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Melissa Giordano
FAO MHHS Team, Ofgem
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By email only

30 January 2025

Dear Melissa,

OVO response to Ofgem's consultation on Proposed Direction to Elexon about reporting on Market-Wide Half-Hourly Settlement (MHHS) implementation and about managing MHHS Testing cohorts

We welcome the opportunity to respond to this consultation and to provide our views on the proposed direction to Elexon as the MHHS Programme Manager.

OVO continues to strongly support MHHS and its implementation as soon as practicably possible. We agree with Ofgem on the importance of avoiding further undue delays in the delivery of MHHS.

We note that the proposed direction to Elexon, set out in the consultation, are the first in a package of regulatory measures that Ofgem will be bringing forward in the coming months intended to expedite the delivery of MHHS. In relation to the current consultation, we would like to submit the following points for Ofgem's consideration:

Knock on impact of additional reporting on MHHS Participants

While we note that the reporting requirements set out in the proposed direction would sit with Elexon as the MHHS Programme Manager, we expect that Elexon will require input from MHHS Participants in order to produce the specified reports. We would welcome further clarity of the knock-on impacts that these additional reporting requirements are expected to have on MHHS Participants, and would encourage Elexon to establish arrangements for this reporting which ensure that MHHS Participants are given sufficient time to provide any requested information.

Timing of M10 Checkpoint Reports

We consider that the proposed timings for these reports (March and June 2025) are reasonable. However, we would like to understand what, if any, impacts the production of

these reports will have on wider programme timings, such as timings for Readiness Assessments 5 and 6.

Speeding up MHHS migration and bringing forward M15 and M16

We would welcome further clarity around the decision making process that would be used to determine whether to bring forward the M15 and M16 milestones following the submission of Elexon's report. We believe it is important that appropriate governance is used to ensure that a fully informed decision can be taken.

Furthermore, we would like to better understand the rationale for the trigger point for this report (proposed as being the point at which 40% of Meter Point Administration Numbers (MPANs) have been successfully migrated). We would welcome further detail on how this 40% will be calculated, and whether additional information or context, for example the current migration schedule, will be used to validate the correct trigger point for the reporting. We would have concerns if the first 40% of MPANs migrated came from only a small number of MHHS Participants. We believe that there would be a risk in that scenario of overstating the feasibility of speeding up migration of the remaining 60%. To mitigate this, we would suggest that consideration should be given to the representation of different MHHS Participants (e.g. large, medium and small suppliers, as well as metering service and data service agents) contained in the first 40% of MPANs migrated, to ensure that it is reflective of all participants involved in migration. This would provide a more accurate insight as to whether migration activities across all participants (and thus the achievement of milestones M15 and M16) could be expedited.

We would be happy to discuss our responses further, and should you have any questions please contact policy@OVOenergy.com.

Kind regards,

Jonathan Coe
Industry Change Manager, OVO