drax

MHHS Programme
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Emailed to: SRO@mhhsprogramme.co.uk

20th August 2021

Dear MHHS Programme team,

Consultation on MHHS Programme Governance Framework

Drax Group plc (Drax) owns two non-domestic retail businesses, Haven Power and Opus Energy, and also owns and operates a portfolio of flexible, low carbon and renewable electricity generation assets.

We broadly agree that the strawman governance structure is appropriately balanced and provides clarity of the roles and responsibilities of each governance group and how the groups will interact with each other.

We do not however agree with the proposal to only have a single supplier representative as a member of the Cross Code Advisory Group (CCAG). This is inconsistent with other Level 3 groups – Programme Steering Group (PSG), Implementation Advisory Group (IAG) and Design Advisory Group (DAG) – and creates a risk that a sole representative could prioritise input from only a specific segment of the market, leaving other cohorts of Suppliers not effectively represented.

As Ofgem has concluded in its recent *Implementation Arrangements for Market-Wide Half-Hourly Settlement* decision, there are clear benefits to increasing the number of supplier representatives in the governance structure, including adding a non-domestic supplier representative to represent the unique characteristics of the market and its consumers. We believe this decision should be extended to all the Level 3 groups.

Yours faithfully,

Matt Young
Group Head of Regulation
Drax Group plc