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Sent via email only to flexibility@ofgem.gov.uk
CC: BEIS Officials

Energy UK Response: Regulatory treatment of CLASS as a balancing service in RIIO-ED2 network price control

Energy UK welcomes the opportunity to support Ofgem in the process of reaching a suitable decision on this important issue at such a critical time for the energy system's transition to net zero. We would take this opportunity to note our appreciation for the extensive work done by Ofgem in the past 12 months to develop clarity over the DSO functions and related enablers.

Energy UK must, however, note its disappointment in both the regulatory approach undertaken by Ofgem and the minded-to position itself. Energy UK is concerned that Ofgem has failed to enact a robust regulatory process, instead taking the use of CLASS as a foregone conclusion and dismissing any feedback, against the advice given by a number of stakeholders over the past three years.

The concerns of Energy UK and its members are focussed on a number of core factors, but we would note in particular the need for independent analysis of the potential impacts of CLASS on the interests of current and future consumers, on competition, and on the UK's net zero ambition. There is a wider need for a full review of the regulatory approach taken to date. Based on engagement with industry and economic research, Energy UK believes that in allowing regulated monopolies to leverage their position to influence competition in a contestable market Ofgem has not abided by their requirement to, where appropriate, promote effective competition. Energy UK believes that this is an instance in which effective competition must be delivered in the interests of future consumers.

The attached Economic Analysis from the consultancy NERA, on behalf of Energy UK, explores the potential economic impacts of CLASS. The NERA report suggests that there is a grave risk that Ofgem's minded-to position would fail to meet Ofgem's principal objective of protecting the interests of current and future consumers. NERA's research was taken forward over the course of only a few weeks without the underlying data that only ENWL and Ofgem currently have access to.

Energy UK believes that neither Ofgem nor ENWL have provided sufficient evidence and analysis to enable stakeholders to assess the impacts of CLASS. As such, the aim is not to provide a fully evidenced analysis of the actual impacts of CLASS but to highlight significant areas in which Ofgem must pursue further analysis. NERA's research emphasises that Ofgem should fully assess all options and impacts before reaching a conclusion on the way forward that best protects the interests of current and future consumers¹.

Should you wish to discuss any of the details of Energy UK's response below, we are keen to continue our collaborative engagement with Ofgem bilaterally, and with Energy UK's many stakeholder groups.

Sincerely,
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¹ One member (Scottish Power) does not support Energy UK's position

Energy UK Response to Ofgem Consultation on the Regulatory Treatment of CLASS as a balancing service in RIIO-ED2 network price control

Energy UK is the trade association for the GB energy industry with a membership of over 100 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas. Our membership covers over 90% of both UK power generation and the energy supply market for UK homes. We represent the diverse nature of the UK's energy industry – from established FTSE 100 companies, right through to new, growing suppliers, generators and other market participants including aggregators, software providers and EV chargepoint operators.

Overarching Concerns

Energy UK finds that the approach to this consultation undermines years of valid work from Ofgem, as the approach taken to drafting the document itself seems to be based on a foregone conclusion from the regulator that allowing CLASS to participate in competitive markets as a DRS8 service best protects the interests of current and future consumers. Stakeholders were not consulted on this issue in 2016 when the Authority issued the Directionⁱ to include CLASS into this category, and, therefore, stakeholders did not have the opportunity to effectively assess the detrimental effects to competition or the outcomes for end consumers of this decision.

Since issuing that Direction, Ofgem has refused to heed contrary positions or review its position in light of the weakening incentive on non-network providers to participate and a potential crowd-out effect in some competitive ancillary services markets. We, therefore, would ask that Ofgem resolve this with a full independent impact assessment of CLASS.

It is the regulatory duty of Ofgem to consider the impacts of any decision on the interest of current and future consumers. Ofgem has recently clarified this includes consideration of the environmental and climate impacts of any decisionⁱⁱ, given the importance of reaching net zero. At no time during the past three years has Ofgem acted upon the recurring requests and concerns of stakeholders by conducting comprehensive economic, regulatory, and environmental research into the impacts of CLASS technology.

In this response, Energy UK would note core issues across economic impacts, the regulatory robustness of the decision, and the information imbalance presented by the consultation.

Economic Impacts

The NERA report suggests that there is a clear risk that Ofgem's minded-to position would fail to meet Ofgem's principal objective of protecting the interests of current and future consumers.

