

Private and Confidential

Ofgem  
9 Millbank  
London  
SW1P 3GE

**Condition 31E – Procurement and use of distribution flexibility services**

We, Harlaxton Energy Networks Limited, do not intend to procure flexibility in this regulatory year. Our reason for this outcome is as such whilst Harlaxton Energy Networks are an IDNO the majority of Harlaxton Energy Networks established networks are on new developments and sustainable infrastructures making our assets a low-level concern. Harlaxton Energy Networks has been conscious of future demand and has been proactively catering for increased demand via growing interest in clean energy developments.

Further to this, Harlaxton Energy Networks is also known as the ‘last mile’ of electricity infrastructure and are connected solely to the upstream DNO and with smaller scaled networks having minimal impact and reduced significance to the DSO data model.

Flexibility Services Requirements

Harlaxton Energy Networks do not anticipate incurring flexibility services requirements on our held networks. This is due to factors including but not limited to:

- IDNO network sizing approach
- Limited connected Distribution Generation
- Lack of IDNO remuneration and benefit mechanisms
- Unviable procurement costs
- Nationwide coverage

Tendering Process

As Harlaxton do not seek to procure flexibility services, we have not developed a tendering process to achieve this objective. Should Harlaxton Energy Networks seek to procure flexibility services in the future, we will establish a tendering process that conforms to applicable regulations and competition law and will republish this statement upon Ofgem approval.

Stakeholders Engagement

Should Harlaxton Energy Networks seek to procure flexibility services in the future, a procurement timetable and process will be published alongside a description of the planned engagement activities with relevant stakeholders, particularly DNOs and network customers.

Detailed Quantitative Assessment

No quantitative assessment has been undertaken at this time.

Yours Sincerely



Lucy Mair

Director

Harlaxton Energy Networks Limited



**Harlaxton**  
Energy Networks Limited