



Independent Networks  
Association

Melissa Giordano  
Deputy Director, Retail  
Ofgem  
10 South Colonnade  
Canary Wharf  
London, E14 4PU.

Email: [half-hourlysettlement@ofgem.gov.uk](mailto:half-hourlysettlement@ofgem.gov.uk)

24<sup>th</sup> March 2025

Dear Melissa

## **Consultation on Proposed Directions to Market-wide Half-Hourly Settlement (MHHS) Participants**

The Independent Network Association (INA), on behalf of its IDNO members, welcomes the opportunity to respond to the consultation regarding proposed directions to MHHS Participants.

### **Overview of the INA**

Independent Networks play a significant and essential role in connecting, owning and maintaining the UK's utility infrastructure.

The INA represents IDNOs and IGTs, who design and own 70-80% of the gas and electricity infrastructure connected to new homes each year.

### **Summary of INA views**

We are an active constituency in the MHHS Programme, recognising the significance of our role in meeting the M10 milestone. We supported the approach delivered within CR055 - *Amendments to M10 and corresponding milestones* when it became clear that the then testing timescales could not be achieved. We recognise Ofgem's current involvement in the Programme and the level of transparency that they have on delivery progress. We equally recognise the size and complexity of challenges associated with implementing a Programme of this significance. We, principally, support the emphasis of these directions and recognise that they echo the general obligations, as set out in paragraph 12 of section C of the Balancing and Settlement Code (BSC). We welcome the explicit direction on BSCCo to develop, consult on and baseline a comprehensive M10 'Helix' readiness plan, including the approach to be taken to service management, business continuity and recovery, and the early life support, across all MHHS participants. All participants are dependent on this clarity to meet their own obligations, but to date it has been slow in materialising.



Independent Networks  
Association

## **Issuing of an explicit direction to all MHHS central parties and the LDSOs in relation to operational readiness and service management**

The directions on each MHHS Participant, as set out in the consultation, clearly define the obligations on all participants, including LDSOs. We see no additional assurance on the LDSO activities merely by applying explicit directions to LDSO parties and, therefore, no benefit in doing so.

## **Effective coherence of these directions on those issued by Ofgem on 28<sup>th</sup> February to the MHHS Implementation Manager**

We see no apparent inconsistency between these directions and those issued on 28<sup>th</sup> February 2025.

## **Proposals are sufficient in their scope and timing to mitigate any future risks to MHHS delivery**

Recognising that most of the proposals within this consultation have been live obligations within the BSC for the majority of the Programme, there is a question as to whether these proposals are necessary or whether it is the assurance of compliance that has been insufficient. Further emphasis on the obligations themselves may not achieve the desired outcome. It is now imperative that any potential party delays to milestones are identified, and sufficient support given to mitigate impacts to the overall Programme and to other Programme participants' ability to achieve their milestones. This identification of any non-compliance and support must come from the Programme Implementation Manager and Central Parties.

We recognise the usefulness of the recent RECCo Open Day session where attendees were taken through the details of the code changes by industry process (rather than document section) and offered an opportunity to ask questions. The material and format were very well received. Given the significance in providing this understanding and clarity, we would support BSCCo being encouraged to replicate such a session.

Please do not hesitate to contact me should you wish to clarify any of the points raised within this submission.

Yours sincerely

Vicki Spiers  
Chair of the INA Board