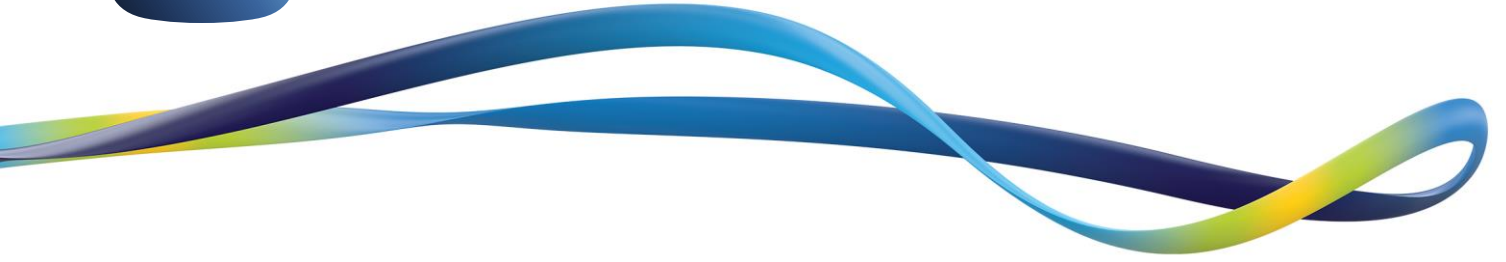




NETWORKS



National Energy Demand Strategy

ESB Networks response to CRU consultation
CRU2023148

Date: 16th February 2024

DOC-210824-IAF

Contents

1. Introduction.....	3
1.1 Role of ESB Networks	3
2. ESB Networks Response to Consultation Questions	4
2.1 Response to Question 1	4
2.2 Response to Question 2 and Question 3	4
2.3 Response to Questions 4 and 5	5
2.4 Response to Question 6	6
2.5 Response to Questions 7 - 8	6
2.6 Response to Question 8	7
2.7 Response to Question 9	7
2.8 Response to Question 10	8
2.9 Response to Question 11, 12 and 14	10
2.10 Response to Question 13 and 15	13
2.11 Response to Question 16, 17	14
2.12 Response to Question 18	14

1. Introduction

ESB Networks welcomes the opportunity to respond to the Commission for Regulation of Utilities' (CRU) consultation paper on the 'National Energy Demand Strategy' (NEDS). ESB Networks is proud to support CRU on the development of the NEDS and will continue to work closely and collaboratively with CRU and other stakeholders on its design and implementation across each scope area within the project.

1.1 Role of ESB Networks

As Distribution System Operator (DSO), Distribution Asset Owner (DAO) and Transmission Asset Owner (TAO), ESB Networks works to meet the needs of all Irish electricity customers – generation and demand - providing universal access to the electricity system. We deliver and manage the performance of a system of almost 157,000 km of overhead networks, 27,000 km of underground cables and 640 high voltage substations.

To date we have connected approximately 6GW of renewable generation to the distribution and transmission systems, from microgeneration, mini-generation and small-scale generation through to large amounts of distribution and transmission connected renewable generation. We have 2.4 million demand customers, of which currently more than 70,000 are now becoming active customers – including, but not limited to, domestic and commercial premises with microgeneration/mini-generation (a rapidly increasing number); participants in flexible demand; and premises with battery storage.

In 2023, the National Network, Local Connections Programme, National Smart Metering Programme, and Retail Market Services areas within ESB Networks have been structured into a single new unit, Distribution Markets and System Operation (DMSO). This function is responsible for driving and enabling smart energy services and flexible demand across all markets, enabling climate action and greater customer participation in a secure and sustainable energy system.

Future Markets blueprint

ESB Networks has commenced the development of a long-term blueprint for the future markets (and underlying functionality, systems and regulatory needs) to drive flexible demand and smart energy services. Aligning with the core objectives of the national energy demand strategy, the blueprint will be a vehicle for delivering 15-20% demand side flexibility, ensuring Ireland's electricity demand is consistent with Ireland's carbon sectoral ceilings and support the delivery of Ireland's transition to reach net-zero by 2050.

