The voice of the energy industry

Energy UK response to Ofgem's Call for Input on Distributed Flexibility

3rd May 2023

About Energy UK

Energy UK is the trade association for the energy industry with over 100 members - from established FTSE 100 companies right through to new, growing suppliers, generators and service providers across energy, transport, heat and technology.

Our members deliver nearly 80% of the UK's power generation and over 95% of the energy supply for 28 million UK homes as well as businesses.

The sector invests £13bn annually and delivers nearly £30bn in gross value - on top of the nearly £100bn in economic activity through its supply chain and interaction with other sectors. The energy industry is key to delivering growth and plans to invest £100bn over the course of this decade in new energy sources.

The energy sector supports 700,000 jobs in every corner of the country. Energy UK plays a key role in ensuring we attract and retain a diverse workforce. In addition to our Young Energy Professionals Forum, which has over 2,000 members representing over 350 organisations, we are a founding member of TIDE, an industry-wide taskforce to tackle Inclusion and Diversity across energy.

Summary of Ofgem proposals (link here)
Ofgem's analysis suggests that issues around market access and coordination are preventing distributed flexibility from fully offering and receiving their system value. This is especially true for Consumer Energy Resources (CER) like electric vehicles and heat pumps, a key component of distributed flexibility. Ofgem conclude that, without intervention, end-user flexibility will continue to struggle. Without a flex-centric system, the growing take-up of electric vehicles and other smart products could pose a risk (rather than a benefit) to system security. As this would result in higher costs for all consumers, Ofgem's intervention here is warranted by its remit to protect consumers.

To avoid this risk, Ofgem proposes a strategic approach to address the challenges that CER face and unlock CER flexibility as a route to advancing all distributed flexibility. Ofgem suggests that a common end vision of a common digital energy infrastructure would drive certainty and support the delivery of market 'enablers'. This would address 3 out of 4 identified market failures by delivering information provision, market coordination of operations and actions, and trust and governance.

The Call for Input explores three archetypes for a common digital energy infrastructure:

i) The 'thin' archetype is a directory which lists market operators and flexibility providers.

ii) The 'medium' archetype is an exchange platform which hosts multiple markets to facilitate and coordinate market participation and operation.
iii) The 'thick' archetype is a central platform which contains multiple markets, undertaking every step of their process and co-optimising across them.

Summary of Energy UK response

Energy UK welcomes Ofgem's intent to intervene to improve the markets for distributed flexibility and by so doing, reduce costs for all consumers.

As outlined below, **Energy UK's support for common digital infrastructure is contingent upon Ofgem using its role to urgently progress work to remove existing barriers to market access**.

Energy UK agrees that without intervention, end-user flexibility will continue to struggle and that strategic intervention is warranted by Ofgem's mandate to work to minimise costs for consumers.

However, members do not agree that the best use of Ofgem's role now would be to focus on a common digital infrastructure. Members would prefer that Ofgem prioritise immediate issues of market access via the market 'enablers' listed below. These are currently being delivered by the ENA's Open Network project. Members recommend that ENA continues with this role but with Ofgem taking ultimate ownership for delivery and taking an active role to support the ENA and its members deliver the agreed workplan for 2023.

Members note that there have been several missed opportunities over the last 6 years of the Open Network programme where Ofgem could have given DNOs more direction. Here members highlight an open letter sent by Ofgem and BEIS to the ENA in 2019 highlighting the need to move faster to resolve barriers (including on greater standardisation). Whilst the ENA responded by revising the 2020 workplan to include these requests, Ofgem reduced their engagement in the programme from 2020. Members feel that this had a material impact on the programme with ENA struggling to progress areas where consensus was difficult. Members also suggest that resourcing the project became more difficult during the RIIO-ED2 Business planning process.

Members further highlight that there has been greater progress in related areas (such as data and digitalisation) where Ofgem has acted and created new licence conditions. Given this history, members agree that delivering a step-change here will require Ofgem to take a more active role. This applies to the 'enablers' (short and medium term as listed below) as well as to related market changes such as the implementation of Market Wide Half Hourly Settlement (MHHS) and smart meter rollout.

