

Response to CCS Impact Assessment

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?

No. The costs presented have not been defined to a sufficient degree to allow proper consideration. The commercial costs of building and maintaining the service lack detail, and no costs have been assigned to the broader promotion of the service to either potential customers (businesses) or end consumers. Without promoting a service that is easy to find and interact with, no benefits can be realised.

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?

The paper provides insufficient information to make this determination. _

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?

No consideration has been given to existing businesses that operate similar services (primarily within the Smart Energy Code Other User community). The introduction of CCS, together with Ofgem's sponsorship of the Elexon SDR initiative, is likely to severely impact this existing competitive market._

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

No objective research has been conducted to demonstrate the improvements CCS would provide over and above the existing market of services. The introduction of complex, industry-style, costly user onboarding, verification, and liability requirements can only serve as a barrier to entry for organisations wishing to use these services.

Furthermore, the belief that a central body, detached from consumers, could provide a single, user-friendly platform is naive at best.

References to CCS supporting demand planning, flexibility, smart meter rollout, and customer bill savings are entirely unsubstantiated within the impact assessment.