Open Networks 2020 Workplan Consultation – Response to Individual Comments

Background & purpose of this document

The Open Networks project (ON) launched a consultation in January to seek views from industry on the workplan and Project Initiation Document (PID) for 2020. We asked stakeholders to provide comments in any form on our scope, deliverables, priorities and stakeholder engagement.

We received 9 responses from a broad set of stakeholders in the industry including trade associations that cover a wide range of interested parties. We have now reviewed and analysed these responses in detail, taking a bottom up approach to ensure that all key points are addressed.

As part of this approach, we identified 63 key comments across all responses and assessed them against the relevant workstreams and products to understand and reflect stakeholder views.

We have consolidated the analysis and are presenting our findings and outcomes in the following three deliverables:

- Revised version of the PID
- Summary slides outlining key messages
- Response to individual comments – this document

The table in the following section reflects these 63 stakeholder comments and our response to them. This table is sorted by workstreams and products to enable us to group similar themes.

Response to individual comments

Ref	Source	Relevant WS	Product	Summary	Stakeholder Comment	Open Networks Response
57	Energy UK	All		Align with SSFP when it is revised and published.	The Open Networks has been a valuable part of the developing frameworks and revenue streams for flexibility, but must be retargeted and refocussed alongside the other actions of the SSFP as the year progresses.	Our intention is to continue to link in with the SSFP and any further actions that may be identified. The Smart Systems and Flexibility Plan and any further work on it will remain a key driver for the scope of this project. We have updated the PID to clarify this.
11	Renewable UK	All		More refinement of outputs whilst keeping continuity.	Overall support, however, there is a need to better refine the outputs under each of the workstreams, while avoiding loss of continuity. Thus, we would be supportive of continued examination of the areas and a move towards compliance monitoring once a product has been successfully delivered.	As with previous phases of the project, we are undertaking an agile approach to development to ensure continuity and to give stakeholders maximum visibility and opportunity to feed into work and direction of travel. The PID reflects our best view at a given point in time and we have reflected further detail as much as possible in the post-consultation version of the PID. Monitoring Implementation remains a key focus for us and we will now be reporting on implementation progress through the DSO Implementation Plan to provide a more holistic view of all ON as well as other DNO initiatives that are progressing the transition.
10	AMT Sybex	All		Support	Overall support, highlighting products that are informing EFFS project.	We will continue to engage with the T.E.F projects as well as other industry trials to ensure two-way learnings of outcomes.
59	Elexon	All	All & WS1A P1	Ensure ON findings are distilled into the RIIO 2 process to ensure funding.	We believe that provision for spending on flexibility solutions to distribution problems is a key component in establishing the flexibility value stack. The Open Networks project should consequently ensure that its findings from previous years and work for 2020 are effectively distilled and presented into a case for provision of funding in RIIO-ED2. The considerations should focus on best value for money for consumers, which may include diverting capital expenditure to flexibility projects. The requests should also consider the efficiencies gained by reuse of existing energy infrastructure in delivering flexible services.	Ensuring that our work to date feeds into the RIIO 2 process is a key priority area for us and the DSO Implementation Plan will allow us to demonstrate actions and capabilities that are needed in the price control period and will inform the individual company business planning process. We continue to participate in RIIO 2 working groups and liaise with the ENA Regulation Committee to ensure that the ON findings feed into the RIIO2 process. The decision making methodology that is being developed under WS1A P1 will take into account the costs and benefits, including efficiency from utilisation of existing assets to help select the most appropriate option for meeting a particular network need or requirement. We have further clarified the linkage with RIIO 2 in the PID.
43	Centrica	Non-ONP		More visibility from other ENA Groups.	Visibility of work assigned to other ENA groups – the work of other ENA groups that is relevant to Open Networks needs to be more transparent. This includes the Data Working Group and the DER Connections Steering Group (the terms of reference of which says minutes must be published, but nothing has been placed online since mid-2018.)	The DER Connections Steering Group continues to convene on an ongoing basis with minutes and content shared with all members including trade association and we expect that the members of this group disseminate content to their membership organisations. We also welcome attendance from any company that would like to raise any specific issues alongside their trade associations. The ENA website is currently being refreshed and the intention going forward is to not publish the minutes here, therefore, we request that interested parties contact their relevant trade association or regulation@energynetworks.org for any specific material that they would like access to. The ENA Data Working Group (DWG) has the dedicated webpage below for progress updates and for flagging key stakeholder events. The DWG has recently launched a video that demonstrates the use of a new platform for the Digital Systems Map (as recommended by the Energy Data Task Force) for displaying network and asset data and will be planning further events to engage with the industry. ENA will be running a series of stakeholder events across the year and will also be notifying stakeholders of opportunities to engage in this work via the Open Networks mailing list. https://www.energynetworks.org/info/modernising-energy-data.html
48	Energy UK	Non-ONP		Visibility of other ENA working groups	Workstream working groups as well as the ENA's Data Working Group, DER Connections Steering Group, and Low Carbon Technology Working Group are all relatively opaque. Limited publicly available information and membership primarily or solely inclusive of network members gives little or no stakeholder oversight.	As above in ref. 43.

