

Dear Open Networks Team,

Thank you for the opportunity to comment on your ongoing work on DSO use of flexibility. We are supportive of the ongoing work of the Open Networks Project and look forward to continued work with you.

We note that the majority of this consultation is best answered by current and future providers of flexibility. These parties will have a much better understanding of the commercial operation of flexibility. They know the practicalities of contracting, and will be able to answer based on observed best practice. Therefore, we have limited our response to cover initiatives that we are actively working on, or anticipate working on in the future. We hope you find our response helpful.

Q11 – Are there any other key aspects Open Networks should consider when investigating potential methodologies?

Elxon is progressing [BSC Modification P376](#) which aims to introduce a baselining methodology for market participants delivering flexibility services to NGESO. It would make sense for baselining facilities employed for DSO to be consistent with these arrangements. This would avoid the same operators with the same assets working to two different standards at the same time. We're happy to help with this workstream to ensure the arrangements are consistent across industry.

We welcome DSO involvement in the P376 Modification workgroup and would encourage DNO/ENA responses to the relevant consultations. The workgroup should be issuing an Assessment Procedure Consultation in the next few months, which will outline a proposed solution for comment.

Kind regards,

Peter Frampton
Market Architect