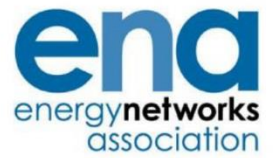


The Voice of the Networks



# Energy Networks Association

## Open Networks Project Advisory Group Response

May 2019

Restriction: Public

## Introduction

The second Advisory Group meeting of 2019 took place on 2<sup>nd</sup> May at ENA’s offices in London. This included segments addressing the *Impact Assessment Consultation Responses*, a new events calendar on the Open Networks website produced by Workstream 5, Workstream 4 Update, Interactivity & Queue Management – key messages and next steps and *The Future of P2*. Comments from these items were captured in the meeting and this paper highlights key questions/observations as well as the responses.

Impact Assessment Consultation Responses
<p>We presented the initial number of responses received for the Future Worlds Impact Assessment Consultation, which stood at 22 (not including those who had requested extensions). The Advisory Group agreed that this was a good amount of stakeholder interaction and they are looking forward to learning more about the results.</p> <p>Once we have received and analysed all responses, the key findings and next steps will be presented to the Steering Group and Advisory Group accordingly.</p>

Workstream 5: Events Calendar	
<p>As per feedback received during the last Advisory Group meeting in March, we presented the new events calendar, which provides stakeholders with information pertaining to upcoming events currently planned for 2019. A brief summary of what is also on the horizon for the Workstream 5 team was also communicated.</p> <p>This was well received by stakeholders and a number of suggestions were made for further improvement. These are outlined below along with our response.</p>	
Feedback	Response
<p>Industry milestones that may be relevant to the Open Networks Project could be added to the calendar to further help coordinate attendance from interested stakeholders. This could include Ofgem and big industry consultation dates.</p>	<p>To not detract from the events that are held as part of the Open Networks Project, links to ONP members’ events pages will be added to the ONP events page. We will also explore adding links to BEIS and Ofgem’s events pages.</p>
<p>A greater level of detail could be added to address why there are gaps between events. Wider stakeholders might not understand the joined-up thinking and industry context behind a lot of what is going on in the events calendar</p>	<p>This is something that will be considered as we update the Open Networks section of the ENA website to consolidate pages and make it easier to navigate. Either the Workstream pages will be updated or a separate, new page could be created to provide context.</p>
<p>A next steps section for consultations [such as the Impact Assessment consultation] or a link to viewing them may also assist in providing a wider view of any progress made.</p>	<p>Similar to the point above, adding wider context to the individual Workstream pages or a separate page to explain its position in the industry could be created</p>

Workstream 4: Milestones Scopes for this Year	
<p>We provided a brief outline of the upcoming proposed milestones that the Workstream 4 team currently has planned for 2019. This included a draft timeline, outputs, sub-deliverables and product participants. There was also a call for volunteers willing to participate in the development of the products to get in touch with the team.</p> <p>Stakeholders agreed with the information presented and provided input on a number of considerations, which have been captured below and will feed into our work going forward.</p>	
Feedback	Response
<p>'Newcomers' assume that the driver for creating a Workstream which addresses Whole Systems is due to the fact that gas and electricity are currently separate entities with their own mode of operations.</p>	<p>The objective is to deliver customer benefits from whole energy system thinking.</p>
<p>The emergence of new technologies should mean that a particular focus on them may be necessary to ensure that none are being overlooked.</p>	<p>We have Energy Systems Catapult engaged in WS4 and would be open to input from other stakeholders. Please email <a href="mailto:opennetworks@energynetworks.org">opennetworks@energynetworks.org</a>.</p>