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60	Elexon	WS1A		Coordination with Power Responsive.	We note that at the last Power Responsive Steering Group meeting on 5 March Ofgem expressed a strong desire for coordination between the Open Networks project and Power Responsive. It may be worth drawing this point out at some point in the work plan.	We work closely with the Power Responsive forum and provide regular updates on our work on flexibility at their Flexibility Forum. Open Networks is represented at the Power Responsive Steering Group through DNO representatives that are involved in Open Networks. We will continue the engagement and coordination that we have through existing channels. We have added this to the PID to provide transparency in the dependencies.
39	Citizens Advice	WS1A	2019 P3	Ensure fairness in dispatch decisions for flexibility.	Ensuring that consideration of fairness and transparency in dispatch decisions for flexibility have a high focus alongside tendering decision-making procedures	The 2019 WS1A P3 Dispatch and Settlement good practice identifies fairness and transparency as key principles and we will continue to ensure that this remains the case.
13	Renewable UK	WS1A	Multiple	Support	Encourage, as far as practicable, common processes and platforms for procurement of flexibility services. We welcome the extent to which this current goes on, for example through the Piclo platform, and the suggestion that there should be full alignment regarding the Terms and Conditions, contracts and compliance. Progress under WS1A Flexibility Services will be extremely helpful to drive further standardisation going forward, with new market entrants and services which are not delivered by DSOs (e.g. peer-to-peer trading).	Acknowledged.
42	Citizens Advice	WS1A	P1	Consider energy efficiency as an option alongside reinforcement for decision making.	Ensuring that energy efficiency is incorporated as an option within Cost/Benefit analysis as an alternative to infrastructure investment decisions.	The scope of the work to develop a Common Evaluation Methodology (CEM) and tool, being undertaken by Baringa, covers the evaluation of flexibility against the counterfactual of network reinforcement. Ideally the CEM tool would be able to evaluate a range of alternative/ innovative solutions, including energy efficiency, against the counterfactual of network reinforcement. The funding of energy efficiency measures by DNOs has been an ongoing discussion with BEIS and Ofgem for a number of years and as yet hasn't been resolved. We will continue the discussions and look to include energy efficiency as an alternative solution at some point in the future.
21	E.ON	WS1A	P1	Consider extending scope of WS1A P1 to include analysis of investment in LV data monitoring.	As well as testing different sources of flexibility, it might be possible to extend this analysis to cover investment in better data monitoring of what is happening on the LV network and similar strategic investment in better data. As EVs become more prevalent, the decision to defer (through flexibility) or reinforce (minimally or strategically) will be better informed with essential half hourly load flow data. Therefore, the cost benefit analysis of flexibility ought to produce (almost as a by-product) the value of better data which can then be factored into investment cases for the roll out of LV monitoring	Making efficient and timely intervention decisions following the connection of multiple LCTs onto an LV network requires better data, irrespective of whether the data is derived from aggregated smart meter data or data from network monitoring equipment. This is not for consideration in the WS1A P1 but a separate decision for investment in LV monitoring. The WS3 DSO Implementation Plan will give visibility of all planned and ongoing LV monitoring initiatives that the individual DNOs are undertaking to progress the network operation function of DSO.
20	E.ON	WS1A	P1	Consideration of CLASS in decision making.	This work we believe should also cover options open to DNOs such as CLASS (Customer Load Active System Services). In this way, Ofgem's assumptions around the unlikelihood of monopolisation of flexibility markets from this source can be tested.	WS1A P1 is looking at how DNOs choose from a range of options to meet local distribution network needs. CLASS is also an alternative solution like energy efficiency and is not currently included for the scope of this product. Currently CLASS is a potential option for a DNO to provide an ancillary service to the ESO to meet a national need (rather than provide a service to itself for a local need). Ofgem consultation on CLASS is open and is addressing views on this. Until a decision has been made, CLASS will not be considered as an alternative solution in the tool at this time.
26	OVO	WS1A	P1	Consideration of CLASS in decision making.	Given that certain solutions such as ENWL Project CLASS do not fall neatly under ANM, flexibility or reinforcement, it is equally important that the work plan brings clarity to how such solutions will fit within DNOs' overall decision-making on procurement.	Please refer to response above under Ref 21.

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14	Renewable UK	WS1A	P1	Enforcement of carbon intensity metric as part of procurement of flexibility products.	A specific metric on the carbon intensity of the service provision under local flexibility markets could also provide useful. We would welcome if future plans for standardisation of flexibility products are able to consider enforcing such metric.	The proposed Common Evaluation model will be a financial evaluation tool to determine the economic efficient solution to a network need. The scope of the current model takes into consideration the differential in the carbon impact associated with distribution network losses for each of the options being evaluated; it currently has not been designed to take into account the carbon intensity of each of the options, for example from service provision for flexibility or the installation of new network assets as this is a significant increase in complexity to ensure each option is appropriately evaluated. The current licence and regulatory arrangements do not allow us to unduly discriminate. In 2019 the ENA published Flexibility Commitments, which the DNOs, IDNOs, TOs and ESO publicly signed up to, requires that we create a level playing field for all energy technologies and services.
18	Renewable UK	WS1A	P1	Maintain optionality in ownership and operation of ANM schemes and consideration of consumer/commercial impacts of ANM in decision making.	Optionality in terms of the ownership and operation of any future ANM must be addressed as a matter of priority before any further ANM schemes are facilitated. Further work should clearly set how future alternative options for flexibility should be assessed and the system outcomes required. This should also lay out an assessment in terms of how those requirements can be best met – through ANM or flexibility tenders, and the consumer and commercial impacts of ANM schemes.	Any decisions on optionality and whether or not a particular function should be delivered by DNOs is a key focus of Ofgem's work on DSO as well as RIIO 2 and this is a key consideration for us in all our work under ONP. The evaluation methodology and tool is being developed in a way that would allow consideration of all options (current and future) to determine which one is the best to meet a particular network need.
4	ADE	WS1A	P1	Transparency in decision making in choosing options for network need.	Transparent cost-benefit analysis is done and shared with industry and that ensuring the largest number of participants can meet the requirements arising from a system need is prioritised.	As with all ONP outputs, we will be publishing the evaluation methodology and tool to the ENA website.
25	OVO	WS1A	P1	Transparency in decision making in choosing options for network need.	Flexibility valuation methodology as part of this common methodology will be a crucial tool that will bring consistency to DNOs' procurement of ANM, flexibility and reinforcement. Vital that this tool is shared with the whole industry and that flexibility providers of different scales are included in the development process. It is particularly crucial that the tool is made available to potential flexibility service providers as well as DNOs to ensure maximum transparency.	As outlined in the PID, we will be publicly consulting on the evaluation methodology and tool and the intention is to publish them once completed.
27	OVO	WS1A	P2	Alignment with ESO	To ensure as many flexibility providers as possible participate in the market in the future, and the full benefits of flexibility are realised across the energy system, it is vital that end-to-end procurements processes are simplified and aligned with National Grid Electricity System Operator's (NG ESO) future updated processes.	In intention is to align these processes with the ESO as much as possible noting that there may be aspects of the procurement process where there may be value in applying different approaches across DNOs and the ESO to cater for the different nature of services being procured (national vs local) and to meet the needs to potential participants, both large and small. In such cases, we will clearly capture and document the reasoning. National Grid ESO are involved in the development of the consistent procurement processes, it is therefore expected that it will incorporate its findings/recommendations where possible.
45	Centrica	WS1A	P2	More standardisation of legal requirements at pre-qualification and EOI stage should	Pre-qualification legal criteria – as raised at the March 2020 Advisory Group meeting, DNOs have different approaches to the legal requirements around pre-qualification and expressions of interest. We welcome the ONP's commitment to standardisation and these pre-qualification agreements must not be a loophole. We would like the commitments in the ONP's written response to the March AG to be added to the 2020 Work Plan.	We recognise that currently, there may be differences across DNOs in legal requirements in the Expression of Interest (EoI) and pre-qualification stage, however, we expect that this will no longer be the case once the common commercial contract has been adopted by all DNOs in line with the timescales that they have committed to. We agree that the legal requirements should not be more onerous than those set out in the common contract. The expectation is that the EoI and pre-qualification legal requirements will mirror the T&Cs set out in the common contract and this will be done thorough WS1A P2. We have updated the PID description for WS1A P2 to reflect this.

