

ELEXON RESPONSE TO ELECTRALINK'S CONSULTATION ON FLEXR

1. Introduction

- 1.1 This is a copy of ELEXON's response to Electralink's consultation on Flexr, which ran between 21 April and 29 May 2020.
- 1.2 ELEXON's response was submitted via a web form, and this document attempts to make an accurate representation of ELEXON's responses to the questions. We have removed questions for which no response was provided, or are related to identifying the person responding to the consultation.
- 1.3 If you have any questions about our response to Electralink's consultation please contact Peter Frampton (Peter.Frampton@elexon.co.uk)

2. Our response to Electralink

Q3. Do you agree that now is the right time to be introducing a service such as Flexr to the market?

Yes

Q4. Do you agree that providing data such as this as we have proposed will bring benefits to the energy market and help simplify the flexibility market?

yes

Q5. Can you see any potential barriers to ElectraLink delivering a service such as this to market?

Other: The service will need to ensure it fully addresses the criteria of the Energy Data Taskforce requirements for open system data. Some of the data available on the platform will be crucial for the deployment of DER and the effective operation of the system. This data must be available in an efficient way that is open to all and operated securely.

We note that in addition to the £3.5m contribution from Electralink, DNOs have requested an additional £9m of innovation funding, and that Flexr will be built on existing Energy Market Data Hub infrastructure. These elements of industry funding mean that it is particularly important that the operation of Flexr does not convey any commercial advantage to Electralink or the DNOs. Additionally, this development should be subject to some form of cost-benefit and consideration of alternative options.

Q6. How useful would access to planning data be to you and your business?

Not very useful

Q9. How useful would access to asset data be to you and your business?

We may require asset data to effect settlement for services delivered at the asset level, including those delivered by Virtual Lead Parties and any settlement or adjustments necessary in respect of delivering local balancing services.

Q12. How useful would access to operational data be to you and your business?

We may require operational data to effect settlement for services delivered at the asset level, including those delivered by Virtual Lead Parties and any settlement or adjustments necessary in respect of delivering local balancing services.

ELEXON RESPONSE TO ELECTRALINK'S CONSULTATION ON FLEXR

Q13. Of the operational data listed in table 1, which would be the most useful data for you? Please prioritise the following data types with 1 being the most important and 10 being the least.

Dispatch and control status

Q14. For that same data, would these represent a short-term or long-term priority for you and your organisation? (please check short term and long term columns as appropriate)

Both long and short term

Q15. How useful would access to near data be to you and your business?

We are likely to need access to data within settlement timescales (i.e. real time) to perform imbalance price calculations. Access to longer term information on assets/metering may be useful for audit and assurance activities.

Q16. Of the near real-time data listed in table 1, which would be the most useful data for you? Please prioritise the following data types with 1 being the most important and 10 being the least.

Dispatch and control status

Q17. For that same data, would these represent a short-term or long-term priority for you and your organisation? (please check short term and long term columns as appropriate)

Short term

Q18. What other types of data should we be considering?

It's unclear whether the portal will contain only static data (MDD type) or real-time networks data as well. If real-time, data needs to be available in actual real-time to be useful. Question 19 contains references to half hourly consumption and profile data. This data will need to be transferred according to the Target Operating Model for Market-wide Half-hourly settlement and therefore the Flexr platform shouldn't be in a position of specifying flows for this information at this time.

Q23. Do you think that the Open Portal as described will be of use to you?

Other: The Open Portal is likely to be of limited use to us, as any data need would rely on real time data via a direct data feed.

Q25. Can you identify any potential barriers to the Open Portal?

The description of the Open Portal implies it will be tracking how users are using the portal. This may introduce some competition issue if any party has access to data about what data within the portal identifiable commercial entities are using or attempting to access. Is this compatible with Ofgem security concerns and open data principles?

Q26. Do you agree that Flexr will deliver against these key industry objectives as laid out in the table 2?