These (direct) enablers are listed in the accompanying local energy governance consultation as:

i) Data standards
ii) Standardised market products
iii) Market stacking and primacy rules
iv) Standardised contracts and pre-qualification

In members' view, it is these 'ingredients' that should be the primary focus, with any subsequent common digital infrastructure a secondary focus. Without the common digital infrastructure but with the enablers, the market would work (albeit with more friction). However, if the preliminary work to agree, standardise and consistently implement the common 'ingredients' is not delivered successfully, then any digital infrastructure built on them would not be effective.

Some members are further concerned that focussing on the common digital infrastructure rather than the underlying process could divert resources from the critical work on the enablers and the active role that members think that Ofgem will need to play to ensure that these are accelerated. (that the focus could be 'counterproductive')

If there can be a step-change in the oversight and delivery of the short and medium term 'enabler work' set out below, then members are supportive of Ofgem continuing to explore common digital architecture (including decentralised approaches). Our preference is that for now, rather than committing to an approach, Ofgem let market innovation evolve platforms. In the longer term, member preference is for infrastructure to iteratively evolve from today's market infrastructure (to avoid any hiatus).

Members would welcome further engagement from Ofgem on the archetypes when the initial enablers work is nearing completion (for example, Autumn 2023), and when the next stage of market 'enablers' (common APIs and the asset register) is in hand with no risk of delay. Members emphasise that as well as being their priority, the enabling outputs should feed into and shape the discussions on the relevant architecture – something that is not possible at this stage.

The prioritisation for industry here is as follows:

1. Short-term (by December 2024) enablers completed via ENA Open Networks process and 'thin' 'directory' archetype' delivered
2. Medium term – asset register and common APIs (18 -24 months)
3. Longer term - common digital infrastructure (depending on the additional value it will offer and the delivery timeframe).

Whilst members do not agree with the current prioritisation of a common digital infrastructure, Energy UK welcomes the Call for Input and congratulates Ofgem and the team responsible for the clear leadership it has shown. Members agree that Ofgem intervention is warranted here and highlight that continued strong leadership will be required from Ofgem to ensure that the barriers that currently prevent assets from contributing to the system are removed.

Call for Input questions

Section 1

1. What do you think distributed flexibility could contribute to the energy system?

Energy UK agrees that distributed flexibility would contribute to the energy system – reducing capex spend on generation assets and network improvements and reducing balancing and ancillary costs.

In the Call for Input, Ofgem quotes the following projected savings:

Flexibility could deliver savings of £3.2-4.7bn/year by 2030 (c.f. thermal generation):

- *25-60% through reduced low carbon generation investment*
- *25-40% through cheaper reserve services;*
- *10-20% through reduced distribution network reinforcement ;*
- *and up to £10bn/year in system cost reduction in 2050.*

Modelling by the Carbon Trust and Imperial College London showed that deploying demand side flexibility, could save around £5bn per annum in 2050[1].

2035 deployment

In the 2022 Future Energy Scenarios (FES) modelling, the Leading the Way scenario suggests that demand side flexibility could reduce unmanaged peak demand by over 40 percent by 2035. This highlights the material impact that demand response, if properly harnessed, could have on delivering a leaner, system by reducing the overall level of additional generation and network infrastructure that will be required.

The 2022 FES also highlights how quickly "positive tipping points", particularly in the consumer space can induce change. For example, in the early part of the last decade, subsidies for small-scale renewable energy, coupled with reducing technology costs, led to a rapid increase in deployment of solar PV, resulting in 13 times over the capacity predicted by FES in 2011 for the year 2020. As with solar PV, tipping points for electric vehicles, heat pumps and domestic batteries could mean the deployment of CER is non-linear and hard to forecast. As highlighted in the consultation, if markets signals are not sufficient, there is a risk that accelerated deployment here could create stability issues for the system ('parasitic loads').

Deployment today and market friction

ENA's published data on the volume of tendered and contracted distributed flexibility highlights the current friction in the markets and what more needs to be done to enable flexibility service providers. The final figures for the past 12 months from the ENA shows the distribution network operators (DNOs) have tendered for 3.7GW of flexibility but were only able to procure just over half of that - nearly 2GW. This gap highlights why industry is calling for measures to reduce friction (standardisation) and improve viability (stacking and primacy) to be prioritised.

Findings from relevant flexibility trials

Demand Flexibility Service (DFS)

National Grid ESO's DFS saw over one million households participate and support the grid during times of strain between November 2022 and March 2023 showed that demand flexibility can have a significant impact on the grid at all times, but especially at periods of strain on the grid (2.92GWh of energy was shifted from peak periods).

