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Consumers & Markets
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Via email: Half-HourlySettlement@ofgem.gov.uk

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Ecotricity Reference No.: 717
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Ecotricity Response to Ofgem Consultation:

Access to half-hourly electricity data for settlement purposes

Dear Anna,

Ecotricity were the world's first green energy company when we started in 1995 and we now have almost 200k domestic & non-domestic customers and almost 90MW of self-developed renewable energy generation capacity. We continue to invest in new sources of renewable generation, Electric Vehicle charging through our Electric Highway and more generally promoting sustainable living through all of our activities in the sectors of Energy, Transport and Food.

We also invest in research and development; we are currently developing a ground breaking 'grass to gas' green gas mill.

Question 1: What are your views on Ofgem's assessment of the implications of the options we have set out for access to HH electricity consumption data for settlement?

The perceived implications that maintaining opt-in arrangements will result in high numbers of non-HH settlement consumers could be mitigated with wider-targeted campaigns to engage consumers in the benefits of access to HH consumption data. There's certainly a benefit to being HH settled and consumers will realise this once they're subjected to these

campaigns. This could potentially also be expanded to a wider audience in Smart Energy GB campaigns.

Question 2: Do you agree with Ofgem's current view that the best balance could be achieved by a legal obligation to process HH electricity consumption data for settlement provided the consumer has not opted out, and if so, why? If you have a different view, please explain which option you would prefer and the reasons for this.

We believe that option 1 of maintaining the status quo is the best option in order to robustly maintain consumer choice.

Question 3: There is a risk that consumers who use particularly high volumes of electricity at peak could choose not to be HH settled and therefore disproportionately increase energy system costs, which would then be shared by all consumers. Do you have any views on whether or how we should address this issue?

Due to our preference for option 1, we shan't be providing a response to this question.

Question 4: What are your views on the potential enhanced privacy options?

We aren't in favour of these options, primarily because HH settlement data provision will be mandatory. Furthermore, anonymised data isn't as secure as portrayed as suppliers could still use the monthly readings to theoretically determine which consumer the data applies to.

The other concern is the cost and implications of procuring these central systems. The complications and delays witnessed in the implementation and operation of the DCC doesn't fill us with the utmost confidence that a central system to perform these enhanced privacy options could be procured and implemented within an adequate timeframe which benefits consumers. Regardless of a successful implementation, this will result in greater costs for consumers in order to fund such a project, which is unnecessary at this point in time of ensuring as much of a cost saving for consumers as possible.

Question 5: If we decided to further consider the hidden identity option, do you think data from all consumers should be pseudonymised or only data from consumers who have not chosen to share their HH data for settlement?

Due to our belief that these enhanced privacy options shouldn't be considered, we shan't be providing a response to this question.

Question 6: Please provide any information you can about the likely costs and benefits of these options.

No comment.

Question 13: Do you consider that any additional regulatory clarity may be needed with respect to the legal basis for processing HH export data from smart and advanced meters for settlement?

Additional regulatory clarity would be greatly received in order to ensure everyone is on the same page. We welcome Ofgem's aim to provide a further update on the grounds for access to HH export data in their published final decision.

Question 14: Do you have any thoughts on the monitoring/auditing environment for the use of HH data for settlement purposes?

No comment.

Question 15: Do you have any additional thoughts or questions about the content of the DPIA?

No comment.

Conclusion

In conclusion, Ecotricity believes that the status-quo must be retained in order to safeguard consumer choice. The benefits to HH settlement can still be achieved under this option, but wider-targeted engagement is needed with consumers in order to communicate the benefits and receive opt-in consent.

Ecotricity welcomes the opportunity to respond and hope you take our comments on board. We also welcome any further contact in response to this submission. Please contact Joshua Phelps on 01453 840637 or joshua.phelps@ecotricity.co.uk.

Yours sincerely,



Alan Chambers
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