



Making a positive difference  
for energy consumers

## **Feedback Form**

Once completed, please send this form to  
[HalfHourlySettlement@ofgem.gov.uk](mailto:HalfHourlySettlement@ofgem.gov.uk) by 1 September 2017.

**Organisation: Smartest Energy**

**Contact: Colin-Prestwich@smartestenergy.com**

**Is your feedback confidential?**

**YES**

**NO**

**Q1.**

**Do you agree with our proposal to opt for *SCR Option 3: Ofgem leads an end-to-end SCR process, as outlined on pages 5-6 of the Launch Statement?***

We can see that previous SCRs have been less than successful in implementation because the SCR and mods process were repetitive but, even so, some issues were still not considered under the SCR element. It would therefore appear sensible not to run the SCR and mods serially and perhaps try to raise mods slightly earlier in the process.

**Q2.**

**Do you agree with our proposed governance model for the Target Operating Model, outlined on pages 6-8 of the Launch Statement and detailed in Appendix 2A? This includes the Terms of Reference for the DWG and DAB in Appendices 2C and 2D.**

In the interests of transparency we feel it is important that any BSC Party should be able to attend the Design Working Group in the capacity as an observer.

**Q3.**

**Do you agree with the Target Operating Model Design Principles, set out in Appendix 2B?**

We have no issues with the principles per se but it occurs to us that there could be conflicts between the need for simplicity and effective competition and there appears to be no indication of the direction to be taken when this conflict arises.

Similarly, we detect a contradiction in Ofgem's objective to incentivise changes to customer behaviour and the objective to minimise undesirable distributional effects on consumers.