

AWG Apr-May Consultation Response

Date	21 May 2021	Classification	Public
Document owner	Elexon	Document version	Version 1.0

Respondent information		
Your name	Claire Hemmens	
Your company	OVO	
Type of company	Large Domestic Supplier	
Contact details	07747 559286 claire.hemmens@sseenergyservices.com	
Confidential Y/N	N	

- Identify clearly which, if any, aspects of your response are confidential. We will not publish any information marked as confidential or share this with the AWG. However, Ofgem will see all responses in full. We encourage you to provide non-confidential responses where possible, to inform the AWG's discussions.

Question 1. Do you agree that the business and non-functional scope as set out is consistent with Ofgem's business case, target operating model development principles, the agreed TOM and subject areas considered by the CCDG?

Yes, this high level, draft recommended architecture seems to be consistent.

Rationale:

We believe this is consistent with the scope of OFGEM's business case. The agility afforded by the AWG's architectural design promotes the principles of timeliness and data accuracy, especially in consideration of the large volumes of consumption and registration data forecasted to flow through this new settlement regime.

To underpin this framework, we welcome a robust performance assurance function and go further to stress the importance of ensuring that all adapter services are safe and secure. A precedent for how this should take place is being made under CRD075. *"This CR proposes that adaptor services should qualify under the REC as CSS Interface Providers, and therefore be subject to direct assurance of their security arrangements rather than multiple parties needing to manage this contractually"* ([REC v.3.0 Consultation Document](#)).

OFGEM's decision to implement MWHHS was also predicated on forecasted savings that would be created for the customer. Given the considerable expense of implementing and running MWHHS, we welcome any recommendations that find financial efficiencies within an architectural design for MWHHS implementation of the recommended TOM via the proposed CCDG detailed requirements,

without undermining quality, flexibility and the ability of parties to choose the right solution for them.

We welcome the acknowledgement that further work will be required with parties with the reference architecture and we look forward to seeing this take form;

- to determine the full detail, costs and impacts associated with this architecture.
- taking the Architecture Product Descriptions from the minimum level of detail that has been provided in this high level architecture, taking it to a final, complete set of design artefacts.

In the next iteration we hope there will be;

- removal of the “maybe’s” and confirmation that steps are mandatory or optional
- clarity on which party/role is referred to within the flow diagram
- clear legal drafting, minimising the use of new terms

We hope development will follow the principles underpinning the Retail Energy Code, for requirements to be set out in an easily accessible, consistent, transparent way, to avoid confusion or barriers to engagement and development.

Question 6. Do you have any other comments?

Yes.

This is the first sight of this recommended architecture, published with a short consultation time to review, assess and respond. It would have been helpful for this consultation to have been run over a longer period, with a more comprehensive stakeholder engagement session to discuss what this means for parties.