

Feedback Form

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

Organisation: Salient Systems Ltd

Contact: Dermot Hearty, heartyd@salient-systems.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?

SSL are in general agreement with Ofgem's updated analysis and thinking.

Analysis has been predominantly driven, understandably, by the desire to persist responsive and competitive service delivery of particular data management roles that will have a critical impact upon effective delivery of market wide HHS.

Although the analysis identifies that current and future new HH consumption data enabled business models will introduce additional data management challenge at industry process design and at agent service providers we believe that positive contributions available from competitive agents, rather than from central agents, will more effectively assure the integrity of consumption data entering into settlements; such contribution has been understated at the analysis.

The inevitable introduction of new or refined mechanisms at the BSC that will be positioned in order to accommodate new business models, while assuring settlement integrity, will implicate additional requirements upon service providers for responsive and targeted additional data management services.

The integrity of data entering into settlements as a consequence of the operation of new business models must be assured through rigorous definition, positioning and auditing of data management role responsibilities attached to the creation, validation and possible assignment/aggregation of consumption data that will be presented to settlement in line with agreements between parties operating within new business model(s) rules and constraints.

A centralised service model will risk inertia at the market where faced with the challenge of adequately validating the data attached to multiple new business models from multiple parties. Competitive agents and Suppliers will be better positioned to deliver together such differentiated services to market but will be subject to more rigorous auditing regimes in order that the integrity of data entering settlement continues to be assured.

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

Yes, apart from positioning of proposed centralised data aggregation service (see Q3 response).

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?

Data will require to be aggregated somewhere within final HHS TOM.

If it is aggregated centrally then all of the classification data pertinent to any new rules that are introduced to accommodate new business models will need to be available and managed at centralised service – risking inertia, compromise, vanilla services.

Data aggregation service extensions have been implicated over the past few years at a number of key industry changes. Impacts will continue to arise. Existing agents will not be incentivised to deliver any changes arising over the next few years if the prospect of a centralised service is contemplated. Existing agents will be incentivised to work with Suppliers to provide aggregated views of data implicated by new business models, so aggregate all data.


HHDA systems and services already exist and will very likely continue to be delivered at very modest service costs. A centralised service will introduce higher costs to serve and will be less responsive to market requirements.

If it works don't fix it !

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

Yes.

Further comments



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?

Overall process excellent, very professionally and effectivel managed throughout.

