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Emailed to: halfhourlysettlement@ofgem.gov.uk

1st March 2021

Dear Anna,

Response to Marketwide Half Hourly Settlement (MHHS) – Consultation on Programme Implementation Principles

Drax Group plc (Drax) owns two retail businesses, Haven Power and Opus Energy, which together supply renewable electricity and gas to over 350,000 business premises. Drax also owns and operates a portfolio of flexible, low carbon and renewable electricity generation assets – providing enough power for the equivalent of more than 8.3 million homes across the UK. This is a joint response on behalf of Haven Power and Opus Energy.

We support Ofgem's plan for Elexon to act as the Senior Responsible Owner (SRO) and agree that they are well placed to perform this role given their deep understanding of the systems and processes impacted by the move to MHHS. In adopting this approach, it is important that lessons are learnt from the implementation of *Project Nexus* and therefore recommend that Ofgem closely manage Elexon to avert issues or delays to the programme's management and delivery.

We do not however agree that new obligations need to be placed on relevant parties to ensure an industry-led implementation. We believe that Suppliers' existing *Duty to Cooperate* with a Significant Code Review (SCR) under Standard Licence Condition 11, is sufficient. That *Duty* was purposefully designed to accommodate any (reasonable) support that Ofgem may require from licensees when embarking on a SCR. As outlined by Ofgem in its 2018 decision¹, guidance and other material specific to each SCR may be necessary, but that does not require amendments/additions to SLC 11.

Yours sincerely,

Matt Young

Group Head of Regulation

Drax Group plc

¹ *Decision to modify the Standard Conditions of the Gas Supplier, Electricity Supplier, Gas Transporter and Electricity Distribution licences* – <https://www.ofgem.gov.uk/ofgem-publications/144252>