



Anna Rossington

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By email only: retailpriceregulation@ofgem.gov.uk

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Dear Anna

SMNCC Response Paper #4

Thank you for the opportunity to comment on your SMNCC Response Paper 4, disclosure arrangements.

We welcome Ofgem's proposals to create a Virtual Disclosure Room, and to allow six named Authorised Attendees who can be directly employed by a Relevant Party.

However, we do not understand the logic for placing the non-confidential elements of the SMNCC model in the Virtual Disclosure Room; we see no reason why this information should not be published. Further, we disagree with Ofgem's reasoning for not providing confidential information within the Virtual Disclosure Room. Ofgem acknowledges that the data is not sensitive from the perspective of an individual supplier, but considers that it may be so for other stakeholders. We do not agree with this position; we do not believe there would be any information in the model that would not already be available to stakeholders by other means. In order to properly assess the accuracy of the SMNCC, it is important that confidential information be made available. We urge Ofgem to reconsider its position on this point.

We believe the Permitted Purpose is too restrictive and ask Ofgem to consider allowing the model to be used for further purposes, for example business planning. This would be a benefit for suppliers and consumers and also the smart programme itself.

We urge Ofgem also to consider opening the Virtual Disclosure Room as soon as it has developed its model, and no later than on issuing its consultation, in order to allow stakeholders the maximum amount of time for proper scrutiny.

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If you require any further information on the concerns we have raised above, please do not hesitate to contact me.

Yours sincerely

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