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28	OVO	WS1A	P2	P2 should encapsulate good practice established through WS1A P1.	Another consideration for the Open Networks Project is to ensure that the common methodology under P1 feeds into the best practice established under P2, in order to maintain maximum consistency and efficiency across DNOs' procurement of flexibility services.	As P2 covers the end to end process for procurement, it is key for WS1A products, including P1, to feed into this. The expectation is for all DNOs to adopt the good practices and processes that are developed through WS1A (across all relevant products including P1, P3, P4, P5) and P2 captures this as good practice in the end to end procurement process. P1 is looking to develop common methodology that evaluates flexibility against reinforcement whilst P2 assumes that flexibility is the preferred solution, looks to converge on processes for procuring flexibility. The two products will not contradict one another and will dovetail where necessary. We have updated the PID description for WS1A P2 to reflect this.
56	Energy UK	WS1A	P2	Pre-qualification indemnities should not be more onerous than the ones defined under WS1A P4.	Standardisation should be extended to contracts relating to pre-qualification to ensure that these do not contain any undue barriers, such as indemnities that are more onerous than the full procurement contract.	Please refer to response above for Ref. 45.
53	Energy UK	WS1A	P2 & All products	Stakeholder participation in ON workstreams.	In order to increase the levels of feedback into this and other workstreams, it would be timely to open up all workstream working groups to wider stakeholders. This would also improve the amount of feedback on more specific issues, for example in emerging concerns about prequalification requirements for flexibility providers, where Energy UK members have noted arbitrarily burdensome requirements on participants. It is difficult for stakeholders to know where to feed in comments about specific issues, and opening up these groups would allow direct feed in.	More broadly, we offer a number of forums to engage with stakeholders and to give them the opportunity to feed into our development work at an early stage. These include and are not limited to public consultations, webinars, Advisory Group sessions and open workshops where stakeholder get early visibility of work and have the opportunity to raise specific issues. In addition, we welcome feedback on all our work, including published deliverables on our website through opennetworks@energynetworks.org. With all these mechanisms in place for stakeholders to feed in, we do not believe that participation in all groups in necessarily the most efficient option for industry and also for us as a project. As part of WS1A this year, we are planning focus groups and workshops with wider industry to progress product development. In the current COVID-19 situation, these workshops will be held remotely. We will continue to plan further workshops for other workstream as well and will publicise them on our events page. https://www.energynetworks.org/electricity/futures/open-networks-project/open-networks-project-stakeholder-engagement/events.html
29	OVO	WS1A	P3 & 2019 P5	Alignment of WS1A products with other similar markets such as ESO BM and clarity on stackability of services.	Work plan does not detail how these products will be aligned with other similar markets and mechanisms available in the UK, such as NG ESO's services or ELEXON Balancing Mechanism Units. To ensure flexibility providers are able to pool together multiple revenue streams and offer customers affordable, low carbon technology propositions, it is crucial that the Open Networks Project looks at DNO and ESO services and considers how they can stack value together.	All WS1A products have elements in their scope to look at other similar markets, particularly, ESO services. WS1A P4 has now developed a common contract for DNOs that aligns with ESO contracts and is now looking to extend this contract to ESO services (FFR, STOR etc.). We will be publishing a paper that clarifies stackability as part of ongoing work under 2019 WS1A P5. This paper will define/confirm what services can and cannot be stacked. The majority of products can be stacked in adjacent time windows. The non-stackability of some products within the same time window comes from the ESO still needing services to be available ahead of real-time in case they then need to dispatch the flexibility to resolve a system issue. If it is already deployed, it cannot be re-dispatched. In these circumstances, the ESO flex value must reflect that it is sterilising it from being used in other markets (which it currently does). If the products can be stacked in the same time window, network owners and system operators would expect more competition and competitive prices.
55	Energy UK	WS1A	P4	Timely treatment of any serious issues identified in the common commercial contract.	ONP cancelled plans to share the common contract with market participants before implementation. Whilst Energy UK is keen to avoid implementation delays it is now vital that any issues stakeholders identify with the new contract during the March-June 2020 stakeholder engagement period are resolved and resulting changes made rapidly (before December).	We had originally scoped the development of good practice under WS1A P4 in 2019 and made a decision based on stakeholder feedback to take this further and deliver a common commercial contract for flexibility services which is a significantly a larger piece of work therefore, requiring longer. We communicated our revised development timelines and committed to a target date of Mar 20 in our flexibility consultation in July last year and have recently met this. Through the development of this contract, we publicly consulted in 2019 on the areas identified for common T&Cs as well as ongoing engagements through the Advisory Group. The Mar deliverable is an initial contract that will be open for stakeholder feedback from Mar - June and will continue to be under change control following that. We will assess the severity of issues that are raised by the industry and stakeholders and based on this we will re-consider and expedite the timeline for the next iteration where necessary.

