

Melissa Giordano
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

27th March 2025

Sent by email only to: half-hourlysettlement@ofgem.gov.uk

Dear Melissa,

British Gas response to the Consultation on the proposed Directions to MHHS Participants

We appreciate the opportunity to respond to Ofgem's consultation on the proposed Directions to be issued to Marketwide Half-Hourly Settlement Programme Participants.

We agree that the proposed directions set out by Ofgem in this consultation are appropriate in the context of the programme and are prudent to mitigate the risk of further future delays to critical programme milestones. We also agree that they appear to be consistent with the directions issued to the MHHS Implementation Manager (IM) on 28th February.

British Gas remains fully committed to the successful implementation of MHHS as both a SIT and Non-SIT (Qualification Wave 3) supplier, for our domestic and non-domestic supply businesses, respectively. British Gas is fully aware of the obligations placed upon MHHS participants through BSC Section C paragraph 12.12 and as a highly engaged MHHS participant, will continue to comply with those obligations as required.

British Gas has fully resourced and fully funded delivery programmes for both our Domestic SIT and Non-Domestic Non-SIT business units. We have mature programme governance established within both business units for MHHS delivery, each with senior leadership team sponsorship. We have previously shared high-level details of those governance arrangements with the MHHS Programme IM and IPA, and in compliance with the direction, will do so again.

The requirement to re-share MHHS Participant Plans following revision may create a resource burden for MHHS Participants and the Implementation Manager:

We are comfortable with the instruction to share our MHHS Participant Plan with the MHHS IM – we've done so previously as a SIT participant through programme readiness assessment and assurance activity. We see clear value in Ofgem requiring all programme participants to evidence the existence of their delivery plans, particularly those in later qualification waves and those who do not routinely engage in programme governance, PPIRs, CRs etc.

However, we are somewhat concerned about the practicality of having to share amended plans with the MHHS IM and associated parties within 3 working days of those plans changing. In a complex programme of this nature, our delivery plans will continually evolve and be subject to minor revisions as a matter of course. The requirement to share those revised plans with the MHHS IM each time they change will create a burden on participants and the MHHS IM itself to review those submissions. Typically, these changes will be immaterial and will not impact our ability to achieve critical programme milestones. We would encourage Ofgem to reconsider this requirement and either:

- a) introduce a materiality threshold, such that MHHS participants are only required to re-share plans that have been subject to material change that puts delivery against critical path milestones at risk, or

- b) introduce a regular cadence for MHHS Participants to share the latest version of their plans with the MHHS IM.

British Gas favours an approach to regularly provide updated delivery plans to the MHHS IM and other relevant stakeholders – consistent with the approach taken by the MHHS IM itself in publishing updates to its own MHHS Implementation Timetable. We believe that a monthly cadence would be sufficient, noting that consistent with BSC Section 12.12.1(g), any more material issues that risk MHHS delivery would already be notified by the participant to the MHHS IM.

Please feel free to contact me should you wish to discuss any part of this response.

Yours faithfully,

Adam Iles

Regulatory Manager

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