

Angela Love SEC Panel Chair
Smart Energy Code Company Limited
77 Gracechurch Street
London, EC3V 0AS

For the attention of: MHHS Team
Submitted via email: half-hourlysettlement@ofgem.gov.uk

24 March 2025

Dear MHHS Team,

Thank you for the opportunity to response to the proposed Directions to Market-wide Half-Hourly Settlement Participants.

We acknowledge your decision to approve MHHS Change Request CR055 and support additional measures to mitigate further delays. We also recognise the benefits MHHS should deliver and are keen to support the industry in realising these for market participants and end consumers.

We understand our role in supporting BSCCo and RECCo in implementing any post-M10 changes to the Balancing and Settlement Code or Retail Energy Code and will continue to engage with both Codes and also collaborate with the MHHS Implementation Manager to support the 'Early Life Support' phase of MHHS implementation. Therefore, we support the proposed Direction to SECCo outlined in this consultation.

We would also like to emphasise our continued commitment to enhancing cross-code working and are actively participating in several ongoing initiatives with other code bodies. We will continue with these initiatives and remain open to providing any additional support to the MHHS Programme that falls within the remit of Smart Energy Code.

Within the consultation Ofgem is proposing to issue a Direction to BSCCo for it to publish a consultation on the development and implementation of a smart meter data repository. This was an aspect of the consultation that we wanted to specifically reference, given our proximity to smart metering data and our governance of the smart metering arrangements. We recognise the value that an open data repository could deliver, however this appears similar to the work conducted by DESNZ under the Smart Meter Energy Data Repository (SMEDR) Programme, which has been ongoing since May 2022, and we were concerned about whether this extensive work has been or is being considered. In addition, the DCC has been considering a Secure, Publish and Subscribe service, which we understand is also looking to hold smart metering data.

From our understanding of these pieces of work – DESNZ, through its Flexibility Innovation Programme, has extensively tested the business cases that wider access to granular smart meter data could support. We therefore believe that it would be beneficial for the findings of the trial projects, which DESNZ ran, to be fully considered when looking at the most appropriate data solution. And that an industry-wide, informed, and open dialogue is required around data requirements, availability of data and the benefits it can deliver. From this we believe that a business case could be developed detailing where best a data repository, for both gas and electricity data, sits (and is governed), the cost of implementation, and how market participants and innovators can access the data (with suitable privacy controls). This will allow for a more encompassed approach to considering what is needed in respect of

data sharing and would build on the DESNZ work that has already been funded. Arguably, building on the work already undertaken by DESNZ will provide a more efficient path to developing a solution.

Furthermore, we believe there is merit in building a full understanding of the present smart meter data sharing value chain and data sharing mechanisms. This will allow prioritisation of new business cases which are not or could not be fully supported by current provisions.

We expect that a repository such as this would require significant new funding from the industry and anticipate that Ofgem will be carefully considering potential options and where and how it should be developed to maximise value to the industry, while not placing unnecessary additional burden on funding parties and, ultimately, consumers. We did facilitate a discussion with Elexon (BSCCo), DCC and DESNZ around the DCC's proposed data lake and the smart meter data repository around 18 months ago, as we wanted to ensure there was no duplication of effort or cost for consumers. However, we are unclear of the result of these discussions.

Given that wherever any data repository or lake is located is likely to require industry participation and funding to develop, we believe that it would be beneficial for industry to be consulted on where best they see such an initiative sitting, in particular considering what any proposal might mean for traffic on the DCC's network. As far as we can see none of the industry Codes have agreed funding for an initiative in this area within their 2025-28 business plans and therefore it would appear that there remains time for this consultation to take place and for Code Parties to be consulted.

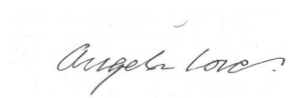
No matter where this initiative is placed, we believe that co-ordination is required between the Codes and central bodies to ensure governance arrangements are not duplicated, nor is there any overlap with the existing arrangements. In particular, we believe there needs to be an in-depth consideration of how any proposed data solution would interface and interact with the DCC data network. We also recognise there are several ongoing projects at SECCo and RECCo which can support a smart meter data repository, for example the Consumer Consent Framework, and it would be beneficial for this to also be considered.

We would encourage further consultation to take place with stakeholders across the industry, including BSC Parties, gas market participants, SEC Other Users and those involved in the SMEDR work, to ensure costs are not incurred unnecessarily and there remains a focus on benefits to consumers.

We remain fully committed to supporting innovation and the evolution of the energy industry on the journey to net zero and assisting in considering how smart metering data can be leveraged.

I trust this provides you with the clear commitment SECCo has to the MHHS Programme and the wider industry transformation. Should you have any questions, please do not hesitate to contact myself at consultations@secco.com or Oli Meggitt (oli.meggitt@seccoltd.com), Senior Strategy Manager.

Yours Sincerely,



Angela Love

SEC Panel Chair