

[REDACTED]

From: [REDACTED]
Sent: 12 October 2020 15:39
To: Half-Hourly Settlement
Cc: [REDACTED]
Subject: RE: Electricity retail market-wide half-hourly settlement: consultation response [OFFICIAL]

[REDACTED]

[REDACTED]

4. We propose that the Final Reconciliation Run (RF) should take place 4 months after the settlement date. Do you agree? We welcome your views.

From a consumer perspective we would strongly suggest keeping the RF run at the current 14 months. Our experience of comms faults on our 1,500 advanced meters is that from detecting a fault to resolution takes a reasonable length of time:

Raising a D0001 (~2 weeks after comms drop) – engineer attends site (~3 weeks after receiving a D0001, dependent on capacity) – if fault not fixed, new job raised to replace meter or reattend (further ~3 weeks, dependant on capacity).

From D0001 to the re-establishment of comms or designation as no-comms, we'd expect a turnaround of 2 months, all working well. Our experience would suggest it tends to take longer than that which cuts deeply into the proposed RF timetable. The estimated shape that we'd have to fall back on during this time is unfit for use as described in the attached email, previously sent to the Half-Hourly settlement inbox.

There has been a consistent effort to state HH settlement and metering issues are separate. We would contend that they are two sides of the same coin. Without effective and reliable metering systems, HH settlement will fail in its objectives. Data will not get through in time for RF and we will be in no better position than we are currently. Time needs to be given for the effective resolution of comms faults which the current RF run allows for.

11. & 12. Data access and Privacy

We would suggest that it is unwise to half-commit to HH settlement. Savings that have previously been discussed by OFGEM will be harder to realise the more space is given to avoid HH settlement. The [letter](#) on the use of data for settlement, dated the 25th June 2019 we would broadly support the decisions of. Specifically, we would agree that microbusiness should not have the opt out option where an AMR/SMETS meter is fitted but would desire clarity that this would cover all Profile Class 3 & 4 meters where an AMR/SMETS meter is fitted? If not, we would suggest it should.

While we would agree that daily reading is considerably better than monthly, it is not producing the shape accuracy that is desired. If HH exceptions are going to be allowed, the minimum allowable granularity should be a reading at the transition between DUoS periods. This would provide a rough shape and also allow for a far more accurate and therefore fairer TOU charge distribution on DUoS and CM. It would also allow greater engagement with the aims of the SCR.

13. Should there be a central element to the communication of settlement / forecasting and associated data sharing choices to consumers? For example, this may be a central body hosting a dedicated website or webpage to which suppliers may refer their customers if they want more information. If yes, what should that role be and who should fulfil it? We welcome your views.

Yes, this should be on the OFGEM website. As the regulator, OFGEM holds the highest level of authority in the perception of the average consumer. Privacy concerns around the use of HH data could therefore be ameliorated by giving the consumer the clear statement on their choices from this position of authority.

18. Do you have any comments on the draft Impact Assessment published alongside this document, or any additional evidence that you think we should take into account?

Consideration needs to be given to the increase in fixed costs that the customer is going to incur with MHHS. Currently the MOP and DC fixed charges would see a very significant increase over current NHH costs. Commercially, the incentive would be to retain heritage metering on the majority of our small sites which would work against the aims of MHHS.

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