# Delivering a smart and secure electricity system: implementation - Response Form

The consultation is available at: [https://www.gov.uk/government/consultations/delivering-a-smart-and-secure-electricity-system-implementation](https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fconsultations%2Fdelivering-a-smart-and-secure-electricity-system-implementation&data=05%7C02%7Caudrey.nivarosa%40energysecurity.gov.uk%7C07616cab62ed467efbf808dc5a110cfe%7Ccbac700502c143ebb497e6492d1b2dd8%7C0%7C0%7C638484276480302174%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Dw1wd1LtdS3X6uahQVKfKgl%2F032p6CeuxMk8PUVgKGI%3D&reserved=0)

The closing date for responses is 21 June 2024 at 23:59 GMT.

Please return completed forms to:

Email: ssesconsultation@energysecurity.gov.uk

Post: Smart Secure Electricity Systems Team, Department for Energy Security and Net Zero, 7th Floor, 3-8 Whitehall Place, London, SW1A 2AW

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If you want information, including personal data, that you provide to be treated as confidential, please explain to us below why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we shall take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

I want my response to be treated as confidential [ ]

Comments: Click here to enter text.

## Questions

Respondent Name: Click here to enter text.
Respondent Organisation (if applicable): Click here to enter text.
Respondent Email Address: Click here to enter text.

*Please check the box that best describes you as a respondent from a list of options below.*

|  | Respondent type |
| --- | --- |
| [ ]  | Business representative organisation/trade body |
|[ ]  Central government |
|[ ]  Charity or social enterprise |
|[ ]  Individual |
|[ ]  Large business (over 250 staff) |
|[ ]  Legal representative |
|[ ]  Local government |
|[ ]  Medium business (50 to 250 staff) |
|[ ]  Micro business (up to 9 staff) |
|[ ]  Small business (10 to 49 staff) |
|[ ]  Trade union or staff association |
|[ ]  Other (please describe) |

