

## **Flexibility Market Asset Registration Consultation**

### **Response from ev.energy**

We support Ofgem's intention to create an asset registration system in which asset data is collected one only, stored as a single source of the truth by a trusted entity and made accessible by multiple actors according to need and permission. We support efforts to align ESO and DSO processes and to support a new digital infrastructure that is integrated across all systems. We agree that asset data should be accessible in a way that facilitates its use in multiple markets; this may also require a more interoperable, streamlined way for different flexibility markets to use data.

We agree that the requirements should begin with small-scale domestic assets, and that the roll-out to >1MW assets is a later step. In fact, we suggest that in its initial phase Ofgem and Government consider aligning the scope with SSES and PAS1878 definitions of the Energy Smart Appliance.

Where we have concerns, these are indicated in our answers to the specific questions. In general, however, we want to note the following principles:

- Data rules should allow that asset, not the metered boundary, to be the primary unit of flexibility. They should be structured so that consumers can make easily implemented decisions about which assets in their home they use to participate in flexibility markets, and which they use in a simpler, less managed way that is not exposed to price fluctuations.
- Although we support the plan that an asset is registered just once, we note that some aspects of the registration are subject to consent (such as data sharing and participation in flexibility markets) and others are not (such as DNO visibility of the asset's power rating). The rules will need to make it easy for a customer to withdraw data sharing consent, for example, without affecting other, mandatory requirements.

### **Section 2**

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

Yes.

#### **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 and see no risks to this approach not already identified by Ofgem in its discussions with Industry.

#### **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?**

It is still not clear to us what the exact relationship is between the Automatic Asset Registration (AAR) work being supported by InnovateUK and DESNZ and this FMAR work program. Which takes precedence? Are they aligned, in which case is there an unnecessary duplication? What is the difference between the two programs?

Additionally, we think that the initial scope of these requirements should be the ESA as defined in PAS1878 and SSES. Where the rules enlarge the scope in future, this should be done only for a good reason. We absolutely see that extending the requirements to larger assets will be of future benefit. Automatic registration of smart whitegoods (for example) may well be useful in future in order to allow consumers to add or remove these smaller (in power terms) assets from their flexibility portfolio, but this should be done in a way that does not add unnecessary cost to those devices or to the experience of participating in a flexibility service.

### **Section 3**

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

We agree that all ESO and DSO markets requiring flexibility from registered assets should be within scope of this policy, with data being accessible by the ESO and DSOs.

We agree that the Digital Infrastructure should focus initially on small-scale domestic and small business assets that are also within scope of the PAS1878 ESA definition and the SSES program. This may create a challenge with respect to an EV, which in itself is not in scope (when not connected to an EVSE) and can be charged in many different places: with an EVSE that has been registered through FMAR, for example, but also at an on-street public chargepoint, a forecourt, or at a workplace (which may or may not register its EVSE through FMAR).

This creates complexity. EVs are already registered (DVLA). If an EVSE is registered through FMAR, would registering an EV in addition to that make it easier or more difficult for DNOs, flexibility service providers and energy suppliers to make informed decisions about managing or servicing that asset? Given that an FMAR registration of an EV would give no indication of how much or how often the EV would charge at home, is it useful information?

These are questions we cannot answer, but we caution that FMAR should include the vehicle in its scope only if there is strong, informed agreement and support for that move as it does create a risk of “double-counting” of the charging asset.

We agree with the proposed data scope for static data, including Flexibility Service data and Technical Asset data.

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

We agree and do not see significant gaps in this consideration.

#### **Q6. Do you agree with the design principles? Should anything else be considered?**

We agree with the proposed design principles.

However, the templates and data sets shown in the consultation document are better described as design *criteria* or *characteristics* than design principles. This is a level of detail that ought to be considered by Industry and other stakeholders through Working Groups before being agreed. We

suggest that designing the data fields, agreeing the tabs and headings – this is a task for a professional data company that would respond to Industry suggestions and then confirm with an Industry working group that the result supports present and likely future use cases – or has sufficient flexibility to adapt to future use cases. The current consultation should step back from all these details and just agree the principles (including timeliness, cyber security, ability to port data across flex markets, consumer protection and data privacy, and more as set out in the consultation).

#### **Section 4**

**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 that Elexon should coordinate Working Groups.

**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?**

None of the proposed bodies are consumer facing organisations with experience in designing simple, effective User Experiences for the end consumer. We support the proposal to adopt Elexon as the delivery body, but the UX and the data fields, tables and headings sitting behind that (see our answer to Q6) needs to be done by UX professionals and then approved or amended by the working groups.

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

Quite simply, the sooner the better. Every new asset that is installed without being properly registered is another asset that needs to be retrospectively enrolled or registered later.

Industry, Ofgem and Government should be working with the approach that there is nothing spectacular about the completion of the GB Smart Metering rollout, or MHHS, and therefore no need to time FMAR or AAR go-live with either of those. SMIP and MHHS completion should be just that: the mopping-up of the last hold-outs or hard-to-reach properties at the end of a gradual (but urgent and accelerating) nationwide rollout of smart meters and HHS capability.

In short: the FMAR start-date should not be delayed to coincide with MHHS or any other industry timeline – especially as MHHS is likely to be delayed.

#### **Section 5**

**Q10. What existing or new policy levers could be used to improve asset visibility**

We assume Ofgem and Government already have the vires for these proposals. Above all, the FMAR proposals should be taken forward to support implementation of and compliance with the G99, G100 etc Code requirements that give DNOs and others full visibility of electrical assets as they are installed.

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

First priority is safety, closely followed by visibility of assets that prevents unexpected loss of service (blowing fuses, network planning, sufficient infrastructure and substations ...). Next priority is enabling each in-scope asset to be engaged in flexibility markets to their full potential, stacking value across multiple markets and supporting business cases that help return the value of the flex to the consumer.

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

We support the plan to reduce time, cost and consumer inconvenience by creating a system in which the asset is registered once and once only, ideally at point of installation, and the data used for all relevant activities: DNO planning, flex markets, safety, everything else.

There should be an assumption of participation. NO DNO should be able to remove or prevent an asset or asset type from participation without good cause, and – within the strict bounds of good practice and consumer protection – participation should generally be an “opt-out” consumer preference, not requiring “opt-in”.

Above all, the data should be obtained, retained and protected in a way that provides high levels of confidence for consumers, and that supports efforts to use the registered assets across flexibility markets. This is essential to support strong and productive flexibility markets with a good return on investment for consumers who buy flex assets (and FSPs providing flex services).

We look forward to working with the Market Facilitator, our industry colleagues, other stakeholders, Ofgem and Government to guide the development of a new digital infrastructure that is integrated across all systems and markets, for the benefit of consumers and the electricity system.



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