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23 September 2024

Decentralised Energy Systems Team
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

Dear Ofgem team,

Flexibility Market Asset Registration Consultation

We are supportive of the general approach and principles outlined in your consultation and fully recognise the need for a centralised flexibility market asset register to lower a barrier to entry and drive whole-system efficiencies.

The feedback we have received through our regular engagement with both established and emerging Flexibility Service Providers (FSPs) is that the current state of registering flexibility assets across multiple platforms is a key problem, particularly when managing a large number of assets, across a national footprint. To address this issue in a prompt, independent and coordinated manner, we would support policy intervention to deliver the common Flexibility Market Asset Registration.

We agree with your proposal for the Market Facilitator to be the delivery body, but furthermore we believe they should have responsibility for ongoing oversight once the register is operational in order to maintain central coordination and avoid further additional actors in the market (we envisage that Elexon would outsource the actual platform provision in a competitive nature, in order to drive efficient delivery long term). We agree the ENA Open Networks programme should work on delivering this in the interim.

With regard to alignment with other policy, we advocate for coordination between Flexibility Market Asset Registration and general asset visibility policy as this presents a clear opportunity to deliver efficiencies and promote data accuracy and completeness. We believe the most appropriate data collection point is asset installation, presenting the best opportunity to capture technical asset data and it should be the responsibility of the party installing the asset to register this, creating a complete view of the location of flexible assets. In addition, this approach could address an issue that we have observed in the market whereby FSPs protect their own datasets of flexible assets, limiting transparency.

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Flexibility service data is unlikely to be known at point of installation and therefore, rules governing the registration of this data type should allow for other entities to register such information down the line. We would suggest a structure of static asset data with subsequently associated dynamic flexibility service data with associated data access rights in place based on the data type - supporting wide access to technical asset data, while ensuring sufficient measures are in place to maintain data privacy controls. This would support System Operators having better visibility of where they are more or less likely to be able to resolve network issues through flexibility assets and could be used by FSPs to identify assets that could deliver flexibility services. Flexibility services data may be more sensitive and therefore, access to this dataset could be restricted to the contracted parties and the networks that will be impacted by their delivery.

When determining the data that is to be in the scope for the Flexibility Market Asset Registration, consideration should also be given as to how this can be aligned with the data required through market pre-qualification mechanisms. For example, the standardised pre-qualification template that was published by the ENA Open Networks programme in March 2024 could function as a blueprint for the data that is captured within the Flexibility Market Asset Register and by achieving this alignment, would minimise the number of times additional asset information needs to be added to the register, driving efficiency.

Clearly the proposed delivery of the Flexibility Market Asset Register by Elexon as the Market Facilitator comes at a time when consultation on the design of the Market Facilitator role and principles for delivering the role are also being considered. Both items need consideration in tandem to ensure they are supportive and additive of one another.

Finally, due to the importance of the FDI outcomes, we believe the Market Facilitator should adopt broader oversight of all outcomes to ensure coordinated and efficient market development. We would specifically highlight Common ESO-DSO Coordination as a particular area of importance as independent, bi-lateral action (as is currently occurring with MW Dispatch) could lead to co-ordination standards being developed without the input of all System Operators, which could result in uneven development of these areas.

We would be pleased to discuss any of our feedback in further detail, should this be of interest.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'P. Glendinning'.

Paul Glendinning
Director of Energy Systems