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Ofgem MHHS Team

*By email only*

29 January 2025

Dear Colleague,

**RE: DCC response to Proposed Directions to Elexon about reporting on Market-wide Half-Hourly Settlement (MHHS) implementation and managing MHHS Testing cohorts<sup>1</sup>**

Thank you for the opportunity to respond to the above consultation. As a MHHS Participant and central system provider, DCC is broadly supportive of the proposals made by Ofgem.

In relation to the post-M10 milestone proposal, we support the intent of the Direction and the requirement for MHHS Implementation Manager to submit a report at this stage of the programme. However, we suggest including an additional assessment of central system capability alongside any accelerated migrations forecast **if that accelerated forecast should exceed the agreed documented migration thresholds.**<sup>2</sup>

This will provide continued certainty that the systems of central services are able to support these volumes and reduce risk to the remaining stages of MHHS migration.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'R. Vernon', on a light blue background.

**Richard Vernon**  
Senior Regulation Lead  
[Richard.Vernon@smartdcc.co.uk](mailto:Richard.Vernon@smartdcc.co.uk)

<sup>1</sup> [Direction on Elexon as Market-wide Half-Hourly Settlement \(MHHS\) implementation manager | Ofgem](#)

<sup>2</sup> As described within the MHHS – Migration Thresholds Document (MHHS-DEL1648)