

Demand Flexibility Service Consultation changes summary

We have included a summary of changes made to the Demand Flexibility Service (DFS) EBR Article 18 consultation documents below. The draft version refers to the tracked changes made following the EBR consultation period with industry and the initial version submitted to Ofgem. The final version refers to the tracked changes made in the consultation documents following feedback and comments from Ofgem.

DFS Procurement Rules

Version	Paragraph	Subject Matter	Change
DRAFT	4.3	Validation of Unit Meter Points (MPANs)	Initial list of MPANs to be submitted (and retained for 6 months) as part of Registration and Pre-qualification Procedure, showing whether Manually Initiated or Directly Instructable, and to be accompanied by a description of DFS Initiation Measures See also new definitions “Manually Initiated” and “Directly Instructable”, and amended definition of “DFS Initiation Measure”, in Schedule 1
	4.4	Unit Meter Point eligibility criteria	For clarity, moved from earlier clause (4.2) which is dealing with requirements for DFS Units
	4.3 (old)	Requirement to describe DFS Initiation Measures	Deleted as now covered by 4.3
	4.4 (old)	Requirement to retain Unit Meter Point List for 6 months	Deleted as now covered by 4.3
	4.5 (old)	Requirement to seek ESO approval to marketing / branding	Now replaced by new 19

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	6.2	DFS Operational Baselines	Clarification that baselines derived from the Unit Meter Points allocated to the DFS Unit at time of bid
	7.1	Onboarding tests	2 onboarding tests to be carried out in calendar month which follows first weekly indicative forecast, rather than time of registration
	7.4.6	Deemed cancellation of onboarding tests	Onboarding test cancelled and treated as carried out for the purposes of the 2 test entitlement if utilisation price exceeds Guaranteed Acceptance Price
	7.5	Entitlement to carry forward of onboarding test entitlement	Issue of 5 service requirements no longer nullifies entitlement
	8.1	Weekly Indicative Forecast	Clarification that weekly forecast based on a notional allocation of MPANs to DFS Unit (ie actual allocation only takes place at point of bid submission). Also, NGENSO will also invite forecast to be broken down by GSP Group.
	8.2	Submission of Weekly Indicative Forecast	To be via DFS Assessment Platform rather than email See also new definition "DFS Assessment Platform" in Schedule 1
	8.3 / 8.4 / 8.5	Updated list of MPANs	Each Weekly Indicative Forecast to be accompanied by an updated list of validated Unit Meter Points, which will be subject to validation by NGENSO in same manner as initial list
	9.5	Regular Test entitlement	Clause reworded to make more readable
	9.7	Notification of Service Requirement	Will be given by NGENSO via the DFS Assessment Platform
	10.4	Submission of DFS Bids	Bids to be submitted via the DFS Assessment Platform rather than via email
	10.5	Offered Demand Reduction Volume	Clarification that will be based on an allocation of MPANs to the DFS Unit, and that NGENSO will invite volumes to be broken down by GSP Group
	10.6	Unit Meter Points allocated to DFS Units on bid	A record to be maintained and provided to NGENSO on request
	12.1.2(a)	Warranty as to eligibility of Unit Meter Points	Clarification that warranty given at the time MPANs are allocated to a DFS Unit
	15.2	Updated Volume Forecast	Clarification that forecast is based on best estimate of volumes delivered from those MPANs allocated to the

