



Consumer Consent Solution Consultation GreenSync

Email sent to digitalisation@ofgem.gov.uk

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Introduction

GreenSync thanks Ofgem for the opportunity to respond to this consultation on 'Consumer Consent Solution,' as published on 9 August 2024.

GreenSync has committed its resources and intellectual property to supporting the transition to Net Zero, in particular integration and digitalisation of LCTs as they interact with broader energy system. On this journey, GreenSync has been dealing with data privacy concerns and different customer consent procedures, their advantages and disadvantages when it comes to scaling, cost of implementation and level of protection.

GreenSync has identified a lack of a system-wide customer consent in the UK also during the DESNZ NZIP AAR Programme. When trying to register LCT assets (ESAs), the current application or system specific consent collection process is introducing a number of obstacles, which can have an impact on the costs of LCT asset (ESA) registration implementation and operations.

GreenSync believes data sharing with clear and concise system-wide standardised consent processes for organisations and consumers alike, alongside a consumer-facing interface that contains all the consumer's permissions data in one location, is a critical enabler in maximising the value of LCTs as they become more and more integrated with the future *digital* energy system.

Please reach out to igor.dremelj@greensync.com.au in the first instance should you wish to discuss our response.

With kind regards,



Igor Dremelj

Head of GreenSync Europe

Consultation questions

Q1. Do you agree with these Design Principles? Would you recommend any additional Design Principles?

Although GreenSync agrees with the design principles, we challenge the prioritisation of the use cases. We believe the solution should cover next to HH meter consumption data also ESA data to support the implementation of systems such as AAR/CAR and/or FMAR.

Q2. Do you have a preference between the centralised, decentralised or hybrid models? Please elaborate.

If a centralised model is to be chosen, then the solution must, in our view, support consumer consent management to register, collect and use LCT asset (ESA) data from the onset, for systems such as AAR/CAR and/or FMAR avoiding the need to implement a dedicated consent collection and management solution.

If this should not be the case and a decentralised (or hybrid) approach is to be taken, then LCT asset (ESA) data consent collection and management may need to be implemented in AAR/CAR and/or FMAR.

If the consent solution will support the consent management for ESA data, GreenSync prefers a centralised model.

Please note that applications dealing with ESA data may require high volumes of consents to be managed – possibly even higher than with HH metering data. Currently a consent is needed for every ESA and for every party and application using that ESA data, regardless of if an OEM system, HEMS, a CPO or other registration platform. Please refer to DEZNS AAR Programme for further findings on the current consent management barriers when it comes to ESA data.

Q3. Do you consider the security measures referenced in this section, including the access control measures, will meet the requirements of a consent solution holding consumer data? Which additional protections would you recommend?

Yes. No additional recommendations at this stage.

Q4. Do you consider these standards are sufficient parameters to ensure inclusivity, accessibility and interoperability for the consent solution? Which standards would you recommend?

Yes. No additional recommendations at this stage.

Q5. Do you agree with the options assessment conducted by Ofgem? If not, why?

GreenSync respects Ofgem's assessment and believes all three organisations are capable

of delivering the solution. As Consumer Consent Solution may be critical for a number of systems, we believe the assessment, before final decision, should include aspects as well such as time and cost to implement and scale the solution.

Q6. Do you agree with Ofgem's minded-to position that RECCo should be selected as the Delivery Body for the consent solution? If not, which of the three proposed organisations should be selected as the Delivery Body for the consent solution, and why?

GreenSync respects Ofgem's minded-to position and believes all three organisations are capable of delivering the solution.

Q7. Do you hold any views as to how the proposed solution should be funded? Please consider the points regarding fairness raised in paragraphs 4.12–4.14 and Ofgem's duty to consumers when providing your answer.

GreenSync agrees with points raised in paragraphs 4.12 – 4.14 and holds at this point in time no additional views to how the proposed solutions should be funded.

Q8. Do you agree with our position to make sharing consent data with consumers (via the consent solution) an obligation for licensees?

Yes, we agree.

Q9. Do you consider SLC 0 an appropriate route for implementing these changes, or should Ofgem create a bespoke licence condition?

Yes, we consider SLC 0 an appropriate route.