There remain a number of potential hidden costs associated with the provision of CLASS, with no analysis or evidence provided by Ofgem. These include:

- Cross-subsidies from consumers to the DNOs;
- Impacts on the useful lives of certain machines and household appliances;
- Increased risks that suppliers over-procure (or under-procure) power relative to the amount their customers use;
- Costs imposed on consumers if DNOs have incentives to discriminate against their competitors in their role as DNO or in procurement of flexibility services for their network;
- Consumers may place a value on voltage stability depending on their usage.

Energy UK and others have repeatedly raised concerns regarding cross-subsidies from consumers to DNOs. We don't, however, have evidence that Ofgem has assessed the potential impacts of a DNO tendering for National Grid ESO services using assets underwritten by consumer funding. This issue of CLASS cross-subsidy requires investigation, but is also not the only factor.

The impacts on other market actors have also not been publicly analysed. When CLASS is utilised, there is an increased risk that suppliers over-procure (or under-procure) power relative to the amount their customers use. The exposure to the System Imbalance Price with the resulting costs of an imbalance position will be passed on to consumers via energy bills.

Further costs may fall on consumers if DNOs have incentives to discriminate against their competitors in their role as DNO or in procurement of flexibility services for their network. If the DNO is participating in the market, it cannot be held up as a neutral market facilitator. Ofgem itself noted the risks associated with this in its review of allowable activities for DNOs in Energy Storageⁱⁱⁱ:

If a network company is also participating in the competitive market, it may have a strong incentive to use this ability to gain an unfair advantage over its rivals.

By allowing ENWL to participate in ancillary service markets without a full assessment while in full knowledge of the potential conflicts of interest this would result in, Ofgem has not delivered effective competition in an appropriate area and has actively encouraged ENWL to subvert the flexibility principles^{iv} agreed by all DNOs. This may undermine the welcome work of the ENA and the Open Networks Project, as the principles they have defined hold less impact for industry if DNOs do not follow them.

A far broader question has yet to be addressed regarding consent from consumers. This is of particular relevance as CLASS removes the ability of users on the network to quickly change their operations. Any aggregator participating in the market must gain the consent of their customers before being allowed to access their assets and modifying their usage. A DNO using CLASS to perform the same function has no such requirement, resulting in a clear unfair competitive advantage. As such, this removes the visibility of what value consumers may place on voltage stability and at what rate they should be remunerated in exchange for the right to modify their energy usage. This is likely to be entirely dependent on their respective usage type and will vary from customer to customer.

Furthermore, in Ofgem's Decarbonisation Programme Action Plan^v; Ofgem sets out a commitment that it "will ensure that customers are offered low-hassle ways to participate, and are rewarded for contributing flexibility to the system where they are able to". We would welcome evidence from Ofgem as to how the provision of CLASS meets this commitment; it is the view of Energy UK that it does not.

Wider impacts on the useful lives of certain machines and household appliances have not been investigated by Ofgem. Certain Industrial and Commercial (I&C) consumers deploy their own voltage controls at point of use, to protect their instruments from damage due to DNO balancing actions. We are uncertain of the impact of these technologies and it is uncertain if this impacts upon the effectiveness of CLASS by negating the balancing actions taken by DNOs. This further raises the question of what impacts CLASS could have on consumer assets. No domestic consumer can be expected to invest in the same technology and as such cannot react to the actions of the DNO.

Research from Imperial College London and the Carbon Trust was used to inform BEIS and Ofgem's Smart Systems and Flexibility Plan, and indicated that a failure to establish truly competitive flexibility markets in the early 2020s would result in a 'slow start' scenario at a cost to consumers of ~ £9bn by 2030^{vi}.

Ofgem has made no attempt to assess the impact of allowing CLASS to participate on market confidence, nor has it assessed whether CLASS will contribute to the net zero challenge whilst keeping down the costs to consumers. As such Ofgem has failed to abide by its statutory duties, as set out further below.

Legal Standing of the decision

The lack of a full and independent impact assessment makes it very challenging for Energy UK to be confident that Ofgem has duly taken into account the impact of CLASS on consumers. Alongside this, deciding to overturn core principles of competition and send a signal that conflicts of interest are acceptable if mitigated, rather than avoided, will severely undermine investors' confidence.

As such, Energy UK feels that Ofgem has not abided by its statutory duty to give appropriate consideration to the proposal for current and future consumers. The consultation paper itself recognises that CLASS will compete against other balancing providers, but does not recognise the removal of a level playing field where a regulated monopoly participates in a competitive market. The consultation is not accompanied by any independent analysis of the impacts of this on consumers.

