



Elexon Ownership Consultation

Response form

The consultation is available at: <https://www.gov.uk/government/consultations/elexon-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: Gemma Slaney – National Change Manager

Organisation (if applicable): National Grid Electricity Distribution

Address: Elliott Road, Prince Rock, Plymouth, Devon, PL4 0SD

| | Respondent type |
|-------------------------------------|---|
| <input type="checkbox"/> | Business representative organisation/trade body |
| <input type="checkbox"/> | Central government |
| <input type="checkbox"/> | Charity or social enterprise |
| <input type="checkbox"/> | Individual |
| <input checked="" type="checkbox"/> | Large business (over 250 staff) |
| <input type="checkbox"/> | Legal representative |
| <input type="checkbox"/> | Local government |
| <input type="checkbox"/> | Medium business (50 to 250 staff) |
| <input type="checkbox"/> | Micro business (up to 9 staff) |
| <input type="checkbox"/> | Small business (10 to 49 staff) |
| <input type="checkbox"/> | Trade union or staff association |
| <input type="checkbox"/> | 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 ☒ **Agree** ☐ **Disagree**

B

Please state why.

We agree with the proposed criteria detailed within the consultation. It is important that disruption to key businesses and programmes is kept to a minimum and that this process doesn't impact the creation of the FSO. The new ownership structure will need to preserve accountability and the resilience to future change will be paramount.

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 ☒ **Agree** ☐ **Disagree**

B

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

We agree that public ownership and ownership by a group of industry stakeholders are the most credible options. We note the other options detailed within the consultation and agree with them being discounted and do not believe that there are other options that should be considered.

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 ☒ **Agree** ☐ **Disagree**

B

Please state why.

We agree that the potential options of, Licenced BSC Parties; Licenced parties who fund Elexon and Voting Parties are viable. We support the view that it may be easier to implement if all the new owners are licenced and therefore support discounting Voting Parties as a group.

Question 4

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

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

B

Comments regarding ownership options and our preference:

We agree with the analysis of the ownership models. We feel that there would need to be careful and considered management of milestones and coordination to ensure that there is no disruption to the FSO delivery timeline, but also need to ensure that the adequate time is allowed to complete any necessary legal processes.

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
- ☒ **Agree**
 - ☐ **Partially agree**
 - ☐ **Neither agree nor disagree**
 - ☐ **Partially disagree**
 - ☐ **Disagree**

B

Please explain why:

We agree that the implementation of any temporary measure should cause the least amount of disruption, time and resource. Any temporary measure should only be put in place if absolutely necessary. We do not agree with the temporary fall back to temporarily transfer ownership into the public sector. We are concerned that this could involve wasted effort, take too much time and have additional risks with potentially unintended consequences. We would suggest an interim fall back option of it remaining for a short period within the National Grid Group, potentially with either National Grid Electricity Transmission or National Grid Electricity Distribution, as we believe that this would be a relatively easy and painless transition.

Question 6

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

Please provide your answer below:

No further comments.

Question 7

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

Please provide your answer below:

The proposed changes detailed in the code seem appropriate.

Question 8

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

Please provide your answer below:

Based on the high level of information in the relevant section of the consultation, we believe that the relevant costs and benefits have been considered.

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.

No further comments.

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

☒No