
Re: Ofgem: Flexibility Market Asset Registration - consultation and webinar

From Konstantinos Kotsalos <konstantinos.kotsalos@eurodyn.com>

Date Thu 2024-09-19 14:03

To Euan Kirkmorris <Euan.Kirkmorris@ofgem.gov.uk>; Nina Klein <Nina.Klein@ofgem.gov.uk>; Francis Mosley <Francis.Mosley@ofgem.gov.uk>

Cc Vassilis Sakas <vassilis.sakas@eurodyn.com>; Nikolaos Bilidis <nikolaos.bilidis@eurodyn.com>; George Boultsadakis <george.boultsadakis@eurodyn.com>

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

Dear all,

Thank you for inviting us to participate in the Ofgem consultation on “**Flexibility Market Asset Registration**”. As the consultation document states, we are sending our response to the team named on the document's front page, namely Euan Kirkmorris, Nina Klein and Francis Mosley. Kindly indicate whether we need to forward this response to a different recipient.

Through our experience on developing a Flexibility Registry within the INTERFACE HORIZON 2020 project and further enhancing it through other R&D projects (like H2020 OneNet), we believe that a Flexibility Register capable to do more than simply keeping information on flexibility assets and resources, might be a powerful engine to support any activities around flexibility procurement and provision. In this regard we have been lately working on an extended Flexibility Register Component entitled as Flexibility Analytics Register that derives several different analytics (personalized for FSP as well as analytics based on aggregated information stored in Flexibility including both static and dynamic attributes) of the registered assets.

Based on this, we would like to provide some answers on the consultation regarding the importance of information sharing on Asset Registration reflected below, derived from the validation of this new service component:

Section 2. Flexibility Digital Infrastructure Policy

Q1 Do you agree that policy intervention is needed to deliver common Flexibility Market Asset Registration?

Policy intervention is deemed important as standardization for an orthogonal set of steps and processes is needed, to ensure trusted treatment of data related to small-scale distributed energy resources (DERs), consent management and seamless data sharing following IEC Market/Asset Standards (ESMP, CDPSM etc.), among others. Policy makers can also act as drivers for the wider adoption of such solutions among System Operators.

Q3. Are there any other policy alignments or industry developments, in the UK or internationally, which should be considered as part of ongoing FDI policy development?

Policy alignments shall focus on procedural standardisation (e.g., asset registration steps – profile data, asset data-, consent appendage, declaration of interest to assign specific product/services for asset/asset group, issuance of certificates) adoption of standardised data profile as well as on potential revisiting of other DSO-centred novel product/services and mechanisms (i.e., enabled via the Asset Registration) of easing access of small scale DERs with FSPs to ensure enough market liquidity, and fair market participation from small scale DERs.

Particularly on small scale DERs it is important exploit whether IEC CIM xsd standard profiles could be used for them.

Section 3, Flexibility Market Asset Registration – Aims, Scope & Approach

Data In Scope

Q4. Do you agree with the scope proposed for markets, assets, and data? Should anything else be considered?

Operational or dynamic data under point 3.18 could be an optional attribute to be included in the Asset Registration and ongoingly; APIs from asset providing SoC, actual power output, can be useful for the derivation of data analytics personalized/aggregated.

The deployment of the Asset Registration shall better start from the upper grid layer and then evolve towards the DSO, where multiple challenges will certainly rise related to large sets of data, numerous collections of consents etc. Hence, knowledge and experience from the higher (e.g. transmission) level can be thereafter induced to the DSO centred services.

Additionally, sub-metered identifiers need to be attributed. EIC-codes shall be probably expanded.

Design Principles

Q.5 Do you agree with the functional outcomes? Should anything else be considered?

[in resp. 1 &4]

Standard APIs adopting standard data profiles (i.e., IEC) shall be supported by the platform allowing for programmatical introduction of any input

[generic comment]

Analytic data specifications need to be devised considering that assets can be under maintenance or in operation

[to be considered]

Processes of updating assets should be supported (e.g, a battery rack can be extended with higher capacity), without creating conflicts with IDs

[design principle to be regarded]

Assets should be able to be grouped in Asset groups and be assigned to market products or services

[design principle to be regarded]

Market/Product qualification shall be validated not only per -individual -asset but also in Asset Groups (i.e., level of aggregation for providing services)

Q6. Do you agree with the design principles? Should anything else be considered?

[to be considered as a general Non-Functional requirement]

Self-sovereign or decentralised identities can be important to streamline and ensure trust and security of registering individual assets.

Please consider that the above answers are not considered as confidential from our side,

Kind regards,

Dr. Konstantinos Kotsalos

EUROPEAN DYNAMICS S.A.

18, Fragoklissias & 53, Samou Str.

15125 Maroussi, Athens, Greece

Tel: +30 210 80 94 500 (Internal: 639)

Fax: +30 210 80 94 508