Crowdflex

Crowdflex[2] investigated how 25,000 households responded to price signals Extrapolating to GB in 2030, CrowdFlex Phase 1 implies that domestic flexibility provided by households could reduce the GB system peak demand by up to 10% (6.8GW) and GB household's could provide up to 37GW of demand turn up flexibility; this equates to 53% of the magnitude GB system peak.

FRED

The FRED trial worked with 250 trial participants to demonstrate that smart charging can immediately reduce the routine cost of supplying electricity by 26%. Their research found that electric vehicle users respond well to incentives but there is no single proposition that will appeal to all consumers.

FLATLINE

[1] Page 106 of Flexibility in Great Britain 2021; Carbon Trust and Imperial College London; Key findings - Flexibility in Great Britain - The Carbon Trust

[2] Run by SSEN Distribution, National Grid ESO, Octopus Energy and Ohme

FLATLINE[3] used batteries in conjunction with smart energy management systems to 'time-shift' demand to better align with generation. Twenty new build homes (fitted with heat pump, solar PV system, battery, hot water tank and energy management system) were able to almost completely avoid the national grid at peak times with the key enabling asset – the battery – leading to cost savings of around £220 per year.

2. Will a focus on CER flexibility also help enable other forms of flexibility, especially distributed flexibility?

The CfI premise is that if the market set up is such that it supports access to CERs, then by default DERs will have access. In general, members agree with the premise.

Some members, however, prefer different terminology - 'behind' versus 'in-front' of the meter assets rather than 'consumer' versus 'distributed' energy resources. This framing would better highlight that the commercial and industrial users (particularly parts of sites or smaller users) can face many of the same barriers as domestic customers. Whilst a focus on CERs will pick up most of these, there may still be residual issues with market stacking for the C&I sector (even after the changes in train [code modification on meter splitting] and shift to more sophisticated metering. However, if the platform/ functionality is tested on a wide range of assets, and includes both I&C behind the meter assets as well as CERs, then members are comfortable with the CER/ DER reference point.

On a related point, members would like to highlight the need for new incentives/ thinking in this space to increase industrial and commercial (I&C) demand response. The Demand Flexibility Service, whilst including I&C users, has focussed on domestic volumes and the changes to the Triad mean that demand response from this sector is under utilised.

Members have also flagged the importance of understanding how consumers would be protected from the risks of participating in a smart energy system. For example, if they could be subject to penalties if CERs are unable to participate.

Section 2

3. Is there a 'case for change' and a need for a common vision for distributed flexibility?

Yes - members agree with the analysis that market access is fragmented and difficult, with value lost across the system. Members highlight that each individual change takes too long and there is no overall owner or strategy to coordinate or drive change. Often the responsibility for decisions sit with organisations with little incentive to deliver them in a timely fashion.

Recent examples are the proposed Code Modifications P415 and P444 (which aim to allow wholesale market access for flexibility dispatched by aggregators). The necessary system changes are unlikely to be implemented (by Elexon) until November 2024 which seems at odds with other parts of the industry which are trying to accelerate such changes.

The ESO's Demand Flexibility Service (DFS) which provided emergency back-up last winter which was developed, consulted on and implemented in just four months (and engaged 1.6 million customers and over 30 flexibility providers), clearly shows that change is possible faster where there is

[3] Run by Octopus Energy, Tirion Homes, Pobl Group, Western Power Distribution, Sonnen and Mixergy

sufficient will. The level of engagement with DFS, a temporary service, highlights that intervention will be needed to get the market for distributed flexibility working effectively.

However, members do not necessarily agree that the vision of a common digital energy infrastructure is the key way to overcome this impasse. Some members go further suggesting that it could be counter productive as it could stall wider developments in flexibility market if the focus is on new systems rather than enablers.

Members instead point to the related work on the market 'enablers' as their preferred critical focus. The core focus, members advise should be on accelerating delivery here. Only then should decisions on any new significant digital infrastructure in this space be considered. The vision for members then (and what industry should be driving at) is for shared rules and standards rather than the digital infrastructure that is built on these (and whether it exists as a single or multiple platforms etc).

This sequencing is important as the enabling work is the foundation on which, to function correctly, the digital infrastructure will need to work (the common standards and rules). Note members exclude the 'thin' digital infrastructure here. This does not seem dependent on the 'enablers' work and should be progressed immediately.