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44	Centrica	WS1A	P4	Timely treatment of any serious legal issues identified in the common commercial contract.	WS1A P4 Commercial Arrangements – the ENA had planned to share full version of the standard agreement for DSO services with stakeholders towards the end of 2019. This did not happen and now the contract will be implemented before stakeholders have a chance to comment on the full text. We are pleased that the ENA is reporting that initial comments submitted by stakeholders including Centrica and RWE have been incorporated. Following the planned stakeholder engagement (Mar-Jun 2020), if any serious legal problems are identified with the text of Version 1, these need to be remedied rapidly and not left to the end of the year.	Please see response above for Ref. 55.
30	OVO	WS1A	P6	Consider timelines for WS1A P6 in light of BEIS Flex Exchange projects.	Based on the timelines for projects launched as part of BEIS Flex Exchange, projects under P6 are unlikely to have fully defined and tested non-DSO services to supplement the Open Networks Project with necessary levels of detail by December 2020.	We are closely working with the BEIS Flex Exchange and a number of products to test principles and bring in learnings to inform this work. We do note in the PID that this product is likely to continue in 2021 due to the length of these projects and we will publish work completed to date in 2020 and continue to build on it the following year. This has been reflected in the PID description for WS1A P6.
1	ADE	WS1A	P6	Need to ensure that we do not create separated markets for flexibility and ANM.	We consider it very important that we do not move towards network operations that create discrete, separated markets for flexibility on one side and Active Network Management for generation on the other. We consider the most efficient outcome is that generation, storage and DSR can compete for flexibility and trade curtailment to find the most efficient outcome.	WS1A P6 is looking at facilitating non-DSO markets that would allow DER to trade curtailment and capacity. WS1A P6 to continue to ensure that in defining the principles and data requirements for these services, potential participants are not excluded from participation in flexibility markets. ANM is simply a tool to manage assets on the network. There is no intention to extend its use for managing constrained assets through this product. Indeed, trading constraints or capacity could alleviate the restrictions on assets in existing ANM zones. A paper is currently being drafted to provide clarity on the interaction between ANM and flexibility during operations and this will be published in Jun 20 (as an additional deliverable to 2019 WS1A P5).
3	ADE	WS1A	P7	Baselining approach may vary for DSO and ESO services.	Support coordination between ESO and DSO but approach to baselining needs to take account of type of service as needs may vary between the ESO and ESO (balancing vs constraints).	The aim of this work will be to recommend actions that will promote greater consistency across DNOs in how they measure the delivery of the same services (i.e., the active power services defined under ONO). Whilst we will work with the ESO to understand their approaches and any learnings we may be able to apply; we do not envisage that there will be a common methodology for all service types. We will be consulting on our proposed future baselining work in July.
2	ADE	WS1A	P7	Baselining work should consider P376.	Common baselining approach should consider industry modifications such as P376.	The starting point for WS1A P7 will be to undertake an initial review of ongoing initiatives, this will take account of P376.
31	OVO	WS1A	P7	Consideration of related initiatives as part of baselining work.	P7's timeline should take into account the fact that both ELEXON and NG ESO are working on updating their baselining methodologies. For example, the P376 modification for ELEXON Balancing Mechanism Units and NG ESO's baselining methodology trial are projects that are taking place as part of the wider work on new frequency response products. These should be taken into account in the P7 timeline.	The work on WS1A P7 will be kicked off with a review initial review of ongoing initiatives, this and will take account of P376 and NG ESOs trial as well as other related work in the industry. The outcomes of the initial review will inform the subsequent timings of this product.

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15	Renewable UK	WS1A & WS1B		Broader consideration of cyber security.	Work on flexibility services should develop simultaneously with high-grade cyber security and data assurance and it must be considered, embedded and addressed from concept through design to implementation. Current connection guidelines do not take into account cyber security and we welcome focus on developing cyber security connection guidelines for DER by the ENA and BEIS. The 2020 Workplan does not reflect this work or provide assurances as to the broader consideration of cyber security and cyber risk management.	The ENA runs a cyber security group with experts in this field. We regularly share ON development work with experts in this group for considering present and future requirement and will continue to do so. The ON project has fed into the development of the Cyber Security Guidelines for DER that are being developed by ENA and BEIS and will continue to inform future requirements. This liaison has been reflected in the PID.
12	Renewable UK	WS1A, WS2 & WS3		Priorities	We have the following priorities in relation to the workstream products outlined in the 2020 Workplan: • Speed up the development of local flexibility markets, DSO implementation plans • Clarify decision-making criteria regarding flexibility, Active Network Management (ANM) and network reinforcement • Appropriate consideration of market arrangements for flexibility allowed to connect earlier	Acknowledged.
32	OVO	WS1B	All	More communication of progress on WS1B products.	Support work however, it is of concern to OVO that most of the product timelines do not include communication of product progress and outcomes to the wider industry. While these products are mainly focused on the T&D internal processes, all products within WS1B have implications to potential flexibility providers.	We do bring updates to our Advisory group on the progress being made under these products. Due to their technical nature, often, interest has been much lower in these products and feedback in the past has been to reduce the frequency of these product updates. In addition to Advisory Group meeting, we also communicate progress through quarterly newsletters, and we can include more details on the progress for WS1B as part of that. Based on this feedback, we will plan a webinar in Q3 2020 to share a progress update on WS1B and give the industry the opportunity to ask any questions or provide input. This webinar will be advertised on our events page. https://www.energynetworks.org/electricity/futures/open-networks-project/open-networks-project-stakeholder-engagement/events.html
22	E. ON	WS1B	P2 & P5	Support	DNOs have looked to provide a more regional view of FES, but to date these have been very different and difficult to compare. Any work that looks to make each DFES as accessible and easy to use as FES is very much welcomed by E.ON.	Acknowledged.
62	Elexon	WS1B	P3	Consider ongoing data transparency work.	On the exchange of real time and forecast data, it is worth noting that the Grid Code, BSC and European Transparency Regulations all place obligations on ESO to publish data to the market. It may be worth considering whether the principles of Open Data and Transparency would be best served by the publication of some of the data addressed by this work.	We agree that data should be open and transparent and published where this is feasible. WS1B is reviewing what data can be more open across Products 1 to 5. For Product 3, detailed data exchange requirements have yet to be finalised. When they are, the publication of this data will be considered.
5	ADE	WS1B	P3	Transparency in developing metering requirements for DER.	It is important that decisions are made transparently in standardising metering between ESO & DNOs; including, specifically, with a published assessment of the costs and benefits of different metering specifications.	We note the need to be transparent in decision making and will also ensure that we undertake appropriate stakeholder engagement in developing any functional specifications for operational metering of services. We are unlikely to be able to pick up development of metering requirements under WS1B P3 this year due to priorities for resourcing and will consider these comments around transparency next year when we revisit this work. This has been reflected in the PID timelines for WS1B P3.
33	OVO	WS1B	P3 & P4	Consultation on metering requirements and data exchange aspects under P3 and P4.	P3 and P4 are especially relevant to flexibility providers, as parts of these products consider further defining operational metering and data exchange standards for Distributed Energy Services providing services within the 2020 timelines. Metering and data exchange aspects from P3 and P4 should also include consultation with wider industry in 2020.	P4 is now being progressed through network code proposals and consultation and stakeholder engagement will be progressed via the network code governance process. We are unlikely to be able to pick up development of metering requirements under WS1B P3 this year due to priorities for resourcing and will consider these comments around transparency next year when we revisit this work.