### Energy Smart Appliances (ESAs) policy consultation

**1. Do you have a view on the lead time industry will require to implement the first phase regulations as proposed in this document?** (p.15)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**2. Do you agree with our plan to proceed on the basis of phasing ESA device regulations as set out above whilst committing to keep this approach under review?** (p.15)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**3. Do you have a view on when the smart mandate for heating appliances should be implemented? Please provide evidence to support your answer.** (p.15)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**4. Would you support the introduction of a metering accuracy requirement to the effect that all ESAs should have a means to measure their import/export consumption to up to or better than 2% nominal accuracy?** (p.17)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**5. If you are a manufacturer, would requiring a nominal 2% accuracy requirement impact your business or products? If yes, please outline the impacts and the costs and benefits with as much detail as possible.** (p.17)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**6. Do you agree that the scope of the smart mandate should be extended to include hot water storage and generation (indirect electric hot water storage cylinders, standalone direct electric hot water cylinders, and hot water heat pumps)? If not, please provide supporting evidence.** (p.21)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**7. Do you agree that the scope of the smart mandate should be extended to include the whole hybrid heat pump system (rather than just the heat pump within a hybrid), with requirements placed on the common controller? If not, please provide supporting evidence.** (p.22)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**8. Do you have a view on whether standalone domestic battery energy storage systems (BESS) should be included in future legislation in order to be subject to the smart mandate requirements associated with the first phase regulations? Please provide evidence to support your answer.** (p.22)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**9. Do you have any data on what proportion of installed domestic battery energy storage systems (BESS) have smart functionality? Smart functionality is defined as being communications-enabled and able to respond to price and/or other signals by shifting and/or modulating their electricity consumption.** (p.22)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**10. Do you have evidence on the extent to which domestic battery energy storage systems (BESS) with smart functionality already meet the minimum requirements set out in Table 1? Please provide evidence to support your answer.** (p.23)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**11. Do you agree with government’s proposal that electric heating appliances must be able to modulate output and/or change the time at which electricity is consumed in response to signals, including price and other signals that facilitate DSR?** (p.29)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**12. Do you agree with the proposal that electric heating appliances within the scope of the mandate must provide two-way communication in order to receive and act upon direct control signals, and to send signals on the device status?** (p.30)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**13. Do you agree with the proposal that electric heating appliances within the scope of the mandate must be designed to be interoperable so that devices do not cease to have smart functionality if the owner changes electricity supplier?** (p.31)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**14. Do you agree with the proposal that, as part of the first phase ESA regulations, electric heating appliances within the scope of the mandate must be designed to utilise open standard communication protocols for the application interface to remove a barrier to interoperability with DRSRPs?** (p.31)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**15. Do you agree with the proposal that the mandate should require electric heating appliances to prioritise safe operation over responding to information or user input?** (p.33)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**16. Do you agree that the mandate should require electric heating appliances to be able to continue to function to provide heating and/or hot water services when network connection is lost?** (p.33)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**17. Do you agree with government’s proposal that the mandate should not require a maximum turn/shut down time or minimum speed of response?** (p.34)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**18. Do you agree with government’s proposal that the mandate should not require specific control strategies to be installed with electric heating appliances?** (p.34)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**19. Do you agree with government’s proposal that hybrid heat pumps operated by a common controller must be able to receive and act upon fuel tariff data and be able to utilise the alternative heat source to meet heat demand during a DSR instruction?** (p.34)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**20. Do you agree with government’s proposal that all electric heating appliances within scope must provide a user interface?** (p.35)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**21. Do you agree with government’s proposal that electric heating appliances must be able to estimate their power consumption, with the manufacturer free to choose the estimating (calculating or measuring) approach?** (p.36)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**22. Do you see any difficulty with the position that government is proposing? Please provide evidence to support your answer.** (p.36)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**23. Do you agree with government’s proposal that electric heating appliances will not be required to collect data on their thermal output?** (p.36)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**24. Do you agree with government’s proposal that all electric heating appliances, on set up, should require users to set their heating preferences, that DSR and TOUT operations to be enabled by default, and for functions that can be undertaken outside of peak hours to be pre-set to do so?** (p.37)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**25. Are there any other requirements that you believe should be included in the minimum requirements for the smart mandate?** (p.37)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**26. Do you agree with government’s proposal to require the appliance manufacturer to provide appliances with integrated or ‘add-on’ ESA functionality?** (p.39)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**27. Do you agree with government’s proposal to require sellers to ensure that an electric heating appliance (or system of appliances) is sold with either integrated or add-on ESA functionality?** (p.39)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**28. Do you agree with government’s proposal not to place any legal obligations on installers of smart heating appliances?** (p.40)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**29. Do you have a view, and supporting evidence, on how government ensures that installers have the awareness and ability to successfully install smart heating appliances?** (p.40)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**30. Do you agree that open data standards are required to enable EV charge point interoperability with energy suppliers and DSRSPs?** (p.40)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**31. What are the barriers to implementing such open data standards?** (p.40)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**32. From your experience does EV-EVSCP interface communication regarding battery state of charge pose a barrier to access to the full range of EV tariffs and DSR services?** (p.41)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**33. What other technical and commercial barriers have you experienced to EV drivers accessing a full range of available tariffs and DSR services?** (p.41)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**34. Do you foresee any issues with adoption of ETSI EN 303 645 for Phase 1 requirements for all ESAs? If so, how could these issues be mitigated?** (p.44)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**35. To what extent would requiring cyber security testing of ESAs prior to them being sold or distributed in GB impact ESA supply chains? What other approaches could be used to provide sufficient assurance that cyber security requirements were being met?** (p.44)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**36. Do you have any suggested alternative solutions to the random offset function which would mitigate the risk of large-scale synchronised changes in load?** (p.46)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**37. Please comment on the assumptions and methodology used in the cost appraisal of the analytical annex. Can you provide estimates of the costs of providing consumer interfaces and monitoring?** (p.47)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**38. Do you agree with using the Designated Standards approach as the basis for government to design the Approved Standards framework for the SSES programme?** (p.52)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**39. Do you have any comments, suggestions or changes to the initial view described above for how Approved Standards could work; especially for the proposed manner of assessing potential new approved standards?** (p.52)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**40. Are there any areas where you foresee the need for additional standardisation beyond PAS1878? If so, in what areas and over what timeframes would you expect new standards to develop?** (p.52)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**41. Do you believe that there is a need for standardisation of Implicit (also called Routine) DSR in order to meet the government’s interoperability objective? If so, what aspects do you consider would need to be standardised, and are there any existing technical standards that you believe could be used?** (pp.52-53)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**42. How should an approved standards approach be designed to ensure that DSRSP interoperability is maintained?** (p.53)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**43. How complex would it be for DSRSPs to update their system to have the functionality to interact with an ESA that uses a new approved standard? What would the likely timeframes be and how could the technical challenges be managed?** (p.53)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**44. What criteria should be applied to ensure that any proposed standard is fit for purpose, and to avoid an excess of standards adding undesirable complexity?** (p.53)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**45. Should DSRSPs be required to ensure that services they offer are interoperable with all ESA types that they offer that service to? (for example, a service for EV drivers should be compatible with any approved standards for EV charge points).** (p.53)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**46. How should an approved standards approach be designed to ensure that the SSES cyber security, grid stability and data privacy objectives for devices can be met?** (p.54)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**47. What information of the cyber security, data protection and grid stability criteria would industry need to be able to design a new approved standard?** (p.54)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**48. What template of “open” or “fair and equitable” licence should government require before allowing technical specifications that require this intellectual property into the standard?** (p.57)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**49. Given the additional detail provided in this chapter, do you believe that the proposed 24-month period between when the first and second phase regulations come into force is appropriate?** (p.58)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**50. Are there any documents (such as specific standards, protocols, guidance, code, specifications) that should be explored for inclusion into the SSES technical framework? Please can you provide within your answer why their inclusion would help meet the SSES policy objectives and why the SSES technical framework is the best delivery mechanism.** (p.58)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**51. Do you believe that in the future, homes with multiple devices will have problems (such as sub-optimal energy management, grid stability concerns, etc) if there is not an active management of the devices at a premises level?** (p.58)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**52. What is your definition of a Home Energy Management System (HEMS) and what, if any, role do you see HEMS having within the SSES technical framework?** (p.58)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**53. Does this list capture all the required functions to maintain the technical frameworks necessary to facilitate load control? Are other functions needed?** (p.61)