Ofgem's proposal further fails basic principles of procedural fairness: lacking any quantification of impacts, and not undertaking adequate inquiries so that Ofgem can properly understand the implications of what it is proposing to do. This has resulted in the inability for stakeholders to have a fair opportunity to comment on the assessment of those implications.

One of Energy UK's members has also commissioned an opinion from Towerhouse LLP on Ofgem's consultation, of which Energy UK has had sight. Towerhouse concluded that it would not be lawful for Ofgem to proceed on the basis outlined in the consultation paper. More detail of the Towerhouse opinion was submitted alongside that member's response to the consultation.

Information imbalance

It cannot be expected that any market participant outside of ENWL be able to provide information that only DNOs themselves can quantify. There is no incentive on networks to share this information, or to actively record this data or commission any other organisation to develop research that may undermine the case for continuation of CLASS. This asymmetry of information requires Ofgem to provide independent analysis of the impacts to give all participants the ability to reflect on the same data when responding to the consultation.

We would ask that Ofgem explain why this proposal is not deemed 'important' (as defined under Section 5A of the Utilities Act) and therefore not deemed to require an impact assessment. The way in which the consultation, and Ofgem itself, dismisses concerns or risks without reference to any evidence that these will not in fact occur is in itself alarming.

In order to meet its statutory duties, Ofgem should commission an independent impact assessment of all elements of CLASS technology and the economic impacts of the various options for delivery.

Responses to Questions

1. Are there other options we should have considered? Please provide reasons.

A wide range of approaches must be comprehensively considered before making a decision about whether to prohibit or permit DNOs to operate CLASS and on what basis. As such we feel that Ofgem should deliver a cost benefit analysis fully assessing each option and a range of other options. Before discussing additional options for delivery, we would note with concern the fact that Option 1A has been given three pages of consideration in the document, while the other three options presented are limited to around half of a page each. There seems to be no actual consideration of these options, with the Consultation Paper simply being used to set out arguments for one option to the detriment of others.

Other options which should be considered include the use of CLASS in emergency circumstances under the same principle as OC6 controls, following the use of all available contracted flexibility. This could be set out as Option 2B, as it would be delivered under existing price controls but would add another level of separation to ensure that DNOs do not impact the competitive market, while also giving National Grid ESO another tool with which to curtail the impact of or altogether avoid significant events.

2. Do you agree that market based mechanisms can provide the most efficient incentive for CLASS participation in balancing services?

It is concerning that the second question in this consultation is a leading one which not only assumes that Option 1A is the best solution, but also completely avoids the broader issues with CLASS. This question would have been more appropriately worded if it simply asked respondents for their views on the various options.

In this area, market mechanisms in which DNOs are allowed to participate will have the adverse impact of incentivising DNOs to pursue additional activities outside of their usual activity as a distribution network, and, based upon the Baringa assessment, will risk the relevant markets becoming solely dominated by DNOs. The impact of this will be to change the nature of DNO operations and encourage DNOs to focus efforts on maximising profits through balancing activities, rather than on optimising network operation.

Ofgem must ask the question of what should be achieved with CLASS technology. In order to do so Ofgem must deliver comprehensive analysis of the impacts of CLASS on consumers, on the market, and on other participants.

This approach may expose DNOs and the regulator to legal action, as the level playing field expected from all energy markets is removed.

3. What is your view on DNOs' sharing profits with consumers, even if this means consumers are also exposed to DNOs' losses (including how this might affect DNOs' competitive behaviour noting this is different to other providers of balancing services)?

Ofgem has provided no evidence of the potential impacts of placing risk on consumers in developing CLASS. As such, Energy UK is unable to comment effectively on the actual impacts.

Energy UK is, however, fundamentally opposed to the approach of allowing DNOs to gather profit through balancing services, even when these are shared with consumers. Only if comprehensive analysis of both near and long term impacts indicates that CLASS participation in ancillary services results in the best outcome for consumers, for competition, and for the UK Government reaching its net-zero target, would Energy UK accept that this is the optimal approach.

In order to meet its statutory duties, Ofgem must assess if there are any hidden costs to the operation of CLASS, if the market is delivering effective procurement of balancing services, and if the investment in CLASS is profitable. This includes the impact of CLASS on DUOS charges and the wider impact of CLASS on consumer bills.

