

Dear Charles Clark

We would firstly like to thank Ofgem for giving the market an opportunity to provide views on the Consumer Consent Solution Draft Impact Assessment.

We have provided our responses to the consultation in the appendix below, please note that when providing response to this consultation we do so representing the views of a non-domestic supplier only.

We would be happy to support Ofgem in further developing policy changes in this area in future.

Yours sincerely
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Corona Energy

Appendix

Consultation questions

1. Do you agree that we have - to a reasonable degree - identified, understood, and described the potential costs and benefits of implementing the Consumer Consent Solution with RECCo Ltd delivering the Solution?

Corona Energy Response

We agree that the Impact Assessment identifies and describes the high-level costs and benefits associated with the Consumer Consent Solution. However, from a non-domestic supplier perspective we do not believe the IA captures these impacts in completeness.

Non-domestic system integration costs are understated. Business customers often require complex data flows (multiple MPANs, multi-site portfolios, agent/broker arrangements). The IA's standardised integration cost assumptions do not reflect this complexity.

Transition costs appear incomplete. Mapping existing consents, broker mandates, and bespoke contractual data permissions into a new central system is materially more burdensome than for the domestic sector.

Cost recovery pressures during a period of rising regulatory costs (nuclear RAB, RIIO-3) are not factored into the assessment of affordability. These external cost pressures make what could be deemed as modest additional supplier costs, significant for business bill-payers.

Benefit attribution is weighted to domestic assumptions. Many monetised benefits (automated switching, consumer engagement tools, tariff comparison) do not apply in the same way to non-domestic customers who already use bespoke procurement methods.

The IA provides a good foundation, but underestimates supplier costs and overstates wider benefits in the non-domestic sector.

2. Do you agree that we have - to a reasonable degree - identified, understood, and described the potential impacts of implementing the Consumer Consent Solution with RECCo Ltd delivering the Solution?

Corona Energy Response

We agree that many of the impacts are described, but we do not believe the IA reflects, to a reasonable degree, the full range of impacts on non-domestic customers or their suppliers.

Impact on non-domestic market structure.

The IA does not acknowledge how multi-party consent (customer → broker → supplier → agent) complicates implementation, operational processes, and liability.

Implementation coincides with major cost-raising reforms (nuclear RAB charges, RIIO-3 network allowances, and smart metering cost recovery changes). The IA does not assess cumulative bill impacts.

Introducing a centralised consent system creates new cyber-security, data-governance, and service-continuity dependencies. These are mentioned but the scale of exposure for non-domestic portfolios needs to be addressed.

3. Are there, in your view, any unintended economic consequences of implementing the Consumer Consent Solution with RECCo Ltd delivering the Solution which we have not identified?

Corona Energy Response

Larger suppliers may absorb development and integration costs more easily than smaller non-domestic specialists.

Migrating existing bespoke consent arrangements, broker mandates and contractual permissions into a common framework could create short-term operational cost spikes that are not modelled.

Many non-domestic customers rely on highly tailored data-sharing frameworks. Enforcing a single standardised consent journey may unintentionally reduce commercial and contractual flexibility. Suppliers may need to maintain both the new centralised system and existing contractually-mandated processes for corporate customers, increasing cost rather than reducing it.

4. Do you agree with our assumptions and proposed attribution rates for value accrued to the Consumer Consent Solution?

Corona Energy Response

From a non-domestic supplier perspective, we do not agree that the attribution rates are appropriate.

Attribution heavily favours centralised uplift assumptions (e.g., switching benefits, consumer engagement benefits) that are primarily domestic.

Non-domestic customers will receive lower behavioural benefits (automated switching, time-of-use optimisation, smart home device enablement).

Many projected benefits depend on external market developments (flexibility markets, interoperability standards, smart data ecosystems) that are uncertain and outside the remit of this programme.

Applying identical attribution rates to domestic and non-domestic sectors does not reflect reality. Benefits accrue unevenly, while costs are more uniformly distributed.