Delivering A Flexibility First Approach

Consultation

September 2019

WESTERN POWER DISTRIBUTION

Serving the Midlands, South West and Wales

Contents

1 Overview

Western Power Distribution (WPD) is the distribution network operator (DNO) for the Midlands, South West and South Wales. We are responsible for delivering electricity to approximately 7.9 million customers in the UK.

Flexibility can help network and system operators deliver services efficiently and economically at lower costs and timescales than traditional reinforcement. But, as distribution constraints have a more localised and limited pool of potential participants, establishing liquid and competitive markets will be more challenging than on a national basis.

Recognising that the success of the market will depend on participants being aware of distribution system needs well ahead of the timescales in which DSOs anticipate deploying flexibility, during April and May 2018, WPD sought views on its proposals to publish signposting and forecasting information on distribution network system needs as part of its transition to managing more active networks as a Distribution System Operator (DSO). Feedback received from stakeholders has driven recommendations for better informing markets.

We are fully committed to acting in the best interests of consumers by opening up network requirements to market competition on a business-as-usual basis.

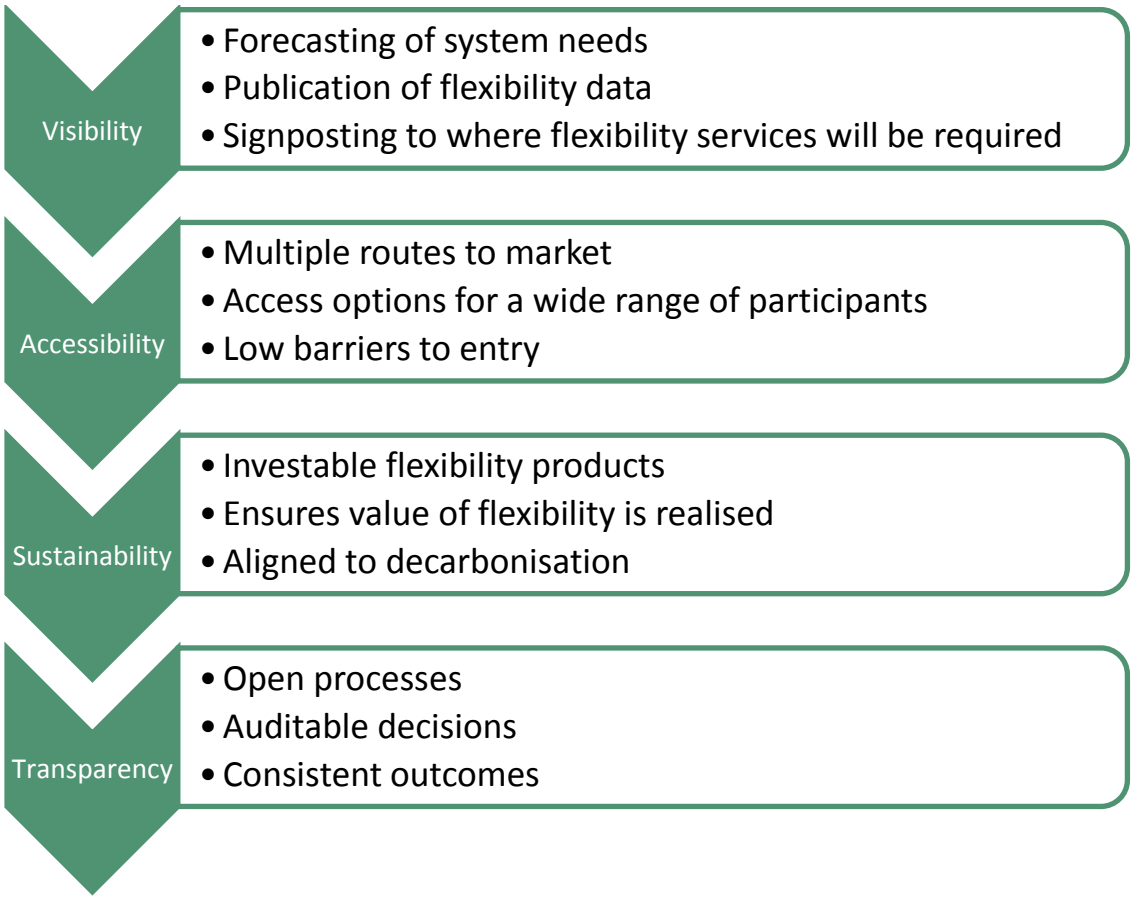
Two early rounds of flexibility procurement, beginning in May 2018 and February 2019, have shaped the engagement with providers to successfully deliver flexibility for distribution system needs. DSO capabilities have been developed across a number of aspects to best enable a smarter and more flexible energy system. Within this document, work supporting these strategic outcomes has been summarised.

WPD is now seeking feedback on the processes it has developed to recommend the use of flexibility as an enduring alternative to conventional reinforcement and to ensure these outcomes are transparent, predictable and justified.

2 Delivering a Flexibility First Approach

During December 2018, WPD, along with all GB DNOs, committed to a Flexibility First approach, which would openly test the market to compare conventional reinforcement and flexibility solutions for new projects as part of their day to day operations.

WPD sees there being four key enablers for us to deliver on a Flexibility First approach:



These four considerations will underpin the methodology for how we assess and recommend the course of investment to take.

As WPD enhances its role as being at the forefront of DSO progression, sections within this document describe positions on how flexibility can be used to develop electricity networks and systems and the processes proposed that will enable that.