2. ESB Networks Response to Consultation Questions

2.1 Response to Question 1

Do you agree with the overall approach to the NEDS?

ESB Networks welcomes the publication of the NEDS consultation. It offers clear regulatory direction on flexibility and smart energy services, a pragmatic phasing of its delivery, and guidance for all stakeholders on the roles they are expected to play.

As outlined in section 2.3, ESB Networks has and will continue to play an important role in implementing the NEDS. We welcome this role and want to acknowledge the effectiveness of the structures put in place by the CRU to date to support the initiation of the NEDS. The governance structure put in place will – we believe – enable the development of strong, coherent priorities which are consistent and aligned between the different areas of the NEDS.

As the NEDS progresses, we will collectively depend on the effectiveness of these structures, and the leadership shown by the CRU, to ensure the effective, timely and strategic delivery of the NEDS. The consultation paper sets out the CRU's intent to progress a discovery led approach; in the context of an immature and rapidly developing field of flexibility and smart services, this will prove an effective approach, albeit dependent on the strength of coordination and conscious focus on progress, learnings and effective adaptation through the governance structures introduced.

There will likely be many interdependencies between areas of the NEDS, the organisations delivering or participating in them, and the success of the NEDS as a whole. It will be critical that the evolution of the NEDS continues on the coherent and consistent path initiated by the CRU through this consultation, with these interdependencies known and accounted for in planning, prioritizing and adapting activities progressed through the NEDS.

2.2 Response to Question 2 and Question 3

Do you agree with the sources of demand flexibility identified (storage, transport, domestic, industrial & LEUs, commercial)? Are there other sources of flexibility that could contribute to the demand flexibility targets?

Do you agree with the assessment of what cohorts and technologies are in scope for the demand flexibility target?

ESB Networks agrees strongly with the sources of demand flexibility outlined in this consultation, and the considered approach that the CRU has taken in defining them. We note that over the period since the initial publication of the NEDS Call for Evidence and the associated publication of ESB Networks' ['Scenarios for 15-20% Flexible System Demand'](#),

greater clarity has emerged as to the most likely near term sources of flexible demand at scale, including for example the role of industrial electric heat, and the role of sector coupling between gas and electricity, initially through the integration of biomethane.

Building on what has been learned, and our experience of the discovery-led National Network, Local Connections Programme, we expect that further technologies and sources of flexible demand will emerge, as a result of technological and policy developments. This is why we consider two elements of the NEDS as set out to be particularly important. Firstly, the discovery led approach will allow the CRU and other relevant stakeholders to adapt approaches based on evidence as it emerges. Secondly, the suite of concepts defined in the consultation paper relating to demand, system demand, supply, demand flexibility and supply flexibility provide a clear framework for considering how new sources or technologies fit and align with the objectives of the NEDS.

Finally, ESB Networks considers that a critical attribute of any source of demand flexibility is the carbon intensity. Each source or technology enabling demand flexibility will have some impact on the carbon intensity of demand. Some of the sources of demand flexibility operating in the market today can inherently result in net carbon increases as a result of demand flexibility (for example if they shift demand through the use of emissions-intensive behind the meter generation). Other sources of demand flexibility may increase or decrease emissions pending how they are operated, for example storage or changing the time that electricity is used). We look forward to working in partnership with the CRU to ensure that the rules, provisions and criteria adopted in the development of initiatives to stimulate demand flexibility consistently deliver net carbon reductions at a system level and over appropriate timeframes.

2.3 Response to Questions 4 and 5

Do you have additions or modifications to offer on the summary of the key mechanisms through which market participants can provide flexibility?

Are there additional contributions (i.e. other actions or proposals) to the NEDS that should be considered from stakeholders such as Government departments, SOs and State Agencies?