Members agree that common digital infrastructure would help grow the markets for flexibility, but have strong concerns about the timescales involved.

Whilst a 'thick' archetype with full interoperability would deliver the best benefits to the market, a ten(+) year delivery timeframe is too long. By 2033, either the flex markets will be working effectively without this or alternative flex provision (for example, on the supply side, potentially at higher cost) would have been built/ commissioned to support the system. Members also highlighted the risk that, given the pace of change, any thick archetype platform specific now could be out of date/ redundant before it was complete. This would place unrecoverable costs upon the end consumer.

The priority then will be to commission assets that can open up the market sooner – even if they will be suboptimal. If flexibility providers have better market access, they will be able to innovate round lower levels of friction. A series of different platforms could evolve from today's market. Whilst this could then later evolve into a fully operable 'thick' platform, members did not support this as the immediate focus.

4. What is your vision for how to accelerate the delivery of accessible, coordinated and trusted markets for distributed flexibility?

Members' vision is that soon

- distributed energy assets (consumer and C&I) have easy access to a range of markets
- common rules and standardised process enable flexibility providers to stack across a these markets, enabling them to build a variety of attractive customer propositions and engage a wide variety of consumers in demand response.

Delivering this vision will involve

- completing the 'enabling' work to standardise products, standards and contracts
- agree and implement primacy rules,
- complete the common asset registry (owned by DESNZ) to ensure that assets don't need to be registered in each individual marketplace/ platform
- develop common APIs.

With these 'ingredients' in place, a variety of different digital infrastructure set-ups could work – from a single platform to multiple platforms. Members preference here will be a set-up that can deliver the best 'bang for buck' in the shortest timeframe.

Members see these 'ingredients' as the 'real work' required here. Whilst a common digital infrastructure (for example a single platform or an exchange) would bring benefit, members urge that the focus be on this crucial enabling work first.

As well as these direct 'enablers', members highlight the need for a similar 'active' engagement/oversight from Ofgem and DESNZ to ensure that other enablers required for 'smart' including Market-wide Half-Hourly Settlement (MHHS) programme and the smart meter rollout are not delayed.

How can this vision be realised?
The initial enablers are currently being progressed via the ENA's Open Networks plan. Whilst the speed of the Open Networks project has been too slow to date, it is currently the best vehicle for getting this work done.

Most agree that the ON workplan for this year, which envisages the enabler work being completed by December this year, is reasonable. Whilst some members argue that some elements are already overdue and should therefore be delivered faster, most agree that if it can be delivered according to the plan then this would represent a step change. The key risk for all members was *whether* it would be delivered in this timeframe.

We spoke to the ENA as part of this response and understand that changes have been put in place this year that will help it to accelerate delivery here. These changes include Director or CEO level sign off of the workplan, a renewed focus on delivery and a reporting process that will flag where the actions or views of a network are impacting on the delivery of the wider group's aims for standardisation and delivery of the workplan.

Whilst members are somewhat reassured by the changes, the past track record on the delivery and ENA's role as a membership body mean that Energy UK are recommending that Ofgem take ownership and a more active role in overseeing the delivery of this work to reduce the clear risk to flexibility providers.

This is required for several reasons:

i) Whilst ENA has the technical expertise, as a non-regulated membership body it does not have the authority to enforce its decisions.
ii) Whilst these rules and standards are technical, they will also determine which actor takes precedence in which context – decisions which involve risk and can be challenged. Whilst these decisions can and should be informed by ON analysis, the decisions should sit with either Ofgem or a nominated relevant body (e.g. FSO).
iii) If there is non delivery in this area, it will impact flexibility providers (smaller/ non viable market) and energy bill payers (higher costs) rather than the networks.

Therefore Energy UK recommends that the ENA work continues as set out in the workplan but with Ofgem bearing the ultimate responsibility for timely delivery of the workplan (via its oversight of the networks) and using its regulatory powers (licensing conditions and DSO incentive) to support the ENA.

Given the scale and complexity of the work, the technical project management part of this active oversight role could be outsourced. This would free up Ofgem to focus on decision-making aspect (for example which party [at least for the time being] takes precedence in primacy rule conflicts) and ensuring outputs stay on track.