We are keen to understand your views on our proposals to accelerate flexibility within WPD and ensure we are building confidence in delivering a smarter and more flexible system. Within this consultation, we are seeking feedback in three main areas:

- Our four key enablers for flexibility
- Our proposals for using flexibility to develop electricity distribution networks
- Our System Investment Assessment which addresses any potential conflicts between DNO and DSO functions

Question 1: Do you agree with the four key enablers for flexibility? If not, how should these be improved, expanded or refocussed?

3 Visibility

Facilitating new neutral markets around flexibility requires WPD to share a greater level of information on the performance characteristics of its network than ever before and in a format which is understandable and transparent.

WPD has developed two sets of information to provide to flexibility providers on the future flexibility requirements across its network – Signposting and Forecasting.

A signpost provides general directions to a number of destinations, without defining the exact path in the way a map would. In the same sense, WPD's signposting information directs flexibility providers to the different distribution system needs potentially required under a range of scenarios and timings.

Signposting provides a multiple scenario-based view of future system requirements across a five-year window. It therefore gives the market information on WPD's distribution system needs in areas that we expect to become constrained for demand before we request expressions of interest for flexibility. Signposting starts at Grid Supply Point and Bulk Supply Points, as these voltage levels require the most costly and time-bound reinforcements.

Through this signposting work, we describe what flexibility requirements we may want (months required, MWs needed, predicted availability windows) and also quantify a likely market volume of energy (MWhs per month).

Forecasting is a more accurate single scenario view of what flexibility is required in an area across a two-year window. WPD uses forecasting information to advise what flexibility it is seeking in expressions of interest, whereby it can then test the market to deliver alternatives to conventional reinforcement.

Forecasting explicitly states WPD's flexibility requirements. Being transparent about system needs demonstrates our commitment to openly test the market to compare relevant reinforcement and market flexibility solutions.

Forecasting also describes what flexibility we need (months required, MWs needed, predicted availability windows) and defines the market volume of energy (MWhs per month), but over a shorter, more defined timescale.

This advanced knowledge enables Distributed Energy Resource (DER) providers to respond quickly and reactively to DSO flexibility tenders and facilitate markets that operate neutrally.

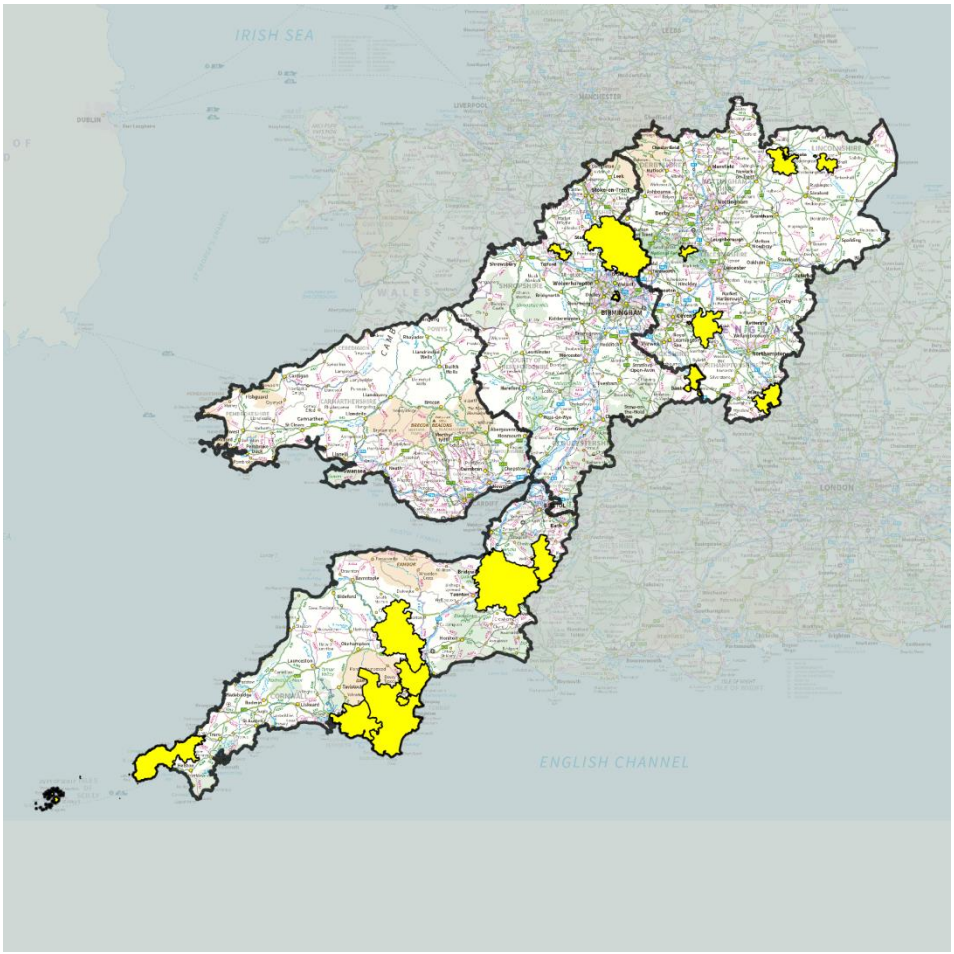


Figure 1 - 2019 Procurement Cycle 2 CMZs

Primaries with Signposting information	29
Primaries with Forecasting Information	120

To date, we have provided flexibility information on 149 primary substations across our regions, representing around 13% of our network.

