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Our ref

Your ref

Date

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Dear Anna

Access to half-hourly electricity data for settlement purposes

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc regarding the Ofgem's consultation on Access to half-hourly electricity data for settlement purposes, which opened on 10 July 2018.

Please see Appendix for detailed responses to specific questions raised in the consultation.

Yours sincerely



Paul Branston
Regulatory & Government Affairs Manager

APPENDIX– ANSWERS TO QUESTIONS POSED IN THE CONSULTATION

Chapter Three

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?

We consider Ofgem’s assessment of the implications is comprehensive and complete.

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 agree with Ofgem that Option 2 is the most balanced solution, Whilst mandatory provision is the optimum solution from a settlements perspective, on reflection we recognise that Option 2 will be more acceptable from a customer view point.

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? Access to half-hourly electricity consumption data for settlement purposes

We recognise this as a potential issue, which could involve customers either opting out of HH settlement or alternatively refusing a smart meter altogether. The only solution for those who have accepted a smart meter is to mandate HH settlement. If this is not seen as acceptable, then we do not see that this issue can be resolved.

Chapter Four

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

We consider these suggested solutions are overly complex and potentially costly. Option 2 we believe will provide the required volumes of HH data once Smart Meters have been rolled out.

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?

If the decision was to pseudonymise data we consider that there should be one solution where all customers’ data is pseudonymised.

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

We are not able to comment on any likely costs.

Chapter Five

Question 7: Do you think that there should be a legal obligation to process HH data from all smart and advance metered microbusiness customers for settlement purposes only? If you disagree, please explain why.

Yes.

Question 8: Are there any issues relating to access to data from microbusinesses that you think Ofgem should be aware of?

Not that we are aware of.

Chapter Six

Question 9: We propose that domestic and microbusiness consumers retain the level of control over sharing their HH electricity consumption data that was communicated to them at the point at which they accepted a smart or advanced meter, until the point at which the consumer decides to change electricity contract. Do you agree this is the best approach?

No – we prefer Option 2, as we consider Option 3 is difficult to operate and again introduces complexity. The volume of SMETS1 meters is already substantial and we are seeing SMETS2 roll out ramping up as suppliers try to meet the 2020 deadline. Therefore this will reduce the volume of HH data available for settlements and not provide the benefits that HHS program envisaged.

Chapter Seven

Question 10: What are your views on Ofgem’s proposal to make aggregated HH electricity consumption data broken down by supplier, GSP group, and metering system categorisation available for forecasting?

We agree with Ofgem’s view to allow suppliers access to aggregated data by supplier/GSP and metering system category with appropriate requirements for use & treatment of the data by suppliers. This should allow improved forecasting for suppliers with potential benefits to customers for reduced purchased costs.

Question 11: Is there any additional data beyond this aggregated data that you consider suppliers will need for forecasting?

As a DNO, we have no comment.

Chapter Eight

Question 12: Our analysis suggests that HH export data reveals less about a consumer and is therefore likely to be of less concern to consumers than HH electricity consumption data. Do you agree?

Yes.

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?

We are not aware of any additional clarity required.

Chapter Nine

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

To provide customers with the confidence that their data is being used in an appropriate manner, all auditing/monitoring should be undertaken in a robust/rigorous and transparent way.

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

No.