If this arrangement delivers successfully and is positively viewed by all parties, Energy UK suggests that it could be considered as an option for further enabling work. Ofgem's preference for the market facilitator role is the FSO and members already have concerns about the level of work this new body will need to contend with. Continuing this arrangement, if deemed successful, could help ensure that the necessary work on Distributed Flex can be progressed without interpretation until such a time as the FSO is ready and resourced to take over.

5. Will certainty of an end vision help accelerate enabling work and make it cohesive?

Whilst members support the ambition and intention behind this Call for Input, they do not agree that a common vision for a common digital infrastructure would necessarily accelerate the enabling work or make it more cohesive.

Members also highlight risks from focussing on a common digital infrastructure as the end vision:

i) The process for specifying and procuring a product in this space could detract from the vital enabling work.

ii) That a costly procurement exercise is run for a medium or thick archetype but without this underlying work having been fully completed or without the underlying rules fully accepted by buyers/ potential buyers. Here consumers would face the full costs but without getting the full benefits.

If these risks could be mitigated and the enabling work delivered in a timely fashion, members would support a common end vision of a common digital infrastructure built on the outputs of the enabling work.

A way to ensure that the enabling work is prioritised and delivered on time could be for Ofgem to take high-level ownership of the programme and, as part of this to take an active role in support the ENA to deliver this work. This could involve outsourcing the technical programme management oversight and focussing its input on key decisions (e.g. which party benefits in primacy conflicts) and using the new powers in the RIIO-ED2 to ensure that regulated parties play an active role in ensuring successful delivery of the ENA workplan.

6. When should a common digital energy infrastructure be in place? And therefore, when should development begin?

A 'thin' archetype (directory of buyers and sellers) could be developed immediately, alongside the work of actively managing the ON programme to ensure that the key enablers are satisfactorily completed, according to the agreed timeline.

Members recommend that work on a medium /thick archetype is paused until this work is complete. This is both because this work should be prioritised and because the outputs will be needed to inform the next stage and ensure that additional spend can be justified in terms of benefits to the consumer.

Members generally support an evolutionary approach here (to reduce the risk of procuring assets that may be outdated by the time they are delivered). Based on member views now this would be

the medium archetype for a flexibility exchange – what this cannot offer in terms of interoperability it could make up for in likely speed of delivery.

Industry views here may change when the work on the enablers is complete and the impact on the sector becomes evident. Members would welcome further decisions here being delayed until this time and a further consultation with stakeholder as to the most appropriate model.

In summary:

- Thin archetype (directory) to be developed from May 2023
- Further decisions delayed until end 2023/ early 2024

Section 3

7. What should a common energy digital infrastructure look like, and why? Please consider the archetypes or develop your own proposition.

As highlighted previously, member vision here is for a near-term expansion of markets for distributed flexibility enabled by accepted rule/ standardisation. Whether the buying and selling takes place on a single or variety of platforms is less important than the volume of distributed flex being traded and how fast this can be enabled.

All members highlight the need for speed in this space. In practice, this is likely to mean a 'thin' directory to be delivered as soon as possible and then potentially a medium 'exchange' archetype that has the potential to evolve into a more complex platform later on if the context warranted it.

As previously, members feel that any common digital infrastructure (beyond the 'thin' 'directory') should be informed by the outcome of the enabler work to standardise common processes. Members view this as the foundation required for an exchange or more complex model and needs to be completed first to inform the decision.

8. What is your view on the desirability and feasibility of the archetypes or your own alternative proposition?

As above – industry would welcome a further consultation on this at end 2023/ early 2024.

Section 4

9. Should a common digital energy infrastructure be new-build, or should it buildout from existing infrastructure?

Members highlight that the transition is happening now and therefore the design of any common digital infrastructure neds to be driven by this urgency. Given this urgency members support an approach that builds out from existing infrastructure.

Members feels that there are already emerging examples of this sort of evolution. For example, the ESO's Local Constraint Market will use a third party platform provider which enables it to innovate at a pace faster than its own IT platforms will allow (and with less risk).

10. What are the important areas for consideration when designing institutional delivery models for a common digital energy infrastructure?

As highlighted previously, the current focus should be on the *underlying ingredients* rather than on commissioning / planning for common digital infrastructure. This is ultimately a question of governance and regardless of which body is responsible for the work, will need to be *actively overseen* by Ofgem.

Members assume, from the related Ofgem consultation on Local Energy Governance, that the future market facilitator will assume the role for much of the underlying work in this area and note that Ofgem's current preference is for this role to sit with the Future System Operator (FSO).

