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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.*

Electricity North West Limited

**Organisation:**

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**Contact:**

**Is your feedback confidential?** NO YES

Unless you mark your response confidential, we will publish it on our website, [www.ofgem.gov.uk](http://www.ofgem.gov.uk), and put it in our library. You can ask us to keep your response confidential, and we will respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004. If you want us to keep your response confidential, you should clearly mark your response to that effect and include reasons.

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 support the proposed assessment criteria. They are reflective of the importance of the role and the requirements to develop and deliver a timely, cost effective solution. |

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

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| We would suggest that Criteria 3 and 7 are the most important. The EDA must be delivered in line with the MHHS timeline and in an efficient manner. Criteria 3 should allow Ofgem to determine if the proposed party has a history of delivering similar scale projects to time and specification. We need to be mindful of the impact of the cost impact for customers of any change programme, especially at a time when energy prices are beingsignificantly increased to address current market issues. Criteria 7 should allow Ofgem to test the ability of the proposed party to deliver in a whole life cost efficient manner. |

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

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| No |

**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 support the proposed principles. We would suggest that the governing body should also ensure that the service is operated in a manner which does not distort competition as this is a fundamental function of any energy data service. |

**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 suppliers, supplier agents, DNOs, generators and National Grid ESO have an operational interest in the objective of providing accurate and timely support for the settlement process. It would therefore be sensible to ensure that the views of these parties are captured in the EDA 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 agree that the funding of the EDA should be split by all parties which will use and benefit from the service. Ofgem has previously identified that DNOs will receive little benefit from the move to MHHS. We would suggest that the parties who will benefit from the change should bear the costs of the EDA. We would suggest that the suppliers would contribute a significant proportion of the total cost, in line with the agreed funding approach established under the Retail Energy Code. |

**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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| We have no preference for who manages the EDA service. |

**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 have no preference for who manages the EDA service. |

**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 agree that this service would sit well with either ELEXON or RECCo but Ofgem could competitively tender the provision of the EDA to understand if other options are available. |