

# Market Facilitator Governance Consultation Response Form

---

Publication date: 18 September 2025

---

Please use this response form to respond to the Market Facilitator Governance Consultation which was published on Thursday 18 September 2025.

Please submit your response to [flexibility@ofgem.gov.uk](mailto:flexibility@ofgem.gov.uk) by 5pm on Thursday 16 October 2025.

<b>Respondent details</b>
Contact name: Paul Youngman
Role title: Regulation Manager
Company name: DRAX
Company type (e.g. DNO, flexibility service provider): Electricity generator and supplier
Telephone number: 07738802266
E-mail address: paul.youngman@drax.com
Date of submission: 16 <sup>th</sup> October 2025

<b>Confidentiality</b>
We will publish non-confidential responses on our website. However, You can ask us to keep your response, or parts of your response, confidential.
Do you want all or part of your response treated as confidential? If yes, please confirm if all or part of the response should be treated as confidential and if so, which part
No

## Questions

<b>Annex A – Draft Governance Framework Document</b>
Q1. Do you agree that the Draft Governance Framework Document clearly defines the scope, roles & responsibilities and deliverables of the Market Facilitator? If not, what would you change and why?
Yes, we believe that the document defines the roles and responsibilities of the market facilitator. Our view is that the stakeholder advisory board should be elected by market participants rather than directly appointed. Elected members are recognised as experts by their peers and offer the appropriate level of challenge and diversity of views.
Q2. Do you agree with the appeals process and the proposed performance arrangements for Elexon as the Market Facilitator? If not, what would you change and why?
We agree that there should be an appeals process for both the annual budget and on the market facilitator decision on flexibility market rules.

We agree that the grounds for appeal should include the market facilitator not reasonably considering consultation responses and/or the views of the stakeholder advisory board. We also agree to a right for appeal where there could be a potential breach of licence conditions arising from the implementation of a proposed change.

Q3. Do you have any other comments on the Draft Market Facilitator Governance Framework Document?

No.

### **Annex B – Draft Market Facilitator Impact Assessment**

Q1. Do you agree that we have, to a reasonable extent, identified and understood the potential costs and benefits of implementing the Market Facilitator?

We agree and have not identified any unintended consequences.

Q2. Do you agree that we have, to a reasonable extent, identified and understood the potential impacts of the introduction of the Market Facilitator? Are there any unintended consequences of implementing the Market Facilitator that we have not identified?

We agree and have not identified any unintended consequences.

### **Annex C – Licence Changes**

Q1. Do you agree with the updated proposed Definitions to be added to the Standard Conditions of the Electricity Distribution Licence and the ESO Licence? Are any changes required?

We agree with the updated proposed definitions to be added as they clarify the defined terms in a simple and relevant manner.

Q2. Do you agree with the updated proposed licence condition clauses for Flexibility Market Rules to be added to both licences? Does the current drafting deliver the policy intent? Do you have any suggested changes?

We agree with the proposed licence condition clauses for Flexibility Market Rules.

Q3. Do you agree with the updated proposed licence condition clauses for implementation monitoring to be added to both licences? Does the current drafting deliver the policy intent? Do you have any suggested changes?

We agree with the updated proposed licence condition clauses for implementation monitoring.

Q4. Do you agree with the updated proposed licence condition clauses for Market Facilitator input into NESO service design to be added to the ESO Licence? Does the current drafting deliver the policy intent? Do you have any suggested changes?

We do not agree with the removal of the obligation on the NESO to comply with the Ways of Working Document as this would weaken the purpose of the document, which is to ensure that there are clear ways of working between the NESO and the Market Facilitator and that they are followed.

Q5. Do you have any additional comments or suggestions?

No additional comments.

## Market Facilitator Governance Consultation Response Form