Yes, provided it is the most efficient way of delivering the changes.

Q27. Are there any other drivers that could impact on the design of Flexr? Please describe

Developing flexibility markets, may introduce new data sources and transfer needs. Different industry parties will need access to this data in different timescales to ensure markets operate efficiently and effectively, delivering fair outcomes for consumers. The framework for transferring this data is likely to evolve dynamically with the platforms.

ELEXON RESPONSE TO ELECTRALINK'S CONSULTATION ON FLEXR

The ongoing development of Distribution System Operators and potential future operating models may impact the entities involved in sharing information on flexibility. This may introduce new sources and recipients of additional data.

Q29. Of the benefits listed, which would be the most significant benefit to you and your business? Please prioritise the following benefits with 1 being the most important and 4 being the least.

1 - Data transparency, 2 - efficiency, 3 - reduced cost to consumers, 4 - accelerate decarbonisation.

Q32. Please order the Common Flexibility Market Services use cases that Flexr could support in order of priority as you see it? (with 1 being the highest priority and 5 being the lowest)

1 – Procurement, 2- flexibility, 3 – settlement, 4 – dispatch, 5 - analytics

Q36. What would be your preferred option for the governance of Flexr? Please order them according to your preference (with 1 being the most preferred and 3 the least)

1 – DCUSA, 2 – DTS like, 3 – new arrangement

Q37. From a Flexr User perspective, are there any key requirements that the Governance options should consider?

Like others in industry we believe there should be a consolidation of the codes governing energy market participation and key industry infrastructure. Therefore, of the governance options presented we believe that DCUSA is the most favourable. However, we note that DCUSA is not the only code that could govern such a service, nor are the DNOs and Electralink the only parties working on a platform that could deliver this capability. We believe any enduring arrangements should be subject to some level of industry scrutiny to ensure that the most efficient option is progressed, noting that timeliness is of the essence.

Q38. Do you agree with the proposal to include a Steering Group and a User Group for all Governance options?

Yes

Q39. Please state your preferred option for funding (please use 'other' option to provide any additional comments)

Regulated service

Additional comment in 'Other': As the service will be based on existing funded EMDH infrastructure, the funding model should ensure some benefits accrue for the parties funding this development, for example offset future costs.

Q40. Do you foresee any barriers of any of the above funding options, if so please describe.

A customer pays funding option could be operated as a commercial service and is unlikely to be fully consistent with ensuring open data due to the huge variety in customer types who could need access to the data. A User Group could ensure the provision and charging of services is reasonable and fair to all users.

Q41. Do you support the concept of Flexr as a means to surface and share data relating to DSOs and their stakeholders?

Don't know [multiple choice – see following]

Q42. Is there any other additional feedback you would like to add?

Provided the Flexr platforms is the most efficient means of ensuring that the DNO data listed is made available to the market in full accordance with open data principles then we believe that this is a positive development.

ELEXON RESPONSE TO ELECTRALINK'S CONSULTATION ON FLEXR

Q43. We are keen to work closely with any organisation that may be developing initiative similar or related to Flexr. Are you aware of any such initiative from within your organisation or beyond? Please provide any details you have.

ELEXON are working on a significant upgrade of settlement systems to ensure the infrastructure that the GB energy markets run on is state of the art and future enabled. Part of these developments will include a platform for insights, building on the significant data resources we already make available for free on BMReports. We believe it is crucial for effective commercial development in the energy sector that as much data as possible is made available to current and future sector participants, which is why we have recently introduced a new open data license and made even more data publically available.

We are also working with Ofgem to design the future arrangements for Market-Wide Half-Hourly Settlement. Part of the Target Operating Model includes a source of data relating to half-hourly meter consumption, which should be made available in various combinations in order to facilitate commercial innovation and academic research.

Q44. Would you like to continue to be consulted as Flexr development progresses?

Yes