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52	Energy UK	WS1B , WS2 & DWG		More focus on system & network data rather than on connected resources and transparency in DWG.	An area of particular importance within the PID is the implementation of Energy Data Taskforce recommendations regarding opening up system data. There is focus from the ONP on a SWRR opening up data about connecting parties, but a lack of consistency from DNOs in terms of opening up granular and accurate data on the state of the network. While heat maps are a useful tool, the level of detail, accessibility, granularity and wider data reliability seem to differ from DNO to DNO. Energy UK disagrees with the intended approach to implementing the recommendations of the Energy Data Taskforce (EDTF). This is based in a number of objections, focussing on: · A continued focus on opening up system user data over implementing a single process for sharing of network or system data, and; · A lack of transparency over decision-making regarding sharing of network data, with this being taken forward by the ENA's Data Working Group instead of a wider stakeholder group. The approach to implementation of the EDTF recommendations should focus on prioritising the opening up of network and system data, not the data of connected customers.	We recognise that there are differences in the system data that is available currently and in how it is presented including data through heatmaps. The DWG is progressing the development of the Digital System Map and as part of this, consistency in data, including system and network data, will be addressed and ON will support this through WS1B or other workstreams as needed. The ENA Data Working Group (DWG) has the dedicated webpage below for progress updates and for flagging key stakeholder events. The DWG has recently launched a video that demonstrates the use of a new platform for the Digital Systems Map (as recommended by the Energy Data Task Force) for displaying network and asset data and will be planning further events to engage with the industry. ENA will be running a series of stakeholder events across the year and will also be notifying stakeholders of opportunities to engage in this work via the Open Networks mailing list. https://www.energynetworks.org/info/modernising-energy-data.html The work under ON the SWRR predates the EDTF recommendations and we have engaged with stakeholders through a number of forums (Advisory Group, public webinars) where we have received resounding support to take this work forward as stakeholders find this data useful for a number of purposes including identifying opportunities to connect, being able to see flexibility capabilities in a given areas and identifying opportunities for aggregation. The SWRR includes network data as well as data on connecting parties. In the Phase 2 SWRR release due in July, data on the network reinforcements needed for connection if different parts of distribution networks will also be included. The enhanced data (predominately system data) exchange proposals of 2019 WS1B P4 (Data Exchange in Planning Timescales) work are being progressed in 2020 as a formal modification to the Grid Code (GC0139). A Grid Code Workgroup has been set up to action these change proposals and part of their work will be to consider what data can be published (recognising the recommendations of EDTF) and the standard method of communicating the data.
61	Elexon	WS1B, WS4	P2 & P5	Consider case for single FES document produced independently. Consider analysis of GB FES to gauge accuracy of predictions in the last 10 years.	There is a lot of focus on the production of various FES documents within the work plan. There may be a case for looking into the possibility of producing a single FES document in place of the ever growing number of separate documents. This could also be produced independently, removing the risk of the current documents being too focussed through the lens on an individual company's view of the world. It is also worth noting that the FES has been produced for nearly ten years now, so there could be scope for a piece of work analysing the accuracy of FES predictions. This would help inform users of the document as to the reliability of the forecasts.	Our work on forecasting is an area of high priority and through this we are seeking to achieve the three objectives below. To progress each objective, we have defined a separate products to ensure it gets the right focus and expertise. We recognise there are close linkages and we continue to manage them through the project. We have further clarified them in the PID. * Standardisation of how DNOs produce Distribution FES (DFES) to reflect regional aspects in forecasts and enhanced coordination between DNOs and ESO to reflect regional aspects in GB wide FES (GB FES). (WS1B P2) * Standardisation in how the DFES is used to inform network needs and how network needs are signposted to industry. (WS1B P5) * Identify opportunities for GDN input into GB FES. (WS4 P3) We believe that the DFES and GBFES complement each other and the work under ON further aligns them through the use of common building blocks and greater alignment of scenarios and timescales by the DNOs, TOs and the ESO. The DFES are able to provide greater local granularity for regional stakeholders by including allows detailed consideration of regional factors through substantial local stakeholder engagement that the DNOs are best placed to lead. We believe this granularity would be lost with a single FES document and our intention is to continue using a common set of building blocks and methodologies. In addition to annual iterations of extensive stakeholder input and feedback on modelling assumptions and conclusions of the GB FES, NG ESO has conducted informal internal reviews of the accuracy of its FES analysis in the past in order to drive continuous improvement in its

