMEDR feasibility work, progressing with the current consultation as drafted risks:

- Industry confusion on the anticipated roadmap for smart meter data access – with the potential for two different repositories (and conflicting commercial and

<sup>4</sup> [Consultation on Elexon Smart Meter Data Repository 17 March 2025](#)



governance Frameworks - with associated consumer costs) to materialise. In turn, this risks causing an immediate hiatus across organisations seeking to on-board to the DCC for direct smart meter data access

- Duplicated effort for industry and wasted investment in learnings established through the current SMEDR programme
- Misalignment between Ofgem and DESNZ on the future policy direction and dependencies with related digitalisation initiatives (e.g. Consumer Consent Solution)
- Raising public perception on issues around data privacy, at a time in which maintaining the rate of smart meter adoption remains critical.

We urge consideration of a joined up, more holistic consultation approach focussing on the 'future access regime for smart meter data' more broadly. This could incorporate Elexon's consultation requirements, whilst building on findings from the SMEDR programme, with refinement through industry working groups and concluding with a more fully considered consultation of the key issues.

This approach could include options for access via one or more repositories (including Elexon's proposed approach) but would provide industry with the full breadth of considerations, enabling better and sufficiently informed responses.

Please feel free to be in touch with [richard.vernon@smartdcc.co.uk](mailto:richard.vernon@smartdcc.co.uk) if you wish to further discuss any of the above points. Our response is not confidential.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Arik Dondi'.

**Arik Dondi**

Head of Regulatory Compliance

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