Interactivity & Queue Management – Key Messages & Next Steps	
<p>We built upon the last Advisory Group meeting's update on the Interactivity &amp; Queue Management consultation by notifying attendees that we have now published the responses received in addition to a summary and next steps.</p> <p>This was received well by the attendees, who also provided feedback on the presentations. This feedback has been outlined in the table below.</p>	
Feedback	Response
<p>The project timelines show the development and implementation plan, but it may be useful to also detail the overall plan once a potential view has been taken.</p>	<p>To consider in our published response.</p>
<p>The Open Networks Project has a lot of products that cover a broad area of work. It could be beneficial to extend the invitation to participate [like Workstream 4] for other Workstreams as well.</p>	<p>We have overlap in attendees between workstreams to ensure consistency.</p>

Future of P2: Security of Supply	
Feedback	Response
<p>An ENA Engineering representative presented the P2 structure, work completed to date, the next steps and its relevance to the Open Networks Project.</p> <p>This received a positive response from stakeholders, who also provided feedback, which is included in the table below.</p>	
Reliability expectations from customers will become very important, as well as ensuring that there is an inclusive approach to all customers (and not just early movers or more affluent members of society).	Agreed and we were delighted that CAB have come forward to participate in the Distribution Code Review Working Group.
The points raised are based on the assumption that this work will be done in a stable world. However, this is not the case and this may undermine accelerated electrification.	ENA will be looking to hold stakeholder engagements to determine what stakeholders require from a future P2 standards before progressing further changes to the level of security of supply.
Capacity and access are being looked at under the charging forum, so whether a meeting point between the two programmes is possible and how they may affect one another should be kept in mind.	To consider interactions with the Ofgem Significant Code Review.
There is an ongoing struggle to access up to date material and information.	All up to date material will be found at <a href="http://www.dcode.org.uk/dcrp-er-p2-working-group.html">http://www.dcode.org.uk/dcrp-er-p2-working-group.html</a>
When this work commenced, Ofgem maintained their IIS incentive, meaning there is an interaction between P2 and regulation. There needs to be an understanding of how this can potentially work together.	The Distribution Code Review Working Group should ensure that this is considered in future developments

Workstream 1A: Flexibility Services   Product 2a: DSO Services – Procurement Processes	
<p>The ONP WS1A Product 2 team presented the work in progress for <i>Procurement Processes</i> with the view to collecting feedback on good practices identified to date for procurement of DSO services.</p> <p>This prompted healthy discussion from the attendees, with some of the main points outlined in the below table.</p>	
Feedback	Response
<p>This piece of work should consider the variety of voltage levels used across all the DNOs.</p>	<p>Current service requirements are focused on HV (11kV) and EHC (33kV and upwards) at the moment, but LV services are also under consideration.</p>
<p>While this approach is appropriate for providing established services, it should be noted that when trying to bring new customers on board it may be difficult to ascertain the information about the parties required.</p>	<p>The challenge of on-boarding new customers/smaller parties is recognised, and we are seeking to distil best-practice in this area by learning from recent DNO experience, as well as looking to seek feedback from those who have yet to engage.</p>
<p>When the DSO and ESO are contracting there is sometimes an IDNO in the middle, which should be addressed as all parties need access to those markets.</p>	<p>Agreed. We will give due consideration to issues presented by, and the needs of, IDNOs.</p>
<p>The information acquired up to this point is based on the questionnaire sent to the DNOs – it’s important to get the views of people that aren’t involved in the markets.</p>	<p>Agreed – we plan to do this, with the support of relevant external bodies.</p>
<p>Things (such as potential value and price) need to be published to ensure expectations between DNOs and new-entrant customers are managed and realistic.</p>	<p>Agreed. We will seek to balance the needs of the networks with the needs of service providers in this regard.</p>