During our consultation on the signposting of system needs, we received strong backing to continue to publish both signposting and forecasting data in the proposed formats and also some clear preference on making the raw data available for download outside our online network flexibility map. Both of these actions have been delivered and data is publically accessible.

We have also made strong progress in providing consistency of when throughout the year we will be seeking this flexibility. From 2019 onwards, we are testing the market every 6 months, procuring for services within zones that have requirements for flexibility 6 months to 18 months into the future.

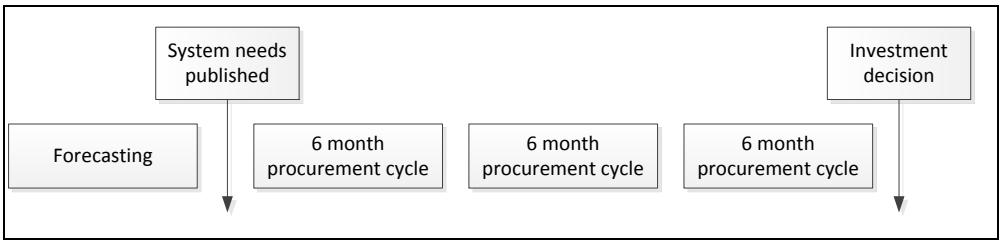


Figure 2 – Timetable for providing visibility of system needs

WPD maintains a Dynamic Purchasing System (DPS) for its demand response requirements. The DPS holds records of all potential suppliers that have passed a Pre-Qualification Questionnaire (PQQ) to ensure they meet the minimum eligibility criteria, which we have published. The PQQ does not commit either party to service provision. The PQQ also asks for site and asset information which supports WPD's assessment of zone viability, and inform which zones proceed to full procurement.

In order to join the DPS, interested parties are required to first register their interest via WPD's 2019 Periodic Indicative Notice (PIN). All parties who respond to the PIN throughout 2019 are then asked to complete the PQQ. Parties who pass the PQQ stage are added to the DPS and these parties then receive an Invitation to Tender (ITT) for all of WPD's 2019 Demand Response requirements.

2019 DPS registration timescales

31st December 2018 - 30th December 2019 – window open for PIN responses

4th February 2019 - 30th December 2019 – window open for PQQ responses

Procurement cycle 1 – for summer 2019 operation window

4th February 2019 – Proposed constraint managed zones (CMZs) published on our website www.flexiblepower.co.uk

19th March 2019 – ITT issued to all participants accepted onto the DPS

22nd April 2019 – ITT Deadline

13th May 2019 – Procurement results

Procurement cycle 2 – for winter 2019/20 operation window

1st July 2019 – Proposed CMZs published on our website www.flexiblepower.co.uk

12th August 2019 – ITT issued to all participants accepted onto the DPS

16th September 2019 – ITT Deadline

7th October 2019 – Procurement results

2020 DPS registration timescales

29th November 2019 - 30th December 2020 – window open for PIN responses

6th January 2020 - 30th December 2020 – window open for PQQ responses

Procurement cycle 1 – for summer 2020 operation window

6th January 2020 – Proposed CMZs published on our website www.flexiblepower.co.uk

3rd February 2020 – ITT issued to all participants accepted onto the DPS

13th March 2020 – ITT Deadline

3rd April 2020 – Procurement results

Procurement cycle 2 – for winter 2020/21 operation window

6th July 2020 – Proposed CMZs published on our website www.flexiblepower.co.uk

3rd August 2020 – ITT issued to all participants accepted onto the DPS

11th September 2020 – ITT Deadline

2nd October 2020 – Procurement results

Question 2: Is visibility an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach? Is the procurement process appropriate?

4 Accessibility

Flexibility will be provided by many different market participants: demand-response aggregators, electricity suppliers, generation operators, battery operators, I&C customers, local authorities, community groups and electric vehicle charging operators.

Recognising that each of these participants may wish to provide services to WPD through a variety of routes, we have been keen to ensure our flexibility offerings are accessible through a number of channels:

Since July 2017, WPD has partnered on Centrica's Cornwall Local Energy Market (LEM) project, which is developing a virtual marketplace for flexibility services across the Cornwall region.

Targeting both business and residential customers, Cornwall LEM is also providing technology solutions to enable flexibility and help unlock new revenue streams.

With funding from BEIS Energy Entrepreneurs Fund, Piclo has developed and trialled the UK's first GB-wide flexibility marketplace.

WPD has displayed its flexibility requirement on the Piclo platform since November 2018, and across 13 competitions, has sought 165.4 MW of flexibility.

Flexibility providers with matching assets in WPD flexibility regions are directed to WPD's Flexible Power site to enter procurement.

Flexible Power has been created by WPD to deliver the procurement of demand response services. It acts as our customer facing brand when seeking flexibility services, delivering a consistent service across all four of our licence areas.

As well as providing visibility and enabling routes to participation, Flexible Power also compasses our flexibility participant portal and electronic dispatch, monitoring and settlement services.

To ensure that WPD is able to continue to offer multiple routes to participation, we are developing the suite of tools under Flexible Power to provide better market integration.

This includes:

- Standardisation of visibility and forecasting data for hosting on flexibility platforms
- Availability of geographic and postcode information for platforms to pre-qualify and validate flexibility assets
- Improved sources of data for assets qualification – e.g. MPAN to constraint managed zones

WPD continues to seek flexibility from a wide range of providers and, uniquely, it has not set a contractual minimum limit for participation, instead, through Flexible Power, it requires the technical ability to provide minute by minute metering through an Application Protocol Interface (API).

