



Consultation questions

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

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

Yes, we agree with the principles outlined in the transition document.

2. **Our proposed 2025 vision**

Do you agree with our proposed high level vision?

Yes, we agree in principal with the High Level vision. While we accept the reference to the current Ofgem position on DSO capabilities, we believe that working together with the ESO and our connected-customers, together we can devise the optimal plan for DSO and the wider system operation.

Do you have any comments on our proposed high level vision?

Not at present, however, we do envisage more comments once the more detailed planned is published.

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

Currently, the DNO/DSO has no input into the procurement decisions of the ESO for Ancillary Services. Given the increase use of DER for these services, more coordination on the impact of these services on the Distribution network would be appreciated.

Do you have any comments on the draft vision for each of the 10 co-ordinating functions as described in Annex 1?

The requirement for data sharing is something we support, however, the additional burdens appear to be more severe on the side of the DSO: real-time information of multiple distribution sites may be achievable in certain locations (high level of constraints) however this may not be scalable across the wider network. It may be that the DSO can provide the ESO with an aggregated view of certain areas of our network, with the DSO 'managing' this area given some targets/instructions from the ESO.

3. **Proposed next steps**

Do you support our proposed next steps?

Generally yes, however, we are unsure to the extent that the ESO have been involved/informed of other DNO's ED2 plans. It may be appropriate to include a formal plan for this individual/group discussions.

Is there anything more you believe we should be doing to facilitate the DSO transition?

While we acknowledge that the ESO require access to DER in order to help manage the Transmission network, we feel that some of the restrictions placed on DER participating in the Balancing

Mechanism/and or Frequency Response products, may prevent DSO markets from evolving. Having to ensure availability for the Balancing Mechanism, for example, may preclude DER from providing DSO-services.

Given the current TO-DNO dynamics SPEN operate within, we can attest to the benefits of information sharing between organisations. It could be proposed to share this level of information between the DNOs and National Grid TO through the rest of the country.