Particularly with regards to the gas network. Are there other proposals which can be included in the NEDS that contribute towards the overall objective of aligning the gas demand forecast, or more specifically the associated carbon emissions forecast, with the carbon budgets?

The broad mechanisms set out offer a clear and consistent framework for considering current and future channels through which market participants can provide flexibility; as a system operator and working in partnership with the CRU, ESB Networks will be responsible for the development of a range of specific products or initiatives falling within each of these mechanisms over the coming years.

Over the coming years technological, economic and policy developments may influence the pace and direction of development within each mechanism. There will likely be a high degree of interaction between these mechanisms; they will have the potential to accentuate or on occasion detract from each other's impact. As ESB Networks and other partners to the NEDS progress activities under each of the priority areas, it will be important that the NEDS governance and engagement structures support open and transparent consideration of the potential trade-offs arising and priorities to be determined.

2.4 Response to Question 6

Do you agree with the proposed clarifications for defining demand flexibility?

ESB Networks welcomes the clarifications provided. Having considered these in detail, we believe that they are consistent with the proposed definition of flexible demand, and furthermore that they reflect the spirit and intent of the targets with respect to flexible demand as set out in Climate Action Plan 2023 and onwards. The clarifications illustrate a consistent approach of defining demand flexibility with respect to the needs it meets, as opposed to a technology-based definition. We believe that this is likely to prove effective in supporting consistent developments and decision making into the future.

Reflecting the immature and evolving nature of flexible demand, we expect that these will be the first of many clarifications and processes to consider alternative approaches and the degree to which they meet the definition for flexible demand. We welcome the leadership shown by the CRU in engaging with these questions and look forward to working closely with the CRU in supporting its consideration of future questions of this nature.

2.5 Response to Questions 7 - 8

**Do you support the proposed Volume Shift option for defining demand flexibility?
Are there additional considerations or clarifications required in defining demand flexibility?**

ESB Networks welcomes and supports the proposed Volume Shift definition for a number of reasons. Firstly, by adopting an energy-based metric, the definition reflects the purpose and intent of the Climate Action Plan 2023 onwards in terms of the role of flexible demand in carbon abatement. The definition makes it clear that demand flexibility should not result in the generation of additional demand so much as changing the time at which demand is seen on the system. It is a definition which provides additional clarity while maintaining a level of simplicity which will support the pace of product development to stimulate this demand flexibility. Secondly, the definition provides a new degree of clarity for all parties to consider whether a given source (technology, product, etc.) meets the requirements of demand flexibility (as opposed to other valuable but independent system needs). This is a vital signal to the market, and to all parties who are investing in the development of new demand

flexibility solutions. Finally, we believe that an energy-based definition as proposed, accounting for both power and duration, promotes materially higher value forms of demand flexibility than would be achieved with a power-only definition.

As such, ESB Networks is now working to update our scenarios and projections for the volumes of different types of demand flexibility which can be stimulated over the coming years such that:

- The additional information gathered over the period since the publication of Scenarios for 15-20% Flexible Demand for consultation in 2023 is reflected.
- The indicative trajectories and volumes projected are restated in terms of energy rather than power.

2.6 Response to Question 8

ESB Networks do not have any additional considerations or clarifications required in defining demand flexibility at this time.

2.7 Response to Question 9

Do you agree with the view of progress to date?

ESB Networks agrees with CRU's view of progress made to date, and we continue to work in close partnership with the CRU to ensure that there is ongoing acceleration on the progress delivered. As acknowledged in the 15-20% scenarios published by the CRU as part of the NEDS Call for Evidence, demand flexibility is an immature and rapidly changing field. Its progress will be inherently market-specific because it is heavily premised on customer choice, which will vary based on a society's economic and industrial conditions, geography, climate, values and norms. In this context, the discovery based approach mandated by the CRU and which has consistently been applied in the National Network, Local Connections programme will remain critical to continued progress.