Removing the potential barrier of a commercial minimum level of aggregation allows direct participation for a larger range of participants, especially those connected at LV. However, as there are a number of technical limitations to provide: minute by minute metering, integration of the API and the ability to dispatch when instructed, the route for the co-ordination of portfolios of multiple devices is expected to be through aggregators.

Aggregators can also offer an important service for Flexible Power participants in terms of revenue stacking and ensuring co-ordination when providing various services, though some participants may choose to do this themselves.

Aggregators are able to be Flexible Power Service Partners, highlighting their proficiency in offering DSO services and offering flexibility providers who are interested in Flexible Power another route to participation.

Through Flexible Power, WPD is working with a number of aggregators to ensure our products are reaching the widest possible pool of participants.

The Flexible Power commercial terms and conditions have been developed to maximise participation and reduce complexity. To do so, we have reviewed a range of other contracts and implemented key contractual conditions that provide a low barrier to entry, such as:

- Mutual and capped liabilities
- Performance based payment mechanisms to incentivise participation
- No penalties for non-delivery, only loss of potential revenue
- No exclusivity clauses
- No obligation to provide availability
- Stackable with other revenue streams

Question 3: Is accessibility an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach?

5 Sustainability

To enable the electricity system to be supported by distribution connected flexibility, there needs to be sufficient market activity and WPD is keen to nurture these early markets and provide a stability of offering to allow investment to flow in. Over the past three years, we have focussed on providing detailed information on what we require from flexibility and how we will engage with flexibility, so that we can build confidence in current and future markets.

Having a flexibility offering which is financially viable and investable will help the provision of flexibility by third parties to be sustainable. There are a number of ways we are helping to support this.

Following feedback from flexibility providers, we have altered our contractual length to better support new investment. For the procurement cycle in the second half of 2019, we are allowing providers to choose their optimum contract length, from between 1 and 4 years.

From 2019 onwards, WPD has implemented a new pricing strategy, which has three distinct phases that can be applied depending on the level of competition within a zone:

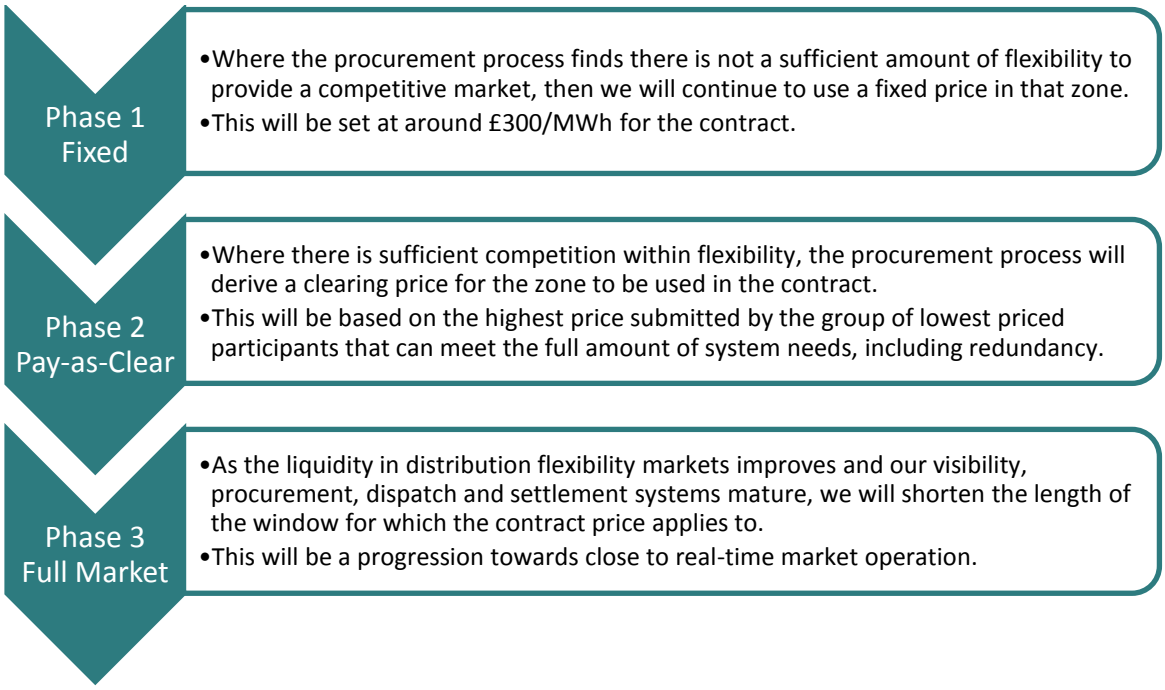


Figure 3 – WPD Pricing Strategy

During the procurement process, the flexibility provider must submit a preferred price, set at their own level, as well as confirming the fixed price basis is acceptable. This preferred price is be a total price for a MWh of both arming/availability and utilisation and can be higher or lower than the fixed price. The same percentage splits used in the fixed pricing of Phase 1 are used within Phase 2 to relate the preferred price to arming/availability and utilisation values, namely Dynamic; availability 1.6%, utilisation 98.4% and for Secure; arming 41.5% and utilisation 58.5%. Flexibility zones meeting the competitive market test then move away from using the fixed price in Phase 1 and instead are settled on a pay-as-clear price based on the highest price submitted within the lowest priced group of participants meeting the competitive market test. Due to the nascent markets for distribution flexibility, we currently expect most zones to continue on a fixed price basis, however where there is sufficient competition, we will move towards the Phase 2 stage.

