

## **Data Sharing Call for Input**

**Q1. Do you agree that a Consumer Consent solution is required as per the task force's recommendation?**

**A1:** Yes, a Consumer Consent solution is imperative in the context of the task force's recommendation. The outlined framework recognizes the need for informed, purposeful, and revocable consent, especially in the energy sector, aligning with the successful model of Open Banking. This ensures that consumers have control over their data, promoting transparency and security in data sharing practices.

**Q2. Could you please provide any reasons why the current methods for obtaining consent from a consumer might be ineffective or inefficient?**

**A2.** The existing methods for obtaining consent may be deemed ineffective due to their complexity and lack of transparency. The text implies that the current process is burdensome for consumers, requiring them to do significant legwork. The proposed framework emphasises the need for a simplified, easily accessible consent solution, modelled after the successful Open Banking initiative, aiming to address these inefficiencies.

**Q3. Do you believe that consumers are sufficiently motivated to engage with the consent solutions proposed in this Call for Input? Please elaborate on your answer.**

**A3.** Consumer motivation is a critical factor in the success of consent solutions. The text suggests that consumers express concern about how their data is collected and used, even in data-driven services like social media. To enhance motivation, the proposed principles focus on transparency, control, and clear communication of the value and benefits of data sharing. Empowering consumers and ensuring inclusivity and accessibility in the consent process further contribute to increased motivation for engagement.

**Q4. Do you agree that the four use cases referenced are high priority use cases? Can you describe any other high priority use cases?**

- Retail specialisation
- Energy system flexibility
- Reduced barriers to market entry and increased competition
- Consumer empowerment, protection, and trust

**A4.** Yes, the four mentioned use cases—retail specialisation, energy system flexibility, reduced barriers to market entry, and consumer empowerment—are undoubtedly high-priority. They align with the pillars of the energy transition and contribute to digitalisation, decentralisation, decarbonisation, and democratisation. Additionally, another high-priority use case could involve enhancing data sharing to optimise predictive maintenance for energy infrastructure, ensuring the reliability and efficiency of the entire system.

**Q5. Do you believe that a new Consumer Consent solution would enable the improvements to the energy system described in the four use cases? If not, could you please elaborate?**

**A5.** Absolutely, a new Consumer Consent solution is pivotal for realising the improvements outlined in the four use cases. It acts as a catalyst for digitalisation by streamlining access to consumer data, essential for tailoring products and services. It empowers consumers in decentralised flexibility markets, contributing to energy system flexibility. This consent solution, by breaking down barriers,

foster's market entry for innovators, promoting healthy competition. Lastly, it ensures transparency and control, empowering consumers to actively participate in the energy system and rebuilding trust.

**Q6. Do you agree with our method and scoring of options?**

**A6.** The method and scoring of options seem well-founded, utilising a qualitative assessment against project objectives and critical success factors (CSFs). The CSFs cover a comprehensive range, considering impacts and interactions with consumers, as well as the development and maintenance aspects. The weightings and scoring system provide a clear framework for evaluation.

**Q7. Which of the options referenced in this chapter do you believe would be the most appropriate Consumer Consent solution, for the industry, the government, and the consumer?**

- **Option One:** A single technical solution to obtain consent, such as a Consumer Consent dashboard. This proposal builds on the Energy Digitalisation Taskforce's recommendation to deliver a technical consent solution.

- **Option Two:** A set of principles outlining a consistent way for trusted market participants to obtain consent, such as Data Best Practice.

- **Option Three:** An industry-developed code of conduct outlining a consistent way for trusted market participants to obtain consent, such as the Confidence Code.

**A7.** Option A: A single technical solution to obtain consent, such as a Consumer Consent dashboard. This proposal builds on the Energy Digitalisation Taskforce's recommendation to deliver a technical consent.

**Q8. Please can you explain why you chose a specific option? Do you have any suggestions on how to improve this option?**

**A8.** Option A is considered the most favourable based on the assessment against project objectives. It aligns for a technical solution, achieving all project objectives. It excels in consumer empowerment, offering a single location for consent preferences. However, it is expected to be the most expensive and time-consuming to implement. Despite potential accessibility challenges for the digitally excluded, it ensures sustainability and adaptability through an industry-wide standardised approach.

**Q9. What barriers do you see to the successful implementation of a new consent solution?**

**A9.** Barriers may include:

- Resistance or lack of buy-in from industry participants.
- Potential for human error and higher compliance risks in non-technical solutions.
- Difficulty in ensuring consistent standardisation across multiple actors.
- Challenges in communicating and educating consumers about the new consent processes.

**Q10. What do you think are the roles of Ofgem, industry and other stakeholders in enabling a simple and effective consent solution?**

**A10. Ofgem:** Set overarching principles, provide guidance, and ensure regulatory compliance. Ofgem should act as a facilitator and enforcer, fostering collaboration and overseeing industry adherence to established standards.

**Industry:** Collaborate in developing and implementing the consent solution, whether technical or principles based. Ensure transparency, data security, and adherence to the agreed-upon standards. Regularly engage with Ofgem and other stakeholders for updates and feedback.

**Other Stakeholders:** Including consumer advocacy groups, technology providers, and data protection authorities, they should contribute insights, ensure consumer representation, and validate the ethical and legal aspects of the consent solution. Regular consultation and feedback loops with stakeholders are essential for a well-rounded solution.