CLASS does not empower consumers to manage changes, instead CLASS manipulates consumer energy usage without their consent, which does not quantify what the actual value attributed to voltage is for consumers. If an aggregator contracted with a consumer to utilise on-site voltage control technology, the cost of delivery would be expected to be higher than that of the DNO, as the willingness of the consumer to participate would need to be factored in, as well as ensuring the services are tailored to reflect individual circumstances. As such, sharing profits with consumers may still be below appropriate levels of remuneration.

This has an undeniable impact on competition, particularly when combined with other costs currently sitting on other participants. If we factor in, for example, the administrative costs of outreach, marketing and engagement while developing contracts, no aggregator can be expected to compete with any DNO operating CLASS even where they utilise similar technologies. Further to this, DNOs do not pay standard charges like DUOS, giving them an additional advantage over the rest of the market.

It is important that Ofgem assess the ways in which CLASS costs are factored in, in terms of what activity is taken forward to separate resources to ensure that there is no cross-subsidy of the activity. For example, if staff and overhead costs such as premises and IT equipment are recovered through the price control or from the profit margin secured. That would require much more clarity on the actual costs, which to date has not been set out.

Consumers will further be impacted by the cost of conflicts of interest. If the DNO becomes discriminatory due to being incentivised to discriminate, investment risk for other participants will increase, and additional costs incurred to connect or to participate in flexibility markets will be passed on to consumers. This has not been explored by Ofgem, and the Consultation Paper dismisses the potential for conflict.

4. How might limits on charges to the ESO in DRS9 affect investment and utilisation signals for CLASS?

Ofgem has provided no evidence of the potential impacts of the impacts of CLASS under different scenarios. As such, Energy UK is unable to comment effectively.

5. Do you agree that requiring CLASS in the price control would not promote efficient investment signals in CLASS and could distort competitive outcomes?

Energy UK is unable to effectively answer this question due to a lack of available evidence or analysis.

This is, again, a leading question that should have been targeted at asking for views regarding the benefits and drawbacks to integrating CLASS into the existing price control. Further to this, the option set out for delivery under the price control does not seem properly thought out or evidenced. As such the ability of stakeholders to effectively feed into the proposal is significantly impacted.

The approach set out seems to place CLASS ahead of other balancing services, again suggesting that Ofgem already has a clear preference for the roll out of CLASS. This approach would undermine the market for flexibility while resulting in the same distortions to competition as are seen in Option 1A, with DNOs taking whatever flexibility provision they deem fit before any other competitor is able to. The difference being that this would formalise that process, where the current approach simply allows the DNO to significantly undercut competitors instead.

The power remains with DNOs in this situation, as so long as DNOs install CLASS under the existing approach they can reasonably expect to be utilised ahead of any non-DNO participants the additional costs that NERA identifies that are not factored into bids.

We believe that the impact on the medium to longer-term competitive market could be significant as the provision of CLASS services across GB would further weaken the business case to build flexibility assets due to lost revenue streams and could affect the breadth of potential flexibility providers available in the medium-long term.

6. Do you have evidence CLASS could affect the likelihood of system reliability issues?

As stated above, it is unreasonable for Ofgem to expect market participants to have any data to prove the impacts of CLASS one way or another, as this information is solely held by ENWL. The burden of evidence remains on Ofgem to provide comprehensive independent analysis of the impacts of CLASS. To proceed without doing so is to move forward blindly, to the detriment of consumers.

It is vital that this research include analysis of the existing response rate of DNOs to an OC6 command from National Grid ESO, and the ways in which CLASS technology could be used to vastly improve the emergency resource available to the system operator. Ensuring that the distribution network is operated safely and reliably is a core DNO task and to achieve this, DNOs ensure that the voltage level on the distribution network remains within a predetermined range. When a DNO provides CLASS, it chooses to operate part of its network at one end of the allowed voltage limits. In so doing, the DNO utilises flexibility that could otherwise serve as a 'safety net' to ensure system reliability in unforeseen circumstances.

We believe that additional issues will emerge in the medium-long term as the provision of CLASS services across GB would further weaken the business case to invest in flexibility assets or flexibility solutions as these markets will effectively be saturated by CLASS. With only ENWL participating in FR and FFR, the

market has seen a 'crowding out' effect, wherein CLASS has imposed upon those providers that count solely on competitive markets to stack value.

