EBR Article 18 DFS Proposal -

Proforma

NGESO invites responses to this consultation by **17:00 17th July.** The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following form. Please note that responses submitted after this time may not be counted.

Please complete this form regarding the proposal titled: **EBR Article 18 Mapping: Demand Flexibility Service,** dated 14th June 2023.

Please return the completed form (in a word version) to: demandflexibility@nationalgrideso.com

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|  Respondent |  |
|  Company Name |  |
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| **Does this response contain confidential information? If yes, please specify.**  |

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|  | Demand Flexibility |  |
| Number | **Question** | **Response** |
| 1. | Do you agree with the proposal for the Demand Flexibility Service? Please provide rationale. |  |
| 2. | Do you agree with our proposal to remove the in-day adjustment for the baseline methodology, and do you agree this effectively mitigates baseline gaming risks?What impact does this have on your ability to accurately deliver the contracted demand reductions in the delivery period(s) (including if the weather on the event day is different to the preceding baselining days)?Alternatively, if we were to extend the in-day adjustment period, would an adjustment period covering the whole of the event day other than the DFS delivery period(s) be more effective?If not, what length / period do you suggest would be suitable, noting that it needs to be longer than the previous 3-hour period to provide a sufficient economic disincentive? |  |
| 3. | Do you agree with our proposal to enable sub-metering (asset metering) as part of DFS? Are there other risks we should be aware of in addition to the identified meter quality, double counting and gaming risks? How well does our proposal mitigate those risks? |  |
| 4. | Do you agree with our proposal to enable opt-out per DFS delivery period? Do you foresee any risks and impacts on having a choice between opt-out or opt-in per DFS delivery period? |  |
| 5. | Annex 1: Do you have any comments on the highlighted Article 18 mapping for the Demand Flexibility Service? |  |
| 6. | Do you have any other comments on the Demand Flexibility Service proposal? |  |