



Making a positive difference
for energy consumers

Feedback Form

Once completed, please send this form to
HalfHourlySettlement@ofgem.gov.uk by 12 November 2018.

Organisation: Haven Power/ Opus Energy – joint response.

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Is your feedback confidential?

YES

NO

Unless you mark your response confidential, we will publish it on our website, www.ofgem.gov.uk, and put it in our library. You can ask us to keep your response confidential, and we will respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004. If you want us to keep your response confidential, you should clearly mark your response to that effect and include reasons.

If the information you give in your response contains personal data under General Data Protection Regulation (EU) 2016/679 and Data Protection Act 2018, the Gas and Electricity Markets Authority will be the data controller. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. If you are including any confidential material in your response, please put it in the appendices.

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

Broadly speaking we agree with the conclusions set out in the consultation document and Ofgem's current thinking.

Question 2: Do you agree with our proposed position? If not, please explain why.

Yes, we support the proposed position. While there may be the potential for some economies of scale from a central agent, introducing a monopoly provider is likely to be detrimental to innovation which could be particularly important as technology, business models and the industry in general evolves. The implementation of a central agent is also likely to be costly and, once implemented, difficult to reverse should the market evolve beyond the requirement for a centralised role. We expect the continued roll out of smart metering to improve data quality in the future but we would not anticipate the centralisation of supplier agent functions to deliver material improvements to either data quality or settlement performance.

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

We consider this question is best examined in detail by the Design Working Group as part of their work future-proofing the Target Operating Model. Key to this consideration will be the extent to which aggregated data submission may limit flexibility and hinder innovation within an evolving supply market and decentralised generation market.

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

We are satisfied with the rationale set out for the assessment principles and with Ofgem's consideration of the proposed position against these principles.

Further comments

We have no further comments at this time.

General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall process of this consultation?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Were its conclusions balanced?
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

On the whole we found the consultation document to be fairly succinct, easy to read and clearly laid out.

