

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

Email: half-hourlysettlement@ofgem.gov.uk

24th March 2025

Dear Melissa

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

BUUK Infrastructure (BUUK) welcomes the opportunity to respond to the consultation regarding proposed directions to MHHS Participants.

Overview of our business

BUUK is the leading UK multi-utility infrastructure investor, working across Great Britain and competing with incumbent utility companies.

Our initial interest in utilities began with ownership of regulated gas networks and we have gradually expanded our portfolio into other utility sectors including electricity, fibre, water, wastewater, and heat.

We are ready to invest in solutions to support the transition to net zero applying our experience of delivering utility infrastructure and we believe our credentials mean we are well placed to do this.

Our IDNO electricity distribution networks business supplies over 900,000 customers and our IGT gas transporter over 1.9 million. We have been involved in the MHHS Programme since its conception in 2021 and are keen to support timely but accurate implementation, to realise consumer benefits that the Programme will bring.

Summary of BUUK views

We are an active participant in the MHHS Programme, being one of the two LDSO Systems Integration Testing (SIT) parties and representing IDNOs on the Programme Steering Group. We have a dedicated project team committed to achieving the Programme milestones to timescale, and 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). For this reason, we see no benefit in also explicitly directing LDSOs to undertake these

obligations. We do, however, 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.

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 28th February to the MHHS Implementation Manager

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

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

Recognising that most 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 and, rather, as to whether the assurance of compliance has been sufficient. 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 and support must come from the Programme Implementation Manager and Central Parties.

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

Yours sincerely



Keith Hutton
Group Regulation Director