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						processes. NG ESO welcome feedback on where additional analysis, engagement, and publication of results might be of value to stakeholders.
54	Energy UK	WS2	P1	Network data rather than user data should be a higher priority and concerns around approach to overcoming legal barriers.	The first EDTF report highlighted the importance of opening up data on system and network assets as the first step in enabling better application of data. The Open Networks project has instead focussed its efforts on opening up data about customers connected to the network, in the form of the System-Wide Resource Register (SWRR). For the ONP to focus on this project ahead of making comprehensive improvements to the granularity, accessibility, and quality of network data betrays a continuation of a network-focussed approach to reform, avoiding a more complicated process for DNOs in favour of a simpler process that produces less benefit for other users. The ONP should, at the very least, match the effort for the SWRR with an equivalent focus on improving the quality of published network data and data on the results of flexibility procurement. It is furthermore concerning to hear ONP representatives discuss attempting to find a way around legal restrictions on what data can be shared in the SWRR. These protections serve the same purpose as the EDTF Openness Triage process intends, ensuring that restrictions apply where data is commercially sensitive, contains personal data, or presents a security risk if shared. The change process being explored under DCP350 may find solutions by coordinating DNO data with other data sources (for example the Capacity Market register), but it is not for the DNOs themselves to share additional data outside of the existing legal and regulatory limits.	Please see response to comment 52. As noted there, the SWRR includes network data as well resource data. In other areas of ON that are more focussed on network data exchange requirements (e.g. Workstream 1B), the wider publication of network data is being considered. Regarding what data can be shared in the SWRR, DNOs have been careful not to publish data where they have existing confidentiality obligations that are intended to prevent certain data from being made more widely available (e.g. customer names and addresses). DNOs will only share data that they are legally able to share, and the intention has always been to follow the EDTF Openness Triage process as good practice. DNOs, including members of the SWRR product team, are actively engaged in the DCP350 process to help find an optimal solution to the sharing of asset data.
35	OVO	WS2	P1	Outputs from Recorder and Residential response should feed into WS2 P1 SWRR.	In addition, outputs from recent projects linked to the SWRR including recorder and Residential Response should be explicitly explored as part of the decision making process within the 2020 timelines.	The ON product team delivering the SWRR have work closely with the RecorDER project to share use cases and to take specialist legal advice to better understand existing confidentiality obligations. This liaison will continue. The Residential Response project is focussed on how smaller scale residential resources can be used to provide ESO balancing services. These resources are below the 1MW threshold of assets reported in the SWRR Phase 1 (January 2020) and SWRR Phase 2 (July 2020). Following the SWRR Phase 2 release, additional scope will be considered including the extension of the SWRR to include resources less than 1MW, and the inclusion of more extensive information on the services being provided. The outcomes from Residential Response will be used to inform this further work. This has been reflected in the PID description for WS2 P1.
6	ADE	WS2	P1	Support	The ADE supports the introduction of a system-wide register for assets.	Acknowledged.
34	OVO	WS2	P1	SWRR should be considered as part of the flexibility procurement process, including on-boarding process.	Support SWRR, however, SWRR must be considered as part of the overall flexibility procurement process, including on-boarding process in DSO and TSO/\ESO flexibility markets. If developed in isolation, the SWRR will have no practical use in the overall flexibility market beyond helping to inform some small scale DNO planning tasks.	The SWRR has been published at the request of wider stakeholders to support a number of use cases including DER connections, infrastructure planning and the identification of flexibility service requirements. In respect of the flexibility services, the SWRR product team is liaising with WS1A to ensure that the link is made with the visibility of asset data for flexibility market purposes.
38	Citizens Advice	WS2	P1	Transparency of network data as well as connected DG and LCTs connected.	Rapid visibility of distributed generation and low carbon technologies that are attached to the network to assist in the development of a more efficient and low carbon energy system. The transparency of other network data, subject to appropriate consumer protection, so as to facilitate the development of flexibility markets and to foster innovation	Please see response to comment 52. We will continue to prioritise development of the SWRR including enhancements such as including DER <1MW to greater visibility of resources on the lower voltages of the networks. In addition, the SWRR and other ON data related products will consider inclusion of any further network data that stakeholders are interested in.
19	Renewable UK	WS2	P2	Consider commercial arrangements as part of promoting flexibility assets in the queue.	We note that the [Queue Management] process developed in 2019 did not consider the commercial arrangements for flexibility and the impact on the market. As such, the next stages of the process need to make sure that it does not provide opportunities to game the system (e.g. initially planning to build a storage facility, then changing the application to a hybrid site). We welcome the focus on developing a user guide for the new approach (with regards to P2 – Queue Management).	Our consultation on queue management is currently open and we welcome all responses. Within the proposals for promotion of flexibility it the queue, we have concluded that contractual arrangements are required between DNOs and potential flexibility providers in order to be promoted in the queue.

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					As part of this work focus should be placed on the commercial risk passed to third parties as a result of the contractual arrangements between the network operator and flexibility assets (e.g. if a storage application is being withdrawn after parties have been given earlier connection dates). Any process must be transparent, robust and must ensure that no connection applicant is unfairly disadvantaged. The commercial arrangements for this might sit outside the scope of the product, but they are inextricably linked to the future development of the market and we would welcome if ENA is able to consider these further under the workstream.	During 2020, we will be further considering how aspects of queue management including flexibility should be implemented. DNOs will consider how flexible resources might be used in their areas taking account of the consultation responses and work that has already been carried out in Workstream 1A. We propose to consider the standardisation and further development of the contractual arrangements in 2021 given the current priorities for 2020. We acknowledge the point made on commercial risk and on ensuring that connection applicants are not unfairly disadvantaged, and we will consider this during the forthcoming work.
50	Energy UK	WS3		Align DSO transition work with Ofgem's DSO enablers work.	DSO Transition must be aligned with Ofgem's work on DSO enablers, to ensure that any least regrets options implemented align with the direction set by the regulator.	Ofgem's work on DSO enablers has been a key steer for us in our development work and in implementation by networks and will continue to be.
51	Energy UK	WS3		Continue monitoring implementation and clarify process.	We ask that this approach to Monitoring Implementation be maintained to enable industry to hold DNOs to account if and when they are not delivering. This will also give BEIS and Ofgem visibility of when they may need to intervene. It would be helpful to know who is responsible for monitoring implementation and whether or not this is externally verified to ensure accuracy. It would also be beneficial to know the process for quantifying which DNOs are or are not implementing best practice or principles, and external input should be integrated to ensure accuracy.	Monitoring Implementation will continue to be a key aspect of providing visibility to industry of how outcomes are bring rolled out across networks. This year, we are further enhancing our capability to report on this through including this in the DSO Implementation Plan and Roadmap tool. Providing visibility on implementation allows stakeholders to monitor network progress toward best practice and alignment. We have clarified this further in the PID including setting out timescales for updates.
41	Citizens Advice	WS3		Establish clear boundaries between DNO activities and DSO functions and manage CoI.	● The establishment of clear boundaries between Distribution Network Operator (DNO) activities and DSO functions to understand appropriate costing of these functions, and to facilitate any future requirement to transfer DSO functions to non-DNO parties ● The elimination or mitigation of apparent or actual conflicts of interest ● Working with regulators, industry companies, and bodies responsible for code development to remove barriers that could impede successful change.	In line with Ofgem's position on DSO, we recognise the need for the development of Distribution System Operation functions now with optionality and the ability to adapt and develop as the industry goes through this fundamental transition and this is embedded in the work that are delivering under Open Networks. We are continuing work on the potential conflicts of interest and will be publishing an update in Q2 2020. We welcome all input from all stakeholders on this work as outlined on our website, via opennetworks@energynetworks.org We continue to work closely with Ofgem and BEIS through the ON project workstreams and Steering Group and continue to work with industry through our Advisory Group, pubic consultations, webinars and other mechanisms. Where code modifications have been generated through ON products, we closely monitor progress on a monthly basis, and help resolve any issues through the relevant ON teams and experts.
37	Citizens Advice	WS3	CoI	Consider including retail market arrangements relating to flexibility in scope.	Ensuring that retail market arrangements relating to flexibility are also considered and addressed by the Open Networks project. The Project Initiation Document (page 10) notes that a key Ofgem priority for flexibility relates to ensuring appropriate retail market arrangements so that all consumers can benefit from a more flexible energy system, and are protected as befits an essential service. The Open Networks project states on the same page that it is excluding addressing the issue of retail market arrangements from its scope. We believe that the Open Networks project, which has a wide and early perspective on the transition, is in a valuable position to be able to identify potential retail market barriers and potential impacts on those in vulnerable circumstances. The Open Networks project can use its expertise to assist in reforming codes, and designing suitable regulatory protections.	Through our work on unintended consequences, we will continue to record possible pitfalls in developing market arrangements, noting where these are being considered or tested through our work. This includes external Projects such as the T.E.F. Collaboration, BEIS FleX Challenge and BEIS Power Forward Challenge. The Steering Group, with input from Ofgem, agreed that Open Networks already has a large scope to deliver for this year and as part of the scope identification process for next year, could consider undertaking a piece of work to understand the linkages with the retail reform in more detail. This could include understanding the interaction with supplier actions and identifying any areas where further interaction would be beneficial to ensure that the needs of the network are understood and the right behaviour is driven.
36	Citizens Advice	WS3	CoI	Consideration of vulnerable customers in project.	The identification and mitigation of impacts of transition on consumers in vulnerable circumstances. At present, those in vulnerable circumstances or who face increased difficulty in participating in the future net zero world do not appear to be fully incorporated within the work of the Open Networks project. For instance, it was not possible to identify references to 'vulnerable' or 'vulnerability' within the Project Initiation Document. It is important to include considerations of those in vulnerable	The needs of vulnerable consumers and the associated protection required during a time of change are embedded into the Open Networks Project principles and we have updated the PID to reflect how we will deliver against this. As part of this, we will raise with all Workstreams in May/June 2020 the need to review all development work and outputs to ensure that the perspective of vulnerable customers is taken into account. In addition, we will ensure that Citizens Advice is an integral part of the Community Energy Forums that we will be facilitating