Phase 3 is intended to be reached in the future, once the market and accompanying technology platforms have reached maturity. WPD will continue to develop its visibility, procurement, dispatch and settlement platforms to achieve this.

Our contractual terms and conditions have been written to provide low barriers of entry to participation, with mutually capped liabilities and no obligations to provide services for all required windows. All of the contract terms are available to view on our Flexible Power website without registration. The simplicity of entry has been mirrored in the approach taken to dispatch and monitor the service, which is all completed via a software application protocol interface (API). Again, the API documentation is available to view online.

The products we are offering are designed to be stackable with other revenue streams and are particularly complementary with the ESO's Reserve products. Our contracts do not have any exclusivity, maximising the ability for a flexibility provider to increase revenue opportunities.

The products being offered are also aligned with other distribution system operators' flexibility services and use the common terminology developed under ENA's Open Networks project. The standardisation of these products across the UK will help develop further confidence that markets for DSO flexibility are worthy of investment.

Question 4: Is sustainability an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach?

6 Transparency

To determine the most economic investment on the network which will deliver the required outcomes, WPD uses a process which recommends an investment option based on the profiled capital and operational expenditures of a range of technically viable possibilities. We have extended this to include the assessment of flexibility as an alternative option.

To ensure there is autonomy of decision when recommending the appropriate interventions, WPD has restructured the Strategy, Design, Innovation and Policy sections to effect a clear reporting line between DNO activities and DSO activities.

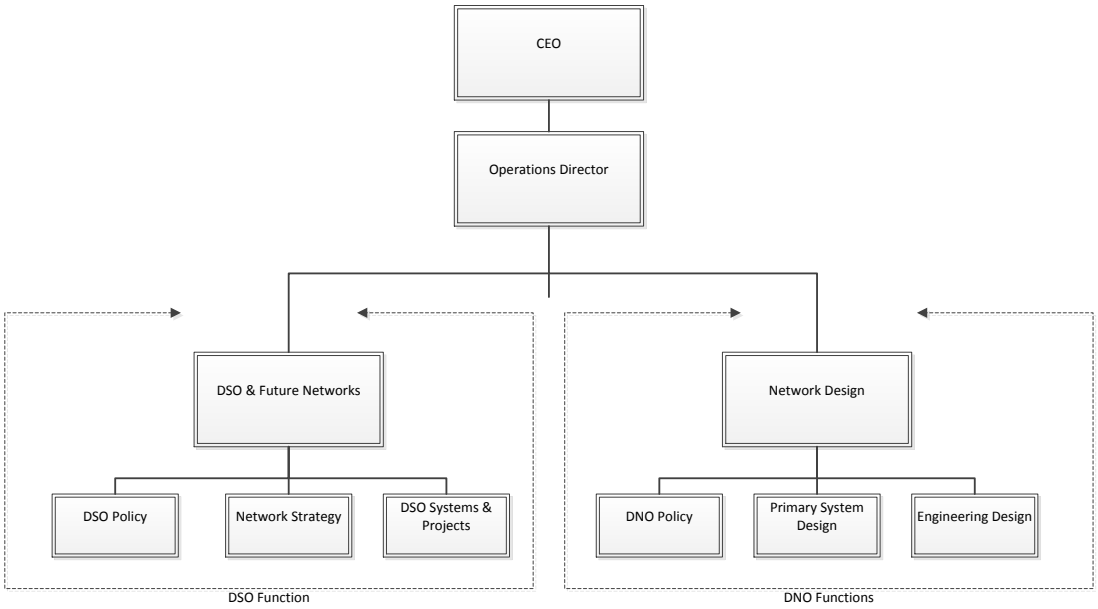


Figure 4 – WPD DNO and DSO Organisation Hierarchy

DNO activities are undertaken by the Network Design function, ensuring continued high performance within traditional network operator duties. The DNO function defines how assets are installed, maintained and repaired, including defining the applicable capacity ratings which can be delivered by those assets.

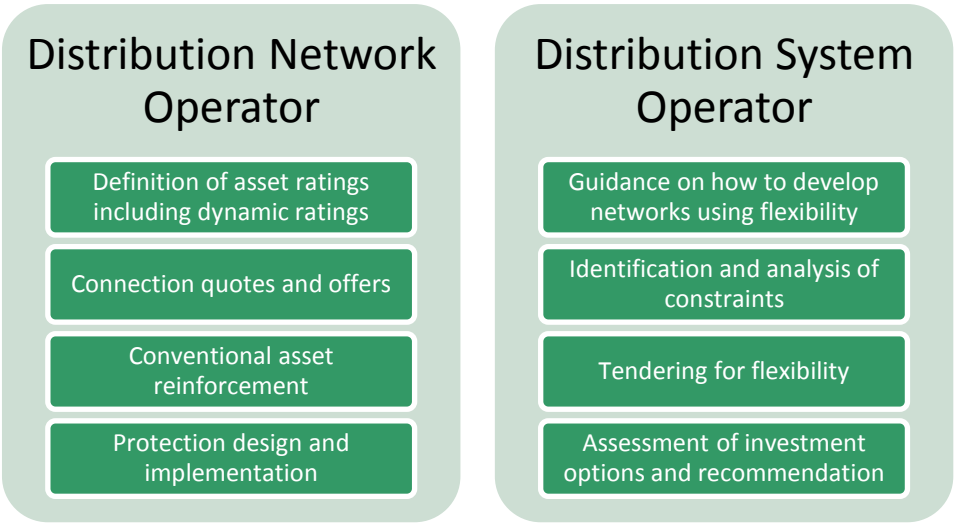


Figure 5 – DNO and DSO Functional Responsibilities

The DSO function is responsible for understanding how the system operates and identifying the potential capacity shortfalls or network limitations that require additional investment. It develops the flexibility products suited to meeting those system constraints and ensure sufficient information is published so that distribution flexibility markets can be established.

