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| **Response Form**  Consultation on Governance, funding, and operation of an Event Driven Architecture for **Market-Wide Half-Hourly Settlement** | | |

*The deadline for responses is* ***17 February 2022****. Please send this form to* [***HalfHourlySettlement@ofgem.gov.uk***](mailto:HalfHourlySettlement@ofgem.gov.uk) *once completed.*

Western Power Distribution

**Organisation:**

gslaney@westernpower.co.uk

**Contact:**

**Is your feedback confidential?** NO YES

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If the information you give in your response contains personal data under General Data Protection Regulation (EU) 2016/679 and Data Protection Act 2018, the Gas and Electricity Markets Authority will be the data controller. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. If you are including any confidential material in your response, please put it in the appendices.

**Question 1:** **Do you agree with the proposed criteria for making our decision?**

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| We agree that the proposed criteria are appropriate for assessing the organisations. |

**Question 2:** **Do you have any views about the relative importance of the criteria?**

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| We believe that to some extent all the criteria are equally important to ensure the most successful outcome.  However, a lot can be said about the importance of Stakeholder relationships and therefore we wouldn’t want this sort of criteria being over shadowed by what might be arguably more ‘important’ criteria such as security and privacy.  They are all important but for different reasons. |

**Question 3: Are there any other criteria we should consider in making our decision?**

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| We believe that the criteria listed cover all aspects of the role. |

**Question 4: Should the EDA governing body have objectives** **to provide accurate and timely support for the settlement process and to further consumers’ interests through the appropriately controlled use of data? If not, please provide reasons and set out alternative objectives, also with reasons.**

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| We believe that it is appropriate for the EDA governing body to have objectives to provide accurate and timely support for the settlement process. |

**Question 5: Do you agree that electricity suppliers, supplier agents, DNOs, generators, National Grid (NG) ESO, consumers and energy service innovators should be represented in the governance of the EDA? If not, please give reasons. Should any other categories of party be represented in the EDA governance?**

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| We agree that it is appropriate for all impacted or potentially impacted parties to be represented in the governance. |

**Question 6: Do you agree that electricity suppliers, supplier agents, DNOs, generators and NG ESO should all take a share in funding the EDA? If not, please provide reasons. Should any other categories of party take a share in funding the EDA?** **We would be interested in any proposals as to the proportions by which the funding requirement should be shared between these parties.**

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| We support the proposal that those that have an operational interest in the accurate and timely provision of consumption data into the settlement system and are represented in the governance share the funding of the EDA. |

**Question 7: With reference to each of the criteria and objectives, including any additional ones you propose, to what extent do you agree that the governance, operation, and funding of the EDA should be managed through BSC and delivered by Elexon?**

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| Whilst we understand that the EDA could be managed through BSC and delivered by Elexon, we feel that when compared to the REC and RECCo, the REC and RECCo would be the better solution. |

**Question 8: With reference to each of the criteria and objectives, including any additional ones you propose, to what extent do you agree that the governance, operation and funding the EDA should be managed through the REC and delivered by RECCo?**

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| We believe that the REC and RECCo are best placed to govern, operate and fund the EDA.  RECCo already have additional representation of DNOs and supplier agents as parties as well as funding mechanisms.  The REC is also the code that is working to be the best in class whilst putting customers first.   We feel that this view sits well alongside the strategic long-term fit of the EDA.  RECCo have shown that they value Stakeholder relationships and have already had a large impact on governance within the industry, for example with new change processes. |

**Question 9: Is there any other governance mechanism and party that you consider would be better placed than BSC/Elexon or REC/RECCo to govern, operate and fund the EDA? If there is, please substantiate your response by reference to each of the criteria and objectives (including any additional ones that you propose).**

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| We believe that the governance mechanisms and parties proposed are best placed to govern, update and fund the EDA. |