

Half-HourlySettlement@ofgem.gov.uk

29th January 2025

To whom it may concern,

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

As a MHHS SIT participant, operating in multiple Supplier Agent roles, IMServ welcome the proposals made in this Consultation and the opportunity to respond to them. Our comments also represent the views of our subsidiary company, Power Data Associates, who will operate the role of UMSDS.

We acknowledge that various and multi-faceted issues have impeded the intended speed of progress of the MHHS Programme which has had a consequential impact on more than one intended “go live” date, and as this has a direct resource and commercial impact on our Company, we support Ofgem’s view that there should be no further delays in the delivery of the Programme.

Given the significance of the Programme and its history of delays we believe that Ofgem has struck the right balance in proposing a fair and proportionate set of measures. The proposed directions appear both logical and sufficiently encompassing to provide Ofgem with a robust monitoring regime, at a frequency and level of detail to provide the necessary assurance and to allow timely intervention if this was to be required.

We would like to highlight two specific directions which are of particular interest to us as a SIT participant, i.e. Reporting in Relation to MHHS Testing and MHHS Testing Cohort Management.

Reporting in Relation to MHHS Testing:

We note the proposal in section 2.9, that “Ofgem are provided with information to provide a prompt and accurate understanding of the causes and materiality of any delays to testing and a clear indication of which part or parties is/are responsible for them”. We agree that this information is required and should be provided, however wish to propose that the SRO at the individual party/parties concerned should be formally notified of this in parallel, in order to ensure that this issue/risk is realised at the most senior level within each party.

MHHS Testing Cohort Management:

Due to the number of Party Agent roles in which we operate, we are undertaking SIT testing within a number of different Cohorts and recognise that there are differences in behaviors and progress between them. We therefore welcome Ofgem’s proposal to strengthen the management of the SIT Cohorts.

Again, thank-you for the opportunity to comment on these proposals and we look forward to seeing the outcome enacted.

Yours faithfully,



Lisa Moran
COO and IMServ/PDA MHHS SRO