ESB Networks also agrees that significant efforts are required to unlock adoption and behavioural changes, incentives and investment quickly and efficiently to meet both the 2025 and 2030 flexibility targets. Doing this in the most effective manner possible will rely on a continued emphasis on learning and adapting based on what is working and what is not working at appropriate junctures on the NEDS project.

2.8 Response to Question 10

Do you have any views on the approach to Area 1: Smart Services, developed to increase customer engagement and participation in support of the NEDS?

a) Are the initiatives that the NEDS is engaged in and planning for its future programme sufficient to support customer participation and deliver increased flexibility?

b) Do you have any view on what measures the NEDS should prioritise in order to deliver greater flexibility and why?

c) Are there other areas or measures that the NEDS should consider in addition to those outlined above?

d) Are there any additional measures that should be implemented by NEDS stakeholders (such as Government departments, SOs, and State Agencies) to contribute towards the goals of the NEDS?

e) Are there any other measures which the NEDS should consider around enabling greater business participation in flexibility?

ESB Networks welcomes the leadership and direction shown by the CRU in setting out the overall approach for Area 1: Smart Services. This area in particular will allow all customers, as well as market participants, secure the value that is enabled by smart meters as delivered through the National Smart Metering Programme. Continued progress towards making smart metering data available to ESB Networks, suppliers, and other innovative parties working in customers' interests will be critical to its success.

We believe that one of the key strengths of the NEDS as set out is to bring this area (Smart Services) within the same overarching framework as the other areas (Demand Flexibility and Response, New Demand Connections). This is because there will inherently be interactions and interdependencies between these areas, in that they each influence electricity demand, operate within the same market context, in many instances will involve the same demand users, and rely on the collaboration of the same set of organisations and agencies. As the NEDS progresses, it will be increasingly important that the interactions and trade-offs between developments in the different areas are considered, and decisions made which promote the overall greatest impact on demand and on consumer participation. There will be instances where within any given area, different approaches are appropriate for different initiatives, for example with more agile proofs of concept for more immature concepts and more standard delivery mechanisms for more mature and knowable concepts. This is perhaps most prescient in the context of Smart Services, which depend not only on technological changes, but on consumer sentiment and adoption, technological advances, business model changes and potentially on new entrants into the market, or significant product development on the part of existing market participants.

ESB Networks looks forward to working in partnership with the CRU, along with energy suppliers, other system operators, the relevant agencies (for example the SEAI and

Enterprise Ireland) to stimulate and accelerate the significant changes needed. The immature and in many instances untested nature of smart services will introduce greater levels of complexity and uncertainty than has been the case in many of the major market developments of the past decades. As such, we will collectively rely on the strength of the coordination and governance mechanisms introduced through the NEDS, and on innovative new approaches to designing and testing market developments (as proposed through the in-development Markets Blueprint) will be increasingly central to the success of Area 1.

With regards to the separation of contracted import from contracted export supplier as referenced in section, 3.3.5 Secondary Measurement Devices / Submetering; ESB Networks supports the proposal for customers to be able to choose a separate supplier for export. As set out in ESB Networks' response to the consultation on the Enduring Arrangements for Remuneration of Microgeneration Exports, the implementation of this proposal will require fundamental changes across several key areas. Its successful implementation will rely on extensive collaboration between, ESB Networks, the CRU and Market Participants and the development of an agreed programme of work to meet the needs arising to appropriate timelines.

With regards to sub-metering functionality, we believe that technological innovation (in particular as regards the consideration of digital / data based innovation) could potentially play a central role in the development of effective solutions to meet the customer need arising. As such, we look forward to working in partnership with the CRU to build a greater understanding of the relevant energy and regulatory policy objectives, so that we can support an innovative and effective solution design process. To the extent that this activity is intended to support innovation in the market, it will be important to consider implementation approaches that maximise this innovation without inadvertently disrupting developments that are already ongoing in the market (for example with respect to microgeneration and other smart services).

