Consumer Consent Solution Consultation

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3rd October 2024

Energy System Digitalisation Team
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Cadent
Your Gas Network

Cadent Gas Limited's Response to Consumer Consent Solution Consultation

This non-confidential consultation response is made on behalf of Cadent Gas Limited.

It's important to point out from the outset, that we broadly agree with the solution that is proposed. We believe we are already doing some excellent work internally by fully utilizing the data we currently have available. We use this to support customers in vulnerable situations and we also use this to drive our overall strategy around CIVS. However, we also believe the current restrictions on GDNs are restricting our ability to maximize the use of this data by sharing externally, with carefully selected third parties.

We have provided answers to each of the questions within the consultation document below.

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

Yes, we agree with the design principles set out in the document, we would also like to suggest that we fully consider how third parties utilise the data. We would like to see the delivery body confirm third parties' competencies, use cases for the data, and not-for-profit status before granting them access.

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

No preference on the models

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. We are satisfied with these requirements. As suggested in answer 1, we would like a keen focus on ensuring third parties are checked using a robust method, prior to sharing any data

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, we consider the standards to be sufficient and robust.

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

Yes, we agree with robust and thorough options assessment that was completed.

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

We support the position of selecting an organization that is already established in industry and one that has links to Ofgem's regulation to perform the role. However,

Whilst we agree with the selection, We also want to acknowledge the point around REECOs bandwidth and the importance of them continuing to deliver strong code manager performance. Although Cadent are a party to the Retail Energy Code, we do not currently pay anything towards its management under the current charging methodology. For avoidance of doubt, we believe it is not appropriate to include parties in the charging arrangements that do not stand to receive a benefit.

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.

We don't have any specific view on funding but would again highlight the point in the question above and we also need to consider the value delivered by the platform as part of chosen delivery body's work on its design and assess that against the cost of delivery.

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

Yes

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

Yes

Yours faithfully,

Sam Graham

Technical Manager
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