Members note a concern about 'scope creep' with the FSO's remit. There is currently ambiguity over the FSO's

- Start date (early/ mid/ late 2024
- Remit and priorities
- Powers

Given the nascent state of the FSO it is important for visible progress to made in delivering the FSO in 2024 alongside a regulatory framework to give stakeholders confidence that it will have the bandwidth and capability to take on further roles (Note - not all members agree that the FSO is a natural fit for the market facilitator role). Members agree that the FSO's initial priorities are likely to be delivery of network infrastructure and connections. Local flex markets (not within the existing's ESO's remit) are unlikely to be a priority.

Given the urgency of accelerating progress here (to avoid 'baking in' higher costs for consumers), members would welcome consideration of whether an intermediary provider might be able to make more progress here. The platform could then mitigate to FSO ownership/ operation (if appropriate) after 3+ years once the FSO is in operation, it is adequately resourced in this area and initial priorities on network investment and connection queue are in train.

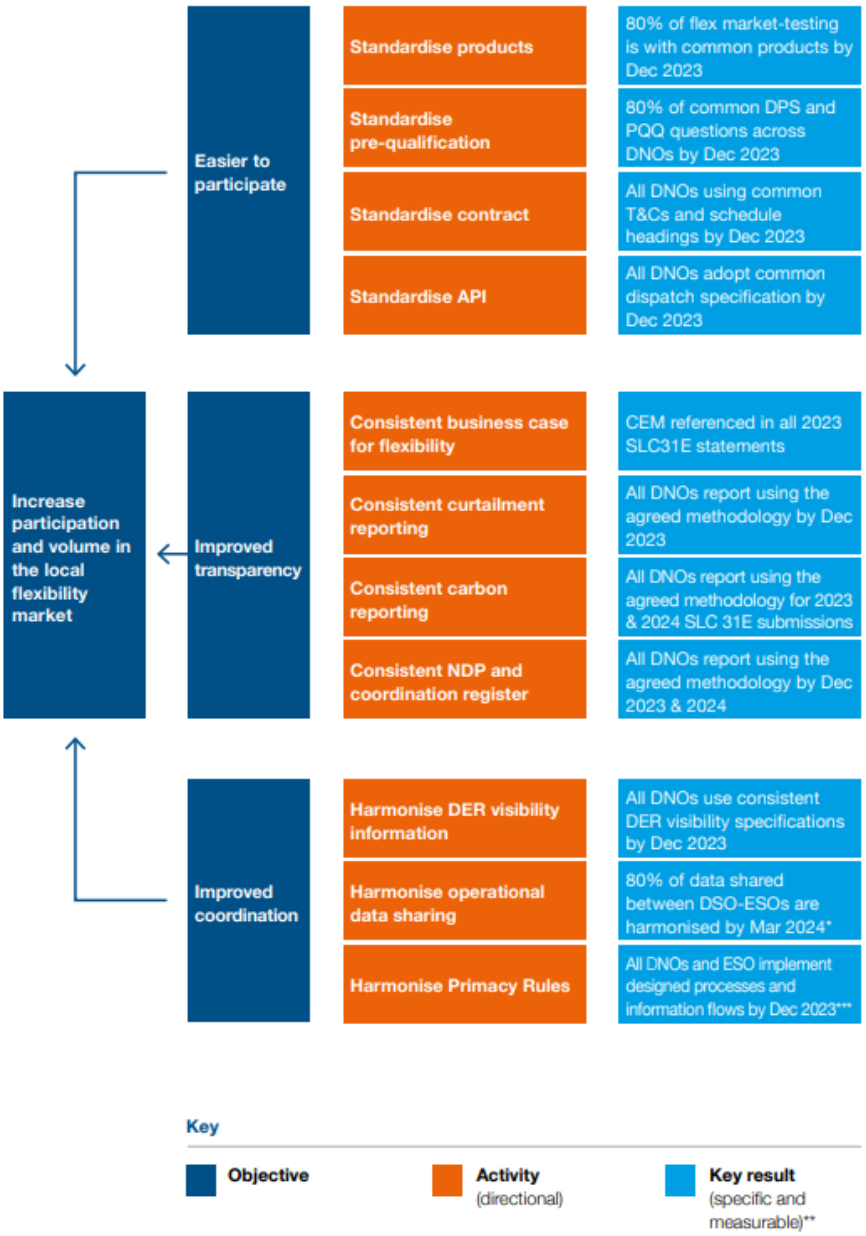
In general, members highlight the need to learn from past industry change programmes implementing IT systems - mainly in retail market, smart meter databases, central switching system and MHHS system. Any delivery of a new digital infrastructure for flexibility needs to reflect on challenges of introducing those other IT systems. Related to this, there is a need to consider security / external interfaces of new data systems from the beginning of any design of any new platform (rather than starting that thinking late in the development).