Workstream 1A: Flexibility Services   Product 4b: DSO Services – Commercial Arrangements	
<p>The ONP WS1A Product 4 team presented the work in progress for <i>Commercial Arrangements</i> with the view to collecting feedback on good practices identified to date for commercial arrangements and input to develop an implementation plan.</p> <p>This was well received by the stakeholders, who provided feedback on the work presented. This has been summarised in the table below.</p>	
Feedback	Response
<p>There was general agreement to the approach for standardisation and common Terms and Conditions where possible, rather than just good practice. However, there is likely to be change or divergence in the future so version control will be important.</p>	<p>We are presenting the Steering Group with the view to move to standardising contract terms, rather than just good practice.</p> <p>We will consider statements on version control.</p>
<p>Product strategy / lessons learned from ESO should be reflected in any standardisation processes going forward.</p>	<p>There is ESO input to the product development and we will continue to learn from ESO experience of contracting for services.</p>
<p>There was a discussion on the use of external legal support over use of in-house legal support, as has largely been the case to date. External central ENA legal support may make approval easier when changes to contracts need to be approved within different DNOs to move to common terms.</p>	<p>We continue to consider the best way to deliver legal support and internal approvals</p>
<p>There should be a plan to look at commonality with ESO contracts, as well as across DSOs.</p>	<p>There is ESO input to the product development and we will continue to learn from ESO experience of contracting for services.</p>

**Workstream 2: Customer Information Provision & Connections | Product 1a: System Wide Resource Register – Detailed Design and Early implementation**

The ONP WS2 Product 2 team presented the work currently being undertaking for in designing the System Wide Resource Register (SWRR).

This included demonstrating interim webpages that are now in place on the ENA Open Networks website to explain and signpost where DNOs publish information on distributed resources at present. These webpages were accessed to show users what data is available. Feedback is sought via the interim webpages to help develop the enduring SWRR solution.

The bulk of the breakout sessions discussed proposals for an enduring System Wide Resource Register. This was structured around a number of questions. These questions, the main points raised, and the proposed actions for the product team are captured below.

Question	Feedback	Response & Product Actions
<p>What are you likely to use the data register for?</p> <p>How can we get further feedback from wider stakeholders?</p>	<p>AG members questioned the data scope (e.g. would it include demand?) and who were likely to use it.</p> <p>Examples of potential use were discussed. For example, could it be used to help agencies plan EV infrastructure? Existing information probably wasn't sufficient for this.</p> <p>It was generally agreed that getting information on DER and on network capacity &amp; reinforcement in one place is likely to be of value. It would also be useful to include resources contracted to connect to enable a look forward.</p> <p>It would be useful to know what %age of connected DER is solar, wind, etc.</p> <p>In some cases, users may not need to know who the customer is. However, it can be interesting to see who's out there and who competitors are.</p> <p>To get wider feedback, it would help stakeholders to know more on what the register would look like and support? For example, how does it help the market to develop?</p>	<p>This was a broad discussion that reinforced the need for more work to clarify what the register could be used for and how it relates to other sources of information.</p> <p>Actions to be taken forward are:</p> <ol style="list-style-type: none"> <li>1) Communicate what the register is (e.g. a factsheet) and how it can be used (e.g use cases).</li> <li>2) Be clear how the SWRR might interact with flexibility platforms (e.g. Piclo).</li> </ol>
<p>What are the key areas of data?</p>	<p>Points raised included whether all of the information needs to be shared and whether it should be mandatory for DER to be included in the register.</p> <p>There will be some areas of data that will need to be restricted. This should be factored in when thinking about overall transparency.</p> <p>On the other hand, it was queried whether non-disclosure of information</p>	<p>On whether DER will be included in the register, the inclusion of resources will depend on code requirements, contracts and what customers want. It is recognised some customers may have reasons for not appearing in a SWRR.</p>

