

To: Ofgem

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**Governance, funding and operation of an Event Driven Architecture (EDA) for Market-Wide Half-Hourly Settlement (MHHS)**

The Association of Independent Meter and Data Agents (AIMDA) represents seven of the largest independent providers of metering and data services to non-domestic consumers in the UK<sup>1</sup>. Collectively, our members support the energy management activities of over ~1.5 million non-domestic sites across the UK and process consumption data for settlement for nearly half the UK's total electricity volume. Competition in metering and data, coupled with consumer freedom of choice, has allowed us to thrive and deliver considerable benefits to non-domestic consumers through reduced pricing, higher service levels, bespoke solutions and access to innovative technologies. Additionally, a whole ecosystem of software, solution and service providers exist using the data that AIMDA members collect to help non-domestic customers engage with their energy use.

MHHS is a key enabler of Net Zero and AIMDA fully support and engage with the Programme at all levels. We recognise that the increased volume of data exchanged under MHHS and the significantly reduced settlement timetable necessitate a new system architecture. Furthermore, a scalable, near real-time and interoperable platform is required to enable the future digitalisation of the energy sector. We agree that an EDA is most appropriate to achieve this.

Both Elexon and RECCo are credible options for the governance of the EDA and we believe that either would successfully deliver the objective of providing accurate and timely support for the settlement process. Under MHHS, anyone can access consumption data through a variety of routes – either via BSC Central Systems, Suppliers or Data Services. Similarly, wider energy system data will be obtainable from Registration, BSC Central Systems, Distributors and NG ESO. All have systems and processes in place to respond to such requests, including safeguards to ensure the release of any data does not negatively impact competition or discriminate against a particular class of participant. Building another route to access this data via the EDA is an unnecessary complication and will increase costs. We therefore do not agree that the secondary objective of furthering interests of consumers through the appropriately controlled use of data is required, as it is effectively achieved elsewhere, and all energy data will be sufficiently open under the MHHS TOM.

The EDA should have a clear and strict regulatory purpose to support data exchange between energy system participants and assets. Governance should be designed purely to ensure the efficient and cost-effective delivery of that service, anything else is a distraction. Existing data monopolies, like DCC and Electralink, have prioritised commercialisation in recent years. From a user's perspective, this appears to be at the expense of maintaining an efficient and cost-effective core service. Commercialisation should therefore not feature at all in the EDA's governance, especially when existing competitive markets could be adversely affected.

We welcome the opportunity to discuss this response and member views with Ofgem, please don't hesitate to contact me to arrange this.

Yours sincerely,

Peter Olsen, Chair – AIMDA

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<sup>1</sup> The member organisations of AIMDA are: Energy Assets, IMServ, Siemens, SMS, Stark, TMA Data Management and WPD Smart Metering Ltd.