



Consultation: Supplier Agent Functions

E.ON Response

26 October 2018

Summary

E.ON welcomes the opportunity to respond to this consultation and appreciates the transparency of Ofgem and their constant engagement during this process.

Question 1 – Do you have any comments on our updated analysis and thinking?

- It has been interesting to view Ofgem's position and assuring that earlier responses from the Industry regarding the proposed approach of a non-centralised agent, have been reviewed and taken into consideration.

One additional point worth reconsidering is that during the role out of Smart metering the data quality may degrade in the interim but following the successful role out of Smart metering with sufficient penetration then the data should be more accurate as suggested in 2.9.

It is also worth acknowledging that the role of an agent may not decrease as anticipated but it may evolve its responsibilities into a different form of agent. This is worth considering alongside the TOM decision as some of the TOM options (A,B and C) would clearly shape the roles that an agent would need to accede too.

Question 2 – Do you agree with our proposed position? If not please explain

- Overall, E.ON agrees with the current position of Ofgem

Question 3 - Do you consider data will need to be aggregated for submission into central settlement systems in future? Inlight of this, do you consider that a data aggregation role is required?

- E.ON agrees in principal that following the deployment of Smart the data aggregator role could be no longer required however we do believe that some element of validation would still need to take place. Currently if there is an aggregation mis-match, the Data Aggregator would send a D0023 or D0095 to the respective Data Collector or Supplier. These highlight problems to parties regarding data quality.

These reports allow opportunities to correct errors in the settlement market so should therefore be replicated should the Data Aggregator role be removed.

There also needs to be consideration regarding any value a party gains from engaging with the Data Aggregator following aggregation. The Data Aggregator can provide holistic views of supplier portfolios to assist in addressing Settlement performance issues and like the above reports these would need to be replicated.

Finally, there is a risk that having meter level data held in a single central location could be targeted through a Security threat so additional controls and mitigations would be required.

Question 4 - Do you agree with our consideration of our proposed position against our assessment principles?

- E.ON understands Ofgem's position that the centralisation of all agents may not be better for the market however as noted in response to question 1 the industry needs to acknowledge that the roles of specific agents will more than likely change.

General Feedback

- This consultation has been clear and balanced outlining Ofgem's position and as such E.ON has no additional comments on this process.