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Rachel Clark
Deputy Director Retail
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Statutory Consultation on Proposals to modify SLC47

Dear Rachel,

Thank you for the opportunity to respond to the above consultation.

We welcome Ofgem's proposal to amend SLC 47 to change the process of customer consent to an opt out basis for sharing half hourly metering data for settlements purposes. We believe it is vitally important that the implementation date of the change should be as soon as possible in order to maximise the consumer benefits that the MHHS Programme will facilitate.

Any delay in implementing this change will increase the number of consumers who remain on an opt in consent basis and as such reduce the benefits that are there for all customers from the use of half hourly data and a more efficiently settled electricity system.

We support the view that customers defaulting onto a standard variable tariff at the end of a fixed term not been considered as entering a new contract. Where a deemed contract is in place because there has been a change of tenancy at an address, but the supplier does not have the customers details, then we feel that this should be classed as a new contract and thus consent should be deemed to be on an opt out basis. This is because the new tenant once their identity is established will enter into a new contract and thus be on opt out terms. As the legal text is currently worded this change of tenancy scenario would count all deemed contacts as not being a new contract.

We also believe that where a customer has not opted out of sharing their half-hourly data whilst operating in the new MHHS arrangements, then suppliers should also be required to collect daily register reads alongside half-hourly data. This will allow the consumption data to be profiled if the half-hourly data fails validation.

I hope you find this response useful, if you have any further queries please do not hesitate to get in touch.

Yours sincerely,

Chris Welby

Chris Welby
MHHS Senior Responsible Owner