

## Response Form

## Market-Wide Half-Hourly Settlement (MHHS)

## Consultation on Programme Implementation

## Principles

The deadline for responses is 5 March 2021. Please send this form to [HalfHourlySettlement@ofgem.gov.uk](mailto:HalfHourlySettlement@ofgem.gov.uk) once completed.

**Organisation:** TMA Data Management Ltd

**Contact:** Claire Henderson [Claire.henderson@tma.co.uk](mailto:Claire.henderson@tma.co.uk)

**Is your feedback confidential?** NO  YES

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If the information you give in your response contains personal data under General Data Protection Regulation (EU) 2016/679 and Data Protection Act 2018, the Gas and Electricity Markets Authority will be the data controller. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. If you are including any confidential material in your response, please put it in the appendices.

## Challenges and Risks

1. Do you agree with the challenges and risks that we have identified? Are there any other challenges or risks from the implementation approach described in this document that you would like to bring to our attention? If so can you suggest any appropriate solutions or mitigations?

No, TMA believes that the risks identified are not suitably qualified and are not complete, please find our explanation of this statement below:

Ofgem should be appointing an independent programme manager in order to ensure the success of MHHS.

We do not believe that Elexon fit the criteria in order to deliver this function due to Elexon not having the experience required to deliver such a role.

Also we see no evidence that any procurement process has been followed in order that Ofgem could appoint Elexon as the programme manager. Whilst we appreciate that Elexon has experience of the BSC, MHHS requires cross-code management which is extremely difficult to manage and Elexon do not have the knowledge of this.

TMA suggest that a detailed specification for the programme management work is put together and that a procurement process is followed. This would then ensure that the relevant expertise can be procured in order that MHHS can be managed and delivered.

TMA also suggests that that programme manager should be completely independent. Elexon are critical to the delivery of MHHS in their role and it isn't acceptable that they can also be the programme manager.

2. Do you support the solutions and mitigations proposed? Are there additional measures or mitigations that you would propose to make the programme implementation approach more robust and effective?

No.

TMA believe that there is a conflict of interest due to Elexon being part of MHHS and also being the programme manager. We also see that Elexon are procuring roles in order to fill gaps so that they can deliver the programme manager role. This is another example of why Elexon should not be appointed this role as the expertise are not currently available.

With such a critical and massive change to the industry, TMA would have thought that Ofgem would have wanted to ensure that delivery was perfect in order that the end consumer would not be detrimentally affected. We do not think that this is possible without an independent programme manager responsible for the rollout.