The DSO will assess the different investment options identified and make recommendations based on published criteria. The resulting recommendations will also be published to ensure transparency.

Should the investment recommendation be to use flexibility, then the DSO will procure flexibility services through the market to meet those system needs. If the investment recommendation is to use conventional reinforcement, the DNO will be instructed to commence conventional network build.

The decisions made leading to the recommendations will be subject to audit to ensure compliance with the agreed processes.

How the decisions made regarding the dispatch of flexibility will also need to be transparent. Where competitive markets have been developed, resulting in over supply, WPD needs to select the priority order on which flexibility assets are accepted and dispatched first. By sharing this methodology in advance, flexibility providers may be able to align the dimensions of the flexibility proposals submitted to the procuring party to those most highly valued.

As WPD operates either fixed or pay-as-clear pricing structures, there will be no differentiation in price, however there will be optimisations it can make by dispatching the participants in an order which most closely aligns to the required flexibility. The following factors are considered to optimise our dispatch:

Fairness	• We will share the dispatch of utilisation across all providers offering availability
Competitive	• Acceptance of availability will be shared across the largest number of providers
Operability	• Providers offering greater operability will maximise their chance of participation
Security	• The needs of the system will be met using flexibility in such a way that security of supply is maintained
Value	• Flexibility will be operated to meet system needs with the minimum level of over-procurement

As our operational experience in dispatching flexibility increases, we will use this information to provide feedback to flexibility providers in areas and support them to maximise their value to the system.

In the future, as our procurement strategy matures towards full market-led pricing, then pricing submitted for each flexibility asset will be the dominant factor for consideration.

Question 5: Is transparency an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach?

7 Developing Networks using Demand Side Flexibility

A conventional passive network will be appropriately sized so that with the network intact, the Group Demand can be supplied under all credible running arrangements assessed under industry security standards. With generation and demand patterns becoming more volatile and variable, networks will require large investment to ensure capacity is adequate to meet all credible load conditions.

Combining new technology with changing generation and demand patterns can allow some network users to provide flexibility in their consumption either by increasing, reducing or shifting their net import or export. This flexibility can be commercially controlled by WPD to provide more capacity to other connections, improve network security or increase system operability.

For load related reinforcement, we are assessing each scheme to determine whether flexibility provides a more economical solution. Expenditure on operational flexibility can be offset against the deferral of conventional reinforcement, enabling the network to developed efficiently and economically whilst also providing a revenue for flexibility providers within an area.

Developing networks using flexibility will benefit customers connecting in those areas, as they will receive quicker and more economic connections. Electricity bill payers will also benefit by a reduction in the socialised costs for increasing network capacity.

Traditionally, increases in capacity are triggered once the network reaches that capacity. This ensures networks are developed economically, but can result in delays for customers requiring additional capacity. However, once the conventional reinforcement has been completed, it usually releases large blocks of capacity due to the discrete sizing of network upgrades. Where conventional network reinforcement takes place, it can take a few years for the investment to be fully utilised until it is taken up by connecting customers.

Flexibility can provide more granular network capacity increases, better matching the in-year requirements of network users. However, distribution flexibility is still in a nascent stage across much of the UK and is not ubiquitous enough to be relied on in many situations; markets will need to be developed in the short-term to encourage the provision of flexibility services. However, once established, flexibility has the potential to manage capacity short-falls economically and responsively. In some circumstances, particularly where uncertainty is high, a greater period of operation of flexibility may allow for more optimal longer term investment plans to be implemented.