11.What are the important areas for consideration when designing financial delivery models for a common digital energy infrastructure?

If the argument for common digital infrastructure is to reduce friction and the incremental erosion of value that this creates, then network costs would seem the most appropriate route to finance the infrastructure (socialising the costs as well as the benefits to all energy bill payers)

More information is required here though for members to take a view.

Annex 1: Open Networks workplan for 2023



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	Technical working group	Description		Impact/Customer benefit
Planning and Network Development	Carbon Reporting	Support Ofgem's/BEIS' initiative to achieve common methodologies for carbon reporting and monitoring across DNOs by the 2023 reporting and refine them further in 2024 reporting cycle.		Customers will have visibility of local flexibility market carbon intensity across GB networks, reported through a consistent and transparent methodology.
	Network Development Plan and Co-ordination Register	Review and update the Network Development Plan (NDP) by 2023 and the Whole Electricity System Coordination Register Form of Statement as required by 2024.		Stakeholders are informed of major developments over a one to ten year time-frame with sufficient detail to aid their planning and forecasting activities.
	DER Information	Implement plans for receiving consistent information from Distributed Energy Resources (DER) with appropriate governance by April 2024 (and/or trigger code modifications as appropriate).		Requirements for new DER connections will be streamlined and network visibility will be improved through the consistent information flow from DER to DNOs.
Network Operation	Primacy Rules for Service Conflicts	Define and implement 'Primacy Rules', including processes and information flows for the ESO and the DNOs to manage service conflicts. (Iteration 1 in April 2023 and iteration 2 in October 2023).		Clear and consistent rules to manage conflicts arising within and across flexibility markets will help service providers improve their DSO flexibility offerings, whilst ensuring secure operation of the networks.
	Dispatch Systems Interoperability	Development API standards for dispatch system interoperability across ESO and DSO for the summer 2024 flexibility tender.		DSO flexibility market platforms will provide an optimal end-to-end experience, saving flexibility service providers from needing to develop multiple interfaces.
	Operational Data Sharing	Facilitating sharing real-time operational and forecasting data between ESO and DNO (and non-network stakeholders).		Consistency of data sharing between DSO and ESO ensures more robust forecasts and processes that will directly contribute to improving flexibility market operation.
Market Development	Standard Agreement	Improve existing Standard Agreement for procuring flexibility services across DSO and ESO by aligning the contract schedules for flexibility tenders beyond December 2023.		Flexibility providers will have minimal legal costs in engaging with the market through standard agreements across all DSO and relevant ESO flexibility services, moving towards a framework arrangement.
	Procurement Process	Alignment of sign-up and pre-qualification processes for flexibility service procurement across DNOs by December 2023.		Simplified and standardised pre-qualification process will ensure easy sign-up to DSO flexibility markets and a consistent user experience across the country.
	Flexibility Products	Align DSO flexibility product definitions. At least 80% of tendered flexibility should be tendered through common products by 2024.		Flexibility providers are able to identify which services they're best placed to offer, based on a limited number of standardised DSO flexibility products.
Monitoring and keeping established work areas on track	Common Evaluation Methodology	Governance of Common Evaluation Methodology (CEM) (and tool) used to evaluate flexibility and traditional intervention options.		Flexibility providers can have confidence in fair rewards and methodologies used for decision making across networks are robust and transparent.
	ANM Curtailment Information	Provide consistent and accessible curtailment information for ANM-enabled flexible connections pre-SCR (Significant Code Review).		Customers under flexible connections have accurate and consistent curtailment information allowing them to forecast their business plans and improve participation in flexibility markets.
	Baselining Methodologies and Tool	Monitor the roll out of the Baselining tool developed in 2021.		This tool allows flexibility providers to better understand their offerings and provides transparency of DNO methodology.