**A** [ ]  Yes [ ]  No [ ]  Not sure

**B** [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**54. Do you agree with the overall model of technical governance? Can you suggest any existing governance that would be well suited to take on this function?** (p.61)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**55. Does this list capture all the necessary functions to deliver security governance? Are other functions needed?** (p.62)

**A** [ ]  Yes [ ]  No [ ]  Not sure

**B** [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**56. Do you agree with the overall model of security governance? Can you suggest any existing governance that would be well suited to take on this function?** (p.63)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**57. Do you agree that electricity network licence holders are best placed to meet certain costs of setting up and maintaining technical and security frameworks during the Transition Phase? Please explain your answer.** (p.67)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**58. Do you agree with the proposed approach for recovering the costs of administering a licensing regime? Please explain your answer.** (p.67)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**Do you have any other comments that might aid the consultation process as a whole?**

*Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.*

Click here to enter text.

### Licensing consultation

1. Do you agree that activities of DSRSPs should require a load control licence? Please explain your answer. (p.30)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

2. Do you agree that activities of DSR Load Controllers should require a load control licence? Please explain your answer. (p.30)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

3. Do you agree that activities of Large Load Controllers should require a load control licence? Please explain your answer. (p.30)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

4. Do you think there should be any further activities that should require a load control licence? Please explain your answer, and expand on any further activities where relevant. (p.30)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

5. Do you agree with government’s proposal to limit the scope of the licence to certain ESAs for each activity proposed in this chapter? Please explain your answer. (p.30)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

6. Do you agree with government’s proposal to limit the scope of some of the activities in the licence (consumer contracting for load control and load control below 300MW) to load control for the purposes of DSR? Please explain your answer. (p.31)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

7. Do you agree with Government’s proposal for protections around DSR in this licence to cover small non-domestic consumers? Please explain your answer. (p.31)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

8. Do you think the scope of DSR protections in the load control licence should extend to larger non-domestic consumers too? Please explain your answer. (p.31)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

9. Do you agree with Government’s proposal for licensees to only be responsible for compliance with particular conditions in the licence related to the activity or activities they carry out? Please explain your answer. (p.31)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

10. Do you agree with the four assurance principles? If not, please explain your answer. (p.34)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

11. Do you agree that two tailored CAF profiles, one for DSR Load Controllers and a separate profile for Large Load Controllers, is the right approach to organisational assurance for assessing licensed Load Controllers? Please explain your answer. (p.35)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

12. Do you agree with requiring DSRSPs through the load control licence to meet a general condition to treat consumers fairly? Please give reasons for your answer and, where relevant, include reference to alternative or additional options. (p.40)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

13. Do you agree with the proposal to use Standards of Conduct within a general consumer protection principle of fairness to impose requirements for communications about products and services? Please give reasons for your answer and, where relevant, include reference to alternative or additional options. (p.41)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

14. Do you agree with the proposal to include a licence condition that instructs DSRSPs to only recommend services that are appropriate to the individual consumer’s characteristics and preferences? Please give reasons for your answer and, where relevant, include reference to alternative or additional options. (p.41)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