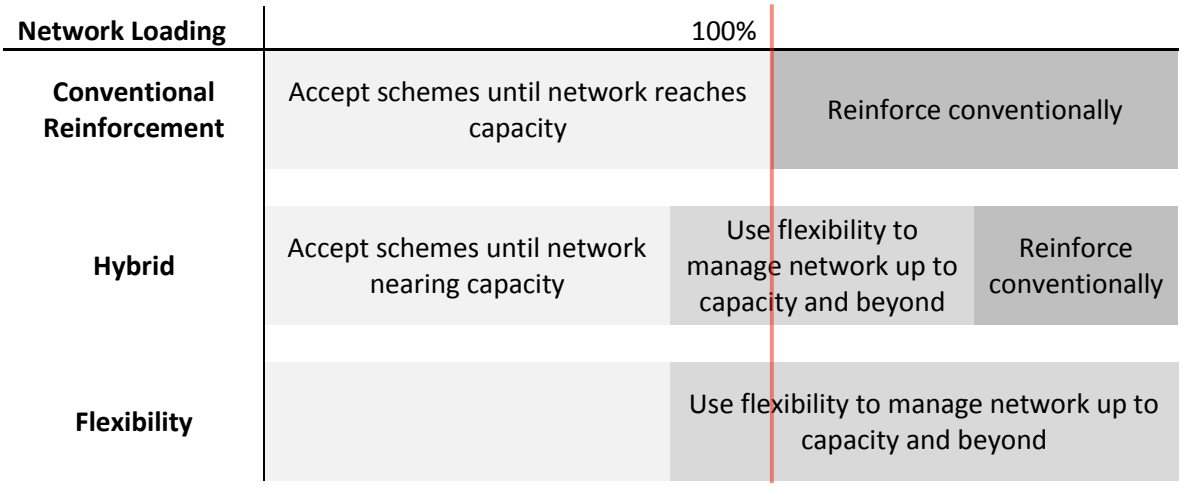


Figure 6 – Investment timetables for conventional reinforcement and flexibility

In recognising that flexibility can develop networks economically and provide benefits for managing uncertainty, but is not yet reliably available in all locations, we will bring forward the investment trigger for flexibility, proactively procuring flexibility ahead of when conventional reinforcement would be undertaken. This will allow for

conventional reinforcement to still be delivered in areas where flexibility is not available without delaying the development of capacity.

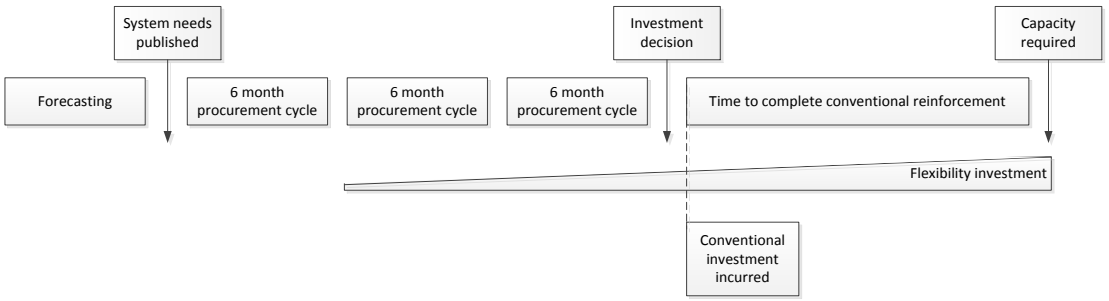


Figure 7 – Timetable for developing networks using flexibility and/or conventional reinforcement

Generally, this will involve publishing flexibility requirements for load related reinforcement ahead of that capacity being needed and investing in flexibility 12 months ahead of when a conventional investment decision would be made.

As well as using flexibility to provide additional capacity to manage load related constraints, we are beginning to use flexibility to provide additional capacity for new connections coming onto the network.

In our constraint managed zones, any flexibility that is provided from the market in excess of our requirements will be used to offer capacity for new connections. Similar to conventional reinforcement, WPD will take on the liability and costs associated with contracting the flexibility, in order to provide security and confidence to the flexibility providers. New demand seeking connection will be offered two methods of paying for these costs; one option will be to pay the costs for flexibility and assets retrospectively as they occur on an annual basis, the other option will be to settle the costs upfront, based on WPD's best view of the blend of flexibility and asset costs. Only the latter option will benefit from a reduction in cost due to NPV applied for future costs and be a fixed cost, the other option will be settled against actual costs incurred and will be subject to variations due to external factors such as the market cost of flexibility and deviations from assumed network loadings. Both of these options will be able to connect to the network without using Active Network Management and without any risk of curtailment and both will still have costs apportioned based on the network capacity. WPD will manage the constraints using flexibility and take on the risk and responsibility for doing so.

We will be piloting this in at least three areas and will develop the commercial details in conjunction with these participants by the end of March 2020, in accordance with our ICE plan.

Where flexibility is able to be provided economically, the network will continue to be managed by flexibility as an enduring solution.

For all the time conventional reinforcement can be deferred, economic benefit will come from the total flexibility costs being lower than the savings generated from the deferral. WPD's System Investment Assessment will be periodically refreshed to determine if the investment strategy is still appropriate.

Question 6: Do you agree with our proposed approach to developing networks using flexibility? Are there any other aspects you would like us to consider?

8 System Investment Assessment

WPD's System Investment Assessment process provides a systematic methodology to recommend a single investment option.

Conventional network reinforcement typically requires a large upfront capital expenditure, though for larger investments, this might be incurred across a number of years.

Deferment of reinforcement by flexibility requires sufficient energy to be balanced within the constraint managed zone. This may begin with a small amount of cost initially, however it usually involves increasing volumes of energy to be procured, resulting in the costs rising year-on-year. The lack of visibility of flexibility availability and poor liquidity in these early markets currently operating makes it harder to establish whether flexibility is a viable approach in all areas.

Innovative interventions may deliver capacity for initial low costs, but there may be an increased uncertainty over the length of time the solution is applicable for due to technology limitations.

