

## Response ID ANON-Z1FM-TFGT-K

Submitted to The future ownership of Elexon  
Submitted on 2022-09-22 15:10:46

### About you

What is your name?

What is your name?:  
Alfie Dunton

What is your organisation?

Organisation:  
ElectraLink

What is your address?

Address:

Northumberland House, 303-306 High Holborn,  
London  
WC1V 7JZ

Respondent type

Other

If Other please describe below:

Central Party

Are you happy for your response to be published?

Yes

### Consultation Questions

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

Agree

Please state why.:

ElectraLink supports the proposed criteria. We agree that it is critical to "Preserve accountability to industry stakeholders and independence". The delivery mechanisms for BSC should remain separate to the ownership model, with key controls for the delivery of the code sitting within the regulatory and governance structure of the board and the panel. This is similar structure for the ownership and management of the DTS for the needs of industry.

We would suggest that this change should try to minimise disruption across all industry programmes, as Elexon has an important role across many industry programmes including, but not limited to, "the BSC, MHHS, and EMR". As code manager for DCUSA, ElectraLink believes that Elexon is a key participant in other industry programmes, such as the Targeted Charging Review, and we believe that significant industry-wide change programmes should not be adversely affected by any changes in Elexon Ownership. Therefore, we would recommend the following change: "Minimise disruption to work on Industry Programmes, including those within the BSC, MHHS, and EMR"

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

Agree

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

ElectraLink does not have a view on the ownership models, provided that the right controls are in place to achieve industry outcomes and tackle the current challenges faced with the energy market trilemma.

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.

Agree

Please state why.:

ElectraLink does not have a view on the ownership models, provided that the right controls are in place to achieve industry outcomes and tackle the current challenges faced with the energy market trilemma.

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

Neither agree nor disagree

Comments regarding ownership options and our preference.:

ElectraLink does not have a view on the ownership models, provided that the right controls are in place to achieve industry outcomes and tackle the current challenges faced with the energy market trilemma.

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.

Neither agree nor disagree

Please explain why.:

ElectraLink does not have a view on the ownership models, provided that the right controls are in place to achieve industry outcomes and tackle the current challenges faced with the energy market trilemma.

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

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

Other than our proposal to consider all industry code/change implications outlined in Question 1, we do not believe there are any other changes required.

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

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

ElectraLink does not have any thoughts on changing the ESO license condition and the role of shareholders within the BSC. We do agree that the DTS model works well to ensure the success of the Data Transfer Service and it is possible to have separate legal entities to deliver the outcomes of a license condition.

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

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

We do not have a view on any additional costs or benefits.