

OFGEM – Consultation Response

Proposed reforms - Energy System Planning

Q1. Do you agree with our proposal to introduce Regional System Planners as described, who would be accountable for regional energy system planning activities? If not, why not?

We broadly agree with the proposal to introduce Regional System Planners (RSPs) as described, and we welcome the focus on the regional context when it comes to net-zero and decarbonisation. The precise definition of the 'regions' will be integral to the success of RSPs, we appreciate that these have not been defined within the consultation document.

Further clarity would be beneficial on how disagreements and differing views will be resolved within and between regions, for example, if certain actors object to or disagree with the proposed regional system energy plan, how would this be resolved / who has final say?

Q2. What are your views on the detailed design choice considerations described?

We are in agreement with the proposal that Regional System Planners (RSPs) should be independent and answerable under regulation. It also seems sensible that the RSP role is delivered by one single entity across the country but delivered through multiple branches across the various regions.

Q3. Do you have views on the appropriate regional boundaries for the RSPs?

We appreciate that the regional boundaries are as yet undefined, and that there multiple complexities in deciding along which borders to define these. It is our opinion that these should be defined on the basis of the minimum viable geographical extent while also meeting the tests of functional coherence and accountability to local areas.

Q4. Do you agree that the FSO has the characteristics to deliver the RSPs role? If not, what alternative entities would be suitable?

We have no strong opinions either way and would support the FSO's role in delivering the RSPs role if chosen to do so.

Proposed reforms: market facilitation of flexible resources

Q5. Do you agree with our proposal for a single, neutral expert entity to take on a central market facilitation role? If not, why not?

We are in broad agreement with the proposal for a single, neutral expert entity to take on a central market facilitation role.

Q6. Do you agree with the allocation of roles and responsibilities set out in Table 2? If not, why not?

We are supportive of the allocation of roles set out within Table 2; however, it would be beneficial for this to include some reference to innovation in relation to roles and responsibilities.

Q7. Are there other activities that are not listed in Table 2 that should be allocated to the market facilitator or other actors?

Table 2 makes no reference to a regulatory function/scrutiny function which represents the interests of consumers/generators and other actors affected by market performance.

Q8. What are your views on our options for allocating the market facilitator role?

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Q9. Are there other options for allocating the market facilitator role you think we should consider? If so, what advantages do they offer relative the options presented?

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Q10. Do you agree that DNOs should retain responsibility for real time operations? If not, why not?

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