

14 July 2025

Electricity Authority via email

**Cortexo submission on the Electricity Authority's decentralisation green paper**

Thank you for the opportunity to submit Cortexo's views on decentralisation. We would like to note that four consultations were released around the same time: decentralisation, industrial flexibility, digitalisation and multiple trading. It is unrealistic to expect smaller contributors to be able to spend the time required to respond to all. We appreciate the opportunity to use verbal submissions. For decentralisation, we provide our brief but overarching view below.

Cortexo considers decentralisation to be exactly what our electricity system should reflect; not a centralised system built around the industry that provides it. We think the system needs to look at solutions from the outside in.

Decentralisation to us means that the absolute focus is on the consumer – their consumption, generation and how they may offer their behaviour to make the wider system a better place.

While participants may currently consider themselves to be customer-centric, we don't believe the electricity system operates in this way. For example, distributed energy resources (DER) are an asset to be used, but the industry tends to look at it as a problem to be solved in its capacity modelling etc.

We note on flexibility specifically that we agree with the related FlexForum and EEA submissions. We consider household flexibility, small building flexibility, commercial flexibility, industrial flexibility and major industrial flexibility to all be the same thing when it comes to how we as an industry should look at solutions – as a whole, rather than one sliver at a time.

We further note a number of consultations released by the Authority recently as being interlinked, and we would like our submissions on the multiple trading relationships and digitalisation discussion papers be considered alongside the above comments.

If you wish to discuss the content of this submission further, please contact me at any time.

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