

Response to Ofgem's consultation, 'Proposals for DCC's role in developing a Centralised Registration Service and penalty interest proposals'.

Additional clarification comments provided by EDF Energy

Sent by email, 1 February 2016

Question 1

"I think our key concern is the nature of the explicit reference to the 'maintenance of the Data Transfer Catalogue' within the drafting of LC15. We do not believe that the inclusion of this reference is necessary or appropriate as it makes no reference to the scope being limited to communications with the CRS; we believe that this could cause confusion about the scope of the CRS. This is especially the case because part (c) of LC15.8 (1) already makes reference to 'arrangements for the secure communication and exchange of data between parties and the Centralised Registration Service', which would seem to cover the intent that you have described below.

The inclusion of the explicit reference to the Data Transfer Catalogue within the text of the licence would therefore seem to be superfluous, if it is to be included then we believe that the extent of the CRS's proposed remit in regards to the Data Transfer Catalogue would need to be clearer."