

Feedback Form

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

Organisation: Morrison Data Services

Contact: Seth Chapman (seth.chapman@morrisonds.com)

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?

We agree with the updated analysis and have no further comments to add.

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

We agree with your proposed position for data collection, manual meter reading and meter operations.
Please see question 3 for comments regarding data aggregation.

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?

In principle we see no reason that settlement data needs to be aggregated before submission into central settlement systems.

We do believe that the process currently carried out by data aggregators still need to be preformed for settlement. These include checking that no data is missed or double counted in settlement, only data from the responsible parties/agents is included in settlement and data is of the expected type eg import data for an import mpan.

Further we believe settlement performance, in general, is better where a single organisation currently performs both the data collection and data aggregation roles. This is due to access the data aggregators data to identify and investigate missing settlement data. We acknowledge that this analysis could still be done if mpan level data was submitted the the central settlement systems but it would require access to the same or very similar data to that which can be obtained for the current data aggregators.

Additionally in our experience it is possible to monitor, or predict, performance between settlement runs where the data aggregators are under the same agents control, again we believe this leads to better settlement performance. This is because data aggregators are able to produce "dummy" aggregation runs between the settlement runs for a given settlement date.

We do however see the potential benefit for future changes of having the disaggregated data accessible from one place. For this reason we believe that a single approach should be taken across all market segment, ie smart and advanced meters.

In summary we agree that there is probably no need for data aggregation agent role, but the processes that are currently fulfilled by data aggregation would still need to be performed in central settlement systems. We believe settlements performance, and therefore accuracy, would be adversely impacted if there was not sufficient access to the data the data collectors require to monitor settlement and investigate missing data.

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

We agree with your assessment.

Further comments

none

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?

No comments on the consultation process.

