

Feedback Form

Please send the completed form to HalfHourlySettlement@ofgem.gov.uk by 29 October 2019.

Organisation:	Scottish Power
Contact name and email address:	Stephanie Clements Stephanie.Clements@ScottishPower.com
Is your feedback confidential? <i>If you would like your feedback to remain confidential please include reasons here.</i>	No

We are seeking your feedback on the proposed updated governance arrangements, new and existing principles and the two new industry working groups. In particular, we would be interested in hearing from you on whether these arrangements ensure that the further development of the TOM is carried out in a fair and efficient way and allows all interested parties to have opportunity to engage in the development proposals. Additionally, we want your views on whether the arrangements ensure that the impacts of changing the whole settlement system (including the impacts on end consumers) are identified, and that future changes to the energy system are taken into account. We would like you to respond to our questions (set out below) with these points in mind.

Q1. Do you have any comments on our proposed governance model for the development phase of the Target Operating Model, set out in Appendix 2A of the open letter? Do you believe the structure is fair, efficient and will adequately ensure whole settlement system impacts and future changes are taken into account?

In principle the proposed governance model provides adequate safeguards to ensure a fair and efficient structure. However, we would have concerns that the right calibre of people are involved within the CCDG & AWG, to ensure diversity and knowledge to meet all requirements.

Q2. Do you have any comments our proposed Target Operating Model Development Principles, as set out in Appendix 2B? Is there anything else you think should be included and/or excluded? Are the development principles, when considered with the design principles, sufficiently forward looking?

We agree with the proposed TOM Development Principles, particularly security of data whilst allowing access to third parties for agreed uses. All consideration should be made to make this as future-proof as possible, whilst not being too complex for current interfaces.

Q3. Do you agree that the [TOM Design Principles](#) are still applicable for the further development of the TOM? Do you believe the TOM Design Principles need to be updated going into this new phase?

We agree that the TOM Design Principles are still applicable. All involved parties should be mindful of these whilst in development and make sure they are still relevant as an ongoing process.

Q4. Do you agree with the updates to the Terms of Reference for the Design Advisory Board, as set out in Appendix 2C?

Yes.

Q5. Do you have any comments on the proposed set-up of the Code Change and Development Group and their associated Terms of Reference, as set out in Appendix 2D?

No, this seems standard and sufficient.

Q6. Do you have any comments on the proposed set-up of the Architecture Working Group and their associated Terms of Reference, as set out in Appendix 2E?

No, this seems standard and sufficient.

You can ask us to keep your comments confidential, and we'll 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 comments confidential, you should clearly mark your response to that effect and include reasons. If you are including any confidential material, please put it in the appendices. If the information you give in your comments contains personal data under the 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.