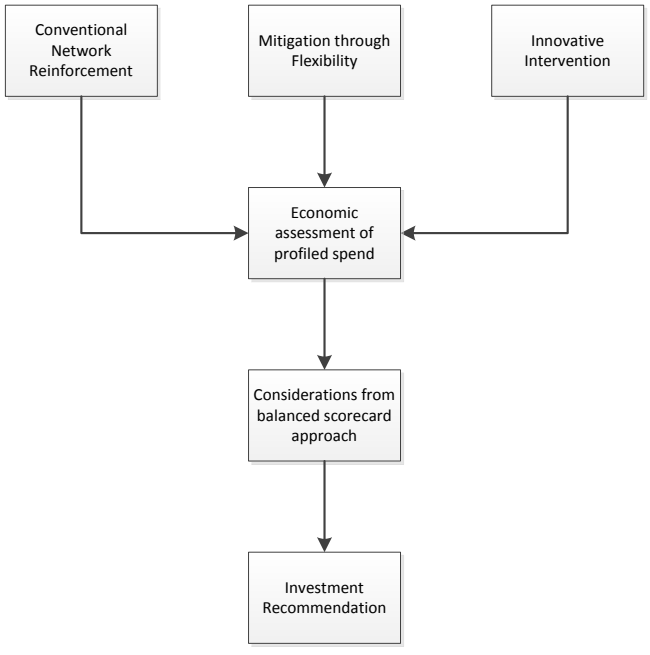


Figure 8 – System Investment Options Process

Each investment option is entered into an economic assessment tool which determines the net present value (NPV) based on the forecast expenditure across a number of years.

By understanding the minimum in-year costs for each investment option and comparing the varied spend profiles, the financially optimum investment pathway can be identified.

Our current System Investment Assessment process is based solely on financial expenditure, however we recognise that wider benefits may be derived across a number of areas which can be difficult to quantify. We are considering using a balanced scorecard approach to assess different investment approaches which may have benefits that do not obviously result in measured financial outputs.

This approach would still have the highest weighting of the assessment based on the quantitative financial category, however, it would only be one part of the System Investment Assessment. A wider balanced scorecard approach would be taken to ensure other non-quantitative benefits of a particular intervention technique can be considered. The categories being considered are:

Financial NPV – costs of the proposed scheme are subject to a net present value calculation to determine the lowest overall cost when spend occurs across multiple years. Where there is a quantifiable and calculable financial impact in one of the other categories, this is also taken into consideration within the financial NPV.

Whole system – benefits may be conferred to other energy vectors, adjacent electricity voltage levels or through a reduction in overall system costs.

Uncertainty and optionality – provides some hedge against uncertainty or allows for a greater range of future investment pathways

Decarbonisation – helps contribute to improving decarbonisation

Accelerated benefits to consumers – advances the delivery of additional improvements to consumers

The balanced scorecard criteria and scoring is described in the table below. The option with the highest score will be taken forward for delivery.

Financial NPV	Whole System	Uncertainty and optionality	Decarbonisation	Accelerated benefits
Lowest overall cost 9	Significant W.S. benefits 2	Large contribution to a smarter and flexible systems 2	Significant reduction in carbon emissions 2	Large benefits accelerated to consumers 2
Within +10% of the lowest overall cost 3	Some W.S. benefits 1	Some benefits 1	Some decarbonisation evident 1	Some benefits provided 1
Above 10% of the lowest overall cost 0	No W.S. benefits 0	No benefits 0	No benefits 0	No benefits 0

As work on whole system and other benefits matures, the scoring will be developed to better capture how the benefits can be quantified.

For each constraint managed zone with live flexibility operating, the System Investment Assessment will be refreshed every year and the recommendation as to which option is most economic can be actioned appropriately.

Question 7: Does our System Investment Assessment address any potential conflicts between DNO and DSO functions? Should the assessment be widened to include non-quantifiable benefits? How might these be best assessed?

9 Summary

WPD is committed to building a smarter, more flexible network, which meets the needs of our customers now and into the future. Through expansion of our role into DSO type activities, we can ensure this is delivered efficiently and economically by making use of all new opportunities afforded by the forthcoming changes in the way electricity is generated, stored and consumed.

WPD has led the industry in developing flexibility and neutrally creating markets for others to deliver that flexibility to be used on distribution networks. We are keen to understand your views on our proposals for delivering a smarter, more flexible network and whether any aspects can be improved.

10 Responding to this consultation

We want to hear your views on the proposals presented in this consultation. It is important that we get a broad range of stakeholders' opinions and we are keen to get your feedback on the specific questions we have included throughout this consultation.
To assist with your response we have produced a questionnaire with the specific questions from the consultation reproduced in Appendix A.

You can answer an online form here.

Responses should be returned by 15th November 2019 to:

Network Strategy Team
Western Power Distribution
Feeder Road
Bristol
BS2 0TB

Or emailed to: wpdnetworkstrategy@westernpower.co.uk

Appendix A: Consultation Response Template

Please provide your responses in the template set out below. A standalone editable version of this template is available on our website and upon request.

Please indicate the type of stakeholder you represent

1.Domestic customer (or representative)	☐	7. Community energy scheme	☐
2.Business customer (or representative)	☐	8.Consultant	☐
3.Local authority / council officer	☐	9.Energy / utility company	☐
4.Parish councillor	☐	10.Regulator / government	☐
5.Developer / connections representative	☐	11.Academic / education institute	☐
6.Distributed Generation developer	☐	12.Other	☐

Delivering a Flexibility First Approach

Question	Response
Question 1: Do you agree with the four key enablers for flexibility? If not, how should these be improved, expanded or refocussed?	
Question 2: Is visibility an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach? Is the procurement process appropriate?	
Question 3: Is accessibility an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current	

approach?	
Question 4: Is sustainability an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach?	
Question 5: Is transparency an important enabler for developing flexibility? Are we making progress in the right areas? Are there any aspects missing from our current approach?	
Question 6: Do you agree with our proposed approach to developing networks using flexibility? Are there any other aspects you would like us to consider?	
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