

**BEAMA response to ESO consultation on operational visibility of DER**

Thank you for sight of the May 2022 document outlining ESO's approach to operational visibility of DER. The BEAMA Consumer Energy Data Industry Group and Smart Metering Group are supportive of the analysis, conclusions and proposals in your Report, and we look forward to working with the ESO and other stakeholders to finesse the details in ways that will support best practice, a competitive market for high-quality devices and services, and ongoing innovation.

**Summary of questions**

1. *Do you have any views on our listed ESO benefits arising from greater DER visibility?*

We agree with the summary of benefits

2. *Do you agree with our proposed roadmap including activities and timescales?*

We broadly agree with the proposed roadmap, though we would hope to be involved in ongoing discussions. Any proposals that suggest a need for redesigning or retooling devices may be affected by the global supply chain challenges that the industry is experiencing. We welcome the opportunity to give advice on the timings and challenges inherent in future requirements or changes.

3. *Do you agree with our approach to BM operational metering requirements for aggregated units?*

This proposal is a critical development with the potential to make the BM process simpler and less expensive right across the process, with significant potential savings and an improved service level outcome. We wholeheartedly support the proposed approach.

However, it is not clear to us where the aggregation will happen, or what the implications could be for the metering system and/or the various devices and other elements in that system. We look forward to supporting ESO to work out these details in the next stage of the process.

4. *Do you agree with our proposed standards for operational communications with aggregated units?*

As for answer to question 3, we are supportive of the principle but want to be involved in the work that delivers the solution(s).

5. *What are your views on our proposed approach to implementation?*

It was not clear from the document what the governance, ToRs, intended learnings or methodology are for the Summer 2022 BM trial, so we cannot comment on that. However, the proposal for a Power Responsive Working Group is a sensible one and we look forward to supporting this initiative through that avenue.

6. *What are your views on our proposed roadmap to review operational metering standards for non-BM services?*

The dates seem reasonable. We presume these are aligned with NG ESO's other strategic work, for example *Bridging the Gap*.

The short-term activities re listed as in 1-2 years; it would be helpful to have an estimate of immediate timelines with more detail, but we expect that will be forthcoming at the start of the Working Group process.

7. *What are your views on our proposed approach to accuracy monitoring?*

No objections were received from members.

8. *How would you like to be engaged on this work going forwards?*



We have already engaged one of your officers (Ed Farley) to speak to the BEAMA Consumer Energy Data Industry Group's metering & flexibility workstream on 27 June. After that, we look forward to involvement in the Power Responsive working group; exact nature of our involvement (whether we are represented on the WG by a BEAMA staff member, by technical expert(s) from within the membership, or both) can be discussed at a later date.

Yours sincerely,

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