Finally, as regards energy communities and energy sharing, we join the CRU in its commitment to a broadened and strengthened role for this as is anticipated in upcoming European legislative developments. To the extent that energy sharing and energy communities are geographically proximate and work to shift demand towards periods of high local renewable generation, there is significant potential to increase domestic customers' opportunities to engage with and share in the benefits of renewable energy generation. To maximise the impact and customer benefit of our shared efforts in this regard, it will be important to explore how the design of energy sharing influences customer appetite and adoption, and the trade offs between technological and market designs, and the different levels of complexity which might be involved. As such, we have commenced investigating different energy sharing initiatives internationally to benefit from best practice and learning to date, and we are committed to innovative approaches to progressing options for energy sharing within energy communities, in partnership with the CRU and with market participants. Finally, we note that our work to date on the introduction of flexible demand services has highlighted some of the barriers to community participation, for example relating to legal basis, resource expertise and capacity. We are committed to working closely with the SEAI and the CRU to progressively address these barriers.

We share the CRU's view on the extent of change required and recognise that this will involve significant commitment of time, effort and planning by all parties involved, to ensure the success of this programme of work. By developing a shared industry understanding of critical design objectives, solution options and the associated lead-in times, we believe that changes and new services can be designed and delivered in a manner that reflects customer needs and expectations, as well as market intent to provide the new services that have been set out to be achieved.

2.9 Response to Question 11, 12 and 14

Can the items proposed for Area 2: Demand Flexibility & Response, as outlined, provide appropriate incentives to improve flexibility across the relevant target sectors (i.e., larger business and industrial users, and the transport and public sectors)?

Are there additional mechanisms to facilitate demand flexibility that should be considered as part of the NEDS?

What are your views on the approach to Area 2: Flexibility Demand & Response? Are there other options that should be considered?

a) Do you agree that the options for flexibility markets can deliver flexibility and represent good value for consumers?

b) What are your views on how the costs of this procurement should be recovered; is the DUoS charge an appropriate mechanism?

c) What are your views on the respective roles of procurement of flexibility at the transmission and distribution level?

d) How can further investment and participation in flexibility from LEUs be enabled?

e) Do you agree with the anticipated benefits, costs and risks from the procurement approach described?

ESB Networks remains absolutely committed to accelerating the delivery of Area 2: Demand Flexibility and Response and our role in its success. We want to acknowledge the commitment and agility with which the CRU has worked with ESB Networks throughout 2023, in particular, to achieve these objectives. Since the NEDS Call for Evidence in 2023, we have updated our view of the most effective pathways to progressing towards the Climate Action Plan targets for demand flexibility to better reflect:

1. The role of industrial electric heat, working in partnership with the IDA, Enterprise Ireland and the SEAI.
2. The role of biomethane to match demand flexibility delivered through behind the meter generation.

3. The role of sector coupling between electricity and heat, transport, gas and water infrastructures, to accelerate and embed the potential for demand flexibility, to the benefit of all society.

As set out in ESB Networks' Multiyear Plan 2024 – 2028, we are accelerating the development of targeted products to stimulate demand flexibility from industrial electric heat and extra large energy users in 2024, while continuing the accelerated development of a route to market for medium duration storage to meet defined distribution system needs. Working in partnership with the CRU, and with all stakeholders in the Energy Demand Strategy Working Group, we have substantially progressed product designs which deliver localised and system value, in terms of congestion management, reducing the cost and time to connect low carbon demand and generation, and delivering material carbon abatement. We look forward to continued progress in this regard, with a growing focus on other cross sectoral opportunities for demand flexibility from 2024 onwards.

