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Open Networks 2021 Workplan consultation

RenewableUK's members are building our future energy system, powered by clean electricity. We bring them together to deliver that future faster; a future which is better for industry, billpayers, and the environment. We support over 400 member companies to ensure increasing amounts of renewable electricity are deployed across the UK and to access export markets all over the world. Our members are business leaders, technology innovators, and expert thinkers from right across industry.

RenewableUK welcomes the opportunity to comment on the Open Networks Project 2021 Workplan consultation. We support the ambition to ensure greater stakeholder engagement during 2021 and look forward to engaging with you throughout Phase 5 of the Open Networks Project.

With regards to 2021 work focus, we believe that the Open Networks project is best utilised to develop solutions to problems which cannot be solved by competitive market solutions or have other existing solutions within the industry. Our comments below reflect our priorities in relation to the following workstream products outlined in the 2021 Workplan:

- Approach to ongoing Product Governance and transparency
- Flexibility roadmap
- Enhancements to the Common Evaluation Methodology with regards to carbon monitoring
- Active Network Management interaction with flexibility markets
- Operational DER visibility and monitoring
- User Commitment Improvements
- Communications and Stakeholder Management

Approach to ongoing Product Governance and transparency

We are supportive of the Open Network (ON) Project work which has continued to deliver on the objective to standardise process across DNOs and bring down the barriers to a wide range of smart flexible and renewable technologies. Future plans to ongoing product governance should aim to facilitate change with industry involvement, drawing on stakeholders' expertise across the industry. We note that an open governance approach to change management of ON deliverables could further improve the transparency of the DNOs own decision-making as local flexibility service procurement is adopted as business as usual. Separately, we see there is a strong case for better co-ordination and consideration of how the enduring governance for ON product deliverables fits in with the Energy System Governance Review by BEIS that is due to launch given the pace required to deliver net zero.

Flexibility roadmap

We welcome the publication of the Flexibility roadmap which clearly defines the interaction between ON activities and wider policy work carried out by Ofgem or BEIS. We further note that pg.12 of the 2021 Workplan states that '*The Energy White Paper is likely to be a key driver for policy and development in the area of Open Networks and the impact will need to be assessed once it is published*'. The Energy White Paper was published in December 2020, ahead of the publication of 2021 Workplan, and should be referenced accordingly. It is important for there to be consistency between the key activities, interdependencies and milestones that are included within the Flexibility roadmap and we strongly recommend the inclusion of the Energy White Paper and the BEIS Engineering standards review.

Open Networks has been a valuable part of the developing frameworks and revenue streams for flexibility and we believe that the upcoming publication of the Smart Systems Flexibility Plan (SSFP) will continue to provide a strategic direction to the ON work carried out. As such, interaction with the SSFP should also be included in the Flexibility roadmap.

Enhancements to the Common Evaluation Methodology with regards to carbon monitoring

We welcome the focus placed on improvements to the Common Evaluation Methodology (CEM) with respect to carbon assessment. A specific metric on the carbon intensity of the service provision under national and local flexibility markets could provide much needed transparency and incentive as we move closer to net zero. We support ON commitment to follow open governance process and progress work in this area together with industry involvement through the establishment of the CEM forum to support changes to the methodology tool that relate to carbon assessment.

Active Network Management interaction with flexibility markets

It is very welcome that the 2021 Workplan has scoped out activities to tackle issues with Active Network Management (ANM). The Workplan has rightfully outlined closer to real-time



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information provision on curtailment and transparency around curtailment rules as potential areas for review. These are important issues which should be prioritised. As part of this review, we believe there should be a specific objective to move towards a unified, liquid flexibility market with ANM and demand side response competing to offer flexibility services. RenewableUK would be keen to engage further on deliverables in scope and particularly: *Principles to review legacy ANM Contracts, Curtailment Information and Apportioning of curtailment risk.*

As business models change over time, the benefit a particular asset has to the system will also change. At the same time, as the DNO network evolves, constraints which were once identified could be elevated either by network solutions or through flexibility services, mitigating for the need of ANM. We strongly support a review of the current curtailment rules where certain assets are subject to ANM deterministic principles over the lifetime of the connection.

We support the ambition to set out plans on how ANM curtailment information could be communicated across DNO, ESO and the generator closer to real-time. A closer to real-time information provision on ANM curtailment could bring significant system benefits, improve the interaction between ANM and balancing services and ultimately result in lower cost to consumers. As we see further generation and network flexibility providers connect at distribution voltage levels and more distributed generation access the BM, provision of real-time information on ANM curtailment will become increasingly important as we move closer to the next price control RII0-ED2.

Operational DER visibility and monitoring

Improving visibility of generation connected to the distribution network should be addressed as a matter of priority. We support the ambition set out in the 2021 Workplan to develop a functional specification for the operational metering of DER. This is fundamental for improving the planning, security and real-time operation of the GB transmission and distribution systems. Efficient operation of networks and balancing at local level goes hand in hand with improved data gathering. Accurate real-time measurements such as power output (MW/MVAR), wider use of operational metering and common communication protocols are critical to ensure improved network visibility as DNOs transition to DSOs, taking up greater roles to deliver flexibility solutions that support local system balancing and network reliability at whole system level.

With regard to additional characteristics which could be considered we suggest those being aligned with the operational metering requirements for participating in the Balancing

Mechanism. This also includes voltage and reactive power data as well as other useful signals such as Power Available from wind parks.

User Commitment Improvements

The 2021 Workplan aims to review the wider experience of network companies and industry with the User Commitment methodology. We strongly support this objective as the regime for calculating connectees' liabilities (first introduced in 2013) can often be disproportionately large for smaller projects or for projects connected at remote locations of the Main Interconnected Transmission System (MITS).

Communications and Stakeholder Management

Continued engagement with network users to confirm the correct direction of travel, identify barriers and enabling actions to support implementation of ON products is important. To maximise stakeholder input it would be useful to review any prospective virtual events and avoid overlap (e.g. ON Advisory Group meetings and National Grid ESO TCMF).

We further recognise the significant effort and range of deliverables which Open Networks is working on. However, the scope of the ON programme is broad and is difficult to keep up to date with at times. It would be welcome if ENA could continue to work to update stakeholders through wider industry forums such as Power Responsive or Charging Futures Forum in the future.

We would welcome the opportunity to discuss further with the ENA or other interested stakeholders any of the comments raised in this letter. If this is of interest, please do not hesitate to get in touch.

Yours Sincerely

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