15. Would guidance for DSRSPs regarding appropriate services for different types of consumers be beneficial? (p.41)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

16. Do you agree with the proposal to use the Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008 as a basis for requirements for complaints processes for DSRSPs? Please explain your answer. (p.45)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

17. Are there any requirements within the 2008 Regulations that you consider to be inappropriate to apply to DSRSPs? (p.45)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

18. Do you agree with the proposal that the licence should require DSRSPs to participate in an ADR scheme? Please explain your answer. (p.47)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

19. Do you think there should be a single common ADR scheme across DSRSPs? Please explain your answer. (p.47)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

20. Do you think government should extend consumer advocacy and advice services to cover issues related to DSR load control? If so, what particular services do you think would be useful for DSR consumers? Please give reasons for your answer. (p.48)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

21. Do you agree with the proposal to use the definition of vulnerable situations used in the Electricity Supply Licence?​ Please give reasons for your answer and, where relevant, include reference to alternative or additional options. (p.50)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

22. Do you agree with the proposal that DSRSPs should seek to identify and maintain their own records of consumers in vulnerable situations? Please give reasons for your answer and, where relevant, include reference to alternative or additional options. (p.52)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

23. Do you think DSRSPs should be required to deliver the priority services defined in SLC 26.5 (a), (b) and (e), and/or any other priority services in the Electricity Supply Licence? (p.52)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

24. Do you agree with the position that the Equality Act 2010 provides sufficient protection regarding inclusivity and accessibility of the design of DSR processes and services? Please give reasons for your answer and, where relevant, include reference to alternative or additional options. (p.54)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

25. Do you agree with our proposal around requiring DSRSPs, in the scenario that they offer an interface to consumers to manage their service, to offer the option for the consumer to request cancellation of load control of their ESA? Please explain your answer. (p.55)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

26. Do you think any further guidance or requirements related to the consumer’s ability to request cancellation of a remote load control action through a DSRSP could be warranted now or in the future? Please explain your answer, making reference to the potential requirements outlined in the consultation as well as any further requirements not discussed. (p.56)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

27. Does the proposed package of consumer protection measures offer sufficient protections to consumers while also enabling DSRSPs to develop innovative service offerings? Please explain your answer. (p.56)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

28. How do you anticipate that the proposed package of consumer protection measures will impact new entrants to the market, and do you expect that any mitigation is required to reduce barriers to entry? (p.56)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

29. Should government include any further requirements to protect consumers in the load control licence not covered in this chapter? Please reference specific requirements where appropriate. (p.56)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

30. For businesses in scope of the licence: Which resources (FTE) or costs (£) are you currently using to deliver consumer protection measures? (p.56)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

31. For businesses in scope of the licence: Which resources (FTE) or costs (£) would you have to use to comply with the consumer protection requirements set out in this chapter (ideally broken down by topic)? (p.56)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

32. Do you agree with government’s proposal to include a requirement in the licence requiring DSRSPs to allow consumers to exit a service? Please give reasons for your answer. (p.61)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

33. Do you agree with government’s proposal for a condition that fees associated with a consumer’s service exit should be proportionate, and if so, do you have a preference as to how ‘proportionate’ is defined? Please explain your answer. (p.61)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

34. Do you think any further requirements around service exit need to be included in the licence, for example around the visibility of exit fees at the consumer contract? Please give reasons for your answer. (p.61)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

35. Do you think there should be requirements for DSRSPs to enable orderly switching of ESAs between services? What specific measures do you think might need to be covered as part of these requirements – including those referenced in this consultation? Please give reasons for your answer. (p.63)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

36. For businesses in scope of the licence: Could you set out the additional resource or cost you would incur for complying with requirements around consumer switching laid out in this chapter? (p.63)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

37. Do you agree with our proposal for no further legal requirements on load control licensees around data privacy at this time? Please explain your answer. (p.67)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

38. Are there specific risks to consumers associated with the processing of personal data as part of load control services not addressed by the UK’s data protection framework? Please explain your answer, referencing specific evidence where relevant. (p.67)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

39. Would specific requirements around the protection of personal data from load control services significantly improve consumer confidence in the sector? Please explain your answer, referencing specific evidence where relevant. (p.67)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

40. In the instance that a load control licensee has produced an assessment of its processing activities, do you think this assessment should be pro-actively shared with Ofgem? Please explain your answer. (p.68)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

