

Decentralised Energy Systems  
Ofgem

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F.A.O Decentralised Energy Systems Team

### **Flexibility Market Asset Registration Consultation**

Bryt Energy is an electricity supplier providing British business with zero carbon, 100% renewable electricity and our purpose is to lead Britain towards a net zero, sustainable energy future: having a positive impact on businesses, communities, and the planet. We are a non-domestic supplier only, focused on the I&C sector with a high proportion of supplied volume on Flex rather than Fixed contracts.

We welcome the opportunity to comment on Ofgem's consultation on Flexibility Market Asset Registration.

**Q1: Do you agree that policy intervention is needed to deliver common Flexibility Market Asset Registration?**

Yes, and this is in line with our overarching view that policy makers need to trigger coordination of implementing practical solutions across the whole regulatory landscape.

**Q2: Do you agree that for other FDI outcomes policy intervention is not needed at this stage? Are there any risks to consider with this approach to FDI delivery?**

We agree. However, a potential risk is that Ofgem may not be able to move quickly enough if it only monitors the situation which may create solutions outside the main FDI. If the FDI policy is not put in place relatively quickly there is a risk of scope creep. Industry developments particularly where different companies could be set up using different naming conventions, introducing pre-centralised processes etc before the specifics of the policy are confirmed could de-stabilise the proposals before they have begun.

Ofgem need to be kept engaged in development along with Elexon in its new role as Markets Facilitator to make decisions when they are required rather than post implementation monitoring.

**Q3: Are there any other policy alignments or industry developments, in the UK or internationally, which should be considered as part of ongoing FDI policy development?**

One of the key considerations that should be made when looking at other existing single market platforms is to assess fully how the Asset Owner vs Agent vs Service Provider architecture is designed. The Asset Owner should be able to assign optimisers / aggregators / traders to act as the Agent or Service Provider in respect of the different markets.

DNO's already hold a significant amount of asset data when connections to the grid happen, if this data collection could be standardised and improved it would help with the base data needed for the FDI.

Have existing rules about obligations to register certain assets been considered if they indeed exist E.g. solar panels installed but not intending to participate in any flexibility markets per se?

Would it also be worth ensuring interconnection is included?

Q4: Do you agree with the scope proposed for markets, assets, and data? Should anything else be considered?

We agree in general with the scope proposed. Dynamic data should not be included. However, there should be a solution to change data where an asset has had a change in technical values, either by the owner or the network operator to which it is connected.

EV's are referenced and we would question if this would require an update every time you change your EV? What if households have multiple EV's how would you know which is connected? Our view would be that it should be the EV charger that is registered, or just that the household contains multiple sources which could be used. Consideration should be given to setting this at MPAN level.

Additionally, consideration needs to be made to the treatment of the data when an asset becomes out of date, no longer exists or simply no longer wants to participate in the flexibility market. There will potentially be a huge amount of data held centrally and for this to be of real value and therefore finding a solution to ensure the data is kept up to date is critical.

Q5: Do you agree with the functional outcomes? Should anything else be considered?

We agree with these functional outcomes.

Q6: Do you agree with the design principles? Should anything else be considered?

We agree in general with the design principles stated.

Q7: Do you agree with the enablers and design activities needed and for the Market Facilitator to coordinate Working Groups for them? If not, what other activities and governance arrangements should be considered?

Agreed, working groups with experts across the industry are critical for this type of project. We also agree that the importance of the role of Market Facilitator should not be underestimated, there is a risk however that as a new entity it could take a long time to prioritise projects of this scale.

Q8: What are the advantages and disadvantages of the proposed delivery body options for the Flexibility Market Asset Registration digital infrastructure? Are there any additional options that should be considered? Do you agree with the justification for discounting approaches?

Option 4 seems the most reasonable and enduring solution. While Elexon do not have the experience in flexibility markets it is clearly accomplished in data management and settlement and this new role should ensure that it is set up for the long-term future as Market Facilitator. The risk of resource needs to be managed by leveraging expertise from the ESO, OFGEM and DSOs.

Q9: Do you agree with the timelines proposed? Should anything else be considered?

This tool will be an enabler for many small entities to engage in flexibility markets and therefore it should be aiming to deliver in the short term for this market rather than the longer-term dates in 2028 particularly in light of our concerns highlighted in our response to Q2.

Q10: What existing or new policy levers could be used to improve asset visibility?

No comment

Q11: What use cases for asset visibility should be considered as priorities and why?

No comment

Q12: What costs, benefits or factors should be considered in a Cost-Benefit Analysis for asset registration solutions?

Consideration should be given to:

- a) the time (in minutes) and resources required to complete current EREC G98, EREC G99 and MCS asset registrations (accounting for any recent process improvements, including ENA's Connect Direct)
- b) the current rate of duplicative registration processes for assets (e.g. networks and MCS)
- c) whether any additional asset data (beyond that of the current registration processes) needs to be registered to enable the benefit cases to be realised
- d) the costs to establish and maintain a register of assets

We feel that the key to engaging the wider smaller asset community will be ease and low cost to be able to connect.

Large assets already have specialists in asset registration so the focus should be on bringing the smaller scale assets onboard early, since so little information is known/centrally recorded for many of them.

Therefore, there should also be an engagement plan to reach out to these potential users. Information on larger assets should be migrated into the tool at a later date.

We hope the above is helpful. Please don't hesitate to contact us if further information or clarification is required.

Yours Sincerely

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