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*Sent by email to: Half-
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Dear MHHS Team,

RE Consultation: Proposed directions to Market-Wide Half-Hourly Settlement (MHHS) Participants

This letter is in response to Ofgem's consultation on proposed directions which are intended to ensure that MHHS Participants fulfil their responsibilities in the delivery of the MHHS Programme milestones in line with the existing MHHS Implementation Timetable. The letter is submitted on behalf of SSE Digital Services, which provides digital solutions for energy infrastructure, including a qualified Half Hourly Data Collection and Data Aggregation (DC/DA) service within the current market. We are an active participant in the MHHS programme and we are seeking to become qualified to perform the new MHHS roles of Advanced Data Service and Smart Data Service. SSE Digital Services Limited is part of SSE energy businesses.

Our views on the proposed directions

SSE Digital Services is fully committed to the delivery of the MHHS Programme milestones in line with the existing MHHS Implementation Timetable. To date, we have demonstrated our readiness to the MHHS Implementation Programme Manager through provision of pre-qualification information which outlines our MHHS qualification and plan, submission and approval of our PIT approach and plan. We were also selected by PWC as a participant to audit where again it was shown we are in a good position for M10 readiness. We are fully engaged in the programme and next steps, which will include submission of Readiness Assessment 5/6 which we understand is the critical input and evidence capturing mechanism to inform and support wider M10 readiness. As such, our resources are geared towards meeting the upcoming key programme milestones, and adhering to the obligations of MHHS Participants set out under the current BSC framework.

In light of the above, we view that further directions from Ofgem to strengthen compliance risks placing extra administrative burden on participants, at a time when all focus should be on delivering MHHS in line with the agreed milestones. Instead of concentrating resources on technical implementation and operational readiness, participants will need to divert time and effort towards meeting new programme reporting requirements, within a short time frame. This risks slowing down progress and creating inefficiencies, potentially undermining the objectives that the new directions seek to achieve. A further concern is the current lack of clarity around the level of detail and format required when submitting a "MHHS

Participant Plan”. This creates uncertainty for participants and could lead to inconsistent reporting approaches.

Further to these points, introducing an additional layer of delivery governance and process will inevitably require agents and suppliers to allocate more resources (both system and personnel) to meet the increased administrative demands. Given that MHHS, like the Smart Metering programme, is designed to deliver overall economic benefits, support system reconciliation and balancing, and ultimately help lower energy bills for customers, adding more administrative requirement to an already complex framework will only drive-up costs. These added expenses will inevitably be passed down to customers as suppliers and delivery agents seek to recover costs associated with the additional resources needed – undermining the intentions of MHHS.

In summary, we do not believe that further directions are necessary as the MHHS programme and existing obligations, already sets out a clear and structured path for MHHS delivery.

We're happy to discuss our response further with you or provide any additional information that is required. Our response is not confidential.

Yours sincerely,

Brian Clark
Regulation Manager