41. Would the creation of sector-specific guidance, like an ICO-approved UK-GDPR code of conduct, be beneficial for consumers and load control licensees? Please explain your answer. (p.68)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

42. Do you agree with the proposal for a condition requiring licensees to have fit and proper senior personnel? Please explain your answer. (p.69)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

43. Do you agree with the proposal for a condition around the operational capability of load control licensees, and how might a load control licence approach this? Please give reasons for your answer. (p.70)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

44. Do you agree with the inclusion of a financial responsibility principle in the load control licence and how might this be approached? Please explain your answer. (p.71)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

45. What risks to consumers do you anticipate may arise from the insolvency of load control licensees? (p.71)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

46. Do you agree that specific processes for insolvency of load control licensees are not required? Please explain your answer. (p.71)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

47. Are there any other financial controls that government should consider including in the load control licence? (p.72)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

48. For businesses that would be in scope of the licence (as either a DSRSP or Load Controller): **Could you set out the additional resource or cost you would incur for complying with the management and financial controls proposals in this chapter?** (p.72)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

49. Do you agree with government’s proposal for Ofgem to be able to start the process of assessing licence applications by the end of 2025? Please explain your answer. (p.75)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

50. Do you have views on the length of the ‘transition period’ between the licence application process opening and the conditions in the licence being effective? Please explain your answer. (p.75)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

51. Do you agree that all requirements in the licence should be introduced at the same time, or should some requirements be phased? If you think requirements should be phased, how should this be approached? Please explain your answer. (p.75)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

52. Do you agree with our proposal that all requirements for DSRSPs in this consultation should apply equally to all relevant organisations irrespective of size? Please explain your answer. (p.76)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

53. Do you agree with the approach on tiering requirements for Load Controllers based on how much load they have the potential to control? Please explain your answer. (p.76)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

54. What role do you think external standards have to play in demonstrating compliance with the load control licence, particularly measures for DSRSPs? Please explain your answer. (p.77)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

55. Do you agree with the proposal for electricity suppliers to hold a separate load control licence? Please explain your answer. (p.78)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**56. Do you agree with the proposed approach for recovering the costs of administering a licensing regime? Please explain your answer.** (p.78)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**Do you have any other comments that might aid the consultation process as a whole?**

*Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.*

Click here to enter text.

### Tariff data accessibility for flexible services consultation

1. Do you agree with the use cases proposed in this consultation for the MVP? Are there any other use cases that you believe should be included in the MVP for energy tariff optimisation services? (p.12)

**A** [ ]  Yes [ ]  No [ ]  Not sure

**B** [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**2. Do you agree with the government’s proposal to extend the scope of public tariff data to all tariffs that are applicable to domestic and small non-domestic (microbusiness) consumers? If you do not agree, please explain why.** (p.13)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

3. Do you agree that the data standard should be extended to included gas tariffs? **If you do not agree, please explain why.** (p.13)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

4. Do you agree that a Supplier Standard API is the most suitable technical approach to enable interoperability of tariff data, based on the analysis set out in the consultation document and analytical annex? Please explain your answer. (p.20)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

5. **What is your view on the methodology and cost assumptions used in the cost appraisal as presented in the analytical annex?**

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

6. Do you agree with the proposed ‘phased approach’ to implementation; namely, to implement an MVP tariff standard for existing simple electricity and gas tariffs to meet use case A? If you do not agree, then please explain why. (p.22)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

7. **Are there any other data items that you believe should also be included within the list of proposed MVP tariff data items?** (p.22)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

8. Do you support the government’s proposal to deliver complex tariffs and remaining use cases (B – D) through future changes to the tariff data standard? If not, then please explain why. (p.22)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

9. Do you agree with the government’s proposal to host the tariff data standard in the Retail Energy Code? If not, then please provide reasons. (p.24)

 [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

10. What is your view on the government’s minded-to position on the phased delivery approach to deliver the tariff data standard? (p.24)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**11. Do you support the proposed regulatory approach to implement the tariff data standard and technical solution? If not, please provide reasons.** (p.25)

*Open question inviting views on the main principle of a particular proposal*

Comments: Click here to enter text.

**12. Do you support the proposed timeline set out in Table 5? Are there any other factors or relevant events to consider? If so, what are these?** (p.26)

**A** [ ]  Yes [ ]  No [ ]  Not sure

**B** [ ]  Yes [ ]  No [ ]  Not sure

Comments: Click here to enter text.

**Do you have any other comments that might aid the consultation process as a whole?**

*Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.*

Click here to enter text.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply [ ]

We carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

[ ] Yes [ ] No