The impact on market confidence would be a lack of investment in flexible technology with severe long-term negative impacts on security of supply. The ESO may not have sufficient and diverse providers to procure reserve from in future, as such providers will stop investing in technologies and solutions as the market shrinks in the UK.

Only DNOs are able to adequately answer this question, as they hold the required data on system needs in the short-, medium-, and long-term. This highlights the conflict of interests apparent, and the information that DNOs have access to and can use to inform their commercial strategy. There is no apparent obligation for DNOs to provide robust and comprehensively accurate evidence to Ofgem regarding system reliability issues in the best interest of consumers.

7. Do you have evidence competition is currently being distorted or impeded by the participation of CLASS?

Do you agree with our assessment that it is unlikely DNOs have or would have market power in future, and the reasons we have provided in Appendix 2?

It is not a fair or appropriate approach to expect stakeholders to be capable of providing in depth analysis on the impacts of CLASS, as the core data sits with Ofgem and ENWL.

Based on the initial Baringa research on which Ofgem seems to base its position, if all DNOs adopt CLASS that would represent far more flexibility than is currently contracted by the ESO in markets where CLASS currently participates. It is inappropriate for Ofgem to attempt to justify a lack of analysis of this potential issue by simply stating that the likelihood is low without providing the basis for this decision, as emerges in the consultation.

It is further disappointing that Ofgem only wishes to analyse the market position of DNOs rather than the far broader issues impacting competition across the market as a result of ENWL participation. Offering only a 'high-level overview' of ENWL's bidding approach is not an effective measurement of current or future impact on the market, on market confidence, or on the continuation of a level playing field.

Energy UK would further note that effective competition is not only threatened where there is evidence of past anti-competitive conduct, or evidence that there 'will' be anti-competitive conduct in future. It is established that even the risk of anti-competitive conduct is sufficient to raise investment risk and deter new market entry. Ofgem itself has previously acknowledged this when it amended the DNO licence conditions in 2018 to prohibit DNOs from operating storage facilities. In that case, Ofgem correctly identified that the *ability* and *incentive* to distort the market or gain an unfair advantage are sufficient.

8. What information could the DNO have privileged access to that that could offer it an unfair advantage in balancing services provision?

How might this change in future if the DNO and ESO increasingly coordinate?

It is impossible for any other participant to say with certainty what data DNOs do or do not hold, as DNO data sets are not widely shared. Where DNOs do have information on the state of the network and on who is connected in any given area, they hold a clear advantage over competitors.

DNOs have an almost complete view of all potential providers of balancing services connected in their regions, as well as an unknown quantity of data about the state of their network assets. A range of existing data sets containing confidential or private data are, rightly so, solely held by DNOs, and as such even if the majority of this information were made public the DNO would retain a set of additional information allowing it to know where the optimal network location was to install flexible assets.

The recommendations of the Energy Data Task Force require DNOs and National Grid ESO to align on Future Energy Scenarios. While we welcome this coordinated effort, there is a clear risk that DNOs will be

able to access network information in the process, with a resultant advantage when determining their commercial position in balancing services provision, ahead of public release of this dataset or the resultant scenarios.

The DNO would also be able to act in a manner that discourages additional connections in areas with CLASS technology installed. Either by increasing costs or by creating an administrative hurdle beyond the capabilities of the connecting party. Allowing the DNO to participate in competitive markets is equivalent to establishing a direct incentive for DNOs to use any information they do hold to the greatest benefit. DNOs will view some as customers but others as competitors, and the difference in approach will show, even if unintentional.

Entering energy markets is by no means simple and as such it is hard to see how Ofgem is able to dismiss any impact, even minimal, of one party holding market power. The smallest of advantages could be the difference between new technologies finding success in GB energy markets and continued market failure.

9. What measures would you consider effective and proportionate to ensure that privileged information the DNO has access to is not used inappropriately to benefit the commercial performance of CLASS?

Ofgem should take forward comprehensive analysis of the potential impacts and assess options for effective and proportionate measures to ensure that DNOs are not able to use publicly funded data sets to maximise commercial performance. The removal of CLASS from competitive markets and the open sharing of any and all data held by DNOs, TOs and National Grid ESO given that collation and processing of that data is financed by public funding.

Should Ofgem decide to continue to enable the provision of CLASS in any form, Energy UK would expect that, in order to mitigate the risk to competition, Ofgem carry out a public consultation setting out proposals for regulatory conditions to apply to DNOs participating in the provision of CLASS.

