Consultation Response from GridBeyond Ltd

Consultation Questions & Responses

1. The ESO's principles to enable the DSO transition:

1.1 – Do you support our proposed principles and approach to the DSO transition?

Yes, we support closer ESO/DSO coordination, we believe this is the only way to encourage participation in DSO programme. Coordination of dispatches, procurements and stackability across ESO and DSO is the key to increasing flexibility in both markets.

2. Proposed 2025 vision

2.1 - Do you agree with our proposed high level vision? // 2.2 - Do you have any comments on our proposed high level vision?

We agree with high level vision, though we believe coordination of markets should happens between Ancillary markets, DSO markets, Balancing mechanism, network charges and in near future wholesale markets as assets are optimising between all these revenue streams.

Questions around the balance between market solutions and any emergency solutions also need to be addressed and debated

2.3 - Do you believe that there are any further co-ordinating functions between ESO and DSO that we should be considering?

Be believe coordination of procurement, technology are the most important challenges that need to be considered.

We believe automated dispatch with clear dispatch strategy is very important specially for smaller DER assets, but we do not believe this is prioritised in your strategy.

2.4 – Do you have any comments on the draft vision for each of the 10 coordinating functions as described in Annex 1?

Markets:

- Coordination of procurement of DSO and ESO markets and stacking across markets are very important factor to allow optimisation of assets.
- Simplification of participation process and framework need to be addressed to remove the current challenges of participating in these markets.
- As constraint management is becoming one of the major market, we would also like to see more report and data on the expected constraint areas, we use this information to understand how revenues are affected by locations, for developing new projects.

Operations:

- We agree with the coordination of dispatches across ESO and DSO, though as aggregator we need a very clear dispatch strategy from ESO/DSO to be able to optimise between markets.
- We believe a fully automated dispatch process should be used to allow fair dispatch of assets. We have experienced lower dispatches in BM historically for DER assets (as they have smaller size), so we believe coordination of dispatches of ESO and DSO is only possible with an automated dispatch system.

2.5 - What additional activities do you believe the ESO needs to undertake to facilitate our 2025 vision?

- More clarification on market solutions and emergency solutions, rather than through incremental modifications;
- Prioritising dispatch automation