ESB Networks is working closely with EirGrid to implement the TSO-DSO operating model which will significantly increase the potential for demand flexibility and response which can leverage opportunities in both localised flexibility markets and in the wholesale market. We believe that this is important both to ensure industry confidence in the routes to market developed, and to maximise efficiency across the energy system. We note that the development of the operating model high level design is enabling ESB Networks and EirGrid progress design proposals which will support the implementation of the demand flexibility product subject to public consultation at the time of writing. We will continue to update CRU on the progress of this activity.

In relation to the role of the Network Tariff Review, we note that the CRU published a Call for Evidence paper regarding Network Tariff Reform in October 2021, setting out a comprehensive plan with the objectives to assess if network tariffs are fit for purpose in a low carbon future. The scope of the Network Tariff Review as set out included consideration of changes to the demand customer Use of System charging methodology, including Standing Charges, Capacity Charges and Consumption Charges. We note that the scope of the CRU Network Tariff Review as set out did not include consideration of changes to Connection Charging Policy.

In the CRU's Network Tariff Review Call for Evidence¹ paper, the following are set out as the guiding principles of the review.

¹ [CRU21123-Electricity-Network-Tariff-Structure-Review-Objectives-Principles-Call-for-Ev.pdf \(divio-media.com\)](#)



Figure 6 Network Tariff Review Principles

In their report on ‘Distribution Tariff Methodologies in Europe, ACER²’ set out their view on Tariff Setting Principles as follows;

- *Electricity tariff design, in general, aims at recovering the costs incurred by a monopolistic system operator while stimulating efficiency. Cost recovery is the core objective of tariffs. Efficiency mainly relates to cost-reflectivity and the economic signals sent to the network users for optimal use of the network.*
- *Other principles, such as non-discrimination, transparency, non-distortion, simplicity, stability, predictability and sustainability, are usually also pursued. In practice, it is difficult to meet all of the principles simultaneously and fully. Therefore, when setting tariffs, the NRAs aim to achieve a balance between these principles or they have to make certain trade-offs according to priorities, while also respecting legal boundaries.*
- *The tariff structure covers all allowed costs of the DSO and can consist of a single tariff or several regulated tariffs or tariff elements, including the distribution tariff, as defined by ACER for this Report, as well as other (additional, complementary) charges. Complementary charges can recover specific DSO costs, for instance regarding first connection and the injection/withdrawal of reactive power by each network user.*
- *More advanced differentiation in time and location through dynamic tariffs could further increase tariffs’ cost reflectivity and incentivise efficient network behaviour. However, such differentiation is rather complex, requires a sufficient level of automation, and may therefore contradict other principles, such as simplicity, predictability and transparency, if not implemented effectively.*

ESB Networks supports ACER’s view that overall, the core objective of network tariffs is cost recovery and that tariffs should be cost-reflective. ESB Networks also believes that given the investment that both users and network operators will need to make to transition to a low

² [ACER Report on D-Tariff Methodologies.pdf \(europa.eu\)](https://europa.eu)

carbon future, tariff stability is also particularly important as it provides certainty and predictability for those making investment decisions. Simplicity and transparency will also be key to ensuring that any changes to the distribution tariff structure are well understood by market participants and electricity customers.

Electricity network tariffs have the potential to signal to users when/how to make use of the electricity distribution network. It will be important to therefore ensure that tariffs incentivise, as far as possible, efficient use of the network and are recovered in a way that fairly reflects the costs imposed on the network by different user groups. A complex tariff structure may be confusing and thus less likely to achieve the desired results, and there is a risk that a complex tariff structure could conflict with the signals arising of the wholesale market and more explicit demand flexibility products (which are specifically designed to best reflect localised system needs).

