EBR Article 18 Proposal:

Demand Flexibility Service

NGESO invites responses to this consultation by **13:00 on 22 August 2024.** 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.

## Instructions

Please provide responses to the specific consultation questions (below) or any other aspect of this consultation via the MS Forms link provided below by **13:00 on 22 August 2024.** A Word version is included to allow internal working/drafting as we understand this may facilitate editing and shared drafting. Completed answers should be copied into the MS Forms link by the respondent for submission.

[**Link to Submission Form**](https://forms.office.com/r/gfgyQjYu9k)

Should you have any issue with the proposed submission process, please contact the Market Change Delivery team via [demandflexibility@nationalgrideso.com](mailto:demandflexibility@nationalgrideso.com) to make alternative arrangements.

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| --- | --- | --- |
| 1 | Company Name |  |
| 2 | **Respondent name and contact details** |  |
| 3 | |  | | --- | | **Does this response contain confidential information? If yes, please specify.** | |  |
| 4 | **Have you previously or do you intend to participate in the Demand Flexibility Service? Yes/No** |  |

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| --- | --- | --- | --- |
|  | Demand Flexibility Service | | |
| No. | Topic | Question | Answer |
| 5 | Service Positioning | Do you agree with the proposal to evolve the DFS away from a last resort enhanced action winter contingency service and operate as a merit-based margin tool? Please provide your rationale. |  |
| 6 | Do you have any other comments or questions on the proposal to the DFS operating as a merit-based margin tool? |  |
| 7 | Stacking | Do you agree with the proposal to facilitate stacking with the Capacity Market and DNO Flexibility Markets? Please provide your rationale. |  |
| 8 | Do you agree with the proposed additions within the baseline methodology to offer clarity on how stacking will impact parties baseline calculations? Please provide your rationale. |  |
| 9 | Do you have any other comments or questions on the proposal to facilitate stacking with the CM and DNO services? |  |
| 10 | Performance Incentives | Do you agree with the proposed performance incentive structure? Please provide your rationale. |  |
| 11 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 12 | Procurement  /Utilisation | Do you agree with the proposal to move the procurement of the service to within day only? Please provide your rationale. |  |
| 13 | Do you support our intention to enable the DFS as an ongoing service without the need for continued new derogations season to season? Please provide your rationale. |  |
| 14 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 15 | Metering | Do you agree with our proposal to further facilitate the participation of asset metering within the DFS by removing the requirement for asset meters to be associated to a Half hourly Settled (HHS) boundary meter? Please provide your rationale. |  |
| 16 | Does the additional wording provided in the contractual terms offer suitable clarity around premises with multiple boundary meters? Please provide your rationale. |  |
| 17 | Do you have any other comments or questions on unique metering setups and proposed wording? |  |
| 18 | Data/Process | Do you agree with our proposal to remove the obligation to send an incentive file sharing how providers opt to incentivise/pay their customers? Please provide your rationale. |  |
| 19 | Do you have any other comments or questions on this proposal? |  |
| 20 | Do you agree with our proposal to include and share delivery data from all unit meter points that participated in events? Please provide your rationale. |  |
| 21 | Do you have any other comments or questions on this proposal? |  |
| 22 | Do you agree with our proposal whereby each meter point can only be allocated to a single DFS unit? Furthermore, the allocation is indicated at the time of submission of the Unit Meter Point Schedule file. Please provide your rationale. |  |
| 23 | Do you have any other comments or questions on this proposal? |  |
| 24 | Please share your thoughts on the topic of Anticipated DFS Requirement Notice and how the move to within day only procurement impacts your views on the purpose/benefits of this notice. Does the increased automation around various processes impact your views on this notice's value/purpose? Please provide your rationale. |  |
| 25 | Do you agree with our proposal to include the ability to share additional information relating to the Registered Service Provider for the purposes of resolving unit meter point duplications? Please provide your rationale. |  |
| 26 | General Questions | Annex 1 – Do you have any comments on the highlighted Article 18 mapping for the Demand Flexibility Service? |  |
| 27 | Do you agree with the proposal for the Demand Flexibility Service? |  |
| 28 | Do you have any other comments on the Demand Flexibility Service proposal? |  |