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					circumstances to ensure that services or products are designed with all consumers in mind and no-one is left behind in the transition. The Centre for Sustainable Energy 'Smart and Fair' project may be useful to assist the Open Networks project in identifying barriers for people in the transition, the possible distributional impacts on different groups of consumers, and to formulate solutions. See also the recent Citizens Advice published research, 'Zero Sum: How to prioritise consumer protections to ensure that nobody is left behind on the path to net zero'7.	this year to ensure that the needs of vulnerable customers are taken into account and we deliver against our objective of inclusivity. Through a new iteration of the Unintended Consequences and Conflicts of Interest log due to be released early this Summer, we will draw out the areas of most relevance to vulnerable consumers. We propose to engage with the Open Networks Advisory Group and author of the original comment on the revised log, drawing on their experience and expertise to ensure Open Networks continues to actively develop a future accessible to all consumer groups. The Open Networks Project recognises and is supporting the wider work designed to aid the Smart Grid transition for groups that could face barriers to participation. The 2020 ENA Innovation Network Innovation Strategy has identified consumer vulnerability as a key theme across electricity and gas to further explore how best to support their needs. Outputs from the Smart and Fair project will be shared through the participating DNOs and Project LEO. The latter is directly supporting the inclusion of such groups and is testing a Smart Grid world with numerous Smart Neighbourhoods across Oxfordshire. Project LEO is intrinsically linked with the T.E.F. Collaboration which reports directly into the Open Networks Workstreams and Steering Group. We would welcome any further steer from Citizens Advice and industry on product areas where we can deliver greater focus on this.
17	Renewable UK	WS3	CoI	Considerations for CoI Register	There are a number of conflicts of interest which could arise from DNOs current or future ownership and operation of ANM schemes. These are not limited to and could include: • DNOs and ESO balancing actions, where a DNO could perform an action which results in further balancing activity at national, ESO level and therefore potentially increasing cost to consumers • Conflicts with tendered flexibility markets, where DNO would opt in for participation in an ANM scheme instead of tendering for flexibility from the market, damaging industry confidence and the investment case for flexibility • Consumer conflict, where a DNO is allowed to directly operate, for instance through an ANM scheme, specific assets such as electric vehicles, undermining competition and market confidence	Our intention is to keep the CoI and UI register under review through the life of the project. We are currently undertaking a review to identify any new CoI and to provide an update against previous mitigation actions identified. DNOs are currently incentivised to choose the most cost effective option for the consumer and have made a further commitment (through the Flexibility Commitment and Flexibility next steps) to openly test the market for all projects of significant value and to do so in an open and transparent manner. We believe that development of a common decision making method for DNOs to choose between ANM vs Flexibility vs Reinforcement (under WS1A P1) will provide further transparency in how decisions are made and help address concerns around potential conflicts of interest. The Unintended Consequences and Conflicts of Interest identified have been considered and compared with the tracker: 1. DNOs and ESO balancing actions – This is presently logged and visible in the tracker under UC, reference C1 and C2. The example provided will be noted in the next iteration of the tracker. 2. Conflicts with tendered flexibility markets – This is presently logged and visible in the tracker under CoI, reference 1. 3. Consumer conflict – This is presently logged and visible in the tracker under CoI, reference 2.
16	Renewable UK	WS3	CoI	ENA Ofgem collaboration on CoI.	We would like to see the ENA and Ofgem work together with industry to develop a roadmap with associated milestones, where perceived and real conflicts of interest of both ANM and contested services would be addressed.	Ofgem are planning to undertake a work package on Conflicts of Interest for DNOs performing DSO roles and our work on Conflicts of Interest will be a key input into this work. In addition, the mitigating actions from our Unintended Consequences and Conflicts of Interest are in the process of being fed into the DSO Implementation Plan being developed under WS3. These will be reflected in the roadmap as actions with allocated timescales for delivery.
46	Centrica	WS3	CoI	More engagement on the CoI and IT register.	Risk Register for Conflicts of Interest and Unintended Consequences – we would encourage the ONP to engage with more stakeholders on this, beyond the AG, especially some of the newer market participants (e.g. aggregators, flexibility providers) using the distribution system. This would be a good topic for an industry workshop.	We intend to host a stakeholder session at the Advisory Group on 7th May and will publish the next iteration of this register early this Summer. We will consider further stakeholder sessions in the second half of the year for future iterations, COVID-19 permitting. **The register is open to comment and input from anyone through the link on the ENA website - we would encourage anyone to provide input.**

