

# Flex Assure response - Open Networks 2022 Workplan consultation

16 November 2021

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## Context

Flex Assure welcomes the chance to respond to [Open Networks' 2022 Workplan consultation](#). We have had substantial interaction with individual DNOs and with the ENA over the past six months and look forward to further engagement going forward.

[Flex Assure](#) is a code of conduct and compliance scheme, which sets common standards for flexibility services providers (sometimes referred to as 'aggregators'). The Flex Assure Code of Conduct can be found on our website and is freely available for anyone to use and refer to. By defining and enforcing minimum standards of practice, Flex Assure provides assurance for business energy users of the service they will receive from companies signed up to the Scheme. The current Code and Scheme focus on the business-to-business energy flexibility environment, however, work is ongoing to consider development of a code of conduct and compliance scheme for providers working with domestic and micro business customers.

## Consultation response

This consultation does not include specific questions, but welcomes feedback on the work plan in general. This consultation response focuses on Products 2 and 4, building on previous engagement with DNOs and the ENA and discussions around the potential interactions between these two products and the Flex Assure Code of Conduct.

### Workstream 1A - Flexibility Services

#### **Product 2: Procurement Processes**

Having engaged substantially with individual DNOs and with the ENA over the past six months, we consider that there is significant potential for interaction between this Product and the Flex Assure Code of Conduct. We encourage Open Networks to consider further the use of/reference to the Flex Assure Code of Conduct in work around standardisation of procurement processes, to embed within DNO procurement processes expectations around good practice by 3<sup>rd</sup> parties in their interaction with asset owners. Customer assurance will be key to ensure confidence and healthy levels of participation in local flexibility markets, and Flex Assure exists to provide such assurance. It is crucial that key actors in the flexibility space, including DNOs and the ESO, embed expectations around good practice in their processes and interactions, in order to encourage adherence to minimum standards and uptake of good practice across the flexibility industry. Flex Assure would be happy to engage with the Product Team to consider how this could be implemented.

#### **Product 4: Standard Agreement - Alignment of Contract for DNO/ESO services**

While consideration of the standards set out in the Flex Assure Code of Conduct may sit most appropriately with Product 2, for now, there may be relevance, in future, of embedding reference to this standard within the Standard Agreement. It would be useful for the Product Team to have this on their radar for future iterations of the Agreement. Flex Assure would be happy to engage with the Product Team to explore this further.

#### **Other comments**

##### **Websites - signposting to Flex Assure**

As key actors and influencers in the flexibility space, we would like to see DNOs and the ESO signposting the Flex Assure Code of Conduct and the scheme on their websites, to help raise awareness amongst market participants of the existence of this initiative, which exists to support energy users and build confidence to participate in flexibility markets, at no cost to energy users.

National Grid ESO have included information around Flex Assure membership in their list of aggregators on their [website](#), with a link to the Flex Assure website; we have engaged with the website-responsible team at National Grid ESO for a long time 1) to ensure the list of aggregators is up-to-date and 2) to provide further information about Flex Assure, as part of a broader website redesign, but have yet to see the results of this. More recently, we have seen ENWL publish a [webpage dedicated to Flex Assure](#) on their website, with links to key resources on the Flex Assure website, including a guidance document for business energy users interested in energy flexibility. We would welcome similar signposting by other DNOs (and the ESO), and this page by ENWL could serve as a good example. As discussed with other DNOs (SSEN in particular), Open Networks could provide a useful forum to coordinate such publicity work across DNOs, to ensure a common approach.

#### **For further information please contact:**

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