However, when considering the impact of network tariffs on consumer behaviour, it is important to note that ESB Networks do not levy charges directly on customers. Electricity network tariffs are only one of several charges, levied by suppliers, directly to customers. Currently, network charges (both distribution and transmission) account for approximately 30% of a domestic retail customer's average annual bill. The Use of System network tariff structure is one of several charging structures that together contribute to a whole system approach to network investment, management and system operation. It is our view that some system issues may best be resolved through other charging structures such as connection charges and payments for flexibility. In this regard, we note ACER's view of complementary charges for specific DSO costs, "*Complementary charges can recover specific DSO costs, for instance regarding first connection and the injection/withdrawal of reactive power by each network user.*"

2.10 Response to Question 13 and 15

Do you have views on whether incentives are the best mechanisms to accelerate the delivery of flexibility or if mandatory measures could be more effective?

What other mandatory requirements could be considered as part of the NEDS?

- **These may be already identified but not currently part of the NEDS, or newly proposed mandatory requirements. They may also be associated with any of the relevant entities across the broad range of stakeholders contributing towards the design and implementation of the NEDS.**

ESB Networks believe there is a balance between mandatory measures to implement flexibility and delivering flexibility through market mechanisms. Following on from the security of supply crisis in 2023, it is important to note that there are occasions where mandatory measures should be implemented to reduce demand at certain locations on the network.

In the majority of cases, market mechanisms should be promoted and developed to develop flexibility as an enduring market, however equally there are cases where mandatory

requirements have an important role in promoting consumer rights and interests. For example, proportionate and cost effective mandatory requirements with respect to technology interoperability and “smartness” could significantly reduce the barriers and costs customers face when seeking to participate fully in flexibility and smart services.

We note CRU is consulting separately on a ‘Review of Large Energy Users Connection Policy’ (CRU2024001) as part of the NEDS and ESB Networks will provide a response to that consultation.

2.11 Response to Question 16, 17

16) Are the actions set out to deliver the NEDS consistent with the ambitions for 2025 and 2030?

17) Does the proposed approach to managing uncertainty around elements of future system decarbonisation provide flexibility while building confidence in the NEDS?

ESB Networks welcomes the proposed actions and approach set out in the CRU’s NEDS consultation and considers, at this time, that the proposals are aligned with meeting our overall 2025 and 2030 flexibility targets. The structures for governance and engagement set out emphasise the need for each stakeholder across the NEDS project to deliver in partnership on our respective roles and responsibilities, individually and collectively. We believe that these structures are well designed to ensure that the NEDS project maximises its impact in terms of accelerating demand flexibility and dealing with uncertainty, including through transparent and evidence-based consideration of the trade-offs between different approaches and the potential for effective prioritisation of deliverables and actions. This will be important to ensure that the NEDS project focuses on pragmatic approaches which are based on learning, industry best practice and are prioritised in a manner which produce benefits as soon as possible.

2.12 Response to Question 18

What supporting actions including, for example, delivery of enabling legislation, are required from actors other than the CRU to progress and enhance elements of the NEDS?

Enabling ESB Networks to access smart metering data is key to facilitating flexibility for network, system management and carbon abatement related purposes. Enabling other parties such as suppliers to access customer data may facilitate further uptake of smart services and provide insights to promote customer behaviour that supports flexibility. This is currently being developed through the Smart Meter Data Access Code however, the legal basis (e.g., via primary or secondary legislation, updates to DSO Licence conditions, etc.) for

accessing smart meter data for certain use cases may need to complement the Smart Meter Data Access Code.

ESB Networks' 15-20% scenarios³ publication which was consulted on in 2023, identified a suite of potential scenarios to meet our 15-20% flexibility targets set out in CAP 2023. As part of our work on the 15-20% scenarios and our extensive engagement with interested stakeholders, ESB Networks identified a number of real and perceived barriers to flexibility within certain areas such as energy storage and LEUs. Through continued engagement and partnership with NEDS stakeholders, additional supporting actions to address these barriers can be defined and progressed. As such, we want to restate the value of the structures being put in place through the NEDS to ensure interorganisational collaboration, transparency and alignment.

³ [ESB Networks – Scenarios for 15-20% Flexible System Demand – National Network, Local Connections Programme \(divio-media.com\)](#)