10. In what other ways do you think DNOs could take advantage of their DNO role in the context of providing balancing services with CLASS?

As stated above, the DNO would be able to act in a manner that discourages additional connections in areas with CLASS technology installed. Either by increasing costs or by creating an administrative hurdle beyond the capabilities of the connecting party. Allowing the DNO to participate in competitive markets is equivalent to establishing a direct incentive for DNOs to use any information they do hold to the greatest benefit. DNOs will view some as customers but others as competitors, and the difference in approach will show, even if unintentional.

Connection Queue processes remain complex and any additional complication, even small barriers, would be quite effective in curtailing the number of connections from customers able to compete with the DNO. This could go unnoticed under existing frameworks, as these processes are not fully transparent and sharing of experiences across participants is difficult due to commercial sensitivity.

Ofgem has itself noted that wherever a regulated monopoly participates in a competitive market there is a risk of distortion. It is therefore concerning to see Ofgem continue to allow this risk of distortion to impact the market with no justification or analysis of potential impacts.

11. How far do you think existing safeguards (including licence obligations and competition law) against DNOs taking advantage of their DNO role in the context of participating in the balancing markets with CLASS are sufficient?

These protections clearly were barely sufficient before the decision to allow a DNO to participate in a competitive market against all advice and its own regulatory principles. They are now insufficient as there are no controls separating the operation of CLASS from the other DNO activities or DSO functions taken forward by DNOs.

The most appropriate approach to safeguard against conflicts of interest is to avoid the potential for conflicts of interest to exist rather than asking whether existing safeguards are enough to mitigate the new conflicts. This is the reasoning behind GB network companies being separated from supply and generation activities, and more recently from energy storage, electric vehicle charging, and aggregation activities. If Ofgem does decide to abandon its long-held view that separation is appropriate in these contexts, the licence conditions do not preclude all possible forms of discrimination.

The licence conditions have not prevented ENWL's CLASS services from benefiting from the hidden cost benefits highlighted by NERA, informational advantages or the other advantages CLASS has over EUK members providing balancing services – as mentioned in questions 3, 10 and 13.

12. What additional measures would be effective and proportionate to address actual or perceived risks of DNOs taking advantage of their DNO role?

The removal of CLASS from any competitive markets.

Ofgem should continue the principle of unbundling by ensuring that DNOs are disallowed from owning or operating any technology equivalent to aggregation, including CLASS.

Ofgem should further consider the use of CLASS under the same principle as OC6 'Demand Control', used in emergency circumstances as a last-resort option. This would require further conditions defining the amount of CLASS that could be procured by National Grid ESO, and clear governance to mitigate any risk that CLASS activities present to the efficient and unbiased operation of other DNO functions.

13. Are there other specific effects to competition that are relevant to our decision? What effects would these have on consumers?

Energy UK and the majority of its members are unable to feed into this question as we do not have access to the data associated with CLASS that would allow us to analyse and reflect upon the impacts. Ofgem needs to analyse the "real-world consumer behaviour^{vii}" with the application of CLASS so that all parties fully understand the actual benefits brought to consumers. We have already set out some of the potential impacts on consumers that should be considered further, including: consumer consent; economic concerns; the impact of a 'slow start' scenario^{viii}; conflicts of interest; and wider competition concerns.

ⁱ https://www.ofgem.gov.uk/system/files/docs/2016/04/dno_voltage_control_drs8_direction.pdf

ⁱⁱ As set out in Ofgem's Strategic Narrative for 2019 – 23 and more recently in its Decarbonisation Action Plan

ⁱⁱⁱ https://www.ofgem.gov.uk/system/files/docs/2018/09/storage_unbundling_stat_con_cover_letter_2.pdf

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<https://www.energynetworks.org/assets/files/ENA%20Flexibility%20Commitment%20Our%20Six%20Steps%20for%20Delivering%20Flexibility%20Services.pdf>

^v https://www.ofgem.gov.uk/system/files/docs/2020/02/ofg1190_decarbonisation_action_plan_revised.pdf

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/568982/An_analysis_of_electricity_flexibility_for_Great_Britain.pdf

^{vii} https://www.ofgem.gov.uk/system/files/docs/2020/02/ofg1190_decarbonisation_action_plan_revised.pdf

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/568982/An_analysis_of_electricity_flexibility_for_Great_Britain.pdf