



BEAMA representation to ofgem's Flexibility Market Asset Registration Consultation 2024

Response type: Organisational

Organisation type: Manufacturers' Trade Association

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About BEAMA and Our Relevant Credentials

BEAMA is a UK trade association representing 200 UK manufacturers of electrical products for buildings and electricity networks. Our membership consists of many of the Energy Smart Appliances (ESAs) identified as **flexibility assets** within the Smart & Secure Electricity System framework including storage heating, heat pumps, heat batteries and EV charge points. We are working with Government on the ESA mandate work ongoing over the coming 3 years and co-authors of PAS1878.

We have responded to question relevant to our sector only.

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

We agree that there needs to be a policy lead approach which is simple and common across all Energy Smart Appliances as currently recognised within the SSES framework (plus potential accession technologies down the line). The one version of the truth to multiple stakeholders is specifically important. One note to make here is that this must not be onerous for installers and consumers in a fledgling market. The process for pre-qualification must also have minimum service level agreement standards set to avoid registration delays.

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?

This work must align with SSES programme development with respect to ESA mandates as they relate to functionality and data exchange mechanisms. We broadly agree with the dynamic data approach related to user settings. We would suggest that flexibility asset registration requirements are fed into the Technical Working Group which is developing the ESA specification rather than managing this as a standalone piece of work.

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

As before the asset list must align with the SSES ESA mandate programme for product characteristics. This is also key relating to timings (see response to Q.9). We advise officials that we must be mindful of the fact that in many cases installers will be registering the asset on behalf of the customer (although it is the customer's responsibility). Consequently, it is important to consider whether they - or the OEM - will have available information relating to connection constraints. Again, keep it simple.

We do not agree with availability of device catalogues but perhaps a QR code will suffice. Finally, in order to have a common approach we suggest not linking to scheme compliance e.g. MCS as it does not cover all ESAs.

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

We broadly agree with the functional outcomes and the notion of a good user experience. Consumer consent rules must be backed up by suitable consumer benefits and rationale information to avoid the potential 'Big Brother' backlash to digitally registering home assets. This information must be common to all.

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?

We agree with the enablers and design activities and would be keen to be a stakeholder for technologies as we represent the majority of ESAs within our Smart Buildings Group. We do suggest deferring digital communication platforms to the ESA mandate to avoid duplication of effort and standards setting.

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

In line with our SSES consultation response, we recommend a sensible lead time for manufacturer compliance. In SSES we proposed 3 years from sight of Government regulation which in itself suggests longer lead times than proposed within this consultation as they relate to ESAs.