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					There needs to also be more updates on how the ONP is progressing work to address identified issues.	
58	Energy UK	WS3	CoI	More stakeholder involvement in CoI and UI register.	Given the nature of the Risk Register for Conflicts of Interest and Unintended Consequences, it would be appropriate to increase direct feed-in and oversight from a range of non-DNO stakeholders moving forwards. Energy UK is concerned that a DNO focus in drafting and delivery of this register may result in missing entirely or deprioritising of significant risks on the register An all industry workshop similar to the initial session held solely with DNO participants would be welcome. This is one area where increased stakeholder engagement would be welcome, and should include not only industry participants but also consumer representatives like Citizens Advice.	Same response as for comment Ref. 46.
23	E.ON	WS3	DSO Implementation Plan	DSO Implementation Plan should focus on short - medium term actions and should not be used to close out optionality in the future.	E.ON would like to challenge the base assumption behind Workstream 3 (that the Future World for DSO is concluded) and believes that developing an implementation plan should only consider the short to medium-term measures that are needed to make DSO functions/flexibility markets a business as usual activity. It is important to ensure transparency and openness such that this plan is not used to embedded DSO functionality within the DNO to such an extent that there is no cost-effective option to consider separating them at a later date.	We recognise that that the Future World has certainly not concluded and there will be a number of factors that may impact the direction of travel as concluded in Baringa's assessment of the Future Worlds last year. We will continue to follow the pathways and maintain optionality with appropriate decision points. The work that we are progressing through all the workstreams is least regrets and supports the delivery of a DSO ESO Coordinates World in the short to medium term with optionality for change in the future. Whilst the DSO Implementation plan has the functionality to include longer term actions, we have found that these are minimal at this stage and most of the actions are short or medium term.
7	ADE	WS3	DSO Implementation Plan	Support for developing DSO functions	The ADE supports the development of a clear plan for developing DSO functions. It is important that strong progress is made ahead of RIIO-ED2 as well as during the price control period.	Acknowledged.
47	Centrica	WS3	DSO Implementation Plan	Support for DSO Implementation Plan and continued focus on implementation. Clarification requested on responsibilities for implementation.	DSO Implementation Plan – the online tool presented at the Advisory Group looks as if it will present useful information on timing and links to supporting documentation but does not deliver implementation by itself. The Implementation Plan is intended to report planned actions, but it is not clear where the work to deliver the actions is taking place. We support the contents of Appendix A and would like more clarity on where responsibility lies for the key enablers and no-regrets decisions that will deliver implementation.	The DSO Implementation Plan and Roadmap tool gives visibility to industry of the actions that network companies are progressing. The network companies are undertaking actions to progress the transition and this tool will be helpful in providing clarity to industry on how and where this is bring progressed. Key enabling actions to progress any particular DSO function or activity would also be included in the DSO Implementation plan as well as any barriers or decision points that we have identified.
8	ADE	WS4	All	Stronger zoning approach to heat, energy efficiency and power for decarbonisation.	The ADE supports the focus on linking investment planning with Scotland's Local Heat and Energy Efficiency Strategies and the ESC's Local Areas Energy Planning. The ADE considers that a stronger zoning approach to heat, energy efficiency and power will be important to decarbonisation going forward and it is very welcome to see measures moving towards this.	We recognise the need for a zoned approach and will continue to engage with the Local Area Energy Planning (LAEP) project through WS4 where we have representation from ESC. As part of our WS4 P4, we will be running trials in different areas of the country with close collaboration with local authorities. Through these trials, we will be able to test and demonstrate different approaches that take account of local needs. In addition, WS4 P1 will be looking at setting up a trial with a local authority for a wider decarbonation pathway using whole system CBA.
63	Elexon	WS4	P1	Consider P398 as that may eliminate the need for further code modifications to support Whole System CBA.	We note the comment on the potential need for code modifications to support whole system CBA. It may be of interest to note that the BSC Panel recently raised modification P398 aimed at embedding the principles of Open Data within the BSC. It is likely that this change will make it easier to obtain any data held under the BSC that is required for a whole system CBA without the need for a further code modification.	We note this code modification. We will engage with Elexon and other code administrators as part of Phase 2 to understand and mitigate some of the challenges to a whole system CBA, including data sharing, identified as part of Phase 1.
24	E.ON	WS4	P1	Support for Whole System CBA work and desire to see accelerated timeline.	E.ON has long supported whole system analysis (especially between distribution and transmission for electricity). We are pleased to see a more quantitative approach being taken by ONP with the principles for whole system cost benefit analysis being defined though we would prefer to see a more accelerated timeframe (the PID suggests that a whole system CBA is unlikely to be available until 2021).	This is a substantial piece of work and has been kicked off with a scoping activity. As part of this we will consider any opportunities to bring timescales forward but we do note that these may be limited as this is a relatively new area of work with limited BAU experience. As with all products, we will develop this iteratively, ensuring that we are sharing outputs as soon as they are developed. We will look to bring forward a trial, originally planned for Phase 3, into Phase 2
40	Citizens Advice	WS5		Continued stakeholder engagement.	Continued engagement with stakeholders, consumers and network customers to confirm the correct direction of travel, identify challenges and solutions, and to support the implementation of actions	We are committed to sharing our progress and seeking input wherever possible. In 2020 we will be holding new community energy forums for feedback, as well as continuing to present on the

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						project at relevant external events, and keeping stakeholders informed through our distribution list and newsletters.
9	ADE	WS5		More updates at stakeholder forums	The ADE recognises the significant effort that the Open Networks programme invests in communicating with stakeholders and the wide variety of channels used. Nonetheless, the Open Networks programme is a very broad programme that is difficult to keep up to date with at times. Anything that can be done to help stakeholders keep abreast of the changes would be very welcome. Given the interactions, it might be useful, for example, for a brief update to be given at each Charging Futures Forum, if possible.	We present and share our work at a number of stakeholder forums and are open to presenting at further forums where requested. The ongoing situation surrounding COVID-19 has made engaging in face-to-face meetings difficult, but Open Networks is committed to holding virtual / digital engagement where possible. We have reflected the current situation in the PID. We are sure to update our stakeholder distribution list following product publications and project updates. Following feedback, Open Networks will look to update other relevant ENA working groups, as well as wider forums, on the progress of the project.