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Dear Jenny

Consultation on Proposed Directions to Elexon about reporting on Market-wide Half-Hourly Settlement (MHHS) implementation and about managing MHHS Testing cohorts

BUUK Infrastructure (BUUK) welcomes the opportunity to respond to the consultation regarding proposed directions to Elexon, relating to MHHS reporting and the management of MHHS testing cohorts.

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 was 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 support the perceived need for enhanced reporting and the suite of directions that Ofgem has committed to implement, and support the principles that we have seen in this consultation. We equally recognise the size and complexity of challenges associated with implementing a Programme of this significance.

Timing of the M10 Checkpoint Reports

We support the transparency of progress of all Programme stakeholders. We understand the rationale for additional checkpoints and, thereby, the requirement for targeted reporting to support this. It would be useful to understand whether Ofgem also intends to direct checkpoint reports for M14 (*All suppliers must be able to access MPANs under the new TOM*), 26th October 2026. Whilst we support the steps to avoid any delays to *Central systems being ready for migrating MPANs* at M10, 24th September 2025, we believe that there should also be similar mitigation steps taken against the risk of Supplier and Agent parties not meeting M14, and thereby impacting consumers from realising benefits from Market-wide Half-Hourly Settlement at the earliest opportunity.

Whilst we agree that the first report, to be submitted to Ofgem in March for discussion at the April MHHS Programme Steering Group, is a sensible approach as it allows sufficient time for parties and the Programme to take remedial action, we wonder if the second report, June for 2nd July Programme Steering Group discussion, allows adequate time for corrective action to be taken.

The proportion of MPANs that ought to be successfully migrated before the MHHS Implementation Manager produces its report on the scope for bringing forward the M15 and M16 milestone delivery dates

We are supportive of Ofgem and the Programme investigating how consumer benefits from half-hourly settlement arrangements can be realised as soon as possible, and before the M16 date, currently set at July 2027. The approach of bringing forward the completion of full transition (M15) and the cut over to the new settlement timetable (M16) appears sensible and one could expect that it would act as an incentive to Supplier and Agent parties to complete migration activity more efficiently. Whilst we understand that Suppliers would be unable to onboard new MPANs from M14 (October 2026) if their systems are not aligned to the new TOM, it is unclear what impacts there might be to existing customers of such Suppliers, other than the requirement on them to switch provider so as to benefit from the new arrangements.

In terms of the appropriate percentage target, we would challenge whether, in setting that target at 40%, there is a chance that 40% could be achieved without any one Supplier being fully qualified and system ready.

Whatever the percentage criteria agreed, in any decision point for bringing forward M16, we would suggest that there is a requirement for performance assurance activity to confirm a steady state in all Programme stakeholders' alignment to the new arrangements.

Whether the provisions on reporting are sufficient to give Ofgem the information it needs to understand the nature and causes of any future risks to MHHS delivery. If you believe they are not, and that additional information needs to be provided, please specify what that information is and from whom it may be obtained.

The overall reporting looks sensible. However, the scope of the testing needs to be such that it allows Ofgem to fully understand what process or processes are being proven and the impact of the particular area of testing potentially failing to be achieved.

When reporting defects and the party responsible, Ofgem should also request that BSCCo as Implementation Manager, provides any dependencies on the responsible party's ability to achieve appropriate milestones, so as to give a complete view of the issue. This could avoid subsequent challenges by perceived defaulting parties.

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

Yours sincerely

Jenny Rawlinson
Industry Change Manager