



10th May, 2023

To whom it may concern,

Please find ev.energy's responses to the Call for Input on the Future of Distributed Flexibility. [ev.energy](#) is an electric vehicle charging software management company. We work with charger manufacturers, automakers, energy suppliers, and network and system operators to deliver EV drivers with an easy and seamless charging experience. This includes managing EV charging to tariffs and participating the flexibility in various markets.

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? [As energy systems become more integrated, we can see the benefits of a single impartial entity to coordinate development of energy infrastructure.](#)

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

[To clarify the design considerations:](#)

- [Accountability](#)
- [Regulated monopoly](#)
- [Integrate different stakeholders and energy vectors](#)
- [Single entity with regional branches](#)
- [Regional boundaries](#)
- [Digital infrastructure and technical competence](#)

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

[ev.energy operates mostly in line with electricity network boundaries, DSOs and TSOs, so we do not fully appreciate the complexities of aligning other regional operations such as local authorities or gas networks.](#)

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

[The FSO would seem best positioned for the RSP role. At this stage the FSO's role is undefined and so is free to incorporate such a function. One concern would be considering the potentially broad scope of the FSO, how well can it perform this role. Also, network operators and other entities have built up a lot of skills and processes that would be needed for the RSP role. How do you ensure that those people and systems can be part of the RSP/FSO?](#)

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?

A single entity would improve coordination. There is a balance to be had between centralizing processes for better coordination, but still leaving room for innovation. The UK has pioneered flexibility services as it took a decentralized approach, allowing flexibility buyers the scope to set up new markets and define their own rules. This approach let innovation flourish. This has taken time with incremental benefits at each step. We encourage this incremental approach and to not overly define the future end point. Rather than favouring one archetype, we suggest to begin with a light approach and build upon this towards more integrated and coordinated arrangements. An overly centralized approach from the beginning may limit new ideas and lead to slower progress.

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

Centralising qualification, procurement and settlement would help to reduce the duplication of processes that we currently see. The initial stages of market development and rules should be responsible across each of the actors. Engaging market participants should also be allocated to each actor. ev.energy has already built good working relationships with these actors and see a benefit in maintaining and strengthening those links.

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

Dispatch signals are missing and I believe would be allocated to the DSO. Where is the responsibility for resolving market conflicts? Or is that within scope?

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

We would like to get a better understanding of the expertise and framework that the market facilitator would need to perform its role. All of the functions exist already within the flexibility buyers. How do you ensure that those learnings and processes pass onto the new entity?

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?

We have no opinions on this topic.

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

Yes

Q11. What is your view on our proposed approach to the undertaking of an impact assessment as outlined in Appendix 1?

No feedback

Q12. What is your view on the most appropriate measure of benefits against the counterfactual?

No feedback

Q13. How should we attribute these benefits between the governance changes in the proposed option, and other changes required to achieve the benefits? We particularly welcome analysis from bodies that have undertaken an assessment of benefits, specifically

how those benefits might be attributed to different policy reforms that are required to achieve those benefits.

[ev.energy has not conducted this analysis.](#)

Q14. What additional costs might arise from our governance proposals? We welcome views both on the activities that may arise and cause additional costs to be incurred, as well as the best way to estimate the size of the costs associated with those activities.

[Refer to answer to question 5.](#)

Q15. What additional costs may arise from sharing functions with several interacting organisations? We welcome views on set up cost, lost synergies, and implementation barriers.

[Functions can be shared but to avoid actions “slipping through the cracks”, one actor must be ultimately responsible for delivery or oversight.](#)

Best Regards

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