

Ellexon Ownership Consultation

Response form

The consultation is available at:

<https://www.gov.uk/government/consultations/ellexon-ownership-consultation>

The closing date for responses is Thursday 22nd September

Please return completed forms to:

Electricity Systems Team
Department for Business, Energy and Industrial Strategy
Abbey 1, 3rd Floor,
1 Victoria Street
London
SW1H 0ET

AND

Future System Operation
Office of Gas and Electricity Markets
10, South Colonnade
Canary Wharf London
E14 4PU

Email:

futuresystemoperator@beis.gov.uk and SOreview@ofgem.gov.uk

Personal / Confidential information

Please be aware that we intend to publish a summary of all responses to this consultation.

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

Ofgem will publish non-confidential responses (or parts of response) on its website. If you want your response in whole or in part to be considered confidential, please tell us in your response and say why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

Please be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

We will process your personal data in accordance with all applicable data protection laws. See our privacy policy.

All responses will be processed by both BEIS and Ofgem as this is a joint consultation. This includes sharing the contact details of respondents between BEIS and Ofgem.

We will summarise all responses and publish this summary on GOV.UK. The summary will include a list of names or organisations that responded, but not people's personal names, addresses or other contact details.

I want my response to be treated as confidential ☐

Comments: [Click here to enter text.](#)

About You

Name: David Morley

Organisation (if applicable): OVO Energy

Address: 1 Rivergate, Temple Quay, Bristol, BS1 6ED

Respondent type

- ☐ Business representative organisation/trade body
- ☐ Central government
- ☐ Charity or social enterprise
- ☐ Individual
- x ☒ Large business (over 250 staff)
- ☐ Legal representative
- ☐ Local government
- ☐ Medium business (50 to 250 staff)
- ☐ Micro business (up to 9 staff)
- ☐ Small business (10 to 49 staff)
- ☐ Trade union or staff association
- ☐ Other (please describe)

Questions relating to the ownership of Elexon

Question 1

Do you agree with the proposed criteria to determine the future ownership of Elexon? Please state why.

A **x Agree** ☐ **Disagree**

B

Please state why.

OVO believes that the Criteria are appropriate. OVO agrees with the BSC Panel's representation where it notes that wording around "resilience to future change" needs to be strengthened - the BSC runs critical processes which need to be safeguarded against interruption. OVO supports minimising disruption to the critical processes that are undertaken by BSC.

Question 2

Do you agree that public ownership and industry ownership are the two most credible ownership options? In your view, are there any other ownership options that we should consider, and why?

A **x Agree** ☐ **Disagree**

B

In your view, are there any other ownership options that we should consider, and why?

The proposed options are fine.

Question 3

Do you agree with our stated preference of the potential combinations of BSC parties which could own Elexon if industry ownership were chosen? Please state why.

A **x Agree** ☐ **Disagree**

B

Please state why.

OVO believes requiring Licenced BSC Parties only to be shareholders is sufficient.

Question 4

To what extent to you agree with the analysis of the two main ownership options, public ownership and industry ownership, and our preference for industry ownership?

- A **x Agree**
 ☐ Partially agree
 ☐ Neither agree nor disagree
 ☐ Partially disagree
 ☐ Disagree

B

Comments regarding ownership options and our preference:

OVO has concerns that the public ownership model could put the effectiveness of the BSC at risk, if the code's scope is changed or deprioritised. To that end, OVO supports ownership by Licenced BSC Parties.

Question 5

To what extent do you agree with our proposal that Elexon should transfer temporarily into the public sector as a subsidiary of the FSO as a last resort, if industry ownership was chosen following consultation but could not be implemented without delaying the creation of the FSO? Please explain why.

- A **x Agree**
 ☐ Partially agree
 ☐ Neither agree nor disagree
 ☐ Partially disagree
 ☐ Disagree

B

Please explain why:

For the purpose of temporary ownership, OVO does not support public ownership of Elexon Limited, as the public ownership model could put the effectiveness of the BSC at risk.

Question 6

Are any other changes required to implement either of the two ownership options?

Please provide your answer below:

None

Question 7

What are your views on the proposed licence and code changes set out above?

Please provide your answer below:

OVO believes that the proposed licence and code changes are appropriate and sufficient.

Question 8

Have we considered all relevant costs and benefits of these proposals? Please state why.

Please provide your answer below:

N/a

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

N/a

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☐

At BEIS we carry out our research on many different topics and consultations, and your views are valuable to us. Would you be happy for us to contact you again from time to time either for research or about other consultations?

☐ Yes x No