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			DFS Unit at the time of bid, having regard to those MPANs which are Manually Initiated and Directly Instructable
	15.3	Submission of Updated Volume Forecasts	To be via DFS Assessment Platform
	19	Communication Principles	Rather than a prior approval process, marketing and branding related to DFS to be compliant with principles specified by NGENSO See also new definition "Communication Principles" in Schedule 1
	Schedule 1	Definition "DFS Procurement Period"	Clarification that includes any extension period
		Definition "Onboarding Test"	Missing definition inserted
		Definition "Unit Meter Point"	Clarification all MPANs will be subject to validation by NGENSO
		Definition "Utilisation Payment"	Missing definition inserted
	Schedule 2	Registration and Pre-qualification Procedure	"Process" and "Registration of DFS Units" sections updated, and new "Validation of Unit Meter Points" section included, to better describe process of validation and allocation of MPANs
	Schedule 3	DFS Operational Baselines	Minor corrections to terminology
FINAL	7.1	Timescale for carrying out of two onboarding tests	Clarification that they will be carried out by the end of the first complete calendar month which follows submission of the first Weekly Indicative Forecast <i>E.g. if you submit your first forecast on 3rd Nov, we'll do the 2 Onboarding Tests between 4th Nov and 31st Dec</i> <i>e.g. if you submit your first forecast on 31st Nov, we'll do the 2 Onboarding Tests between 1st Dec and 31st Dec</i> <i>e.g. if you submit your first forecast on 15th Dec, we'll do the 2 Onboarding Tests between 16th Dec and 31st Jan</i>
	7.6	Reference to a utilisation payment for remaining onboarding tests changed from "may" to "shall"	Aligns with 9.6 (regular tests), and also with 7.2 (was 7.3) of service terms which expresses the payment as an entitlement

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	8.2.1	10.00 changed to 10:00	Formatting correction for consistency
	9.1	10.00 changed to 10:00	Formatting correction for consistency
	9.3	14.30 changed to 14:30	Formatting correction for consistency
	9.4.3	Minimum 2 regular tests per month	New clause clarifying that the entitlement to 2 regular tests first accrues in respect of the period following first submission of the weekly indicative forecast and ending on expiry of the next complete calendar month <i>E.g. if you submit your first forecast on 3rd Nov, we'll do the 2 Regular Tests between 4th Nov and 31st Dec</i> <i>e.g. if you submit your first forecast on 31st Nov, we'll do the 2 Regular Tests between 1st Dec and 31st Dec</i> <i>e.g. if you submit your first forecast on 15th Dec, we'll do the 2 Regular Tests between 16th Dec and 31st Jan</i>
	9.6	"remains" changed to "remain"	Typo
	10.1	15.30 changed to 15:30	Formatting correction for consistency
	12.1 and 12.2	Cross references to clauses 12.1 and 12.3 of ENA ts and cs incorrect	Corrected to paragraphs 11.1 and 11.3 (liability, indemnity and insurance)
	13.1	16.30 changed to 16:30	Formatting correction for consistency
	14.2	Cross reference to paragraph 22 of ENA ts and cs incorrect	Corrected to paragraph 12.2 (assignment)
	15.3	10.00 changed to 10:00	Formatting correction for consistency
	17.1	Cross reference to paragraph 16.2.2 of ENA ts and cs incorrect	Corrected to paragraph 13 (confidentiality)
	23.1	Cross reference to paragraph 20 of ENA ts and cs incorrect	Corrected to paragraph 17 (notices)
	Schedule 3	Table 1 – Data Range and Selected Data columns now refer to "most recent" days and	Clarification / formatting correction for consistency

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		numerals now written as text	
	Schedule 3	Table 2 – numerals now written as text	Formatting correction for consistency
	Schedule 3	Formula at BLO1 Step 3	Reformatted for clarity

DFS Service Terms

Version	Paragraph	Subject Matter	Change
DRAFT	6.2 / 6.3	Performance Data	Extension of performance data to include, for each MPAN, whether Manually Initiated or Directly Instructable, and time of issue of the relevant comms/delivery confirmation
	6.4	Performance Data	To be provided on request via the DFS Assessment Platform rather than via email
	7.3	Right to withhold Utilisation Payments being without prejudice to other rights of ESO	Removed as not relevant
	8.5	ABSVD	Clarification that ABSVD volumes where applicable to be submitted in addition to Settlement Data
	Schedule 1		Energy Limited parameters updated (Delivery Duration)
FINAL	7.2	Clause (referring to derogation) deleted	Inaccurate (derogation sought related to another aspect of Article 6(4) not the 'pay as bid' aspects of the utilisation payment), and also unnecessary (derogations have not typically been referenced in service terms).
	8.2	10.00 changed to 10:00	Formatting correction for consistency
	19.1	Cross reference to para 12 (confidentiality) of ENA ts and cs incorrect	Corrected to para 13

