



Anna Stacey
Consumers & Markets
Ofgem
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London
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Via email: Half-HourlySettlement@ofgem.gov.uk

3 September 2018

Dear Ms Stacey,

**Chameleon Technology's response to Ofgem's consultation on:
"Access to half-hourly electricity data for settlement purposes"**

Chameleon Technology has been working with the wider energy industry for some years as part of the smart meter rollout, providing the vital customer engagement element of the smart metering solution to enable customers to visualise and act upon their real-time energy consumption and costs for the first time. We believe that In Home Displays will help all customers manage their energy use better, and also help them to manage their bills.

To date we have delivered over 2.5 million In Home Displays and we expect to provide many more millions over the next couple of years.

We are now looking at what revolutionary applications can be developed using near real time energy data on behalf of consumers, when combined with other high velocity data such as weather prediction, geo positioning, connectible devices and EVs etc.

Access to half-hourly electricity data, for settlement purposes, is only the beginning of using energy data in new ways to revolutionise and digitalise the industry and bring better offerings to customers whilst reducing carbon. As the consultation document highlights on page 7 (5th para), there will be significant medium-term benefits from HHS. These benefits cannot be realised unless access to HHS is achieved, ideally as soon as possible, and that the data is of the highest quality possible, and clearly whilst protecting consumers rights. Customers should expect to see a benefit from sharing this data, as well as understand the greater good that comes from using this data to improve the processes of the energy industry.

We note that this consultation focusses mainly on access to HH data for settlement purposes, with the inclusion of some questions on forecasting data. We believe that this is prudent, to ensure that customers and other stakeholders are comfortable that their data – as demonstrated by the research – is being shared and used appropriately, and they are reassured that it will not be used for unsolicited marketing or sales activity. Energy suppliers or other third parties should create innovative solutions and product offerings that clearly require customers to allow access to their energy data, via a Consumer Access Device (CAD) within the IHD.

We believe that Ofgem should also take steps to ensure that HHS does not become 'closed', for suppliers' access only, and that other parties are also allowed access to the data with permission from the customer. For example, an emerging market in the US is households selling their own data (A few examples have households earning 50US\$ a month just from data.). Ofgem should future proof their policy position to enable access to the data from new entrants in the future within an open market context.

We are encouraged by the other works streams underway looking at the role of data within the energy sector and consumers' and other third parties' access to it and are keen to engage with these work streams where appropriate.

Please find our response below. If you have any questions please do not hesitate to contact me.

Yours sincerely,

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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 think on balance that Ofgem's assessments are accurate. As seen to date, Option 1 does not give enough quality data, and Option 3, for domestic consumers, is too big a leap from the current status quo. Option 4 and 5 are too complex and bureaucratic. Therefore Option 2 would provide better settlement certainty whilst protecting consumers' rights.

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.

Yes.

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?

Better consumer engagement over the broader benefits of sharing this data could help to overcome this issue.

Additionally, greater support and understanding of why they are using particularly high volumes and innovative offerings to help the customer reduce their consumption at peak (such as storage) and understand their consumption and behaviour better (e.g. via insights) could assist this customer, all customers and the wider, longer-term objective.

Chapter: Four

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

Ensuring customers are comfortable with sharing their data is paramount and establishing robust security measures are an element to achieve this.

The research that Ofgem has carried out into consumers' views on sharing HH settlement data indicates that the majority are comfortable with the energy supplier receiving that data.

The alternative options Ofgem has proposed (Hidden Identity and Anonymization) seem overly bureaucratic and complex and add additional unnecessary layers and costs into what is already a complicated and costly system.

Therefore, whilst we understand it is prudent to explore other options, we do not feel that either of these approaches would have any additional benefit over and above the Option 2 that Ofgem prefers.

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?

No answer

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

No answer

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.

We support Ofgem's position.

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

No answer

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?

We think this is a sensible approach, to allay any fears that consumers may be sharing their data unwillingly. Whilst this would mean a delay in getting the granular level of data required, this approach should achieve

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?

To really create an innovative culture in the balancing and settlement processes in the energy industry, access to forecasting data is necessary, as the more data suppliers have access to should help them to identify where efficiencies in the system – so saving costs and/or carbon.

It would be logical that if suppliers had access to data for settlement requirements they also had data for forecasting.

These two data sets, and the right processing of the data, will achieve the best results.

Ofgem should be wary of creating too many unnecessary barriers to access to data, as only by accessing this type of data will the energy industry truly become digitalised.

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

No answer

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?

No answer

Chapter: Nine

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

No

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

No