



Please see below the SP Energy Networks response the following consultation:

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

The timing of the M10 Checkpoint Reports.

We believe that the timings of the M10 Checkpoints are sufficient in terms of content and frequency to provide Ofgem with the information that would indicate the progress of parties and any issues arising.

We do however believe that these reports should be visible to parties that may not be on track to ensure their awareness and ensure the messaging accurately reflects their position in terms of progress and mitigation when it is reported back to Ofgem. This is critical if targeted stakeholder engagement, compliance or enforcement action is being 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 have no issue with 40% of MPANs being migrated being the driver for this report.

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.

We believe that the reporting is sufficient in providing the information required to Ofgem, we are supportive of Ofgem receiving regular and accurate reporting to ensure that they are fully aware of progress and any/all issues that threaten the key milestones of the Programme. It would also be useful for Ofgem to have a view on the scale of mitigating actions, and which parties are picking these up.

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We are supportive of the cognisance of the benefit of shared best practice, and while this may not be applicable in all scenarios the sharing of knowledge across the parties in relation to this programme would be beneficial.

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