	<p>should be penalised if this is done for commercial reasons?</p> <p>It was agreed that greater value would come from having DG, demand and network reinforcement info all together.</p> <p>On detailed data there was discussion about whether data was available for resources at 11kV and below as this is where many 1MW DER would be connected. It was suggested that either the SWRR or the LTDS would need 11kV data included in future as generation installed at 11kV may have more impact, collectively, than larger generators further upstream.</p> <p>There was discussion on whether the maximum level for each connected DER would be included or whether generation or demand profiles would be included.</p> <p>Information on DER that might participate in flexibility services would be useful.</p>	<p>On including data at 11kV, this will be further reviewed by the product team.</p> <p>It is intended to include connected DER levels rather than generation or demand profiles.</p> <p>Actions to be taken forward are:</p> <ol style="list-style-type: none"> <li>3) Consider an option where the register is primarily about capturing participation in flexibility services?</li> <li>4) Further work to confirm if we have access to data at 11kV covering DER &amp; network requirements?</li> </ol>
<p>How would you prioritise the following – accuracy, granularity, completeness &amp; frequency?</p>	<p>It was agreed by some AG members that completeness is most important with granularity also very important.</p> <p>The accuracy criterion was discussed alongside a “timeliness” (frequency of update) criterion. It was agreed that these were similar.</p> <p>Consistency of approach is also important across network companies. Standardisation of checks and updates should be considered.</p> <p>Scalability is very important (e.g going down to 11kV).</p> <p>It was understood that the SWRR couldn’t be completely granular due to data protection issues. Confidentiality is also a potential barrier to ‘completeness’ and ‘granularity’.</p> <p>It was agreed that only connected and contracted DER should be included. Including speculative connections would be less helpful.</p>	<p>This was a useful discussion to help clarify and prioritise attributes. These will be taken account of in the solution development.</p> <p>No additional actions are proposed here.</p>
<p>What are the relative benefits of the different options?</p>	<p>There was little discussion here on the specific options other than further explanation of the RecordDER project.</p>	<p>RecordDER is a Network Innovation Allowance (NIA) funded project looking at a blockchain solution to holding DER data.</p> <p>No additional actions are proposed here.</p>



<p>What other solution options might be feasible?</p>	<p>There was discussion on whether the SWRR and Piclo will be similar or will they complement each other?</p> <p>It was also identified that NGENSO may be doing something similar in a separate piece of work being considered at Wokingham.</p> <p>One way forward would be to evolve existing DNO solutions to be more consistent.</p> <p>What about incorporation with GIS so that demand and generation can be compared on a location basis?</p>	<p>Generally here, the options will be reconsidered to differentiate key areas of functionality (e.g. Should the data be available in a central register?)</p> <p>Actions to be taken forward are:</p> <p>Follow up the related NGENSO work.</p> <p>Also Actions 2) &amp; 3) above.</p>
<p>Are the decision criteria good? Are some criteria more important?</p>	<p>Consumer benefit was identified as being most important and should be included. It was argued that wider consumer benefits should come through market efficiency.</p> <p>Ease of use is important. Scalability is important.</p> <p>How does the development fit with the future worlds? Variations across future worlds may mean something different is required. This should be considered.</p> <p>Criteria should include being able to see both generation and demand – a complete picture of capacity.</p>	<p>Discussion around this question raised some aspects that need to be brought out more clearly</p> <p>Actions to be taken forward are:</p> <p>Consider updating decision criteria.</p> <p>Consider how we explain wider consumer benefits.</p> <p>Test solutions against Future World outcomes.</p>
<p>How should the costs of the preferred solution be recovered?</p>	<p>There was discussion of whether costs should fall on demand or on generation customers?</p> <p>Building costs into the connection process may be unfair on demand customers.</p> <p>Whoever benefits most should pay. It was suggested that we undertake stakeholder assessment of those who would benefit and then allocate %age costs to them either through COE or acceptance charge.</p> <p>Another question that was raised was whether there will be additional costs on DER participants due to additional information requirements? (i.e Might customers have to put in place capability to provide additional information. There may be participants who will need to buy more systems or software, therefore adding cost.)</p>	<p>On the question of further costs falling on DER due to the need to provide further information, this shouldn't be the case as the SWRR would be based on information already provided to DNOs.</p> <p>Actions to be taken forward are:</p> <p>Consider an assessment of those benefitting to allocate costs (perhaps via use cases)?</p>