

ENA Open Networks
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22/08/2019

Response to the Flexibility Consultation

Dear Sir/Madam,

I write to provide our response to your recent consultation of Flexibility Services closing on 23/08/2019.

Having reviewed the consultation material, we have no direct responses to the thirteen questions posed, but we wish to flag the need to actively involve Transmission and Distribution Asset Owners in the development and operation of Flexibility Services.

Through new asset operating envelopes and control approaches, we believe that existing and augmented network assets can contribute to the efficient provision and delivery of required new Flexibility Services. To deliver new network capabilities, for example context specific dynamic ratings, there will need to be asset specific assessments using detailed knowledge of asset performance and health issues to ensure satisfactory and sustainable performance.

We agree with the six key Flexibility principles and also the six marketing principles set out by the ENA. Their implementation should be such as to ensure all network asset owners have access to information about how the use of network assets could change so they can play an active part in the whole system development process and develop working partnerships with their new users.

We look forward to working with the ESO and DSOs and being actively involved in the development and implementation of Flexibility Services and with developments in the ESO's asset utilisation and risk management methodologies pertaining to the balance and timing of investments in network capability and alternative service provision.

Yours sincerely,

Matthew Paige-Stimson
Senior Policy Analyst